

SUSTAINABILITY REPORT

2021



LETTER TO THE STAKEHOLDERS

Dear readers,

Today, more than ever, energy is at the centre of extremely complex and delicate international dynamics.

As OLT, managing a strategic infrastructure, we have worked over the years to provide a contribution to the energy independence of Italy, helping the country to make the sources of gas supply more flexible.

At the same time, we have undertaken to operate responsibly and transparently, paying the utmost attention to safety and environmental protection.

We chose to give strict impartial evidence for the operation of our regasification Terminal a long time ago and to also turn the way we relate with our Community into a system, trying to operate in synergy with the territory and the companies that are part of it.

Therefore, we are also presenting the results of our environmental, social and economic performances transparently, using an integrated tool, the Sustainability Report, which is certified by a third party body and through which the results of our operations can be consulted and verified.

The data in this document refer to 2021, a particularly difficult year because of the lasting nature of the health emergency. Unfortunately, the scenario that we are living, in 2022, has taken on a dramatic profile from a social and economic point of view, with important repercussions on the energy plan, calling upon companies like ours to carry out their work with an ever greater commitment and sense of responsibility, if possible.

We believe in building together an energy system that supports the growth of the country and is addressed day after day increasingly towards Sustainability. It is for this reason that we never stop looking at the future and investing in change. Over 2022, we will launch the new Small Scale LNG service which will complete the national LNG supply chain and allow us to consolidate the end users of this resource, from low impact mobility to support for isolated networks.

Giovanni Giorgi
Managing Director OLT

Maurizio Zangrandi
Managing Director OLT

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Governance



- 2** inspections by the Authorities (environment and safety)
- 13** audits on OLT
- 12** audits on Outsourcing

No breach of laws or regulations

No episode of corruption and no legal action
for anti-competition or antitrust conduct and monopolistic practices

OLT for the market



~ 5% the coverage of the national gas requirement guaranteed by OLT

1,363,451,946 Sm³ of Natural Gas injected into the network

Over 4 million euros of infrastructural investment in the Small Scale LNG project
(+ 348% compared to 2020)

68.3%¹ the allocation of regasification capacity in Gas Year 2021/2022

114 million euros the economic value generated, of which 63% redistributed to
suppliers of goods and services under the form of operating costs

OLT for the environment



- 7% total CO₂eq emissions compared to 2020

- 41% fugitive emissions of CO₂ compared to 2020

-13% CO₂ emissions of the Guardian Vessel compared to 2019

~ 5,500 tonnes of CO₂eq captured thanks to reforestation operations and the creation of green areas

100% plastic free OLT offices

OLT for people



59% female presence in the company population

50% female share of executives

20 hours on average for training per head

441 hours of training provided for its employees

2,939 hours of training for the ECOS personnel employed on the Terminal

41 hours on average per head for training of the ECOS personnel employed on the Terminal

1 Indicator as of 1st March 2022.



Ethics and Integrity:
compliance, corruption,
competition



Fight against
climate change



Approach to risk
management



OLT OFFSHORE LNG TOSCANA

1

1 OLT OFFSHORE LNG TOSCANA

1.1 WHO IS OLT

OLT Offshore LNG Toscana S.p.A. operates in the energy sector.

Without ever deviating from its own responsibilities, OLT puts the safety of people and the area at the centre of its operations, guaranteeing the full environmental, social and economic sustainability of its operations.

The *FSRU* Toscana floating Terminal, through which OLT guarantees the storage and *regasification* of Liquefied Natural Gas (*LNG*), is one of the main infrastructures of national interest for the import of *LNG* serving the development and autonomy of the Italian energy system.

Permanently anchored about 22² km of the coast between Livorno and Pisa and connected to the Snam national gas pipeline network, the Terminal contributes substantially to the Italian Gas System, guaranteeing the security and diversification of the country's energy supply with about 5% of the national requirement covered³.

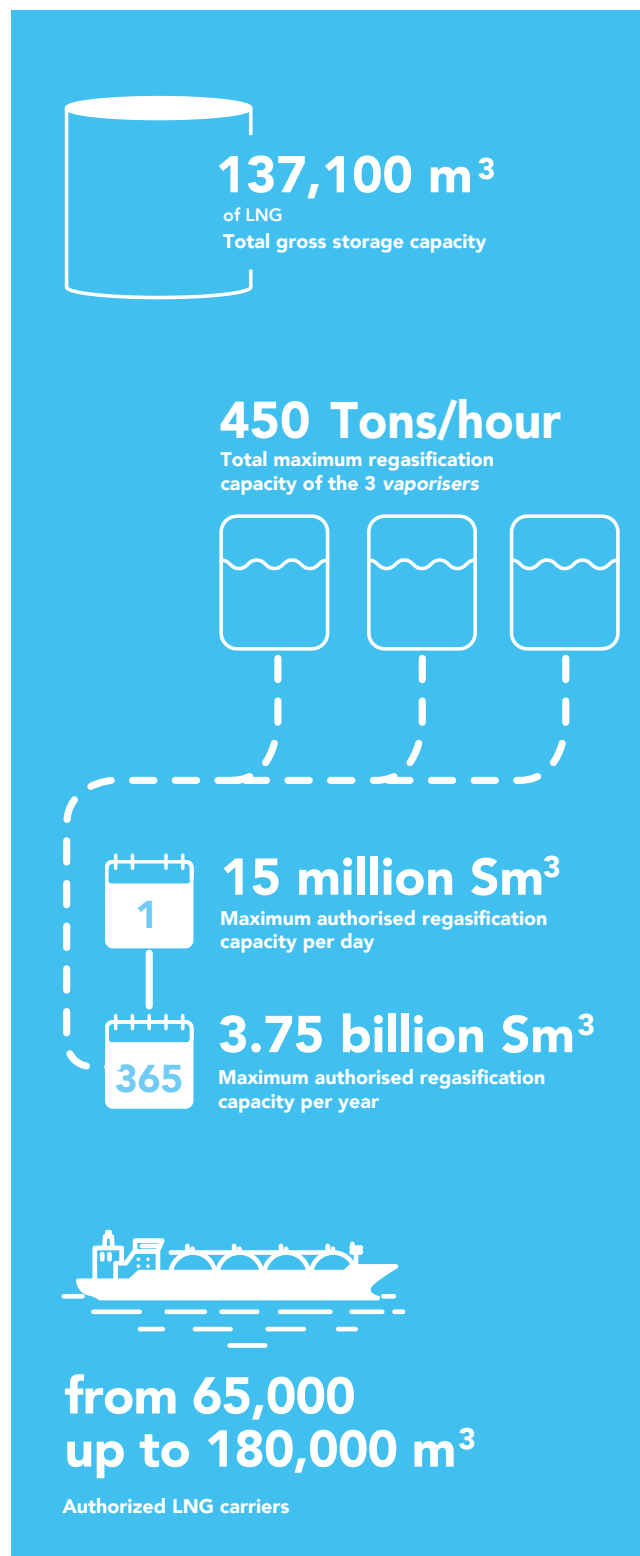
Despite OLT being an entrepreneurial initiative with an international profile, with registered office in Milan, it is strongly linked to the territory where the plant is located; its operational offices are in Livorno.

Location of the FSRU Toscana Terminal
(geographic coordinates 43° 38' 40" N e 9° 59' 20" E)



² Corresponding to 12 nautical miles.

³ Italian gas consumption in 2021 was equal to 76.1 billion Sm³ (Source: MISE).



1.1.1 The Shareholders

The industrial businesses holding shares in the company are active in the energy sector at a national and international level.

OLT is not subject to the management and coordination, nor to control by the shareholders.

Any commercial operation with the shareholders is carried out at normal market conditions; furthermore, it should be stated that contracts have been signed with the shareholder Snam for the services provided by it by virtue of its role as operator of the National Gas Pipeline Network and that these services are provided at rates that are regulated by *ARERA*.

Snam

One of the world's leading energy infrastructure operators and one of the largest Italian listed companies in terms of market capitalization.

49.07%

First Sentier Investors

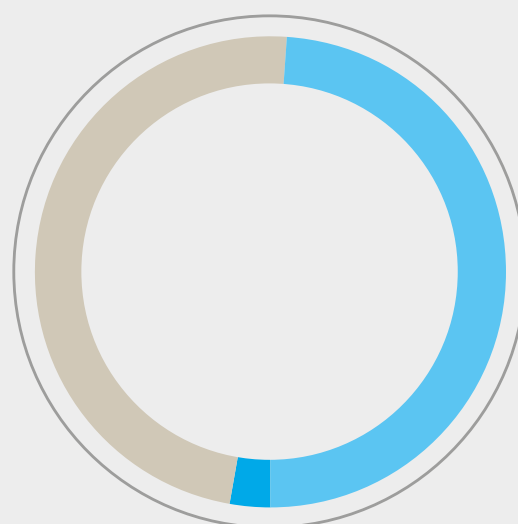
Global asset manager with a client base extending over Asia, Australia, Europe and North America, with a long-term buy and hold investment strategy⁴.

48.24%

Golar LNG

Shipping company engaged in the acquisition, operation and chartering of LNG carriers, *FLNG* and *FSRU*, with over 30 years of experience.

2.69%



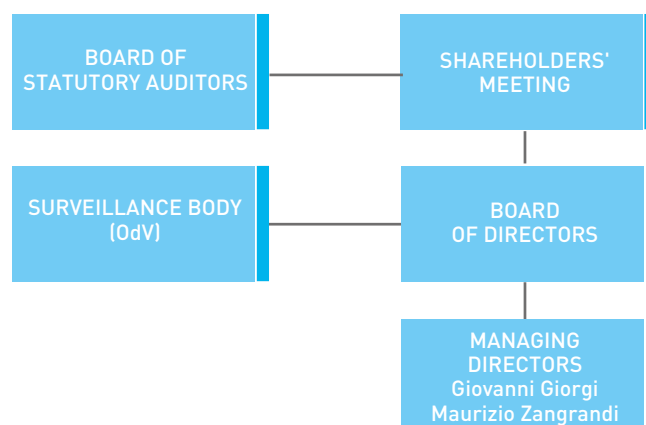
1.2 GOVERNANCE AND ORGANISATIONAL STRUCTURE

The OLT governance structure is characterised by the following bodies: Shareholders' Meeting, Board of Directors, Board of Statutory Auditors as well as the Surveillance Body appointed under Italian Legislative Decree 231 of 2001.

Shareholders' Meeting

The Shareholders' Meeting resolves on the matters reserved under its remit by the law or the articles of association.

In accordance with the articles of association, the Ordinary Shareholders' Meeting resolves on the remuneration due to the members of the Board of Directors appointed by it.



⁴ On 21st March 2022 First Sentier Investors changed its name to Igneo Infrastructure Partners.

Board of Directors

The OLT Board of Directors consists of 6 directors, amongst whom the Chairman, elected by resolution of the Board, and two managing directors identified from the directors of that Board as an expression of the two majority shareholders.

The direct management of the company is entrusted to the Managing Directors with joint powers⁵.

They are members of the Independent Operator under the IFUC and have the right to express binding opinions for all decisions of the Board of Directors which concern managerial and organisational aspects regarding the regasification activity carried out by the company and their impact, as well as approval of the development plan for the regasification Terminal managed by it and all sustainability issues.

The presence of two Managing Directors with joint powers, as well as the absence of delegation of powers to other company exponents, are the main measures for mitigating the risk that operations are carried out with third parties in situations of conflict of interest⁶.

6 Directors



The fixed remuneration and additional payments⁷ allocated to the Managing Directors are defined by a resolution of the Board of Directors.

The Board of Directors was terminated with the meeting to approve the financial statements for the year on 31/12/2021 and it was renewed for other three years by Shareholders' meeting in the date of 22/04/2022.

Board of Statutory Auditors

The Board of Statutory Auditors, consisting of 3 members and 2 alternate auditors, was appointed by the Shareholders' Meeting and will terminate with the meeting to approve the financial statements for the year ending 31/12/2023.

It oversees compliance with the law and the articles of association, observance of the principles of proper administrative correctness and the adequacy of the organisational, administrative and accounting set-up and its proper operation.

Surveillance Body

Under Italian Legislative Decree 231 of 2001, the Surveillance Body is entrusted with overseeing compliance with the preventive measures against the crimes provided for by that decree.

⁵ Giovanni Giorgi, one of the two Managing Directors, also takes on the role for the technical/operational management of the Terminal and support vessels. He has been a member of SIGTTO, the Society of International Gas Tanker and Terminal Operators, since 2009 and has been part of the Technical Committee of SIGTTO since 2015. Maurizio Zangrandi has also been Managing Director of the company GNL Italia, of the Snam group, which manages the Panigaglia regasification plant in Porto Venere (SP), since October 2018 and has been Managing Director of Enura, the company set up by Snam and SGI to build and manage the energy network in Sardinia, since April 2019.



Independent Operator

OLT falls under the definition of "vertically integrated business", i.e. a business that manages an essential infrastructure for the development of the natural gas system in Italy which is also part of a group of businesses which companies, that exercise activities open to competition in the natural gas sector, are part of. As such, it is subject to the obligations of accounting and functional separation as of the Integrated Functional Unbundling Code (IFUC), the purpose of which is to:

- promote the development of competition in the electricity and natural gas sectors;
- ensure the neutrality of the management of the essential infrastructures for the development of a free energy market;
- prevent discrimination in the access and use of sensitive commercial information;
- prevent cross-transfers of resources between the supply chain segments.

The IFUC provides that such companies entrust the administration to an Independent Operator that operates in compliance with the principles as of above and independently of the shareholders' sphere of influence.

3 members



2 alternate

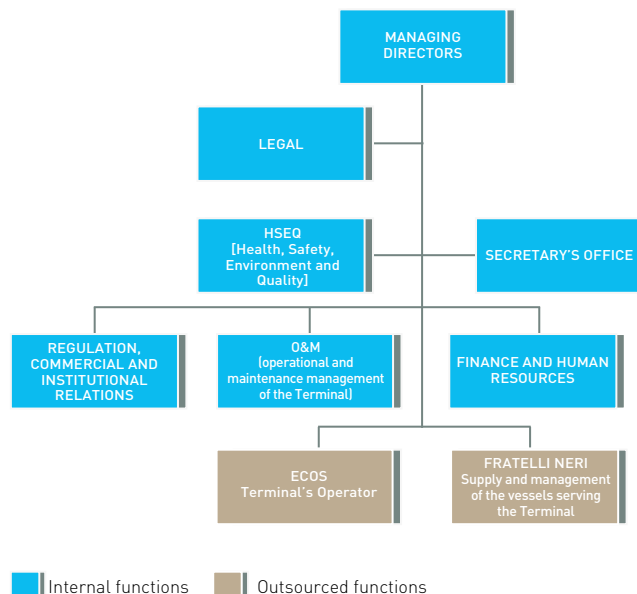


⁶ At the moment, no notices of any situations of conflict of interest to the interested parties are expected.

⁷ Recognition of the Managing Directors' additional payment amount is dependent on achieving targets, also regarding sustainability, which are set annually. The remaining directors are called upon to express an independent evaluation on the Managing Directors' level of achievement for those targets.

The Managing Directors are supported by an organisational structure consisting of executives, middle managers and staff with a high professional level, most of whom have been linked to the company for many years: resources that have been carefully selected, enhancing the professionalism of the territory, in line with the company needs and its business.

On top of the internal functions, the company has chosen to make use, for the operational efficiency of the Terminal, of the support and collaboration of some of the most important operators in the sector: the company **ECOS**⁸ is responsible for the operational management and fitting of the Terminal, whilst the company **Fratelli Neri**⁹ manages the vessels serving the Terminal and provides the crew for them.



1.3 THE FUNDAMENTAL POINTS OF OLT

Policy and Certification

The commitment to continuous improvement of its processes and services, dialogue with all the parties concerned and compliance with applicable laws and the principles ratified by International Conventions to defend human rights and the rights of workers are the foundations on which OLT bases its activities.

It is for this reason that company took a voluntary path to report and certify its performance. This is outlined in the [Code of Ethics](#), the [Charter of Values \(Social Accountability\)](#), the [Health, Safety, Environment and Quality Policy \(HSEQ Policy\)](#) and the [Prevention of Major Accidents Policy \(MAP Policy\)](#), which are implemented in the 231 Organisational Model and the Integrated Management System adopted by OLT in compliance with Italian Legislative Decree 105/15¹⁰ and certified on the basis of international standards.



ISO 9001:
Safety Management System



ISO 14001:
Environmental Management System



EMAS:
Voluntary registration
with an EU
Eco-Management
and Audit Scheme



ISO 45001:
Workers' Health and Safety
Management System



SA8000:
Company Social Accountability



The policies and documents defined in the context of the Integrated Management System¹¹, as well as the procedures linked to Model 231, are prepared and approved by the Board of Directors with the aid of competent functions who ensure they are implemented with the involvement of all OLT's resources.

⁸ Joint venture between Fratelli Cosulich, an Italian company that has been active in the shipping sector for over 150 years and the EXMAR Ship Management company, a group operating in LNG transportation worldwide.

⁹ A company from Livorno, sector leader and part of the Neri Group, with more than 120 years of history in the sector.

¹⁰ Implementation of Directive 2012/18/EU (Seveso Directive) for the control of the danger of major accidents connected with hazardous substances.

¹¹ The purpose of the management system is the following: Management of the Livorno regasification plant. Control and monitoring of the plant and support vessel management processes, managed by the outsourcers. Activities for marketing the regasification service.

Model 231

In line with its company policies, which are aimed at safeguarding the legality and ethics in commercial relations and with its employees and workers, OLT has also adopted an [Organisational, Management and Control Model](#) in compliance with Italian Legislative Decree 231/01¹² in order to provide all stakeholders with a guarantee that it operates with the aim of preventing serious irregularities of a criminal nature when carrying out its own business.

Model 231 - of which the [Code of Ethics](#) is an integral part - identifies the activities exposed to the risk of the crimes included in that decree being committed, among which issues connected with corruption, and sets out the main rules of conduct and the control activities defined to prevent or impede those crimes being committed.

Model 231 is periodically updated on the basis of the evolution of the reference regulations and organisations and submitted to the Board of Directors for approval; finally, it is distributed to all parties concerned after training.

OLT has set up a Compliance Committee, which consists of members from outside the company structure and has independent powers of initiative and control. Its task is to oversee the operation, effectiveness and compliance with the Model, as well as to update it.

The scope of Model 231 also governs the management of reports of illegal conduct (whistleblowing) encountered by employees in their activities, guaranteeing the anonymity of the person who made the report in order to prevent any possible retaliation or discrimination. It should be stressed that no reports have been recorded in the context of Model 231.

1.4 COMPLIANCE WITH LAWS AND REGULATIONS

The Terminal is subject to a framework of regulations and standards that can be broken down from both a market point of view (in fact, the regasification falls under the activities subject to regulation by *ARERA* which defines the tariff rate and the access criteria to the Terminal) and what concerns the applicable environmental and safety regulations.

From an environmental point of view, the OLT activity is first and foremost subject to several environmental impact assessment procedures and authorisations prescribed by the Single Environmental Act, Italian Legislative Decree 152/2006 as amended.

At the same time, by virtue of the quantities of hazardous substances on board, the Terminal is subject to the implementation of Italian Legislative Decree 105/2015 (*Seveso Directive*) for the control of the danger of major accidents connected with hazardous substances.

In the context of the management approach adopted and in compliance with the provisions of the applicable regulations and the existing authorisation procedures, OLT implements a monitoring and control plan which allows the compliance status for the environmental provisions and safety aspects to be constantly checked.

The adoption of a periodic structured first, second and third party audit programme, which does not only involve OLT, but also its *outsourcers*, further guarantees compliance with the regulatory obligations and the effective operation of the Integrated Management System and company processes.

The effectiveness of the approach adopted is testified by the fact that no case of breaches of laws and regulations or episode of corruption by OLT has been confirmed over the last three years, just like no legal proceedings has been recorded for anti-competition, antitrust and monopolistic conduct.

2 Inspections by the Authorities on both OLT processes and the Terminal regarding the Environmental and Safety aspects

13 Audits on OLT

12 Audits on Outsourcers

¹² Italian Legislative Decree 231/01 establishes the administrative liability of the organisation for crimes implemented by Directors, Executives and/or Employees in the interest or to the advantage of the organisation itself.

1.5 RISK MANAGEMENT

The approach to risk management is the set of rules, procedures and organisational structures aimed at allowing the main company risks being identified, measured and managed.

A risk is a potential imbalance that can produce a change; the quality of this change is given by the ability of an organisation to foresee it and address it. Risks, therefore, can mutate into opportunities and proper management of them can evolve from a “defence” tool into a lever for growth.

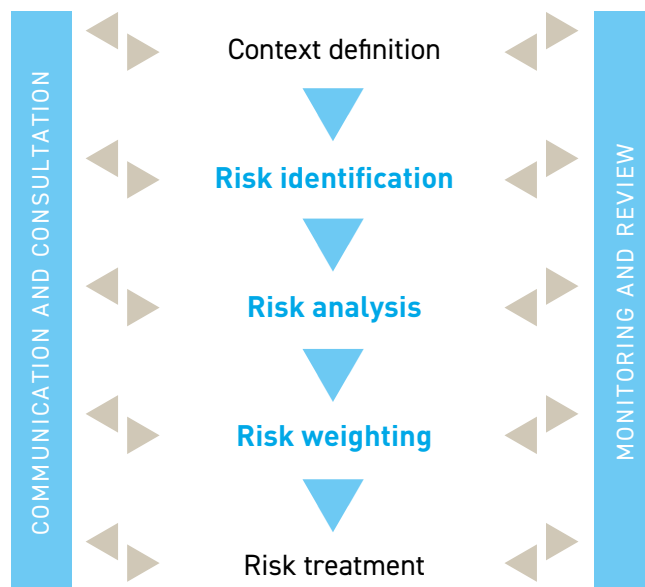
OLT, oriented towards grasping and capitalising on the growth opportunities offered by the context it operates in, has adopted a structured approach for assessing the risk and identifying the most suitable action for managing it.

Using a Risk Assessment activity, which is carried out in line with the provisions of the ISO 31001 standard and with the collaboration of the whole company structure according to the skills of each person, and periodically updated to be capable of anticipating scenarios and developments in the reference context, OLT can identify the potential critical issues and/or opportunities connected with its activities.

The outcome is a mapping broken down into 5 risk areas which affect all the company processes and are impacted by different factors that can be attributed to 10 categories.

Therefore, the control tools implemented for their management and any action plans provided for the treatment of the residual risk in order to bring it to levels considered acceptable are identified for each type of risk.

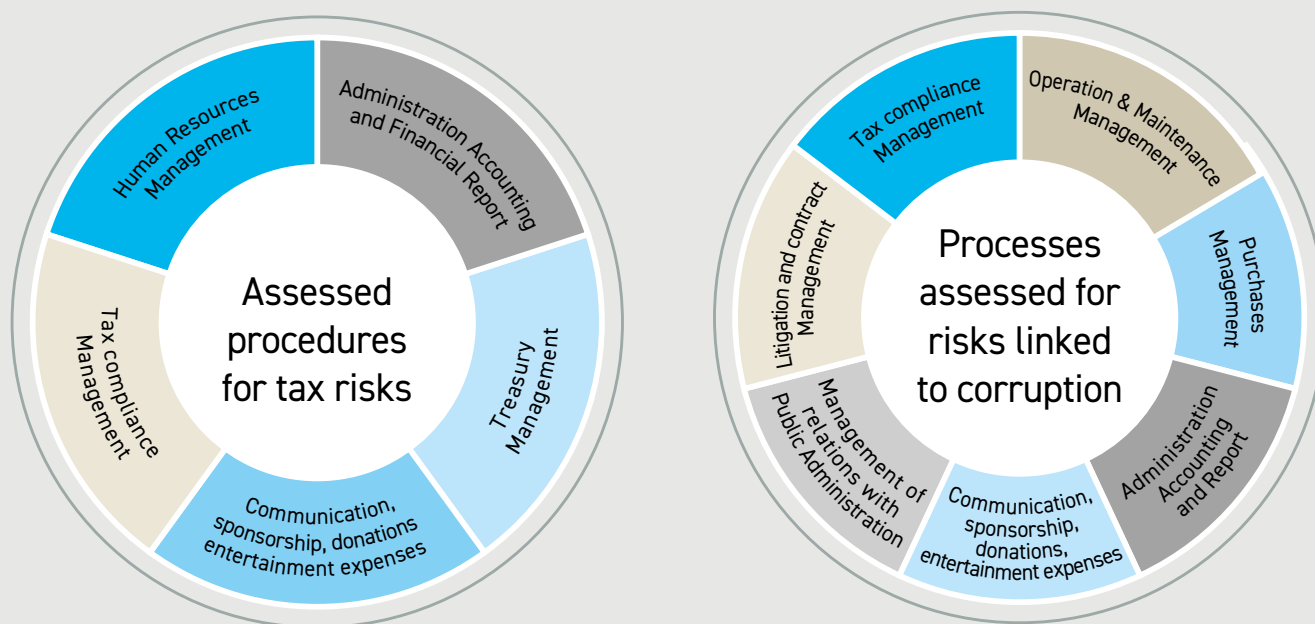
Risk assessment process and identification of treatment



With reference to tax risks and those linked to corruption and the processes most exposed to such risks, rules of conduct suitable to ensure the exercise of company activities in compliance with the laws and regulations have been implemented.

Further control tools are guaranteed by:

- suitably formalised and widespread internal procedures that govern the roles, responsibilities and operating methods provided for carrying out the activities, guaranteeing the traceability of the deeds and operations;
- distribution of responsibilities within the logic of segregation of duties and compliance with system of powers attributed in the context of the organisational structure.



OLT participates, and will participate in the coming years, in the reduction of *GHG* emissions produced during the normal activity of the plant and, in this regard, it is assessing solutions to achieve the goals set by the main guidelines and global meetings held on this issue (e.g. Paris Agreement - COP21 and the more recent Conference on climate change held in Glasgow in 2021 - COP26).

It is for this purpose that it has initiated the necessary activities to define the road map for reducing climate-changing emissions, starting from the identification and assessment of the risks and opportunities for the *FSRU* Toscana Terminal linked to climate change, in line with those taken by the main companies operating in the Oil & Gas sector.

This analysis will be the starting point for identifying the most appropriate measures that would allow OLT to contribute to achieving the global sustainability goals.

1.6 OLT: TODAY'S RESULTS AND TOMORROW'S COMMITMENTS

In order to ensure its sustainable business model, OLT is committed to pursuing continuous improvement in the *ESG* aspects which make the growth in company activities compatible with protecting safety and safeguarding the environment. Moreover, OLT is committed to a path of consultation and dialogue with the territory from which a set of economic and social initiatives to support the community, particularly the weaker brackets, have ensued.













Therefore, the OLT management defines concrete objectives and measures the results achieved, using them to assess the effectiveness of its action, in order to pursue continuous improvement.

The sustainable development goals (*SDGs*), to which OLT contributes and will be able to contribute more in the future, were assessed. All 17 *SGDs* were analysed, with their targets, and the OLT commitments contributing to achieving them were identified, allowing 10 priority objectives to be selected.

SUSTAINABLE DEVELOPMENT GOALS














The table shows the state of progress for the initiatives planned in previous years and the main objectives for the future, broken down in relation to the Sustainable Development Goals (SDGs).

OBJECTIVES		ACTIVITIES CARRIED OUT IN 2021	PLANNED ACTIVITIES	SDGs
OLT FOR THE MARKET				
By 2022 Extending the Terminal's commercial offer by activating the <i>Small Scale LNG (SSLNG)</i> service		Start of the plant modifications to activate <i>Small Scale LNG</i> service	Completion of the modifications and start-up of the <i>Small Scale LNG</i> service ¹³	 
OLT FOR THE ENVIRONMENT				
GHG scope 1	By 2024 Reduction of energy (0.9% compared to 2019) and reduction of CO ₂ (0.47%) by the replacement and use of induction lamps with lower consumption	Outside lamps purchased and replacement of stern lamps started	Intermediate step, by 2023 Completion of lamp replacement	 
	By 2024 Reduction of energy (0.9% compared to 2019) and reduction of CO ₂ (0.47%) through the improvement of the seawater pumps' energy efficiency via a new design	Order issued for the work needed to implement the modifications to the seawater pumps	Intermediate step, by 2023 Implementation of the pump modifications	 
	By 2024 Reforestation and compensation for the CO ₂ released (recovery of abandoned woods hit by natural disasters and creation of new peri-urban green areas)	Reforestation of a first area of Monte Serra with 5,348 tons CO ₂ captured and start of planning for a second area ¹⁴	Intermediate step, by 2023 Reforestation of the second area of Monte Serra and maintenance of the reforested areas	
		Creation of a municipal area in Pisa with 148.6 tons of CO ₂ captured ¹⁵	Intermediate step, by 2022 Creation of a municipal area in Livorno and maintenance of the areas up to 2024	
	NEW By 2023 "Climate change": definition of the GHG reduction plan with subsequent development of the decarbonisation projects		Tendering for the award of the contract by 2022 and definition of the reduction plan by 2023, including the specific feasibility studies	 
	NEW By 2025 Improvement in the reporting of GHG emissions		Definition of the action plan for achieving, by 2025, the maximum reporting level with reference to the OGMP 2.0 framework	
GHG scope 3	By 2022 Reduction by 10-15% (compared to 2019) of CO ₂ emissions for the Guardian Vessel, vessel serving the Terminal	Reduction of CO ₂ by 13% compared to 2019 by turning off an engine when patrolling around the Terminal	Maintenance of CO ₂ emissions reduction	
By 2023 Promotion of proper practices to become a Plastic Free company		100% Plastic Free for the OLT offices	100% Plastic Free for the Terminal by 2022 100% Plastic Free for the vessels serving the Terminal by 2023	

¹³ The service contributes to a reduction of CO₂ on a national scale.

¹⁴ Estimate carried out by the Tuscany Region, quantity calculated over 30 years.

¹⁵ Estimate carried out by the Tuscany University, quantity calculated over 20 years.

OBJECTIVES		ACTIVITIES CARRIED OUT IN 2021	PLANNED ACTIVITIES	SDGs
OLT FOR PEOPLE				
Safety	Every year Risk reduction of major accidents by means of annual improvement plans	Organisational, awareness, maintenance and monitoring improvements in implementation of the Improvement Plan in the <i>MAP Policy</i>	Implementation of the Improvement Plan in the <i>MAP Policy</i>	 
	By 2022 Improvement of the Health and Safety culture	LiHS - Leadership in Health and Safety: Implementation of an innovative method to promote safety culture in the company with the involvement of OLT, ECOS and Fratelli Neri personnel	Monitoring of the safety activities	 
Social	By 2024 Development of projects shared with the territory in order to implement the company social responsibility action	Implementation of the initiatives aimed at reinforcing and structuring relationships between the company and the territory, based on 5 subject areas: <ul style="list-style-type: none"> • environment • young people and training • sport, culture and social • children and health • workers' health and safety 	Continuation of the programme	    
	By 2024 Development of activities linked to the acceptance of diversity and the promotion of inclusion	2 workshops carried out on the subject of "Diversity and Inclusion", which involved ECOS, OLT and Fratelli Neri personnel	Development of activities in line with what emerged from the workshops	 



LNG market
and energy transition



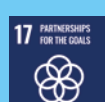
Quality of the service



Economic impacts



Ethics and integrity:
financial flows with
Public Administration and
lobbying



Occupational
practices and
protection of work



OLT FOR THE MARKET

2

2 OLT FOR THE MARKET

2.1 THE LNG MARKET AND ENERGY TRANSITION

Becoming the first zero climate impact continent. This is the ambitious goal that the European Union has set to reach climate neutrality before 2050. An ambitious but necessary target which must provide for adequate strategic planning and the allocation of significant investment in the energy sector and sustainable mobility.

In the transformation phase towards full energy sustainability, natural gas (gaseous or liquefied) can be of fundamental importance for a sustainable transition of the whole energy and transport sector. Furthermore, the gas infrastructures could be converted, in the long term, into the transport and storage of new “green” sources such as biogas, synthetic gas and hydrogen.

LNG, in particular, may contribute to the diversification of the energy supply sources, contributing on one hand to energy security with its use both for storage and distribution and on the other hand reducing the environmental impact of the land and sea transport sectors thanks to its excellent performance in terms of emissions reduction.

The events of international significance over the last year fall under this macro scenario. The global health emergency arising from the Covid-19 virus pandemic has changed the typical dynamics of the energy market. According to the IEA¹⁶, LNG is the main driver in the international gas market, also thanks to significant investment in the 2018-19 two-year period in liquefaction projects which are strengthening the export capacity from North America, Africa and Russia. However, world demand for LNG is growing more slowly after the events of 2020; a return to the pre-2019 levels, the year in which record values were reached, is estimated no later than 2025.

Following the outbreak of the Russia-Ukraine conflict, some measures were taken at a national and European level to tackle the energy emergency and reduce dependence on Russian gas. In particular, the MITE¹⁷ has deemed it opportune to optimise the use of regasification terminals by providing for regasification services integrated with the injection of gas into storage in order to make additional volumes of natural gas available. Moreover, the European Union, with the new “REPowerEU” plan¹⁸, has set out the guidelines at European level for tackle the emergency and accelerate European energy independence from Russia. Among the main actions that can be taken by the member countries, there is specific mention of increasing LNG imports. Therefore,

since the regasification terminals are considered essential for reducing dependency on Russia (from which Italy imports 40% of its gas at the moment), in the future, if the market conditions remain the same, a greater use of the Terminal is expected.



LNG in the National and European Union Policy for energy transition

Decree No. 257 of MiSE (the Ministry of Economic Development) dated 16th December 2016 implementing the European DAFI Directive on alternative fuels stresses the strategic importance of the LNG storage, regasification and transport infrastructures; the National Strategic Framework is shown in the Decree and this dedicates an important section to the supply of LNG for offshore and inland navigation, road transport and other uses.

The Integrated National Plan for Energy and the Climate (INPEC), submitted by the Italian Government to the European Commission at the end of 2019, as provided for Regulation of the European Parliament and Council 2016/0375 on the Governance of the Energy Union, stresses the essential role of LNG in the energy transition; in fact, LNG is a key alternative fuel to guarantee the security and diversification of energy supply. Moreover, the Plan underlines the environmental performances of LNG and its possible uses for transport at sea and on land.

¹⁶ Gas 2020, IEA – International Energy Agency (iea.org).

¹⁷ Decree no. 17 (Energy Law Decree) was published on 1st March 2022 and on 15th March 2022 the MITE Decree on the storage of gas in 2020-2023 in implementation of this.

¹⁸ Published on 8th March 2022.

2.2 THE SERVICES OFFERED

July 2013 Arrival of the FSRU Toscana Terminal at Livorno



December 2013 Start of commercial activity



2014 First offer of the Peak Shaving service



2017 First offer of the Regasification and Storage Bundled service



2018 Start of the auction-based regasification service



Gas Year 2019/2020

allocation of the regasification capacity at 100%



Gas Year 2020/2021

allocation of the regasification capacity at 85%



Gas Year 2021/2022

allocation of the regasification capacity at 68.3%¹⁹



Regasification

Regasification is a system that provides for the liquefaction of methane gas in the producer countries so it can be transported by ship to the consumer countries where it is brought back to its gaseous state.

In order to allow transport, the gas extracted in the countries that have natural reservoirs is cooled to a temperature of -160°C to take it to its liquid form; this reduces its volume by over 600 times. In this way, one ship alone can transport large quantities of gas making transportation economically viable.

The *LNG* reaches the consumer countries where, via special plants, it is brought back to the gaseous state to be injected into the distribution networks. The *regasification* process is obtained by injecting the gas into a "heat exchanger" where a warmer liquid flows, normally seawater, the natural temperature of which is sufficient to heat the *LNG* and bring it back to the gaseous state.

Transport of *LNG* by sea is an alternative that allows gas to be bought freely throughout the world without being tied to a gas pipeline connection with the producer countries.

¹⁹ Indicator as of March 1st, 2022.

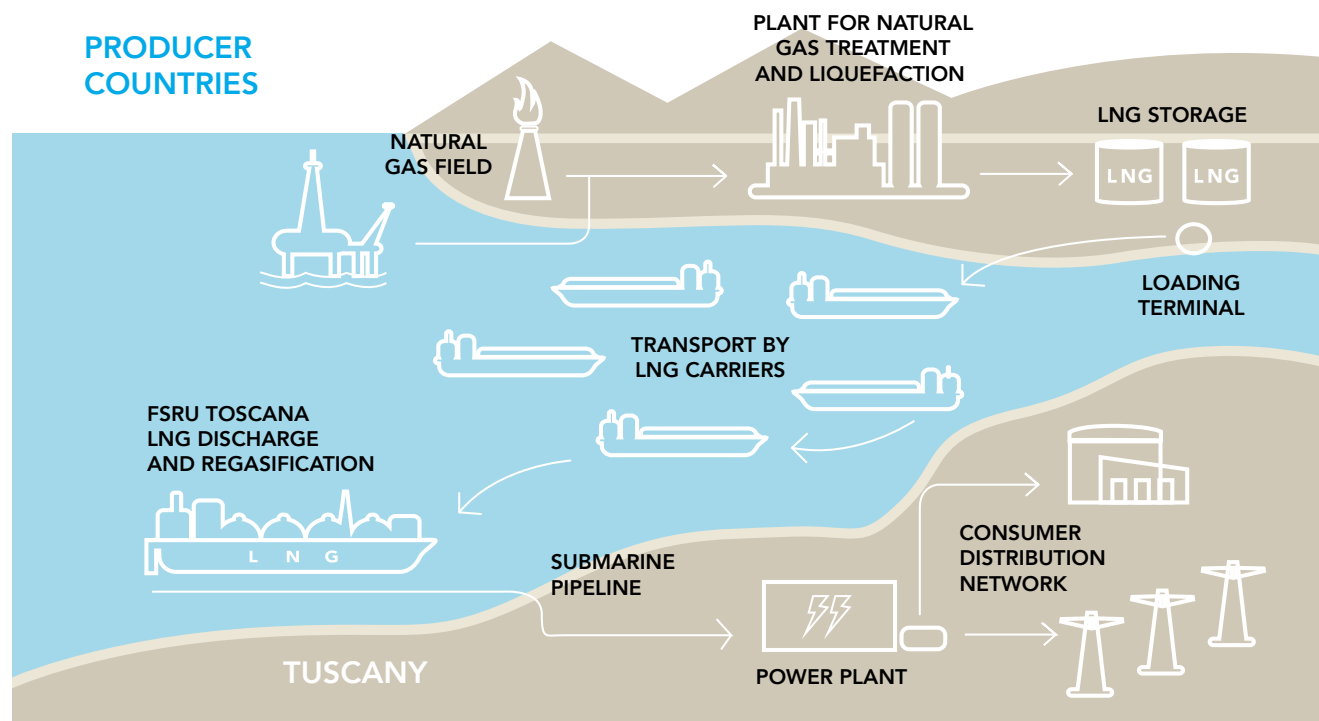
Wobbe Index system, which makes it possible to correct the quality of LNG in terms of calorific value, adapting it to the specific requests of the national network; this allows the reception of most of the LNG produced in the world



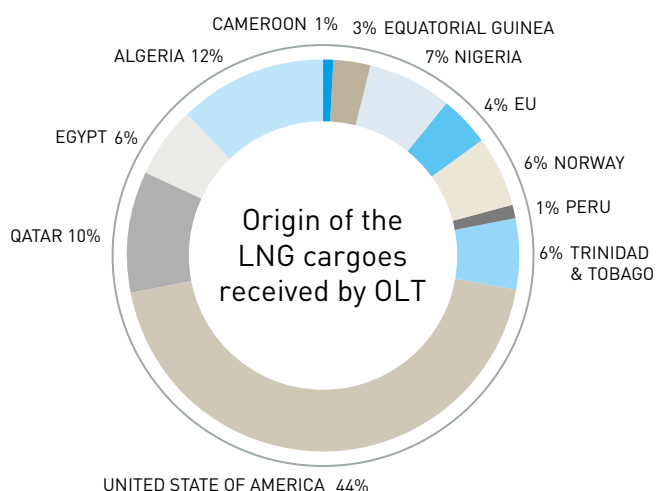
Authorised to receive about 90% of the current LNG carrier fleet, in particular those with a cargo capacity between 65,000 m³ and the New Panamax class (about 180,000 m³)

Despite the market instability, OLT has concentrated its efforts on providing the maximum receiving capacity and flexibility of the Terminal, both from the point of view of the cargo capacity of the LNG carriers authorised both for the quality and origin of the LNG, whilst at the same time undertaking to guarantee very high levels of safety and environmental sustainability.

Thanks to these characteristics, the Terminal is an important guarantee for the security and diversification of the country's energy supply. *FSRU Toscana* can, in fact, receive LNG cargoes from countries which cannot today be connected to Italy by gas pipeline, reducing the geopolitical risks that can arise with importing by pipeline.



The contribution that *FSRU Toscana* provides to the diversification of supply is confirmed by the receipt of *LNG* cargoes arriving from the main exporting countries such as Algeria, Cameroon, Egypt, Equatorial Guinea, Nigeria, Norway, Peru, Qatar, Trinidad and Tobago and the United States.



48%

the percentage of exporting countries with which OLT has commercial relations

The data refers to the period going from the start of the Terminal's activity up to 31/12/2021

2.2.1 The Regasification Service

The *regasification* service includes the receipt of the *LNG* carriers, the unloading of the *LNG* into the Terminal's tanks and the redelivery of what has been regasified to the entry point of the national network or at the *Virtual Exchange Point (VEP)*.

The *regasification* service is offered by OLT on the basis of access rules that are defined in a transparent and non-discriminatory way and gathered together in the Regasification Code²⁰ approved by *ARERA*.

With the introduction of the current mechanism for the allocation of *regasification* capacity by means of an auction procedure²¹, *ARERA*, at the same time, defined the bidding methods and the criteria for setting the reserve price for each allocation process.

Since 10th April 2018, via the *Platform for the Allocation of Regasification Capacity (PAR)* managed by the *GME*, the users of the Terminal can submit their bids for all the products – multi-year, annual and infra-annual – offered according to the terms and conditions set forth in the [Regasification Code](#).

40, 38 and 30 delivery slots out of the 41 offered were allocated respectively in calendar years 2019, 2020 and 2021, nevertheless in 2021, the high market volatility, together with the effects of the pandemic, led to the release of *regasification* capacity previously allocated and hence a contraction of the *send-out* as opposed to previous years.

28 and 7 offloading slots are currently allocated for calendar years 2022 and 2023 respectively.

Regasification Service

	2019	2020	2021
Slots allocated	40 ²²	38	30
Liquefied Natural Gas discharged (liquid m ³)	5,622,804	5,239,792	2,255,137
Natural Gas injected into the network (Sm ³)	3,510,403,200	3,139,415,371	1,363,451,946

OLT makes further flexibility services available to the users of the Terminal - nomination and renomination of their own redelivery profile, extended storage of *LNG* inside the Terminal tanks and the *virtual liquefaction* service - allowing them to seize the market opportunities.

²⁰ Document containing all the rules for access to and use of the regasification service offered by the Terminal as well as the service quality standards.

²¹ Introduced in 2017 by *ARERA* Resolution 660/2017/R/gas.

²² The last slot booked in December 2019 was physically discharged in 2020 due to bad weather conditions that led to the Ship-to-Ship operations being put off by two days.

2.2.2 The Emergency Services set up by the MiTE

The *MiTE* establishes the most suitable measurement to adopt for managing energy emergencies every year. The “Peak Shaving Service” and the “Regasification and Storage Bundled Service” are two of the emergency measures established by the Ministry of Ecological Transition in the context of the “Emergency Plan” to tackle particular unfavourable situations for the National Gas System.

The Regasification and Storage Bundled Service is a measure for the security of gas supply adopted in 2016 and 2017 and consists of offering the *regasification* service during the spring and summer period to take advantage of the lower *LNG* market prices and begin to fill the Italian storage sites, managed by the company *STOGIT*, so that it can be withdrawn during the winter period.

As regards Peak Shaving, in the case of emergency during the winter period, it is possible to regasify and inject into the grid, at short notice, the *LNG* previously discharged and stored in the Terminal's tanks to tackle peak demand for a limited period of time.

In the 2017-2019 three-year period, OLT made available to the system a total quantity of *LNG* of around 219,000 m³ liquid through this service, continuing, at the same time, to offer *regasification* capacity on a multi-year, annual and infra-annual basis, according to the provisions of the current regulations.

More specifically, OLT allocated all the slots offered in the Gas Year 2019-2020, thus ensuring the contribution required in terms of security of supply during the winter period, without the need to issue a call for tenders for the Peak Shaving Service.

In the Gas Year 2020-2021, the offer of this service was not required by the *MiTE*, whilst in the Gas Year 2021-2022, the Peak Shaving Service was not allocated, though it was offered.

219,000 liquid m³

of *LNG* made available
through the
Peak Shaving service
in the 2017-2019
three-year period

2.2.3 The Small Scale LNG Service

The changes in progress in the economic and social scenario, at an international level, have contributed to changing the perception and “status” of the *LNG* commodity.

In particular, there is a desire at European and international level to promote the spread of *LNG* in order to support strategy of less polluting fuels for shipping use aimed at establishing, also in the Mediterranean, a SECA - Sulphur Emission Control Area²³.

The *Small Scale LNG (SSLNG)* service adds an important element to energy logistics, enabling the completion of the supply chain which allows the use of *LNG* as a sustainable fuel capable of reducing polluting and climate-changing emissions in heavy land and sea transportation, as well as for industrial and residential uses in areas not served by the national transportation network.

This service provides that small *LNG* carriers can load *LNG* directly at the *regasification* and storage terminal to refuel *LNG* ships or to deliver it to coastal deposits, inside the Mediterranean ports. In fact, they are making strides in the port structures so as to be able to plan and create *LNG* storage and distribution centres, where both vessels and heavy land vehicles that use *LNG* for fuel can be refuelled.

The Simplification Decree²⁴ is inserted in this context, according to which Sardinia could become, in a short space of time, a pilot area with the creation of the first virtual pipeline - i.e. a virtual connection for gas by sea - to supply its industrial section and develop the maritime sector in a green key.

The *FSRU* Toscana terminal, thanks to its plant versatility and privileged geographical position, is decisive in the Small Scale market: it can, in fact, represent a fundamental block in this nascent chain, making it possible to supply *LNG* to Sardinia by means of shuttle vessels.

²³ At the twenty-second conference of the Contracting Parties of the Barcelona Convention, held at Antalya, the Contracting Parties have agreed to submit to the IMO Committee on the protection of the marine environment (MEPC 78), planned for 6th to 10th June 2022, a proposal to designate the whole Mediterranean Sea as a Sulphur Oxide Emission Controlled Area (“Med SOX ECA”). It is expected that this proposal will come in force on 1st January 2025.

²⁴ Act no. 120 of 11th September 2020, enactment with amendments of Law Decree no. 76 of 16th July 2020, on “Urgent measures for digital simplification and innovation” (Simplification Decree).

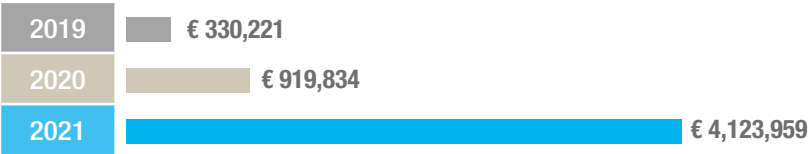
In order to be able to provide the service, OLT made a specific preliminary feasibility study²⁵ - co-financed by the European Union - in 2015, which supplied positive results, confirming the possibility for the Terminal, after marginal plant engineering modifications, to discharge the *LNG* onto small *LNG* carriers.

OLT went ahead with the verification path, giving the go ahead for several detailed engineering studies preparatory to obtaining the necessary authorisation. Some of these studies were partially financed by participating in the *Connecting Europe Facilities (CEF)* Tender: a tender called by the European Commission with the aim of developing the trans-European networks and infrastructures in the transport, telecommunications and energy sectors.

Finally, the company started the authorisation procedure to offer the new *SSLNG* service in 2019 and in October 2020, with a decree issued by the Ministry of Economic Development, in liaison with the Ministry of Infrastructures and Transport and the Tuscany Region, it was authorised to make the necessary modifications to the Terminal to offer the *Small Scale LNG* service. Furthermore, OLT has decided to increase the flexibility and efficiency of the Terminal by undertaking a new authorisation path, in progress at the moment, to allow the berthing of up to 122 small *LNG* carriers a year.

OLT has, as a consequence, significantly increased infrastructural investment in 2021 on the *Small Scale LNG* project with a duration expected until 2033, the date of the plant’s end of life.

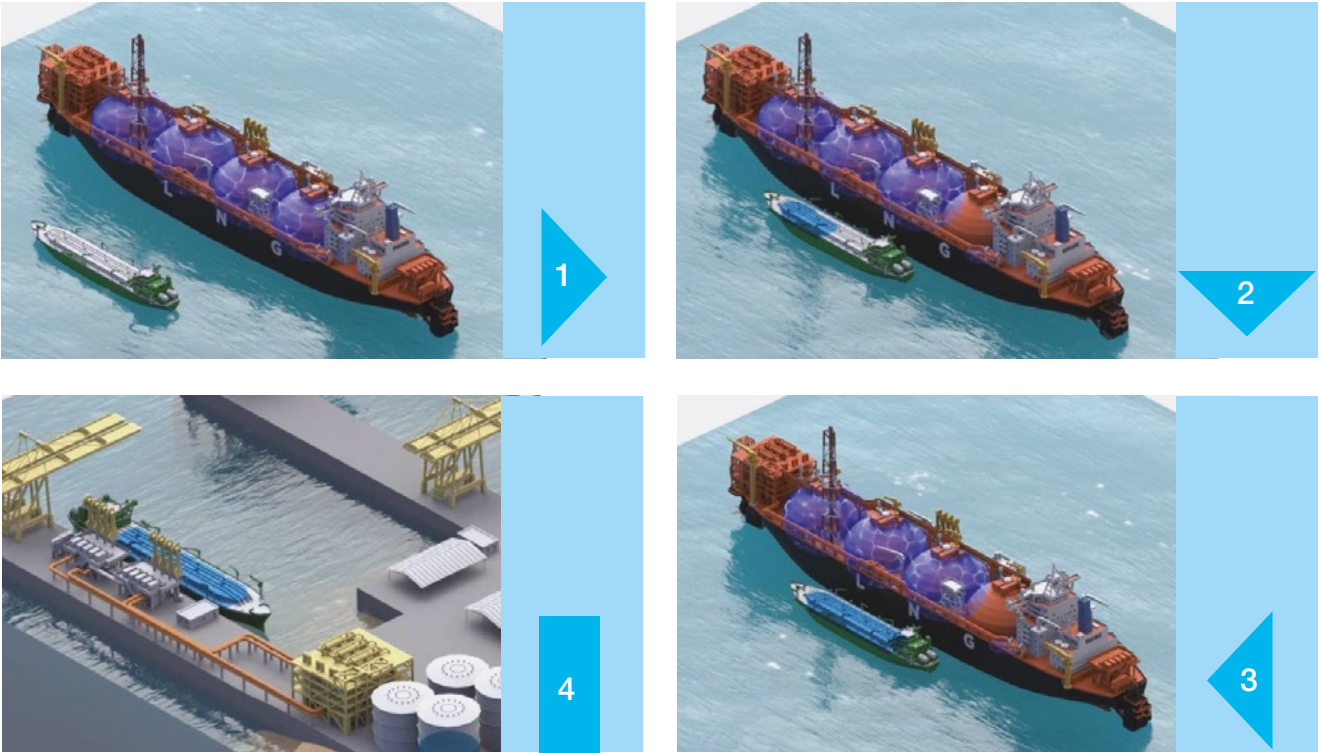
Investment for Small Scale LNG



+ 348%
the increase in infrastructural investment for the *Small Scale LNG* service compared to 2020

The plant engineering modifications concerning the port side of the Terminal, where the main elements for *Ship-to-Ship operations* and discharge are already present, are in the process of being made, with conclusion expected no later than 2022 and consequent start-up of the commercial activities linked to *SSLNG*.

FSRU Toscana will be the first Italian *regasification* to offer this service.



²⁵ As regards safety, reference was made to the international standards for large gas tankers and therefore the small *LNG* carriers must also comply with the OCIMF guidelines and must have emergency shut-down systems (ESD), in accordance with the international guidelines issued by SIGTTO, to guarantee the maximum level of safety during discharge operations.

2.3 THE QUALITY OF THE SERVICE OFFERED

OLT has adopted a policy aimed at achieving and maintaining a high-quality standard so as to guarantee all users a high level of reliability when providing the *regasification* service and respecting safety and the environment.

The provision of the service has always been guaranteed in the three years of reporting and the receipt of cargoes in the planned arrival window has been about 90%²⁶, guaranteeing in any case the annual receipt of 100% of the planned cargoes.

2019: **92,7%**

2020: **90.2%**

2021: **87.8%**

% of cargoes received in the planned arrival window

The [Regasification Code](#) indicates the main quality principles which regulate the provision of the services and the related commercial and technical quality standards.

OLT has dedicated monitoring processes for customer satisfaction and complaints management.

For 2021, the terminal users, by means of a customer satisfaction questionnaire, expressed a positive opinion of the quality of the service offered and the support given to them in the commercial activities.

Finally, OLT does not process customers sensitive data and, in any case, there have never been cases of data loss.

Service quality principles

Safety, health and environment

Provision of the Regasification Service in compliance with safety, health and environment.

Participation

Procedure to update the Regasification Code open to the participation of all those entitled.

Information

The information regarding own capacity contract and other relevant information regarding relations with OLT available for each User.

Efficiency of the Regasification Service

Adopt suitable solutions to adjust the Regasification Service to the market requirements.

Continuity of the Regasification Service

- Limit the consequences of interruptions to the Regasification Service
- Communicate those interruptions to the Users
- Adopt the necessary measures to restore the Service

Impartiality of treatment

Observance of the principles of objectivity, neutrality, and impartiality and non-discrimination in the operation of the Terminal and company activities.

2.4 THE VALUE CHAIN

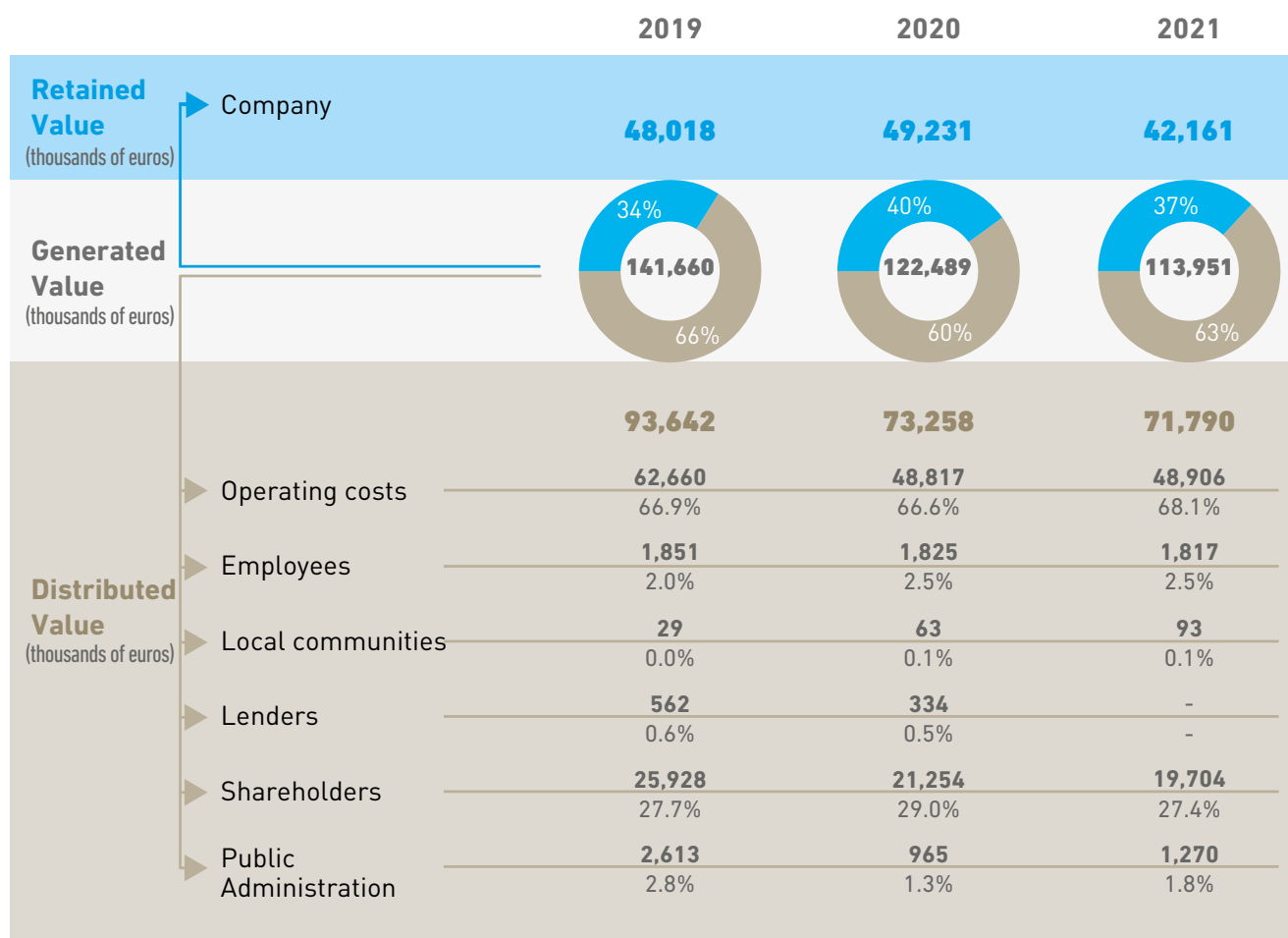
2.4.1 Our contribution to growth

Generating value by adopting initiatives and conduct that allow the Company to operate successfully in the reference market, achieving sustainable results and guaranteeing a balanced distribution of the value to its stakeholders, be they direct or indirect: this is the contribution of OLT to the growth of economic value.

Using the analysis of the distributed economic value, we would like to highlight the flow of resources to our employees, suppliers of goods, services and capital, the Public Administration and the reference territory.

²⁶ Observing the arrival window for the receipt of cargoes is influenced by weather conditions.

The value generated and distributed



In 2021, the economic value generated by OLT was almost € 114 million, of which 37% was held back by the Company and 63% redistributed mainly to the suppliers of goods and services under the form of operating costs.

The value distributed to employees is substantially stable, the value distributed to shareholders records a slight drop (-7% compared to 2020), consisting of interest on existing shareholder loans, whilst the contribution to lenders goes to zero²⁷. The reduction of interest to shareholders can be attributed to the reduction of the debt by effect of the repayments made in 2020 and 2021 for a total of 97 million euros.

In 2021, the contribution to local communities grew (+48% compared to 2020) as did the value distributed to the Public Administration, including direct and indirect taxes (+32% compared to 2020).

OLT does not make political contributions of any kind. It has been able over the three-year period to count on the financial aid received from the Public Administration under the form of tax relief and tax credits for a total of € 563,192, of which € 539,215 for tax relief in 2020 because of the write-off of the Irap balance correlated to the Covid-19 pandemic.

At the same time, in the 2019-2021 three-year period, OLT paid a total of about 1.5 million euros to state property for the occupation of offshore state property by the Terminal.

Other financial flows with the Public Administration

	2019	2020	2021
Financial aid received from the Public Administration (€)	6,500	540,965	15,727
Contributions paid for the granting of the offshore state property area (€)	510,445	506,617	497,244

²⁷ Bond holders and banking system.

The fiscal approach of OLT is underpinned by the values of transparency, honesty and lawfulness. In order to guarantee that these values are applied, the Company has adopted procedures which ensure that the fiscal and tax risks and *Tax Compliance* are controlled, also through the support of external experts.

The process for determining the taxes guarantees the segregation of roles between the different figures involved. The Administration and Finance Department is obliged to check that the tax data are correct before a further check by the auditors.

The approach adopted by OLT for *advocacy* on fiscal matters includes the resort to legal and tax offices of national and international significance whenever there is a tax question to be resolved or a particular operation to be implemented.

Relations with the tax authorities are in any case underpinned by the criteria of maximum collaboration and transparency; given the complexity and unique nature of the business, the Company has over the years needed to submit questions to get instructions directly from the Revenue Office regarding the most appropriate way to define certain operations fiscally.

2.4.2 Partnership with suppliers

OLT operates to build a partnership system with suppliers based on clear transparent rules, which are central factors for maintaining the quality of the services, protecting the environment and the safety of the workers and the communities.

The prior qualification of suppliers and sub-suppliers is a fundamental element in the procurement process. The qualification criteria take into account that the suppliers have high technical/professional, economic/financial, health and safety, environmental and compliance standards, as well as the ability to meet the social accountability requirements set by the SA8000 standard.

If the supplier holds any certification, this is a preferential qualification.

Suppliers and *outsourcers* are required to share the principles expressed in the *HSEQ Policy*, the *Charter of Values* the Organisational and Management Model under Italian Legislative Decree 231 and the [Code of Ethics](#) of OLT.



Social Accountability Requirements

- 1 Child labour
- 2 Forced or compulsory labour
- 3 Health and Safety
- 4 Freedom of association and right to collective bargaining
- 5 Discrimination
- 6 Disciplinary practices
- 7 Working hours
- 8 Remuneration
- 9 Management system

The performance of the suppliers is monitored annually and assessed to ensure that the contracts properly fulfilled and that they comply with the OLT policies and procedures.

Furthermore, the internal procedures that regulate the purchase process define the criteria for identifying the categories of supplies considered critical because of their potential impact on the compliance of the service provided by OLT or their potential repercussions on the compliance of OLT with the regulations and standards. All the suppliers of critical purchases are qualified for the quality, environment, safety and social standards.

There is a further three-yearly assessment for the suppliers of goods and services falling under the “critical supplies” categories²⁸; this is aimed at identifying the suppliers to undergo annual checks on SA8000 aspects.

43 suppliers corresponding to **100%** suppliers assessed during the qualification phase also regarding social impact, on the total number of purchasing suppliers considered critical qualified in 2021

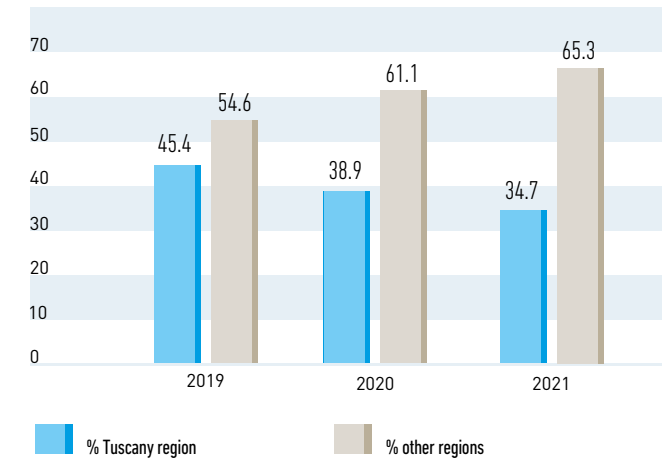
4 suppliers corresponding to **100%** suppliers subjected to periodic social evaluation, on the total number of suppliers to be assessed within SA8000 in 2021

²⁸ The assessment criteria for a supplier on the SA8000 aspects are: commodity sector, OLT sphere of influence, analysis of historical data and risk assessment in the SA8000 context.

Based on the assessment made, no supplier is ever exposed to significant risks with regard to the aspects concerning the freedom of association, child labour, forced labour and, more generally, the respect of human rights.

OLT contributes significantly to the local economy by offering all the firms in the regional area and the District of Livorno, in compliance with the principles of competition, an equal opportunity to compete for the supply of the goods and services necessary for the management of the company business and the Terminal.²⁹

Territorial distribution of expenditure to qualified suppliers



Over **29 million**
the average volume of expenditure for procurement
from qualified suppliers in the last three years

Over **11 million**
the average value of expenditure for procurement
from regional suppliers in the last three years

In the last three years, the average percentage of expenditure to suppliers and *outsourcers* from the District of Livorno is 99.76% of the expenditure to suppliers in the Region of Tuscany.

Of particular significance, in the area of qualified suppliers, are the *outsourcers* that operate on the Terminal and support it and the providers of service and technical consultancy linked to the Terminal's performance.



29 The data for the territorial distribution of expenditure for qualified suppliers with reference to the year 2020 have been amended following some accounting adjustments.



Energy consumption



Fight against climate change



Air quality



Effects on the biodiversity



Waste management



OLT FOR THE ENVIRONMENT

3

3 OLT FOR THE ENVIRONMENT

The *FSRU* Toscana Terminal carries out its activities with full respect for the environment. From the environmental sustainability point of view, the project has obtained all the necessary authorisations³⁰. The results of the *EIA* and *IEA* processes have highlighted the possibility that the floating unit can really co-exist with the ecosystem in the geographic area affected by the presence of the Terminal. The environmental aspects linked to the Terminal's activities were identified and analysed; moreover, as acknowledged by the competent Authorities in the context of the authorisation procedures, the necessary appropriate measure to minimise the impact on the different environmental matrices involved were prepared.

In addition to this, the Company is continuously searching for plant engineering, following the *BAT* philosophy, and organisational improvements aimed at improving performance.

All the activities that have repercussions, actual or potential, on the environment are regularly monitored through the Integrated Management System and especially through a careful Monitoring and Control Plan.

This chapter will analyse the Organisation's performance with regard to the issues that were most relevant following the materiality analysis. For a full examination of the environmental performance of OLT, please see the [Environmental Statement](#)³¹ prepared in compliance with the *EMAS* Regulations.

For an in-depth examination of the standards, scenarios and/or calculation tools used for collecting and processing environmental data, please see the methodology note.

3.1 ENERGY CONSUMPTION AND CLIMATE-CHANGING EMISSIONS

3.1.1 Energy consumption

Energy consumed

The electricity used by the Terminal is entirely self-produced³² thanks to four *steam turbogenerators*, powered by boilers which exploit the LNG vapours, and diesel generators used solely in the case of need and/or emergency.

The consumption of primary energy needed to guarantee the operating efficiency of the Terminal for plant engineering reasons, is exclusively linked to the use of non-renewable sources: *NG* for the operation of the two boilers serving the *turbogenerators* and, to a lesser extent, *MGO*³³ used in abnormal operating conditions or an emergency.

Energy produced and consumed within the Organisation³⁴

	2019	2020	2021
Natural gas - NG (GJ)	1,453,097	1,446,584	1,326,293
Marine Gas Oil - MGO (GJ)	4,395	5,324	3,712
Total (GJ)	1,457,492	1,451,907	1,330,004

The Terminal's energy consumption remained substantially unchanged between 2019 and 2020, whereas as a reduction in consumption of 8% was recorded in 2021, compared to 2020.

The change can be correlated to the contraction of the *regasification* activity, though not directly proportional because of the minimum energy requirement for the Terminal to operate.

The consumption of *NG* and energy production, which are directly linked, have the same trend, showing a slight drop in 2021 (-8%).

More marked is the reduction of *MGO* consumption (-30%), which can be attributed to the careful management of maintenance activities, which has allowed the periods of non-normal boiler operation, when *MGO* is used as a replacement for or jointly with *NG*, to be reduced.

OLT does not have the possibility of influencing the energy consumption upstream and downstream the Organisation, with exception of consumption linked to the services supporting the Terminal's operating efficiency, which are provided by the company *Fratelli Neri*³⁵.

This consumption, for the services for surveillance and security, tugs and assistance to vessels arriving and leaving the Terminal and transport of personnel, arises exclusively from non-renewable sources (*MGO*).

30 In particular: Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), Integrated Environmental Authorisation (IEA).

31 Instrument that is updated annually and represents the means with which the EMAS registered organisation communicates with interest parties on environmental matters.

32 The total energy produced and shown by fiscal meters (70,079 MWh in 2019, 67,067 MWh in 2020, 53,111 MWh in 2021) is totally consumed by the Terminal, as it is not connected to the national grid; this energy is therefore necessary for all the activities connected with the operation of the Terminal.

The data show a reduction of *MGO* consumption (-11%) in 2021, which can be partly attributed to the contraction of the *regasification* activity with the consequent reduction in hours worked and partly to the measures adopted to achieve the goal of reducing CO₂ emissions by turning off one engine of the service vessel, Guardian Vessel, used for patrolling around the Terminal.

Energy consumption outside the Organisation³⁶

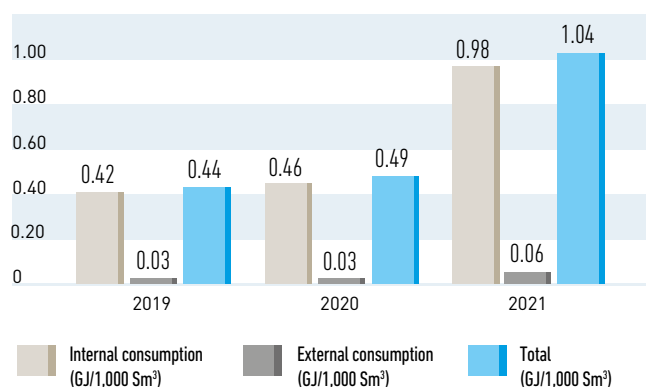
	2019	2020	2021
Marine Gas Oil - MGO (GJ)	102,068	94,044	83,276

Energy intensity

The *energy intensity* index measures the energy consumption in relation to the quantities of regasified natural gas injected into the network. Together with the data for the energy consumed inside and outside the Organisation, this datum contributes to putting the energy efficiency of OLT in context.

The increase in the *energy intensity* indices recorded over the three years, and particularly in 2021, is influenced by the contraction of the Terminal's *regasification* service recorded between 2019 and 2021.

Energy intensity



The plant's operating efficiency in the reference period underwent a reduction caused by the health emergency coinciding with a period of high volatility in the gas price, which at times recorded increases of over 500%. The factors determined a drop in the *regasification* service and the consequent quantity of regasified natural gas.

33 The Marine Gas Oil is used: in the boilers to replace natural gas in abnormal operating conditions, emergencies, maintenance and process transition phases; for the operation of the diesel generator to produce electricity; for the operation of minor utilities in an emergency and/or anomaly.

34 Office consumption is negligible and is therefore excluded from the reporting.

Categories of consumption upstream and downstream the Terminal



Upstream categories

- NG extraction;
- transportation (gas pipeline) between extraction sites and treatment and liquefaction plants;
- treatment, liquefaction and storage of LNG;
- transportation to the offloading terminal (ports) by pipeline;
- transportation of the LNG on an LNG carrier with the related tugs and service vessels.

Downstream categories

- transportation of the gas by subsea pipeline into the national network managed by Snam;
- transportation to electricity generating power stations;
- energy production;
- distribution of electricity.

Reduction of energy consumption

The results of the last energy diagnosis³⁷ show energy performances on a par with the reference best practices.

As regards above, the diagnosis did not suggest action to increase the energy efficiency of the Terminal but only some improvement interventions. OLT defined two lines of intervention in this context:

- a programme to replace the Terminal's lighting units with magnetic induction devices, which are more efficient than the current ones from an energy point of view and capable of guaranteeing a more widespread and uniform lighting and a longer useful life;
- modification of the design of the seawater pumps (high energy consuming equipment) so as to increase their energy efficiency and reduce, though marginally, the overall energy requirement in line with operating efficiency.

The work order for the modification of the seawater pumps was issued in 2021, all the external lamps have been purchased and the replacement of the stern outside lamps has been started. The interventions are expected to be completed no later than 2023 and the premise for the goal of reducing energy consumption is tied to the operating efficiency of the Terminal.

- 0,9% compared to 2019

the reduction in consumption expected from the programme to replace the Terminal's lighting units and implementation of a new design for the seawater pumps

35 The consumption connected with business travel and employees' home-work commuting is negligible and therefore excluding from the reporting.

36 Processing of the data in tonnes provided by the outsourcer Fratelli Neri.

37 Conducted in 2019 under Italian Legislative Decree 102/14 by ISPRA, the entity appointed to perform the energy diagnoses for EMAS registered companies.

3.1.2 Climate-changing emissions

The emissions of climate-changing gases (*GHG*) from OLT are mainly the direct type (Scope 1) and derive from the Terminal's energy consumption connected with the process of generating electricity and, to a residual extent, the Terminal's *fugitive emissions* of natural gas and propane and the emissions conveyed from the Terminal's venting systems (*Vents*), the use of which, as per the *IEA Decree*, is solely provided for in the case of emergency and particular planned maintenance³⁸.

The emissions linked to the Terminal's energy consumption, mainly deriving from *stationary sources*³⁹, are overseen by a continuous monitoring system that ensures compliance with the sector standards and the decrees authorising the plant.

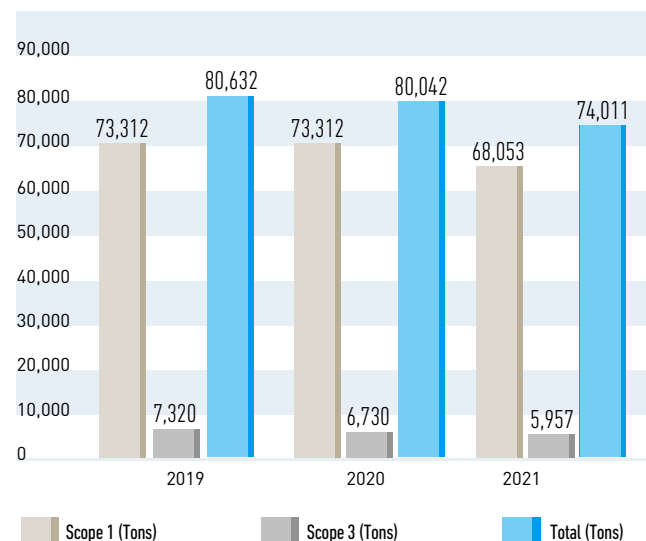
There are no *biogenic emissions* of CO₂ or sources of CO₂eq, or are there indirect emissions connected with the procurement of energy (Scope 2).

The emissions of indirect type *GHG* (Scope 3) regard the consumption of fuels for the vessels serving the Terminal.

- 7%

CO₂ emissions compared to 2020

CO₂eq emissions



³⁸ The Terminal's vent systems were never used for emergency situations in 2021, but only for the planned maintenance of 3 cargo tanks, carried out every 5 years, as required by the applicable regulations. In 2021, 2% of direct emissions of CO₂eq were made up of CH₄, and 0.3 and 0.5 in the years 2019 and 2020 respectively.



Climate-changing emissions

A fundamental role is played by monitoring Greenhouse Gases (*GHG*) in the context of the tools and policies to tackle climate change.

Calculating the emissions of greenhouse gases, such as for example CO₂ or methane (CH₄), is the first fundamental step in the path of de-carbonising a company.

The stand most used for the calculation is the *GHG* protocol, which divides greenhouse gas emissions into three main categories.

- Scope 1: includes "direct" emissions, generated by the activities falling under "the organisational boundaries" of the company;
- Scope 2: are indirect emissions caused by the production of electricity, steam or heat produced by third parties, in places other than where it is used, and purchased by the company;
- Scope 3: are indirect emissions generated in the upstream and downstream stages as opposed to the company's activity, but which in any case can be attributed to it.

The unit of measurement used for accounting the climate-changing emissions is the CO₂eq, a measurement that expresses the impact on global warming of a certain quantity of greenhouse gas compared to the same quantity of carbon dioxide (CO₂). It is used so that the contributions of different greenhouse gases can be compared and added up.

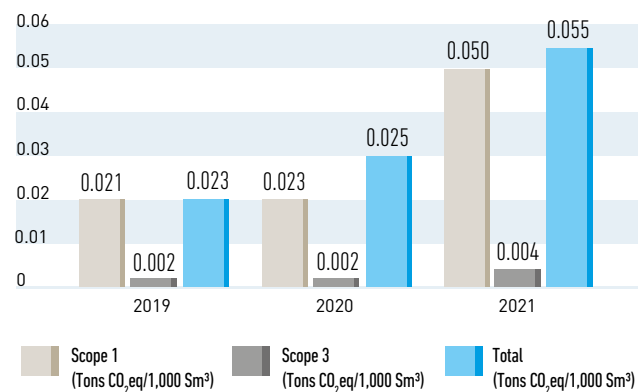
³⁹ In 2021, 97.9% of the OLT direct emission of CO₂eq came from stationary sources (99.7% and 99.9% in 2019 and 2020 respectively).

Emissions intensity

The *emission intensity* rate of *GHG* defines the environmental impact of OLT in terms of *GHG* emissions, standardised against the quantities of natural gas introduced into the network. Together with the organisation's total *GHG* emissions, this contributes to putting its efficiency in context.

Also in this case, given the high contribution of *GHG* Scope 1, which can be directly correlated to the production of energy produced, the data are influenced by the contraction of the Terminal's *regasification* service recorded between 2019 and 2021, as already noted in relation to the *energy intensity* index.

GHG emissions intensity rate



Reduction of climate-changing emissions and offsetting

Although the reduction of CO₂eq emissions can be mainly attributed to the lower energy consumption of the Terminal consequent to the contraction of the *regasification* service, OLT and its *outsourcers* have dedicated, and continue to dedicate, the maximum effort to reduce the atmospheric emissions.

In particular, the turning off of one engine of the Guardian Vessel has allowed a reduction of 13%⁴⁰ of CO₂ emissions to be achieved in 2021 for the Guardian Vessel compared to 2019, thanks to an estimated reduction of about 134 tons of *MGO* which correspond to lower emissions of about 417 tons of CO₂eq.

Moreover, the operations of the *LDAR* programme for *fugitive emissions* has led to a reduction of them in 2021 by 41% compared to 2020, which corresponds to 149 tons of CO₂eq.

Last but not least, the initiatives to offset CO₂ emissions taken by OLT in 2021 must not be overlooked and these have led to reforestation of an area of Monte Serra and the creation of a new green area in the Municipality of Pisa.

-13%

CO₂ emissions of the Guardian Vessel compared to 2019

-41%

fugitive emissions of CO₂ compared to 2020



Absorption and capture of carbon

The Kyoto Protocol expressly provides for absorption by forest as a climatic mitigation activity, complementary and supplementary to the reduction of emissions "at source". Using new forestation and the management of existing forests, it is thus possible to increase the stock of carbon immobilized in the vegetable biomass (thanks to chlorophyll photosynthesis) by capturing it instead of it going into the atmosphere in such a way that it cannot perform its climate-changing effect in the atmosphere itself.

⁴⁰ Value estimated considering the characteristics of the engine and parametrizing the consumption of 2021 on the hours worked in 2019.

3.2 ATTENTION TO BIODIVERSITY

In the context of the environmental policy of the European Union and guarantee the long-term maintenance of natural habitats and endangered species of flora and fauna or rare ones at community level, the “Nature 2000” ecological network spread over the entire union territory was created, considering the economic, social, cultural and regional requirements. With a total surface area of over 850,000 km², the Nature 2000 network is the largest overall network of protected sites in the world. Established under Directive 92/43/EEC “Habitat”, it consists of Sites of Community Importance (SCI), identified by the member states in accordance with the provisions of the Habitat Directive, which are then designated as Special Conservation Areas (SCA), and also includes Special protection Areas (SPA) set up under Directive 2009/147/EC “Birds” regarding the conservation of wild birds.

The Terminal, and the state property area of 286,551 m², fall inside a Site of Community Importance (pSCI) dedicated to the protection of the Tursiops Truncatus, a species classified as “almost endangered” in the Red List of the World Union for the Conservation of Nature (IUCN) and the protected marine area called the “Cetacean Sanctuary”.



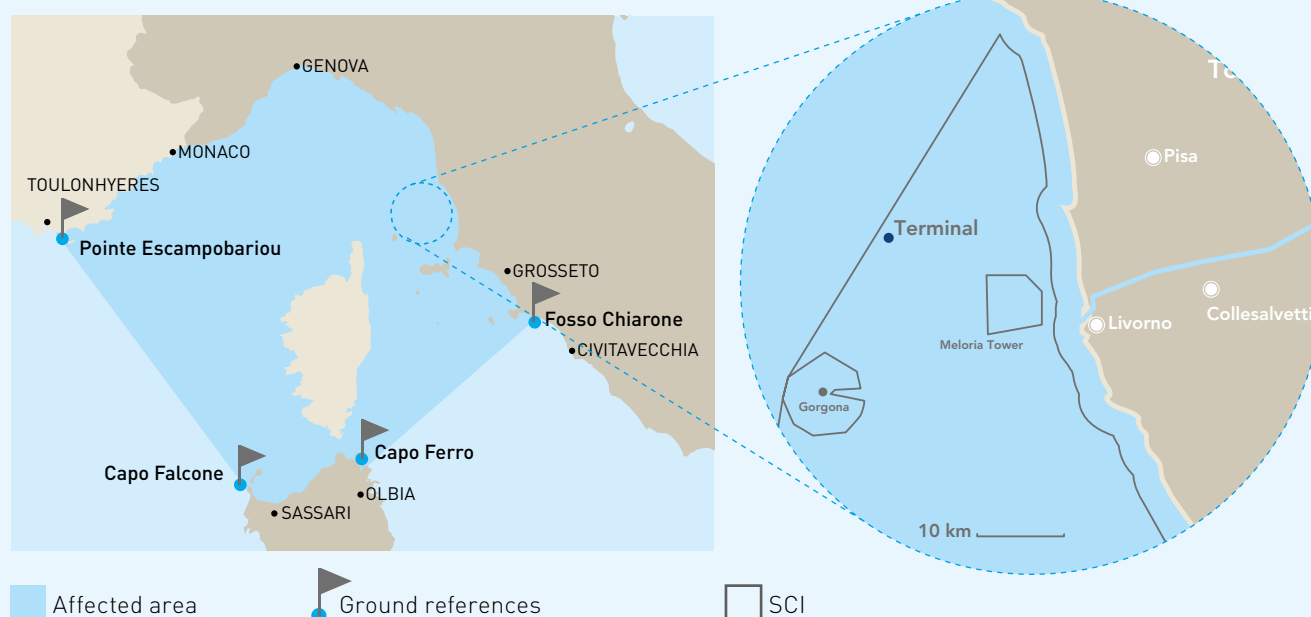
pSCI “Protection of the Tursiops Truncatus” (Nature 2000 code IT5160021)

Officially established with Regional Council Ruling No. 2 of 14th January 2020 and for which the procedure of verification and confirmation for the proposed designation by the competent offices of the Ministry of Ecological Transition and the European Union is currently in progress for the purposes of being acknowledged in the related lists in implementation of the “Habitat” Directive 92/43/EC, it concerns, as a whole, the largest site in the Mediterranean for the protection of the bottle nose dolphin.

It extends between the Municipalities of Pietrasanta and Piombino and juts out to include the islands of Gorgona and Capraia and the Meloria skerry for a surface area of over 3,740 square kilometres, taking into consideration that the two islands and Meloria had already been designated in 2016.

The pSCI is also totally enclosed in the specially protected marine area (Aspim) of 87,500 Km² called “Cetacean Sanctuary”, which was established with Act 391 of 11th October 2001 ratifying an international agreement between France, Italy and the Principality of Monaco. The agreement sets a goal of promoting concerted harmonised action between the three signatory countries for the protection of cetaceans and their habitats against all and any causes of disturbance, pollution, noise, capture, accidental wounding and nuisance.

Sanctuary marine mammals



The main impacts connected with the presence and operation of the Terminal in a Site of Community Importance, which were considered in all the authorisation procedures for the plant⁴¹, concern the possible chemical/physical alteration of the *water column* and the seabed, the possible impacts on the fish or, more generally, the *biotic* ecosystem and the impacts connected with background noise and alteration of the seabed morphology.

The Ministry of the Environment and Protection of the Land and Sea, named MATTM (today *MiTE*) prescribed, with the *EIA* Decree, that a Marine Environment Monitoring Plan be adopted and implemented - around the *FSRU* Toscana Terminal - for the Terminal's entire operating life (20 years starting from 2013, the year operations started) plus the year prior to installation and the year after *decommissioning*. The plan, defined by *ISPRA* and regularly implemented by specialist bodies, consists of four annual monitoring campaigns suitably verified by the named MATTM and *ISPRA* itself.

To date, the monitoring activity has shown that there are no interferences caused by the presence of the Terminal and there are no risks for the marine ecosystem caused by its activities.

Monitoring Campaigns



Marine Biodiversity Monitoring

The density and distribution of the organisms that characterise the correct maintenance of the marine biodiversity are assessed, starting from the plankton up to the fish species.



Bio-acoustic and subsea noise surveys

The noise levels of the running plant are monitored to ensure that the safety thresholds for marine mammals are observed.



Hydrological profile and sediment analysis

The monitoring of the temperature, salinity, pH and turbidity parameters of the *water column* in the area around the Terminal and the physical, chemical, eco-toxicological and microbiological analyses are aimed at detecting any changes in the parameters that can be correlated with the Terminal's activities.



Monitoring area A

Analysis on several axis points referring to:

- sediments for analysis of the fauna, chemical/physical and eco-toxicological analyses
- water for chemical/physical and eco-toxicological analyses
- plankton
- CTD (Conductivity, Temperature and Depth) profiles

Monitoring area B

Analysis for:

- noise measurement
- Sightings of cetaceans and turtles

Subsea pipeline

Starting in mid-2021, OLT implemented further measures aimed at minimising the potential impact that can be attributed, in particular, to the risk of collision or disturbance caused by subsea sound emissions to which cetaceans and turtles could be exposed by the transit of vessels in the area surrounding the Terminal. The daytime visual monitoring of the area surrounding the Terminal by the Guardian Vessel, to detect the presence of any cetaceans in case LNG carriers or *Small Scale LNG carriers (SSLNGc)* are mooring falls under these measures. Furthermore, based on the provisions of both the *EIA* and the *IEA Decree*⁴², OLT must prepare an executive *decommissioning* plan⁴³ that also includes any planning for the monitoring measures to be implemented during the plant *decommissioning* phases and a description of the measures to be implemented to mitigate the potential environmental impacts associated with the *decommissioning* activities, with a definition and quantification of the interactions with the various environmental matrices.

⁴¹ OLT has also taken into consideration the new SCI and its implications in the authorisation procedure for the future Small Scale LNG service.

⁴² Decree No. 13 of January 12, 2021.

⁴³ The Company has set aside a total of € 9,000,000 over 20 years, to the provisions for liabilities and charges, to cover the costs of restoring the site where the regasification Terminal was installed, an amount based on the costs forecast for the draft Decommissioning Plan drawn up during the authorisation procedure.

3.3 PROTECTION OF THE ENVIRONMENT

3.3.1 Air quality

The Terminal is equipped with a Monitoring System able to monitor numerous emissions parameters on each line of the two boilers on board.

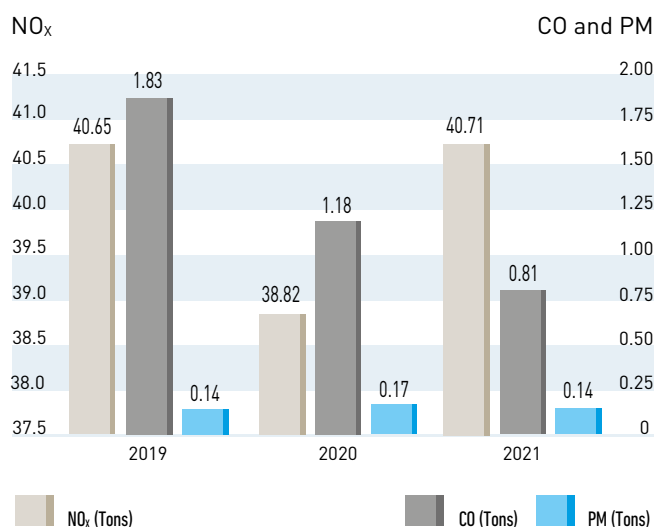
The continuously monitored parameters are: nitrogen oxides (NO_x), amongst which nitrogen dioxide (NO₂), particles (PM), carbon monoxide (CO), volatile organic compounds (VOC) and carbon dioxide (CO₂).

Among these, the parameters limited by law concern NO_x, CO and particles.

The processes in the Terminal do not envisage the emission of persistent organic pollutants (POP) or other hazardous atmospheric pollutants (HAP).

As already mentioned, the emissions trend is correlated, even if not directly proportional, to the Terminal's operations.

Significant emissions from the Terminal



The emissions values for the year 2021 were always below the authorised hourly limits⁴⁴.



The pollutants

Nitrogen oxides (NO_x) are produced by all high temperature combustion processes, through the oxidation of the atmospheric nitrogen and, to a small extent, through oxidation of the nitrogen compounds contained in the fuels. The most important nitrogen oxides for atmospheric pollution are nitrous oxide NO and nitrogen dioxide NO₂.

Carbon monoxide [CO] is one of the most widespread atmospheric pollutants: it is an odourless, colourless and tasteless toxic gas that is produced in all combustion processes whenever a substance containing carbon does not burn completely.

The term atmospheric dusts, or particulate matter, means a mixture of liquid or solid particles, suspended in the air, which varies by dimensional characteristics, composition and provenance. Depending on the formation process, the particles making up atmospheric dusts can vary both in terms of size and chemical composition. The limits set on combustion plants refer to total dusts including fine dusts: particles, of any shape, structure or density, dispersed in the gaseous phase at the conditions of the sampling point.

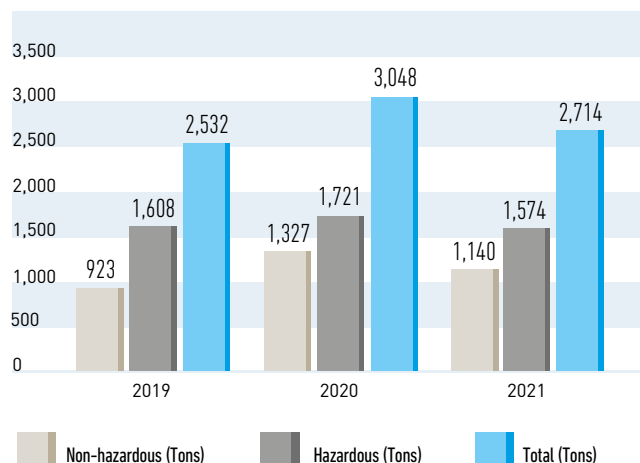
⁴⁴ The following excesses were below the tolerance margins allowed by the reference standards: February 2019: slight excess in the NO_x parameter, for one hour, for both boilers; October 2020: slight excess of the NO_x parameter, for one hour in boiler E2; December 2020: slight excess in the CO parameter for one hour in boiler E2.

3.3.2 Attention in waste management

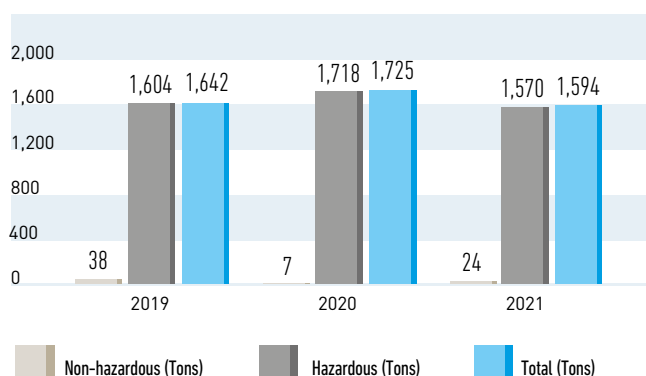
The plant waste, generated mainly by maintenance activities and activities connected with the life of the personnel on board, can be broken down into Hazardous⁴⁵ and Non-Hazardous⁴⁶.

The hazardous wastes consist mainly of *bilge* water (about 99%), a mixture of salt water and hydrocarbons in varying proportions collected in the bilge, whilst the non-hazardous wastes mainly (about 90%) consist of sludge deriving from the treatment of civil waste water.

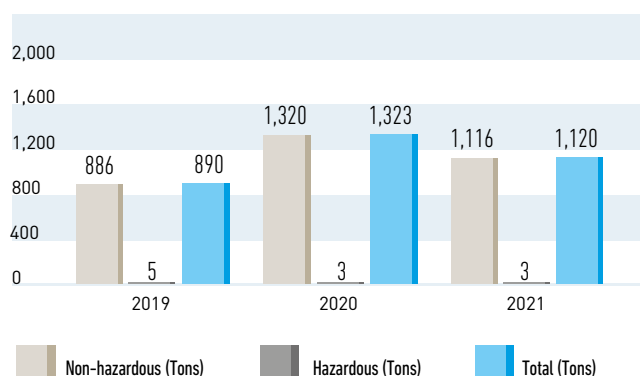
Wastes produced on the Terminal



Waste not for disposal



Waste for disposal



With reference to the wastes produced on the Terminal, the proper management of them is guaranteed, in compliance the reference land and sea regulations⁴⁷, from the time of their production to their transfer to the Port of Livorno licence holder.

There was a reduction of the quantities of wastes produced, both hazardous and non-hazardous, between 2020 and 2021, with values around the 2019 levels.

This improvement is even more significant, and indicative of an effective management of the processes generating wastes, if you consider that the activities connected with the plant engineering modifications for the *Small Scale LNG* service were started in 2021.

Among the measure taken to prevent the production of wastes, OLT has shown interest in the #ioSonoAmbiente project, of the Ministry of the Environment, for the removal of single-use plastic from workplaces, observing the rules of the 4 Rs indicated by the Ministry itself: Reduce, Re-use, Recycle, and Recover.

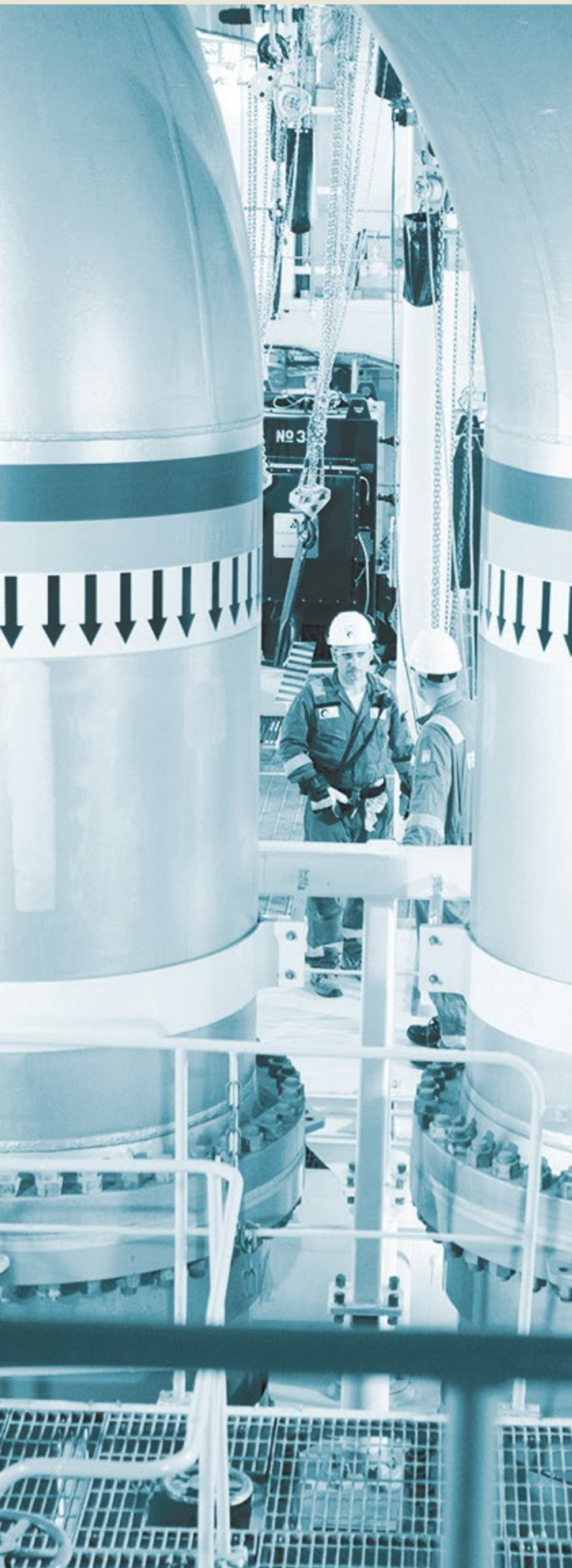
The Terminal is expected to reach the “100% plastic free” goal in 2022.

The OLT offices have been
100% plastic free
since 2021

⁴⁵ Special waste, coming from industrial activity and services, hazardous.

⁴⁶ Including special wastes, coming from industrial activities and services, non-hazardous, and similar wastes by type and quantity to urban ones.

⁴⁷ MARPOL Convention 73/78, Order of the Livorno Port Authority No. 25/2018 and Italian Legislative Decree 152/06 as amended (for the applicable parts). In the chain, OLT is the plant operator under Italian Legislative Decree 152/06 as amended and ECOS the waste manager under MARPOL Convention 73/78, whilst the company Fratelli Neri transports the wastes onshore in compliance with the maritime regulations and the Port Authority order.



Occupational practices
and protection of work



Diversity and
equal opportunity

Economic
impacts



Decommissioning
and restoration

Asset integrity and
incident management

Health and safety
of people



Commitment for
the communities



**OLT
FOR PEOPLE**

4

4 OLT FOR PEOPLE

Opening a dialogue and listening and the sense of responsibility to people, be they employees, collaborators, suppliers or local communities: this the approach of OLT in its relations with the parties concerned.

The adoption of a structured process for risk management and the implementation of Management Systems certified by third parties are an effective safeguard for its own employees, personnel who work on behalf of OLT and the local communities against any critical issue of interest for the social, environmental and safety sphere.

It should be stated that the *FSRU* Toscana Terminal, both because of its distance from mainland and the substances used (*LNG*), does not entail any exposure to harmful substances for the local communities.

The sense of belonging and strong roots in the territory have always seen OLT attentive in grasping the needs of the communities where it operates and committed to supporting social, health, cultural and sporting initiatives and projects.

4.1 ATTENTION TO HUMAN RESOURCES

4.1.1 The OLT team

OLT sees human resources as a fundamental element for its growth. Maintaining adequate levels of employment and a suitable quality of work are therefore considered essential for achieving the company strategies.

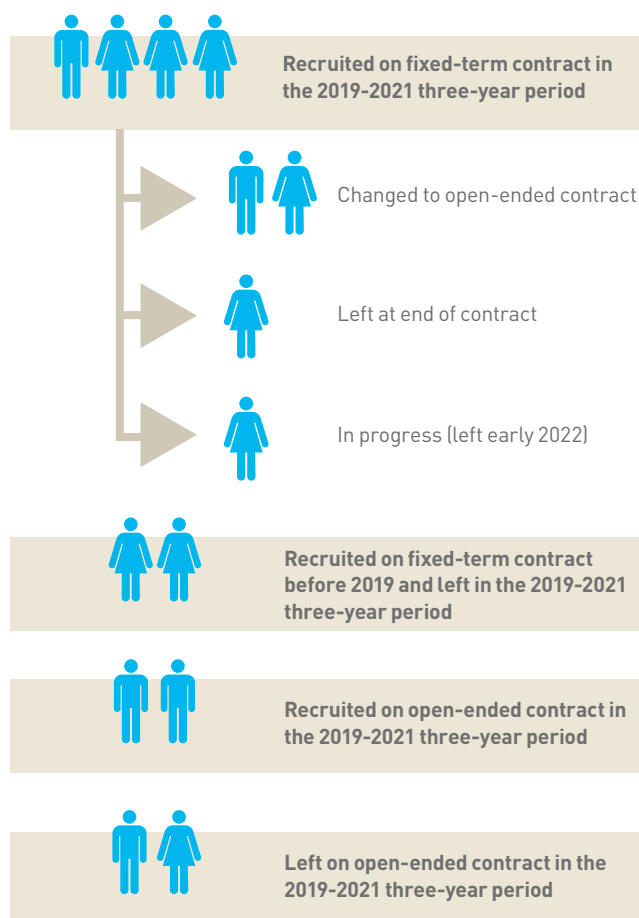
In 2021, OLT had 22 employees, continuing from 2020 and slightly reduced from the 24 employees in 2019. Specifically 3 employees in Rome (all women) and 19 in Livorno (10 men and 9 women).

OLT offers a stable continuous work relationship: all the personnel are hired with an open-ended contract except for one resource hired in 2021, at the Livorno offices, on a fixed-term contract which finished in the first months of 2022 on its natural expiry.

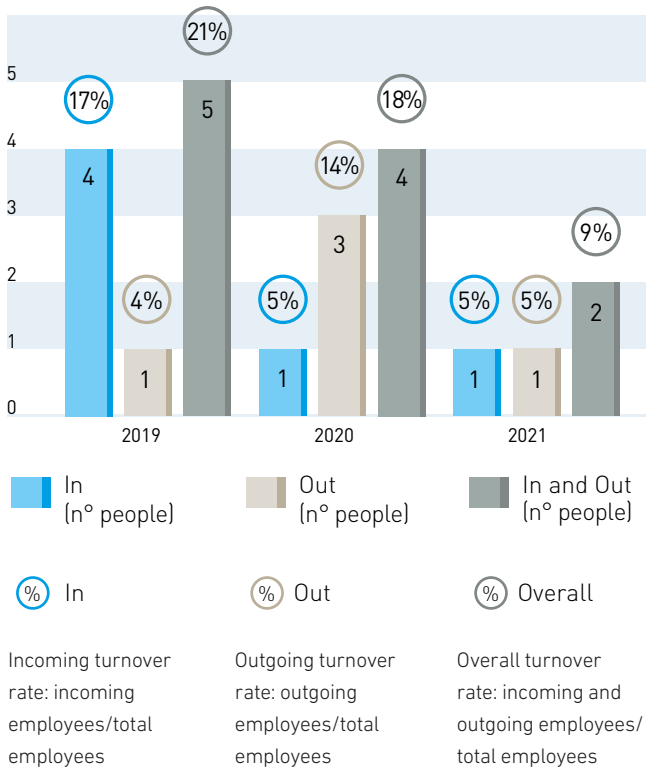
The termination of a resource that had been hired in 2020 with a fixed-term contract for maternity cover was recorded in 2021.

The new recruits in the three-year period concerned the youngest age bracket, 18-35 years, for 67% and the remaining 33% concerned the 36-46 age bracket.

The resignations in the three-year period concerned the youngest age bracket, 18-35 years, for 80% and the remaining 20% concerned the 36-46 age bracket.



Ins and Outs in OLT and turnover rate



The part-time work concerned three female employees taken on at the Livorno offices. The figure is due to individual choices and the preparedness of the Company to meet the needs of reconciling private life with work expressed by some employees.

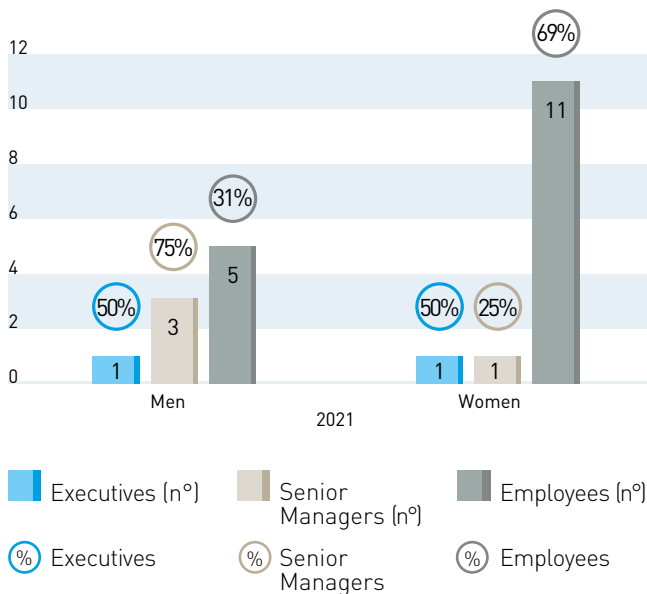
The relationship between OLT and its employees is regulated by the “National Collective Agreement for the water and gas sector” and the “Industrial Executive Contract” which govern, inter alia, the methods for consulting and negotiation with the workers and the minimum notice for any termination of employment.

The distribution of the company population by gender and contractual position in 2021 is substantially the same as the previous two years; there are no differences between men and women in executive positions, whilst middle managers and employees are represented 25% and 68% respectively by females.

59%

of the company population is female

OLT employees by gender and position

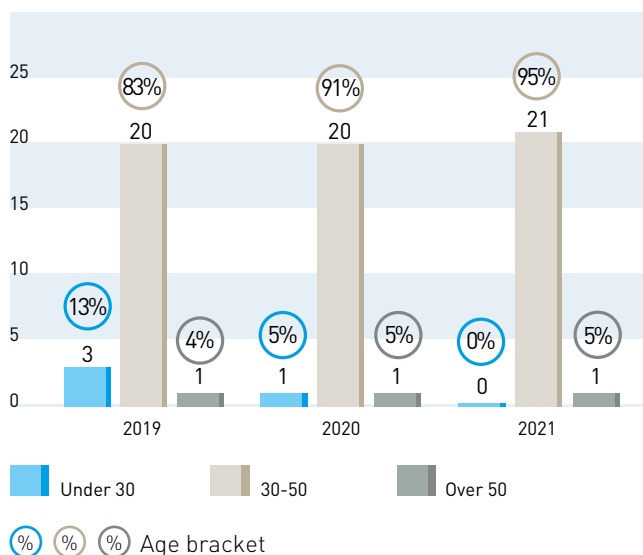


The distribution of the company population by age bracket gives the picture of a young company where executives and middle managers, in 2021 like the previous two years, almost all fall into the age bracket of 30 to 50 years.

95%

of the company population falls into the 30 to 50 age bracket

Employees by age bracket



Among the employees, there is a progressive natural increase in the age of the company population; the 30 to 50 age bracket goes from 78% in 2019 to 88% in 2020 reaching 94% in 2021. At the same time, the over 50 age bracket remains consistent at 6% for all of the three-year period and the under 30 age bracket drops to zero in 2021.

Since 2020, 67% of the members of the Board of Directors have fallen into the 30 to 50 age bracket (83% in 2019); the remaining 33% fall into the over 50 age bracket (17% in 2019).

The end-of-career management, by virtue of the personal profile of the employees and the stance towards consolidation of employment by OLT, has not been evaluated up to now and consequently is not a subject of specific company plans.

An important part of OLT activity is carried out by ECOS, the Terminal's operator responsible for the management of the Terminal. In 2021, ECOS employed 78 operators, of which 72 operating on board and 6 in the offices.

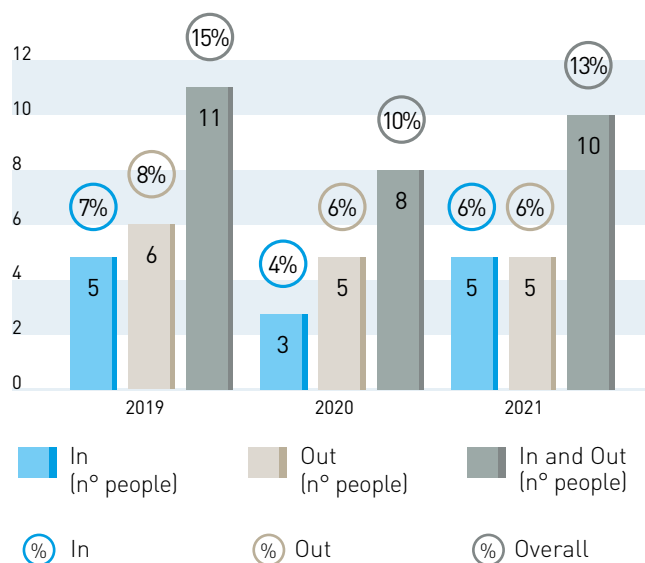
The ECOS employees are engaged with the National Collective Labour Contract for the shipping industry⁴⁸.

In 2021, ECOS recorded the entry of five new resources, of which four in the 18-35 age bracket and one over 46.

At the same time five exits affecting all age brackets were recorded, of which four because of the end of the contract and one because of resignation.

⁴⁸ The enrolment contract in the seafaring sector can be stipulated: for a given trip or several trips; fixed term; open-ended. A further possibility is given by continuity regime (CE - Continuity of Employment), which guarantees open-ended rotation of the enrolment contract and permanence of employment even in periods of leave between each embarkation and the next one.

Ins and Outs in ECOS and turnover rate



Incoming turnover rate: incoming employees/total employees

Outgoing turnover rate: outgoing employees/total employees

Overall turnover rate: incoming and outgoing employees/total employees

The improvement in terms of turnover recorded over the last two years is down to the fact that, starting from 2019, almost all the seafarers went onto a contract under the continuity regime.

The recruitment and terminations in 2021 solely concern male personnel which, even in consideration of the operating sector, i.e. the seafaring one, is the majority of the ECOS workforce.

4.1.2 Protection of work and valuing resources

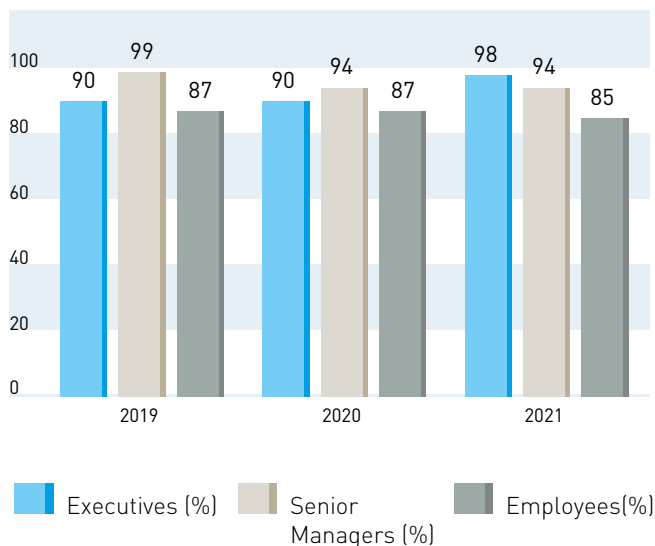
Protection of work respecting diversity

OLT has improvement in the quality of the work environment, the valuing of diversity, the promotion of equal opportunities and the reconciliation of work and life as one of its priority commitments.

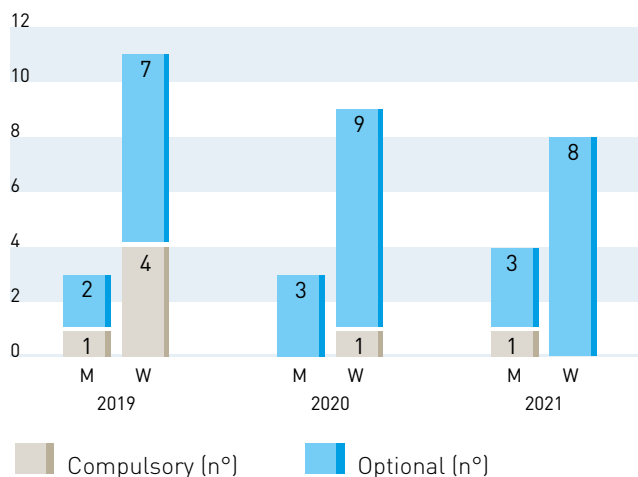
The goal is to make a team to add value to the fruit of individual labour and grow the sense of belonging, creating a common social, cultural, professional and intellectual terrain.

In particular, the Company, by implementing its *Charter of Values* and setting up non-discriminatory procedures and practices, promote a culture based on merit and equality and implements these policies for all its people, without distinction of class, origin, race, gender, political convictions or religion.

Base Salary Women/Base Salary Men



Employees with right to parental leave



The risk of discrimination is constantly monitored and checked according to the SA8000 standard. There were no episodes of discrimination and/or employee claims recorded in the three-year period under consideration.

Payment in line with the provisions of the National Collective Labour Agreements applied and in any case above the “minimum decent pay” calculated by OLT in implementation of the above-mentioned SA8000 standard is guaranteed for everyone, including the new recruits.

In particular, in 2021, in line with the previous years, the gross average pay⁴⁹ was € 53,542 whilst the gross median pay⁵⁰ was € 50,125.

The ratio of the basic pay⁵¹ for women and men by contractual position shows an improvement at executive level and a slight worsening at employee level. Stable, compared to 2020, the values for middle managers.

In the context of parental support, OLT promotes a work environment in which employees feel free to make important family choices knowing that their work position is protected.

In the three years under consideration, all those with the right⁵² made use of compulsory parental leave. In the same period, no interruption of work, for periods over 3 continuous months, due to optional parental leave were recorded.

In 2021, three female employees made use of optional parental leave for short split periods. The data is influenced by the ongoing pandemic which determined greater use of smart working.

None of the employees that ceased employment with OLT in the three-year period under consideration had made use of parental leave in the year before taking the leave.

Given the size of the company and the age of the workers, OLT has not so far implemented supplementary pension plans.

In order to guarantee further recognition of the work of all the employees, be they permanent or fixed term, some benefits have in any case been made available: meal vouchers, parking and professional and out-of-work accident insurance. It should be stressed that converted the paper meal vouchers into electronic meal vouchers during 2021, contributing to dematerialisation and increasing the actual purchasing power of the employees by effect of the acknowledged tax reduction.

Further benefits are made available to employees on open-ended contracts, based on the level: payment of medical expenses, company car, life insurance and permanent sickness benefit.

The company benefits for the employees are maintained throughout parental leave unless strictly connected with presence in the company.

49 Calculated on the Gross Annual Pay - including seniority increases, excluding variable remuneration and overtime.

50 Calculated on the Gross Annual Pay (including seniority increases, excluding variable remuneration and overtime) of all employees except for the individual with the highest pay.

51 Base salary: Minimum fixed amount paid to an employee for the execution of the duties assigned to him/her, excluding any additional pay such as overtime or bonuses.

52 Employees with children under 12, excluding those already affected by compulsory parental leave, are among those that have the right to optional parental leave.

Growth of skills and promotion of a professional culture

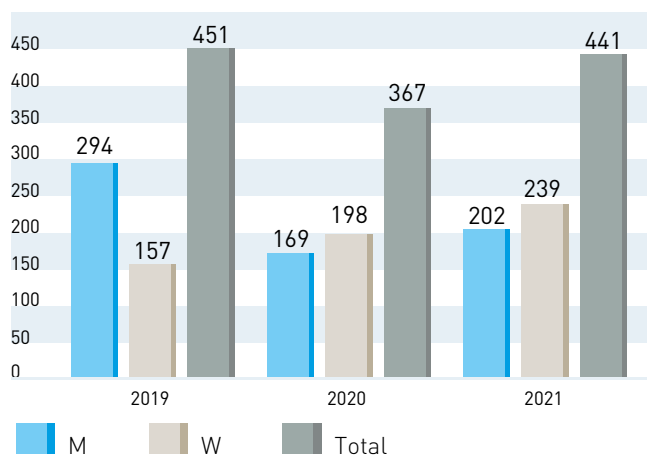
The development of internal skills is for OLT a fundamental element of the agreement between the company and the individual. The purpose of training is the creation of value for people guaranteeing the *employability* of the workers and the chance to have the proper skills, for the present and the future, through the development of the human capital in line with the company strategy taking into account the changes in the market, regulations and technologies.

The valorisation of skills starts right from the *Onboarding* process; in order to guarantee the effective insertion of new employees in OLT, they are provided with all the useful information for understanding the company organisation, their role, the company values and philosophy. The necessary instruction and training paths are therefore delineated on the basis of their actual professionalism and experience.

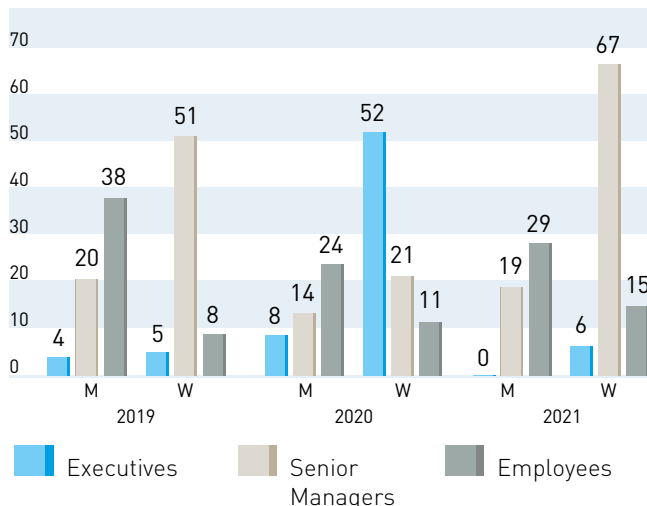
OLT allocates a budget every year for every worker, which is aimed at growing their skills.

441 training hours provided for its employees in 2021
20 average training hours per head in 2021

Hours of training provided by gender



Average hours of training per head by gender and position

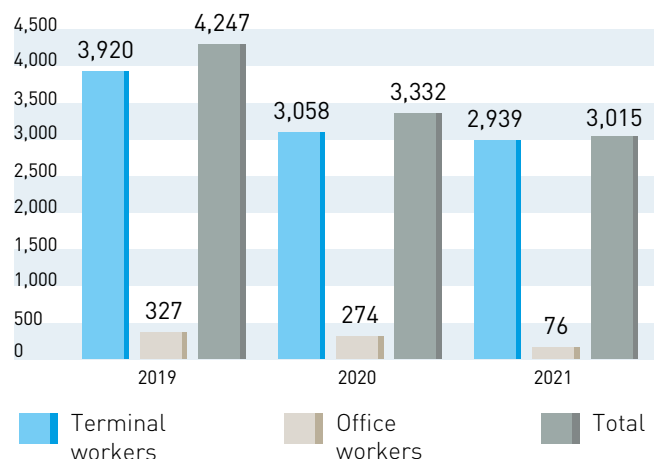


Despite the ongoing pandemic, the training provided returned to the pre-Covid-19 levels in 2021. The professional level that has benefited most from the training opportunities is the middle management one. However, the data varies in different years based on the specific training requirements.

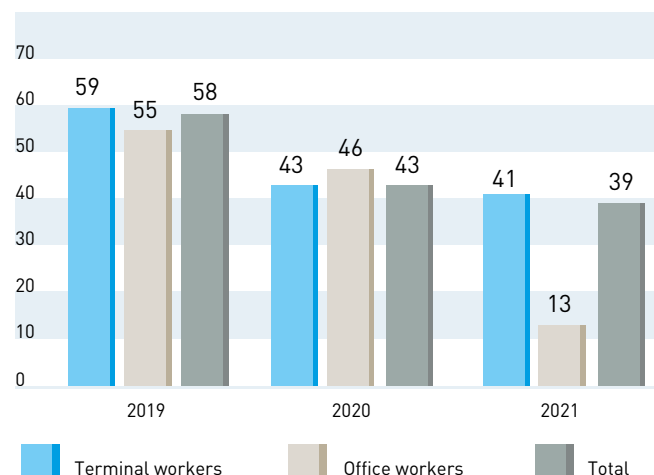
All middle and top managers undergo a periodic formal assessment of their performance and personal development.

Continuous training, with particular regard to that of technical and safety nature, is also very important for the Terminal operators, who are called to manage a strategic infrastructure with the utmost skill and attention possible.

Hours of training, ECOS personnel



Average training per head, ECOS personnel



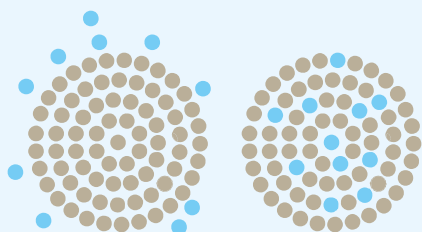
The training of on board personnel is planned and organized according to the Integrated Management System of the Ship Owner and, besides complying with the *Seveso Directive*, also complies with the “*Standards of Training, Certification and Watchkeeping for Seafarers*” (STCW) which govern the mandatory training of seafarers. The STCW courses are carried out at authorized centres that issue certificates after tests have been carried out to verify the learning.

OLT and the Terminal’s operator deal with evaluating what the training needs are for the Terminal and office personnel; the personnel, through the Workers Safety Representative, can propose new training courses based on work and personal needs, personnel shifts, technological innovation and renewal of the training provided for by the standard.

OLT also involves its employees and *outsourcers* in non-compulsory training programmes. In particular, OLT has promoted safety culture and acceptance of diversity over the last two years through two initiatives that aim to give a contribution in terms of safety and inclusion.



Between 2020 and 2021, in the context of the “Leadership in Health and Safety” project, all OLT employees were involved in a training and awareness activity that was extended to the employees of ECOS and Fratelli Neri, as well as to some external collaborators, for the development and consolidation of health and safety in the company, starting from a cultural change.



In 2020, OLT set out an objective aimed at guaranteeing widespread awareness on the issues of “Diversity&Inclusion” to increase the level of awareness through internal surveys, workshops and training and procedural and governance modifications.

In this context, OLT organised an interactive training activity in 2021, which included 2 training webinars; the initiative saw the participation of all the OLT personnel and was extended to the personnel of its main *outsourcers*, ECOS and Fratelli Neri.

4.2 SAFETY AT THE CENTRE OF OLT CULTURE

The culture of safety is an identifying element of OLT, which is committed to the safety of the Terminal and all operations connected with it and the protection of workers, suppliers and local communities.

In order to ensure a safe and healthy work environment and in compliance with the principles of the [Health, Safety, Environment and Quality Policy](#) (*HSEQ Policy*) and the [Prevention of Major Accidents Policy](#) (*MAP Policy*), both OLT and the Terminal’s operator ECOS have adopted an Integrated Management System that complies with requirements of the *ISO 45001 Standard*, UNI 10617⁵³, Italian Legislative Decree 105/15 and the *ISM Code*⁵⁴.

These systems guarantee compliance with the applicable workplace health and safety regulations⁵⁵ and ensure that appropriate measures are adopted to prevent any accidents and mitigate the possible damage associated with the health and safety of the work activities, protecting both OLT and ECOS personnel and, more generally, all the people that work at the Terminal as well as the plant engineering safety, in consideration of the risks of a major accident present on the Terminal.



Industrial safety

The plant was built making use of safe and consolidated technologies and is continuously maintained guaranteeing high levels of safety and reliability. All the safety aspects, both at the design and construction phase and in the operating phase, were and still are subject to verification by the competent Authorities. It should be remembered that the Company, with reference to the activities carried out at the Terminal, is considered the *Plant Operator* under Italian Legislative Decree 105/15, and therefore subject to the provisions regarding plants at risk of a major accident.

⁵³ UNI 10617 defines the requirements for safety management systems in facilities with the danger of a major accident.

⁵⁴ ISM Code: International Safety Management Code.

⁵⁵ For OLT and the ECOS offices, Italian Legislative Decree 81/08 as amended applies, whilst Italian Legislative Decree 271/99 as amended on the health and safety of workers in the maritime sector applies.

In particular, in the current operating phase of the Terminal, OLT and ECOS pursue the culture of prevention putting risk assessment at the basis of their systems and guaranteeing periodic updating in compliance with the applicable regulations. They also implement systematic periodic check programmes which affect all the activities linked to the Terminal, including the activities of other *outsourcers* that provide services for management of the vessels serving the Terminal.

OLT, in its capacity as *Plant Operator*, with reference to the *FSRU Toscana Terminal*, promotes cooperation with the supervisory bodies and competent Authorities to foster knowledge, information exchange and the development of common emergency procedures in compliance with the regulations.

About **150** the emergency tests carried out annually on the Terminal with the involvement of both the on-board personnel and the suppliers present

Both internal and external Emergency and Evacuation Plans are defined and emergency drills involving all personnel are included. From an operational continuity perspective, a crisis team consisting of experts from the company and the outsourcers ECOS and Fratelli Neri has been set up to manage any undesired events capable of affecting not just the Terminal but the company itself and the main outsourcers linked to it. The task of the team is to restore and coordinate operations if a crisis arises, in accordance with the provisions of a suitable "Crisis Management Plan".

The implementation of monitoring and analysis programmes is guaranteed not just for accidents and injuries, but also for near-misses and anomalies and/or potential accidents. More specifically, depending on the gravity of the event, it is analysed using the "Root Cause Analysis" method in order to identify the most suitable solutions for solving the problems that generated it.

The commitment of OLT on safety issues can be found in the results achieved; in the three years under consideration, there have been no spills of hazardous substances or major accidents under Italian Legislative Decree 105/15 on the *FSRU Toscana Terminal* and no deaths have been recorded in OLT personnel or ECOS personnel operating on behalf of OLT.

No accident directly involved OLT personnel between 2019 and 2021, whereas one accident⁵⁶ arose in ECOS in 2020 (accident rate of 8.14 ⁵⁷).

As regards the Terminal suppliers, the first accident occurred in 2021 and this concerned a worker of an ECOS supplier.

The attention to the health, as well as the safety, of its employees and collaboration with occupational physicians has prevented industrial diseases from arising. Moreover, ECOS has carried out an awareness campaign for the proper diet for on board personnel as an initiative to promote health in an occupational context.

0 in 2019
5.9 in 2020
5.5 in 2021
Overall accident rate of OLT, ECOS and suppliers of the Terminal

A further challenge in the reference period was the fight against the Covid-19 pandemic. OLT invested time, money and resources to adopt all the measures to protect the health and safety of its employees and those of the main outsourcers. OLT personnel were able to make use of the smart working mode in order to fight the Covid-19 health emergency, as well as the mitigation measures implemented during work in the office. With reference to the ECOS personnel, all the appropriate precautionary measures were adopted to contain the virus, both for onshore personnel and personnel on board the Terminal, including all the suppliers.

Finally, in the years under consideration OLT received no formal notice for breaches of the law regarding safety issues.

⁵⁶ The same accident led to formal notice to ECOS of an omitted assessment of a risk with the consequent opening and closing of criminal proceedings, which ended with an administrative sanction.

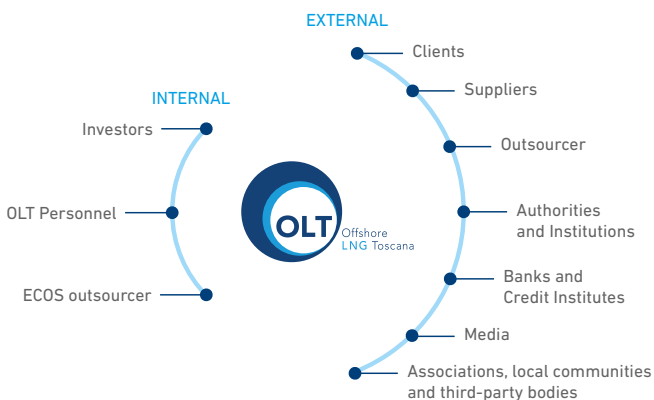
⁵⁷ Recordable workplace accident rate calculated as the ratio between the number of recordable workplace accidents and the number of hours worked parameterized on 1 million hours worked.

4.3 LISTENING, COMMITMENT AND CONSULTATION, INSIDE AND OUTSIDE THE COMPANY

4.3.1 Participation and involvement

From a proactive perspective and in line with its corporate policies, OLT carries out ongoing consultation with its stakeholders, both internal and external, with the aim of developing a constructive comparison and two-way exchange.

The stakeholder network



There are numerous initiatives for listening, consultation and involvement with its stakeholders. The tools and channels used are multiple and different according to the interested parties they are addressed to and the type of relationship that ties them to OLT: from involvement in determining the materiality of the issues to account for in the sustainability report, from the disclosure of the *EMAS Environmental Statement* and the organisation of conferences to the activation of commercial and operating channels.

The involvement and consultation with the reference local authorities are guaranteed, principally, through the service conference mechanisms provided for in the context of the preliminary investigations for authorisation purposes. The issues of most interest to the communities which are linked to the Terminal operations are addressed in this context. Among these, the assessment of the potential impact of the Terminal on the marine ecosystem and atmospheric emissions are subjects that have aroused much interest from the stakeholders and have been considered in great depth right from the design phase. Authorisation prescriptions for the implementation of specific Monitoring Plans have been provided for in relation to these aspects. In particular, the implementation of the twenty-year Marine Monitoring Plan around the Terminal entails significant linked activities on the territory.

Furthermore, environmental compensation measures in favour of the local communities were planned in agreement with the Municipalities of Livorno, Collesalveti and Pisa during the plant's authorisation process. Some have already been completed.



Offset works still open in 2021

Livorno

Contribution to the construction of the “Secche della Meloria” Protected Marine Area Visitor Centre for a value of Euro 400,000 (5% already granted pending definition of the executive project by the Municipal authorities).

Collesalveti

Contribution to the environmental requalification of the Stagno town centre for a value of Euro 420,000; 85% has already been paid out.

The involvement and participation of workers are guaranteed primarily through the periodic meetings provided for by the regulations of health and safety. Employees also regularly attend company meetings and periodic meetings at the Terminal and the offices, with the right of freedom of association and bargaining and the possibility of providing any suggestions for company improvement. OLT gives notice of the company decisions suitably in advance in compliance with current legislation and the requirements of the SA8000 standard.

Moreover, OLT has set up two committees, in compliance with the above-mentioned SA8000 standard, to optimally manage the legal aspects linked to the protection of workers' rights and promote their wellbeing at the workplace.

- **Safety Committee:** consisting of the Workers' Safety Representative, the Prevention and Protection Service Manager and the Workers' SA8000 Representative, its task is to verify and oversee the workers' health and safety requirements under Italian Legislative Decree 81/08;
- **Social Performance Team:** consisting of the Integrated Management System Representative, the Workers' SA8000 Representative and an employee from the HSEQ department, its task is to assess and monitor the company performance with reference to the SA8000 requirements, update the integrated risks assessment on SA8000 issues and draw up an action and improvement plan.

In the context of managing relations with all its stakeholders, OLT has made available channels for requesting information and reporting complaints, also guaranteeing anonymity (e.g. whistleblowing). Reports and complaints, when they arrive, find an adequate response from OLT. It should be stressed that no reports or complaints have been recorded in any context.

In order to guarantee sector-participated development and ongoing consultation with the entities of interest, OLT has also confirmed its participation, in 2021 as well, in a thick network of associations which make the case, at national and international level, for the needs that OLT considers relevant for its business and the sector it operates in; among these Gas Infrastructure Europe (GIE), which deals with issues regarding European policies for the energy sector in particular.

OLT contributes to these category associations by paying the membership fee provided for in their articles of association, participating actively in the preparation of documents drawn up to present the associations' position and being present at the meetings organised by them⁵⁸.



OLT participates actively in different work groups organised by SIGTTO and OCIMF and has representatives in the expert committees and groups. In particular:

SIGTTO:

- Working Group Gas Carrier CO₂ Emissions (Measurement and Reporting of Gas Carrier CO₂ Emissions);
- Working Group LNGC Methane Emissions.

OCIMF:

- Ship-to-Ship Expert Group;
- Ship-to-Shore Interfaces Expert Group;
- Nautical Expert Group;
- Floating Systems Expert Group.

Under the umbrella of these organizations, OLT is an active party in a series of external initiatives for sector progress and sustainable development.

⁵⁸ Ms Venturi, the Institutional Relations, Regulation and Commercial Manager of OLT, was President of Assocostieri from July 2016 to June 2021 and is now a member of the Governing Council.

Initiatives supported in 2021

"VI International Conference & Expo"

international appointment of ConferenzaGNL, to promote the Small Scale LNG chain, in the perspective of energy transition. The sixth edition, in collaboration with WEC Italia, was held in Bologna from 6th to 8th October 2021.

Webinar organised by Canale Energia with the title
"Strategic structures and environmental safety"

Webinar organised by Canale Energia and OLT, with the participation of Edison. Conference title:
"Small Scale LNG, what advantages for ecological transition"

Studio REF-E promoted by Assocostieri, in the context of the
"The Chain of LNG end uses in Italy - 2021" project for the study and updating of data regarding the market, supply chain and regulations on LNG.

OLT also participated in some webinars, with the presence of a speaker, over 2021. These centred on the role of *LNG* in the energy transition and the *Small Scale LNG* service.

Webinar 2021

"Small scale LNG's big opportunities"

organised by LNG Shipping & Terminals, where the SSLNG service that OLT is developing was presented.

Forum with the title **"The role of alternative fuels in the energy transition for the maritime sector"**, organised by Assocostieri and Assarmatori

Online conference organised by ConferenzaGNL, with the title **"The solutions for LNG supply in the Islands"**, where the state of progress in the SSNLG project was presented for OLT

4.3.2 The path of social and economic integration with the community

The Company puts the commitment to manage its business in a concretely responsible manner at the centre of its mission. It is precisely in this perspective that OLT has started a path of integration with the community that welcomed it right from its arrival in the territory.

A path also made credible by the good operation of the infrastructure, just as by the creation of shared value and wellbeing for its people. This has contributed to making the Company and its operations reliable. The Company believes that a company can and must be able to develop on the territory, providing its contribution in supporting the local community when achieving some objectives that it has given itself.

OLT participates in the local economy in different forms, starting from the commitment, taken on right from the start, to look for and select personnel from the territory (of the 2 directors, 1 comes from the District of Livorno).



In 2019, the Company presented a Company Social Responsibility project: “l'Energia del Mare – fare con e per il Territorio” (“The energy of the sea - acting with and for the territory”) with aim of giving coherence to its social and economic operations on the territory, consolidating the relationship with the local communities to develop shared social projects, of interest for the territory of Livorno and Pisa and, at the same time, consistent with its company mission.

This project, started in 2020 and partly developed in 2021, will be brought forward in the years to come.

The project can be broken down into 5 areas of intervention, which concern a series of contexts where the Company has been called upon to provide a contribution, not only socio-economic but also, for example, in sharing its know-how.



ENVIRONMENT To promote responsible and precise policies to protect the ecosystems, reducing the impact of man's activities and disseminating the culture of sustainability.



YOUNG PEOPLE AND TRAINING To invest in young people, research and innovation that lie at the heart of a solid future. The project will include concrete actions to stimulate, support and train the new generations.



SPORT, CULTURE AND SOCIAL To create union in the community by promoting sporting, cultural and social activities. The initiatives aim to amplify the sense of inclusion and stimulate the participation of the company stakeholders.



INFANCY AND HEALTH To support younger children and their families in the difficult moments of their young lives.



WORKERS' HEALTH AND SAFETY To defend workers' health and safety, spreading the culture of safety at work, because it is the workers that make a company a great enterprise.

Several initiatives completed in 2021. Given the emergency situation that the community has had to face in 2020 and 2021, OLT decided to concentrate all its resources to support the social sector and the weakest brackets of the local population, concentrating all the efforts into this sector which had previously been dedicated to different activities of a cultural and sports nature that in some cases have not been carried out or have been carried out in a reduced form because of the restrictions due to the health emergency.



Over 1350 trees planted on Monte Pisano

With the intention of meeting the social needs of the territory that hosts the Terminal, and in synergy with the Tuscany Region and the community of Bosco dei Monti Pisani Onlus, OLT supported operations on the uplands of Monte Pisano, which were seriously damaged by fires in 2018 and 2019. The first project, which saw the planting of over 1350 trees on Monte Pisano, was inaugurated in June 2021. The second project, for Monte Serra, is in the process of being carried out, with planting expected in the Autumn of 2022.

Urban forestation projects in the Municipalities of Livorno and Pisa

OLT is developing 2 urban forestation projects in the Municipalities of Livorno and Pisa together with the benefit company Arbolia. For the first project, over 1600 plants were bedded out in a periurban area of the Municipality of Pisa, with the inauguration held in January 2022. The second project with the Municipality of Livorno is in the process of being defined, the planting of the trees is expected in Autumn 2022.

The urban woodland projects are aimed at promoting concrete action to combat climate change, improve the quality of the area and create green areas for the benefit of the citizens.



Fondazione Caritas Livorno

OLT made a donation to the Fondazione Caritas Livorno, in support of the Villaggio della Carità, which helps the more disadvantaged through different services with the aim of combating poverty (canteen, showers, listening centre, housing support, etc.), a situation that has particularly worsened following the health emergency.

Assonautica Livorno

Always sensitive to the sea as a resource and the world that revolves around it, the Company has made donations, over the years since 2013, to Assonautica Livorno, specifically to support the Sailing School of the association devoted to young, differently abled people who love the sport. The contribution provided by OLT in 2021 has allowed the project to replace an old descent to the sea with a new steel structure with wooden beams to be completed, as well as carrying out other initiatives which had remained unfinished because of the difficult emergency situation.

Toscana Disabili Sport Onlus

OLT also made a donation in 2021 to support the TDS (Tuscany Disabled Sport Non-Profit Organisation) association, which promotes and supports the practice of sport, competitive and not, for the disabled.



Livorno Hospital: child and neonatal emergencies

For some years, also thanks to the donations made by OLT, the hospital of Livorno has been developing a high-fidelity simulation programme for paediatric and neonatal emergencies in which the child is replaced by a sophisticated mannequin able to reproduce with a high degree of fidelity the physiological and vital reactions that the team of doctors and nurses face in real life. To this end, the simulation programme includes the purchase in 2018 of a video laryngoscope, donated by OLT which, together with the high-fidelity mannequin, purchased and donated in 2021 has put the Paediatrics unit in Livorno at the forefront of instrumentation in this field.

VIP Italia Onlus - Clown therapy

From 2018 OLT has decided to support the VIP Italia Onlus Association that promotes volunteer clown therapy in private and public structures as well as in all those places where there is a situation of physical or mental distress. The association, which also operates at Livorno Hospital, also dealt with "alternative" volunteering activities during the pandemic, such as intervention in areas of the city of Livorno characterised by the greatest social hardship.

Porto dei Piccoli Onlus

Since 2013, OLT has supported the "Il Porto dei Piccoli" Association, a NPO which, through its activities, teaches hospitalised children and their families about the culture of the sea.

Unicef

Again in 2021, OLT made a donation to UNICEF over the Christmas period through the purchase of electronic Christmas cards to be sent to its mailing list.



Leadership in Health and Safety

The Company joined the "Leadership in Health and Safety" project of the LHS Foundation in 2020 for the development and consolidation of health and safety values in the organization. The first 2 online workshops were held in 2020. These saw the involvement of OLT employees (top management and some managers) but also those of its main *outsourcers* (ECOS and Fratelli Neri) and external collaborators. The programme continued in 2021 through a "cascading" process, supported by the same managers. It saw the involvement of the rest of the workforce, with interventions aimed at spreading and consolidating the culture of safety in the Company.

APPENDIX: METHODOLOGICAL NOTE

A.1 APPROACH TO REPORTING AND QUALITY PRINCIPLES

The Sustainability Report of OLT Offshore LNG Toscana S.p.A. was drawn up in compliance with “GRI Standards” of the *Global Reporting Initiative* (GRI) for the period 1st January 2021 – 31st December 2021.

In particular, although it is mandatory for information published after 1st January 2023, OLT has decided to draw up the 2021 Sustainability Report by referring to the most recent version of the Universal Standards⁵⁹. Consequently, it used the new information note for the sector “GRI 11: Oil and Gas Sector 2021”, insofar as applicable to its activities, both in the stage of determining the Material Topics and identifying the information to be reported in relation to the issues that were material.

The document was drawn up in accordance with the GRI standards:

- **accuracy:** this methodological note shows, insofar as deemed necessary for the type of information, the references to the standards, hypotheses and calculation methods used. The data shown have been rounded to the third decimal point;
- **balance:** the data are presented so that the users of the report can evaluate the positive and negative performance trends on an annual basis;
- **clarity:** when deemed necessary for a better understanding, a glossary can be consulted and links to external documents have been provided for further consultation. In chapter 1.6 “OLT: today’s results and tomorrow’s commitments” the contribution to achieving the *SDGs* made possible by the improvement initiatives planned by OLT is highlighted. On the other hand, the correlation between the material topics dealt with in the chapter and the *SDGs* linked to the GRI standards dealt with in the same chapter is shown at the start of every chapter, in accordance with the provisions of the document “Linking the *SDGs* and the GRI Standards” dated March 2021;
- **comparability:** the Report, with particular reference to the more significant aspects or ones that show significant deviations in 2021 compared to the previous two years, shows the data for the 2019-2021 three-year period so that the stakeholders can appreciate the changes in the performance of OLT over time. Where necessary for a better understanding, the data are accompanied by pertinent explanatory comments and an indication of the factors and standard conversion protocols applied for compiling and communicating the information;
- **completeness:** the contents of this Report deal with the material issues or the environmental, social and economic aspects that are most significant for the activity of OLT;
- **sustainability context:** the performances of OLT are entered in the broadest sustainability and business context including scenario information in relation to the main material issues dealt with;
- **timeliness:** the report takes into consideration events occurring after 31st December 2021 which may be significant for the stakeholders’ assessment of the performance of OLT. The Report is expected to be published annually no later than the first half-year of the year after the reporting period;
- **verifiability:** the data and information in the Report were collected through a formalised process which involved all the different company structures for the areas in their remit. They were called upon to validate the contents of the document before final approval by the Managing Directors.

As in previous years, OLT has also decided to submit the document for auditing by an independent third party body this year, the declaration which is shown in the annexed “Assurance Statement”.

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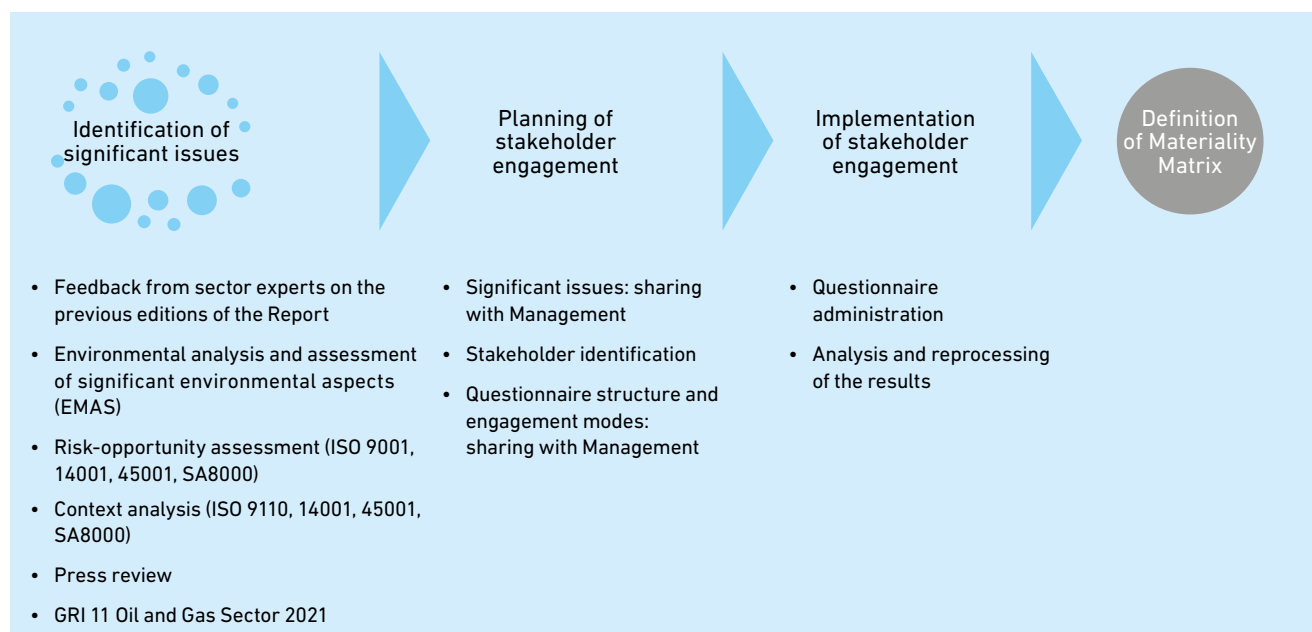
⁵⁹ Available on 5th October 2021.

A.2 MATERIALITY ANALYSIS

The materiality analysis is the tool through which OLT annually defines and reviews the universe of significant issues and the list of material issues on which to concentrate the reporting.

In 2021, the Company updated the materiality analysis to ensure consistency with the provisions of the new Universal Standards and the evolution of the reference context.

The different phases of the updating process for the materiality analysis and the results have been approved by the Managing Directors.



The issues identified as significant by OLT were put to the attention of a representative sample of stakeholders⁶⁰ in order to gather information useful for determining their materiality.

Significant Issues

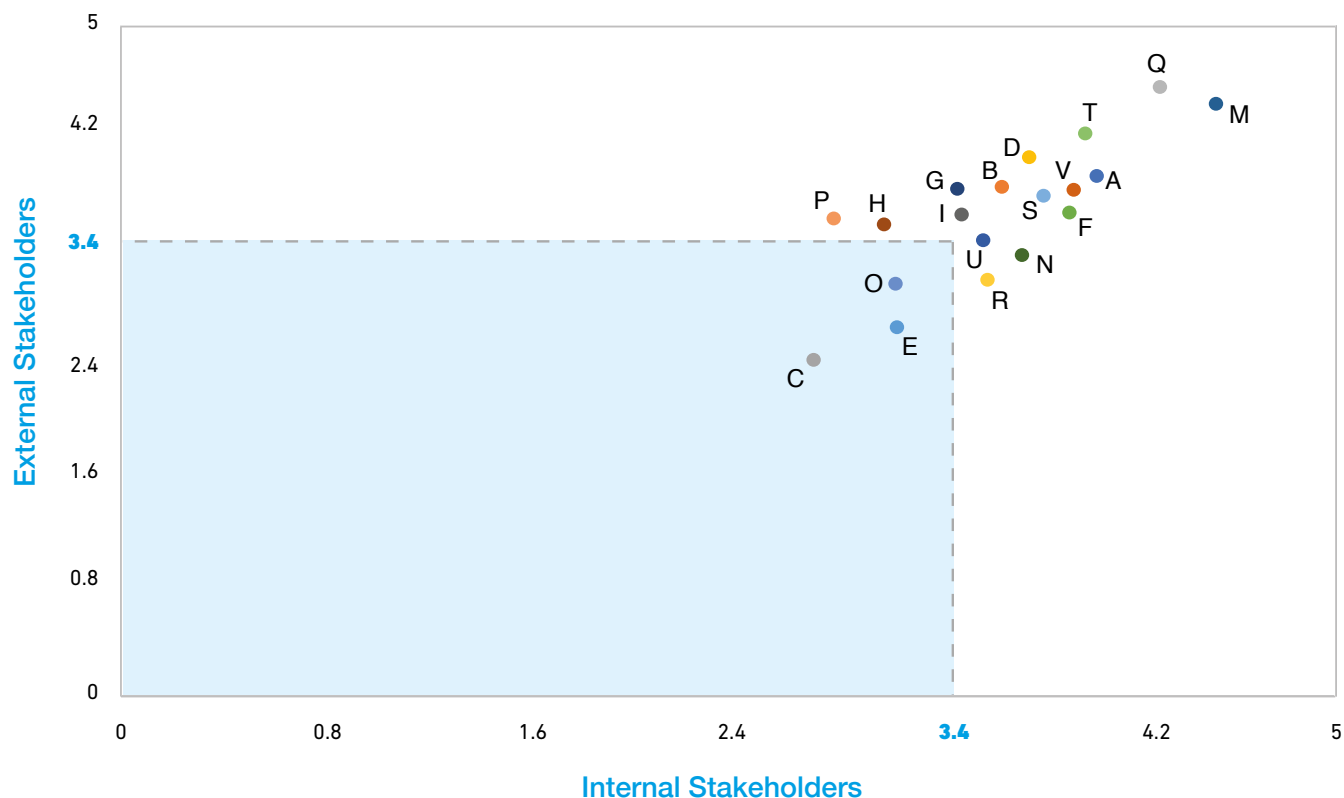
GOVERNANCE	MARKET	ENVIRONMENT	PEOPLE
<ul style="list-style-type: none"> • Ethics and Integrity compliance, corruption, competition • Ethics and integrity Financial flows with Public Administration and lobbying • Approach to risk management 	<ul style="list-style-type: none"> • LNG market and energy transition • Economic impacts • Quality of the Service 	<ul style="list-style-type: none"> • Environmental Protection Air Quality • Environmental Protection Energy Consumption • Environmental Protection Water Resource • Environmental Protection Waste Management • Rights on the land and resources • Effects on the biodiversity • Fight against climate change 	<ul style="list-style-type: none"> • Diversity and Equal Opportunity • Commitment for the communities • Health and safety for people • Asset integrity and incident management • Occupational practices and protection of work • Security and conflict management • Decommissioning and restoration

In particular, the stakeholders were called upon to assess the significance, also in terms of respect for human rights, of the 20 issues identified by OLT, giving a score to each of them on a scale of between 1 (barely significant) and 5 (extremely significant).

⁶⁰ In the scope of the context analysis provided for by the Integrated Management System and in compliance with the reference ISO standards, OLT has identified 9 categories of interested parties: Investors, Customers, Employees, Outsourcers, Suppliers, Associations, Banks and Credit Institutions, Control Authorities, Media. In the stakeholder engagement process carried out in 2021 to update the Materiality Analysis, the Control Authorities and the Media were not directly involved. For the first, it was considered that the materiality assessment could be inferred from the authorisation orders of which OLT is the holder. On the other hand, with reference to the media, it was considered that reference could be made to the analysis of the press review conducted in the material issue identification phase.

The results of the engagement activity allowed the material issues to be identified for accounting purposes as those issues which, based on the assessment of the internal and external stakeholders consulted, were positioned on values above 3.4.

Material Issues



- | | |
|---------------------------------------------------|------------------------------------------------------------------------------------|
| A ● Fight against climate change | N ● Occupational practices and protection of work |
| B ● Effects on the biodiversity | O ● Security and conflict management |
| C ● Rights on the land and resources | P ● Decommissioning and restoration |
| D ● Environmental Protection - Waste Management | Q ● LNG market and energy transition |
| E ● Environmental Protection - Water Resource | R ● Economic impacts |
| F ● Environmental Protection - Air Quality | S ● Quality of the Service |
| G ● Environmental Protection - Energy Consumption | T ● Ethics and Integrity - compliance, corruption, competition |
| H ● Diversity and Equal Opportunities | U ● Ethics and Integrity - Financial flows with Public Administration and lobbying |
| I ● Commitment for the communities | V ● Approach to risk management |
| L ● Health and safety for people | |
| M ● Asset integrity and incident management | |

Compared to the Material Topics of 2020, and apart from some groupings or changes of names, three new issues emerged, whereas, unlike 2020, the issues connected with water resources were not significant and were therefore not taken into consideration in this Report.

However, anyone interested in going into this subject in depth may refer to the [Environmental Statement](#).

Material Topics 2020	Material Topics 2021
-	Quality of the Service NEW
-	Ethics and Integrity - Financial flows with Public Administration and lobbying NEW
-	Decommissioning and restoration NEW
Environmental targets achieved and set	LNG market and energy transition
Emissions into the air - greenhouse gas (GHG) emissions	Fight against climate change
Energy consumption by energy source	Environmental Protection - Air Quality
Consumption of fossil fuels	Environmental Protection - Energy Consumption
Production and concentration of wastes	Environmental Protection - Waste Management
Effects on the biodiversity	Effects on the biodiversity
Equal opportunities and equal pay policies	Diversity and Equal Opportunity
Number of direct and indirect workers	Occupational practices and protection of work
Training	Health and safety for people
Safety (including emergency drills)	Asset integrity and incident management
Policies for the local communities	Commitment for the communities
Indirect economic impacts	Economic impacts
Investment for the environment and research and development	
Origin of purchases	
Compliance with environmental aspects, Claims - Disputes on environmental aspects	Ethics and Integrity - compliance, corruption, competition
Certifications (for social and safety questions)	Approach to risk management
Certification in the environmental field	
Seawater withdrawals	-
Effluents (chlorine concentration and thermal delta)	

A.3 REPORT BOUNDARIES

The reporting scope varies according to the significance of the issues. In particular:

- only the environmental aspects regarding the Terminal are considered for the environmental issues as the environmental aspects connected with the office activities are considered negligible;
- with reference to the information linked to personnel management, in particular for accidents, training and contracts applied, the boundary is extended to include ECOS, the main *outsourcer* of OLT and Terminal's operator;
- for issues related to governance and ones of an economic nature, OLT is considered as the company in its entirety, along the lines of the Financial Statements.

A.4 STANDARDS, HYPOTHESES AND CALCULATION METHODS USED

Energy consumption

The data for the energy consumed within the Organisation only takes into account the electricity consumption at the Terminal. The electricity consumption linked to the offices for lighting and heating is in fact considered negligible compared to the consumption of the Terminal (< 1%).

The data for the consumption of natural gas derive from the plant meters (gas chromatograph and flow meters) which provide the annual accumulated value in GJ based on the *Lower Calorific Value* (LCV) of the NG metered.

The data for the consumption of MGO are shown in tons and converted into GJ using the LCV value of 42.873 GJ/Ton (source ISPRA: UNFCCC national inventory - table of standard national parameter - coefficients used for the inventory of CO₂ emissions in the UNFCCC national inventory - average values for the years 2018-2020).

The expected reduction in energy consumption connected with the programme to replace the Terminal's lighting units was calculated by relating the consumption of the new lamps from the technical data sheets, about 664 MWh/year, with the annual consumption for 2019, 70,079 MWh.

The expected energy consumption connected with a new design for the seawater pumps was obtained by relating the annual energy savings calculated by the supplier of the pump modifications, about 665 MWh/year, with the annual energy consumption for 2019, 70,079 MWh.

Climate-changing emissions

In compliance with framework 2 of the Oil & Gas Methane Partnership (OGMP), the following were included in the calculation of the direct CO₂ emissions:

- the values for the CO₂ emitted by the fumes from the boilers and the minor utilities, which represent the main contribution, calculated according to the methodology provided by the *Emission Trading System*;
- the *fugitive emissions* (unconveyed emissions) calculated in accordance with *IEA Decree* the for the Terminal and following the reference standards: UNI EN 15446, EPA 453/R95, EPA Method 21, ISPRA protocol nf 0018712 as amended;
- the *vent* emissions, i.e. conveyed emissions emitted by the Terminal's venting system through emergency or maintenance/anomaly, calculated on the basis of the plant's operating parameters in compliance with the *IEA Decree*;
- the pneumatic emissions from gas chromatograph vents (very small emissions) calculated taking into consideration the design and hours of use;
- the emissions deriving from unburnt boiler fuel, calculated on the basis of direct measurement of the VOC in the continuous monitoring system.

The 100 years *Global Warming Potential* (GWP) values used for converting CO₂ and CH₄ emissions into CO₂eq are respectively CO₂ = 1; CH₄ = 28 (Source: Vth IPPC Report - GHG Protocol).

The indirect CO₂eq emissions are calculated on the basis of the characteristics of the vessels and the fuel consumption.

Air quality

Emission factors were not used to obtain data for the NOX, CO and Particles emissions, but reference is made to the data measured at the stack.

The values are calculated by adding up the total contributions of the two boilers in all operating conditions - normal operating conditions (i.e. burning NG in the boiler), non-normal operating conditions (i.e. burning MGO in boiler) and *transits* (boilers with load below the technical minimum or in dual fuel condition).

A.5 GRI CONTENT INDEX

OLT Sustainability Report has been performed in compliance with the Global Reporting Initiative (GRI) Standard referring to the period 1st January 2021 - 31st December 2021

Reporting principles 2021 (GRI 1)

Applicable industry standards: Oil and Gas sector 2021 (GRI 11)

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
GENERAL INFO				
The Organization and its reporting practices				
2-1 Organizational details	1.1 Who is OLT			
2-2 Entities included in the organization's sustainability reporting	A.3 Report boundaries			
2-3 Reporting period, frequency and contact point	A.1 Approach to reporting and quality principles			
2-4 Restatements of information	2.4.2 Partnership with suppliers A.1 Approach to reporting and quality principles			
2-5 External assurance	A.1 Approach to reporting and quality principles Assurance			
2-6 Activities, value chain and other business relationships	1.2 Governance and organisational structure 2.2 The Services offered 2.2.1 The Regasification Service 2.2.2 The Emergency Services set up by the MITE 2.2.3 The Small Scale LNG Service 2.4.2 Partnership with suppliers			
Activities and employees				
2-7 Employees	4.1.1 The OLT team			
2-8 Workers who are not employees	4.1.1 The OLT team			
Governance				
2-9 Governance structure and composition	1.2 Governance and organisational structure			
2-10 Nomination and selection of the highest governance body	1.2 Governance and organisational structure			
2-11 Chair of the highest governance body	1.2 Governance and organisational structure			
2-12 Role of the highest governance body in overseeing the management of impacts	1.2. Governance and organisational structure 1.3 The fundamental points of OLT A.1 Approach to reporting and quality principles A.2 Materiality analysis			
2-13 Delegation of responsibility for managing impacts	1.2 Governance and organisational structure			
2-14 Role of the highest governance body in sustainability reporting	A.1 Approach to reporting and quality principles A.2 Materiality analysis			
2-15 Conflicts of interest	1.2 Governance and organisational structure			
2-16 Communication of critical concerns	1.3 The fundamental points of OLT 4.3.1 Participation and involvement			
2-17 Collective knowledge of the highest governance body	1.2 Governance and organisational structure			
2-18 Evaluation of the performance of the highest governance body	1.2 Governance and organisational structure			
2-19 Remuneration policies	1.2 Governance and organisational structure			
2-20 Process to determine remuneration	1.2 Governance and organisational structure 4.1.2 Protection of work and valuing resources			
2-21 Annual total compensation ratio	4.1.2 Protection of work and valuing resources			

GRI 2: General Disclosure 2021

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
GENERAL INFO				
Strategy, policies and practices				
	2-22 Statement on sustainable development strategy	Stakeholder letter 1.6 OLT: today's results and tomorrow's commitments		
	2-23 Policy commitments	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations		
	2-24 Embedding policy commitments	1.3 The fundamental points of OLT		
	2-25 Processes to remediate negative impacts	2.3 The quality of the service offered 4.3.1 Participation and involvement		
	2-26 Mechanisms for seeking advice and raising concerns	1.3 The fundamental points of OLT 4.3.1 Participation and involvement		
	2-27 Compliance with laws and regulations	1.4 Compliance with laws and regulations 4.2 Safety at the centre of OLT culture		
	2-28 Membership associations	4.3.1 Participation and involvement		
Stakeholder engagement				
	2-29 Approach to stakeholder engagement	2.3 The quality of the service offered 4.3.1 Participation and involvement A.2 Materiality analysis		
	2-30 Collective bargaining agreements	4.1.1 The OLT team		
MATERIAL TOPICS				
GRI 3: Material Topics 2021	3-1 Process to determine material topics	4.3.1 Participation and involvement A.2 Materiality analysis		
	3-2 List of material topics	A.2 Materiality analysis		
Service quality		Ability to ensure a safe, efficient and reliable service over time, in compliance with the principles of competition and equal treatment and access to infrastructures.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments 2.2.The Services offered 2.2.1 The Regasification Service 2.2.2 The Emergency Services set up by the MiTE 2.2.3 The Small Scale LNG Service 2.3 The quality of the service offered		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	2.3 The quality of the service offered		
Ethics and Integrity - financial flows with the Public Administration and lobbying		Transparency regarding financial flows with the Public Administration and participation in the development of public policies.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 2.4.1 Our contribution to growth 4.3.1 Partnership with suppliers		11.21.1 11.22.1
	201-1 Direct economic value generated and distributed	2.4.1 Our contribution to growth		11.21.2
GRI 201: Economic Performance 2016	201-4 Financial assistance received from government	2.4.1 Our contribution to growth		11.21.3

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
GRI 207: Tax 2019	207-1 Approach to tax	2.4.1 Our contribution to growth		11.21.4
	207-2 Tax governance, control, and risk management	1.5 Risk management 2.4.1 Our contribution to growth		11.21.5
	207-3 Stakeholder engagement and management of concerns related to tax	1.5 Risk management 2.4.1 Our contribution to growth		11.21.6
	207-4 Country-by-country reporting		207-4 Not applicable: OLT's only tax residence is Italy	11.21.7
GRI 415: Public Policy 2016	415-1 Political contributions	2.4.1 Our contribution to growth		11.22.2
GRI 11: Oil and Gas Sector 2021	11.21 Payments to governments		11.21.8 Gas purchased by the State or by third parties appointed by the State Not applicable: OLT offers a service, does not buy or sell gas	11.21.8
Decommissioning and restoration		Approach to the management of issues related to the disposal of the Terminal in terms of impacts on the local community and workers level.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 3.2 Attention to biodiversity 4.1.1 The OLT team 4.3.1 Participation and involvement		11.7.1
GRI 402: Labor/ Management Relations 2016	402-1 Minimum notice periods regarding operational changes	4.1.1 The OLT team 4.3.1 Participation and involvement		11.7.2
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	4.1.2 Protection of work and valuing resources		11.7.3
GRI 11: Oil and Gas Sector 2021	11.7 Closure and rehabilitation	3.2 Attention to biodiversity	11.7.4 Operating sites closed, in the process of being closed, with decommissioning plans in place; 11.7.5 Disused structures left on site Not applicable: OLT has a single operational site in operation and has no decommissioned structures	11.7.4 11.7.5 11.7.6
LNG market and energy transition		Strategy in relation to the transition to a low carbon economy considering the LNG market.		
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder letter 1.3 The fundamental points of OLT 1.6 OLT: today's results and tomorrow's commitments 2.1 The LNG market and energy transition 2.2.3 The Small Scale LNG Service Chapter 3 - OLT FOR THE ENVIRONMENT 4.3.1 Participation and involvement		11.2.1
GRI 203: Indirect Economic Impacts 2016	"203-1 Infrastructure investments and services supported"	2.2.3 The Small Scale LNG Service		11.14.4
	203-2 Significant indirect economic impacts	2.1 The LNG market and energy transition 2.2.3 The Small Scale LNG Service 2.4.1 Our contribution to growth		11.14.5
GRI 11: Oil and Gas Sector 2021	11.2 Climate adaptation, resilience, and transition		11.2.4 The organization's approach to developing public policy and lobbying on climate change Not available: The necessary activities have started to define, by 2023, the road map for the reduction of climate-changing emissions	11.2.4
Fight against climate change		Management of GHG emissions produced directly by the Terminal or indirectly by the support services to the Terminal itself and strategies for the future.		
GRI 3: Material Topics 2021	3-3 Management of material topics	Stakeholder letter 1.3.The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments 2.1 The LNG market and energy transition 2.2.3 The Small Scale LNG Service Chapter 3 - OLT FOR THE ENVIRONMENT 3.1.2 Climate-changing emissions 4.3.1 Participation and involvement		11.1.1 11.2.1

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
MATERIAL TOPICS				
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities due to climate change	1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments 2.2.3 The Small Scale LNG Service	201-2 Information related to the risks associated with climate change and related aspects. Not available: the activities necessary to define, by 2023, the road map for the reduction of climate-changing emissions, including risk assessment	11.2.2
GRI 305: Emissions 2016	305-1 GHG direct emissions (Scope 1)	3.1.2 Climate-changing emissions A.4 Standards, hypotheses and calculation methods used		11.1.5
	305-2 Indirect GHG emissions from energy consumption (Scope 2)		305-2 Indirect GHG emissions from energy consumption (Scope 2) Not applicable: with the exception of energy consumption related to the activity of the offices, considered negligible, there are no indirect emissions related to the supply of energy	11.1.6
	305-3 Other indirect GHG emissions (Scope 3)	3.1.2 Climate-changing emissions A.4 Standards, hypotheses and calculation methods use		11.1.7
	305-4 GHG emissions intensity	3.1.2 Climate-changing emissions A.4 Standards, hypotheses and calculation methods use		11.1.8
	305-5 Reduction of GHG emissions	3.1.2 Climate-changing emissions 4.3.2 The path of social and economic integration with the community A.4 Standards, hypotheses and calculation methods used		11.2.3
Environmental protection - Air quality		Management of the Terminal's atmospheric emissions and monitoring systems		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management Chapter 3 - OLT FOR THE ENVIRONMENT 3.3.1 Air quality 4.3.1 Participation and involvement		11.3.1
GRI 305: Emissions 2016	305-7 Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	3.3.1 Air quality A.4 Standards, hypotheses and calculation methods used		11.3.2
Environmental protection - Energy consumption		Management of energy consumption related to the Terminal and improvement programs.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management Chapter 3 - OLT FOR THE ENVIRONMENT 3.1.1 Energy consumption 4.3.1 Participation and involvement		
GRI 302: Energy 2016	302-1 Energy consumption within the Organization	3.1.1 Energy consumption A.4 Standards, hypotheses and calculation methods use		11.1.2
	302-2 Energy consumption outside of the Organization	3.1.1 Energy consumption A.4 Standards, hypotheses and calculation methods used		11.1.3
	302-3 Energy intensity	3.1.1 Energy consumption A.4 Standards, hypotheses and calculation methods used		11.1.4
	302-4 Reduction of energy consumption	1.6 OLT: today's results and tomorrow's commitments 3.1.1 Energy consumption A.4 Standards, hypotheses and calculation methods used		
Environmental protection - Waste management		Management of waste produced by the Terminal and control tools.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments Chapter 3 - OLT FOR THE ENVIRONMENT 3.3.2 Attention in waste management		11.5.1

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	3.3.2 Attention in waste management		11.5.2
	306-2 Management of significant waste-related impacts	1.6 OLT: today's results and tomorrow's commitments 3.3.2 Attention in waste management		11.5.3
	306-3 Waste generated	3.3.2 Attention in waste management		11.5.4
	306-4 Waste diverted from disposal	3.3.2 Attention in waste management		11.5.5
	306-5 Waste directed to disposal	3.3.2. Attention in waste management		11.5.6
Effects on the biodiversity		Management of activities in compliance with the principle of biodiversity protection, with particular reference to the marine environment, and monitoring systems.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management Chapter 3 - OLT FOR THE ENVIRONMENT 3.2 Attention to biodiversity		11.4.1
GRI 304: Biodiversity 2016	304-1 Operational sites owned, leased, managed in (or adjacent to) protected areas and areas of high biodiversity value outside protected areas	3.2 Attention to biodiversity		11.4.2
	304-2 Significant impacts of activities, products and services on biodiversity	3.2 Attention to biodiversity		11.4.3
	304-3 Habitats protected or restored	3.2 Attention to biodiversity		11.4.4
	304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	3.2. Attention to biodiversity		11.4.5
Diversity and equal opportunities		Contribution to the dissemination of an inclusive corporate culture, enhancement of diversity and the fight against discrimination oriented.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments Chapter 4 - OLT FOR PEOPLE 4.1.1 The OLT team 4.1.2 Protection of work and valuing resources 4.3.1 Participation and involvement		11.11.1 11.13.1
GRI 202: Market Presence 2016	202-1 Ratios of standard entry level wage by gender compared to local minimum wage		202-1 Ratio between the standard wage for new employees and the local minimum wage Confidentiality constraint: given the number of employees present, providing this data would be contrary to the protection of employee privacy	
GRI 401: Employment 2016	401-3 Parental leave	4.1.2 Protection of work and valuing resources		11.11.3
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	4.1.2 Protection of work and valuing resources		
	404-2 Programs for upgrading employee skills and transition assistance programs	4.1.2 Protection of work and valuing resources	404-2 Transition assistance programs provided to facilitate work continuity and end-of-work management due to retirement or termination of employment Not applicable: OLT has not provided the implementation of transition assistance programs to facilitate work continuity and the management of the end of the work path due to the age of the workers and the employment relationship stabilization policy adopted to date	
	404-3 Percentage of employees receiving regular performance and career development reviews	4.1.2 Protection of work and valuing resources		

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
MATERIAL TOPICS				
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	1.2 Governance and organisational structure 4.1.1 The OLT team		11.11.4
	405-2 Ratio of basic salary and remuneration of women to men	4.1.2 Protection of work and valuing resources		11.11.5
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	4.1.2 Protection of work and valuing resources		11.11.6
GRI 407: Freedom of Association and Collective Bargaining 2016	407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	2.4.2 Partnership with suppliers		11.13.2
Employment practices and job protection		OLT approach for job creation by guaranteeing employment conditions that respect the principles of human rights and fundamental rights at work.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management Chapter 4 - OLT FOR PEOPLE		11.10.1 11.12.1
	401-1 New employee hires and employee turnover	4.1.1 The OLT team		11.10.2
GRI 401: Employment 2016	401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	4.1.2 Protection of work and valuing resources		11.10.3
	401-3 Parental leave	4.1.2 Protection of work and valuing resources		11.10.4
GRI 402: Labor/Management Relations 2016	402-1 Minimum notice periods regarding operational changes	4.1.1 The OLT team		11.10.5
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	4.1.2 Protection of work and valuing resources		11.10.6 11.11.7
	404-2 Programs for upgrading employee skills and transition assistance programs	4.1.2 Protection of work and valuing resources		11.10.7
	404-3 Percentage of employees receiving regular performance and career development reviews	4.1.2 Protection of work and valuing resources		
GRI 408: Child Labor 2016	408-1 Operations and suppliers at significant risk for incidents of child labor	2.4.2. Partnership with suppliers		
GRI 409: Forced or Compulsory Labor 2016	409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	2.4.2 Partnership with suppliers		11.12.2
Health & Safety for personnel		OLT approach to ensure healthy and safe working conditions.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4. Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments Chapter 4 - OLT FOR PEOPLE		11.9.1

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	1.3 The fundamental points of OLT 4.2 Safety at the centre of OLT culture		11.9.2
	403-2 Hazard identification, risk assessment, and incident investigation	1.3 The fundamental points of OLT 1.5 Risk management 4.2 Safety at the centre of OLT culture 4.3.1 Participation and involvement		11.9.3
	403-3 Occupational health services	4.2 Safety at the centre of OLT culture		11.9.4
	403-4 Worker participation, consultation, and communication on occupational health and safety	1.3 The fundamental points of OLT 4.2 Safety at the centre of OLT culture 4.3.1 Participation and involvement 4.3.2 The path of social and economic integration with the community		11.9.5
	403-5 Worker training on occupational health and safety	4.1.2 Protection of work and valuing resources 4.2 Safety at the centre of OLT culture		11.9.6
	403-6 Promotion of worker health	4.1.2 Protection of work and valuing resources 4.2 Safety at the centre of OLT culture		11.9.7
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	4.1.2 Protection of work and valuing resources 4.2 Safety at the centre of OLT culture		11.9.8
	403-8 Workers covered by an occupational health and safety management system	4.2 Safety at the centre of OLT culture		11.9.9
	403-9 Work-related injuries	4.2 Safety at the centre of OLT culture		11.9.10
	403-10 Work-related ill health	4.2 Safety at the centre of OLT culture		11.9.11
Asset integrity and incident management		Approach adopted by OLT to ensure the prevention of accidents related to the operation of the plants.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments Chapter 4 - OLT FOR PEOPLE		11.8.1
GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment and incident investigation	1.3 The fundamental points of OLT 4.2 Safety at the centre of OLT culture		
	403-5 Worker training on occupational health and safety	4.1.2 Protection of work and valuing resources		
GRI 416: Customer Health and Safety 2016	416-1 Assessment of the health and safety impacts of product and service categories	4.2 Safety at the centre of OLT culture		
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	4.2 Safety at the centre of OLT culture		
GRI 11: Oil and Gas Sector 2021	11.8 Asset integrity and critical incident management	4.2 Safety at the centre of OLT culture	11.8.4 additional industry information for organizations with oil sands mining operations Not Applicable: OLT does not carry out oil sands extraction operations	11.8.2 11.8.3 11.8.4

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
MATERIAL TOPICS				
Commitment to communities		Contribution of OLT to the social and cultural development of the host community.		
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter 4 - OLT FOR PEOPLE		11.15.1
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments and development programs	4.3.1 Participation and involvement 4.3.2 The path of social and economic integration with the community		11.15.2
	413-2 Operations with significant actual and potential negative impacts on local communities	Chapter 4 - OLT FOR PEOPLE 4.3.1 Participation and involvement 4.3.2 The path of social and economic integration with the community		11.15.3
GRI 11: Oil and Gas Sector 2021	11.15 Local communities	4.3.1 Participation and involvement 4.3.2 The path of social and economic integration with the community		11.15.4
Economical impacts		Economic repercussions, at local, national and global level, related to the activities of OLT.		
GRI 3: Material Topics 2021	3-3 Management of material topics	2.4.1 Our contribution to growth		11.14.1
GRI 201: Economic Performance 2016	201-1 Direct economic value generated and distributed	2.4.1 Our contribution to growth		11.14.2
	201-3 Defined benefit plan obligations and other retirement plans	4.1.2 Protection of work and valuing resources		
GRI 202: Market Presence 2016	202-2 Proportion of senior management hired from the local community (%)	4.3.1 Participation and involvement		11.11.2 11.14.3
	203-1 Infrastructure investments and services supported	2.2.3 The Small Scale LNG Service 2.4.1 Our contribution to growth		11.14.4
GRI 203: Indirect Economic Impacts 2016	203-2 Significant indirect economic impacts	2.4.2 Partnership with suppliers		11.14.5
	204-1 Proportion of spending on local suppliers (%)	2.4.2 Partnership with suppliers		11.14.6
Ethics and integrity - compliance, corruption, competition		Control mechanisms aimed at guaranteeing the conduct of the business with integrity, transparency and legality, promoting ethically correct behavior and in compliance with current legislation.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management		11.19.1 11.20.1
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	1.5 Risk management		11.20.2
	205-2 Communication and training about anti-corruption policies and procedures	1.3 The fundamental points of OLT		11.20.3
	205-3 Confirmed incidents of corruption and actions taken	1.4 Compliance with laws and regulations		11.20.4
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust and monopoly practices	1.4 Compliance with laws and regulations		11.19.2
GRI 11: Oil and Gas Sector 2021	11.20 Anti-corruption	1.1.1 The Shareholders		11.20.5
		2.2.1 The Regasification Service		11.20.6

GRI STANDARD	INFO	PLACE	OMISSIONS	INDUSTRY STANDARD GRI
Risk management approach		Approach to the identification, analysis and management of risks as a contribution to the protection and growth of corporate value by preventing or minimizing adverse effects and ensuring an effective allocation of resources and the optimization of operational efficiency.		
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fundamental points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management		
	414-1 New suppliers that were screened using social criteria	2.4.2 Partnership with suppliers		11.10.8 11.12.3
GRI 414: Supplier Social Assessment 2016	414-2 Negative social impacts in the supply chain and actions taken	2.4.2 Partnership with suppliers		11.10.9
ITEM IDENTIFICATION APPLICABLE FOR GRI SECTOR STANDARDS (NOT MATERIAL TOPICS)				
ITEM		EXPLANATION		
GRI 11: Oil and Gas sector 2021				
11.6 Water and effluents		From the materiality analysis, the impacts of OLT's activities on the water matrix were non-material. These impacts are attributable to the water discharges into the sea of the Terminal. Anyone interested in an in-depth study of these topics can refer to the Environmental Declaration.		
11.16 Land and resource rights		From the materiality analysis, the aspects related to land rights and resources were found to be non-material. Community rights to use, manage and control land, fisheries, forests and other natural resources are not compromised by OLT's business.		
11.17 Rights of indigenous peoples		OLT operates only in Italy and does not generate impacts on indigenous peoples as defined by Convention n. 169/1989 on Indigenous and Tribal Peoples (International Labor Organization - ILO).		
11.18 Conflict and security		OLT does not operate in conflict areas.		

PREPARED BY

OLT Offshore LNG Toscana
in partnership with Cogitek

CONCEPT & DESIGN

Verdesi and Partners
Marconi Communication

LAYOUT

Marconi Communication

RELEASED

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