

# SUSTAINABILITY REPORT

2023





## LETTER TO THE STAKEHOLDERS

Dear readers,

even in 2023, Liquefied Natural Gas has continued to be at the core of public debate, nationally and internationally.

As a company operating in the energy sector, we have worked hard to offer a service in line with market needs and make a contribution to the country's energy security.

In 2023, as in previous years, we reached 100% of capacity by continuing the positive trend also in terms of reducing emissions and improving social and economic performance.

Our commitment to sustainability, in the round, is reflected in a responsible approach to business management. Especially in our business sector, safety is a central and indispensable element to follow a path that is concretely sustainable.

For this reason, during the past year we wanted to share our vision of safety with all suppliers, as the development of the FSRU Toscana terminal finds its strength in teamwork.

In 2024, the Terminal's operations will be reduced compared to previous years due to extraordinary maintenance intervention. A necessary activity that will allow us to return to our full operation even more ready to meet the challenges of the energy sector, always with full respect for safety and the environment.

**Giovanni Giorgi**  
*Managing Director OLT*

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# HIGHLIGHTS 2023

## Governance



**15** audits on OLT

**15** audits on Outsourcing

**No breach** of laws and regulations in the three-year period

**No episode of corruption and no legal action**

for anti-competition or antitrust conduct and monopolistic practices in the three-year period

## OLT for the market



**~ 6%** the coverage of the national gas demand guaranteed by OLT

**3,671,519,338 Sm<sup>3</sup>** of Natural Gas injected into the network

**100%** the allocation of regasification capacity in Gas Year 2023/2024

**~ 5 billion Sm<sup>3</sup>** the maximum authorized annual regasification capacity

**Over 21 million euros** of investments for technical improvements  
and extraordinary maintenance in 2023

**157 million euros** the economic value generated, 65% of which redistributed



## OLT for the environment



**853 tons of CO<sub>2</sub>eq** the Terminal's emissions reduced compared to 2019

**- 29%** the Guardian Vessel's CO<sub>2</sub> emissions compared to 2019

## OLT for people



**Zero injuries** in OLT and on the FSRU Toscana terminal

**52%** female presence in the company population

**616** training hours provided for its employees → average **25** hours per capita



# **OLT OFFSHORE LNG TOSCANA**

**1**

# 1 OLT OFFSHORE LNG TOSCANA

## 1.1 WHO IS OLT

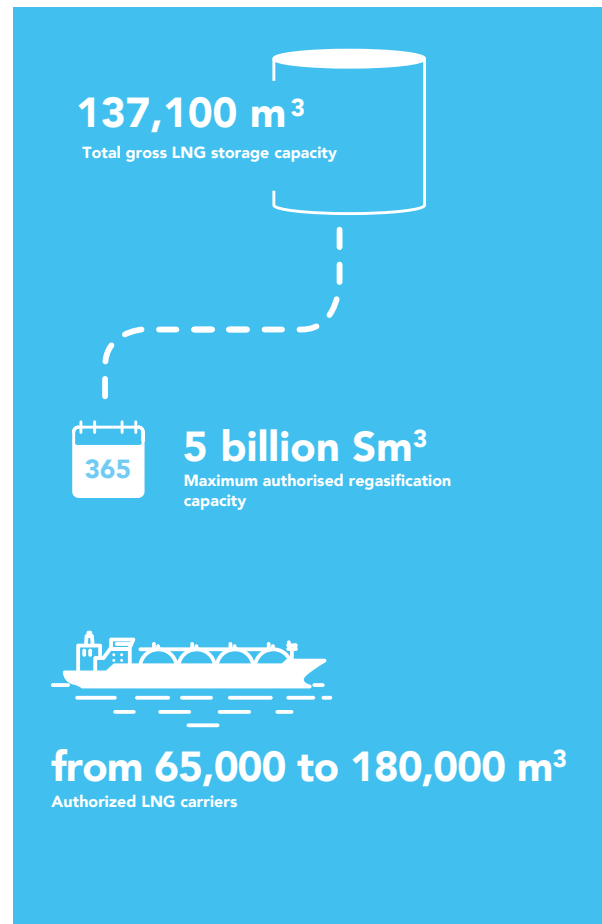
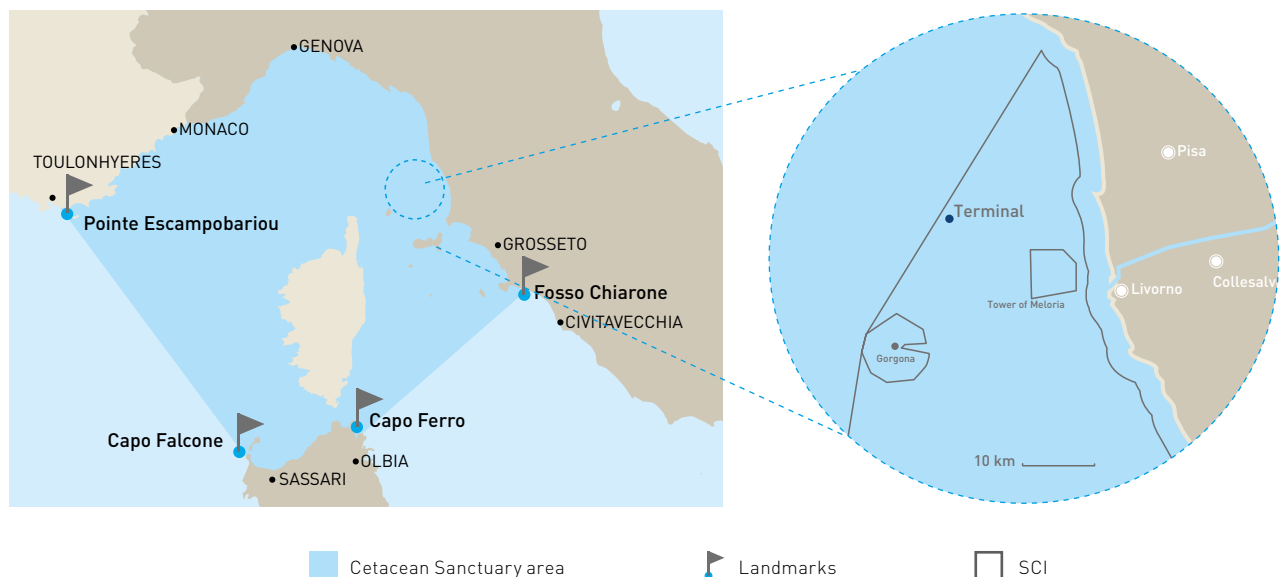
OLT Offshore LNG Toscana S.p.A. operates in the energy sector. Without ever deviating from its own responsibilities, OLT puts the safety of people and the area at the centre of its operations, guaranteeing the full environmental, social and economic sustainability of its operations.

The FSRU<sup>1</sup> 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 22<sup>2</sup> km off the coast between Livorno and Pisa<sup>3</sup> and connected to the Snam's 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 6% of the national requirement covered<sup>4</sup>.

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, Livorno, where it is present with one of its operational offices.

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



<sup>1</sup> Floating Storage and Regasification Unit (floating unit used for regasification and storage activities of LNG).  
<sup>2</sup> Corresponding to 12 nautical miles.  
<sup>3</sup> The Terminal, and its state property area of 286,551 m², fall inside a Site of Community Importance (SCI) dedicated to the protection of the dolphin species (Tursiops truncatus) classified as "almost endangered" in the Red List of the World Union for the Conservation of Nature (IUCN) and the protected marine area known as the "Cetacean Sanctuary".  
<sup>4</sup> Italian gas consumption in 2023 amounted to 61.5 billion Sm³ (Source: Ministry of Environment and Energy Security - Department of Energy - DGIS).

# 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.

## 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%

## Igneo Infrastructure Partners

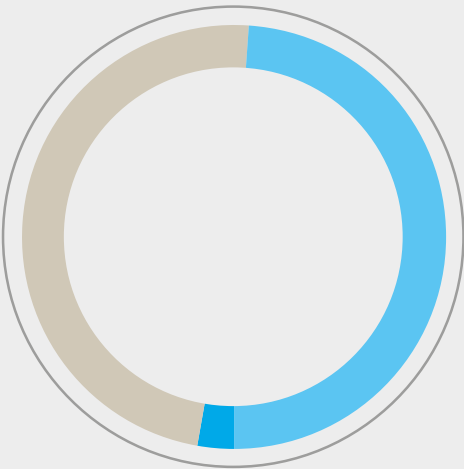
Global asset manager and experienced owner of utility businesses across Europe, Australia, New Zealand and the US.

48.24%

## Golar LNG

Shipping company engaged in the acquisition, operation and chartering of LNG carriers, FLNG<sup>5</sup> and FSRU, with over 30 years of experience.

2.69%

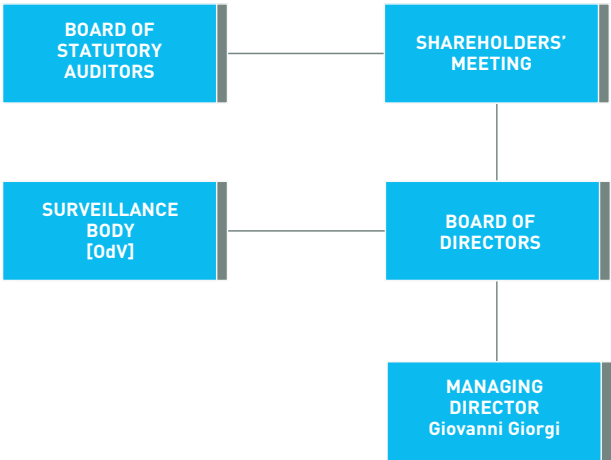


OLT is not subject to the management and coordination, nor to control by the shareholders.

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 virtue of its role as operator of the National Gas Pipeline Network and that these services are provided at rates that are regulated by the Italian Regulatory Authority for Energy, Networks and Environment (ARERA).

# 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. An external auditing company is responsible for the accounting control. Furthermore, having adopted an [Organization, Management and Control Model](#) pursuant to Italian Legislative Decree 231/2001<sup>6</sup>, OLT has appointed a Surveillance Body. The Board of Directors and the Board of Statutory Auditors are informed about the activities carried out, the general performance of operations, and the expected development of operations. They are also informed about transactions carried out by the Company that, due to their size or characteristics, are of greater economic, financial, and asset importance. In particular, the Managing Director reports at meetings of the Board of Directors. In addition, the setting of the remuneration of executives and employees falls under the powers of the Managing Director whereas the remuneration of the members of the Board of Directors is determined by the Shareholders, since a Remuneration Committee has not been established.



## Shareholders' Meeting

The Shareholders' Meeting resolves on the matters reserved to its competence by the law or by the company's By-Laws. 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.

<sup>5</sup> Floating Liquefied Natural Gas: LNG production and storage unit.  
<sup>6</sup> Legislative Decree 231/2001 establishes the administrative liability of the Organization for crimes committed by Directors, Managers and / or Employees in the interest or to the advantage of the Organization itself.

Board of Directors

The current Board of Directors, appointed on July 1, 2022 by the Shareholders' Meeting in accordance with the company's By-Laws<sup>7</sup>, consists of 7 directors including the Chairman<sup>8</sup>, appointed by the same Board, and an independent Managing Director<sup>9</sup>.

7 Advisors



The Managing Director, who has not assigned powers to other employees, is entrusted with the direct management of the Company. The Managing Director is the “Independent Manager” within the meaning of the Integrated Functional Unbundling Code (*IFUC*) and has the right to express a binding opinion for all decisions of the Board of Directors, concerning management and organizational aspects relating to the regasification activity carried out by the Company and the related impacts, as well as for the approval of the development plan of the regasification terminal managed by the same and for all sustainability issues<sup>10</sup>. The Board of Directors has entrusted the management of the Company to the General Manager, also appointing him as Managing Director. The recognition of the additional portion of the General Manager's remuneration is subject to the achievement of objectives, including sustainability objectives, defined annually. The Board of Directors shall express an independent assessment of the degree to which these objectives have been achieved by the Managing Director/ General Manager. The Directors may be re-elected and remain in office for no more than 3 financial years, meaning 3 years, according to the decisions of the Shareholders' Meeting, and cease their office, unless otherwise provided for by law, on the day of the shareholders' meeting convened to approve the Company's financial statements for the last year of their mandate. The term of office of the current Board of Directors is going to expire in April 2025.

Board of Statutory Auditors

It consists of 3 members, besides 2 substitute auditors, the Board of Statutory Auditors was appointed by the Shareholders' Meeting on April 20, 2021 and its term of office expired with the Shareholders' Meeting convened to approve the financial statements as at December 31, 2023. The renewal by the Shareholders' Meeting will take place by April 30, 2024.

3 members



2 alternate auditors



It oversees compliance with the law and the By-Laws, with the principles of proper administration and the adequacy of the organisational, administrative and accounting structure and its actual operation.

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 *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.

Surveillance Body

Consisting of 3 members external to the corporate structure and endowed with autonomous powers of initiative and control, it was appointed pursuant to the Italian Legislative Decree 231/2001 by the Board of Directors on March 11, 2021. Its term was renewed for a further 3 years on March 13, 2024 by the Board of Directors.

3 members



The Supervisory Board is entrusted with the supervision of the functioning, effectiveness and observance of the Model stated in the above-mentioned Decree, as well as its updating

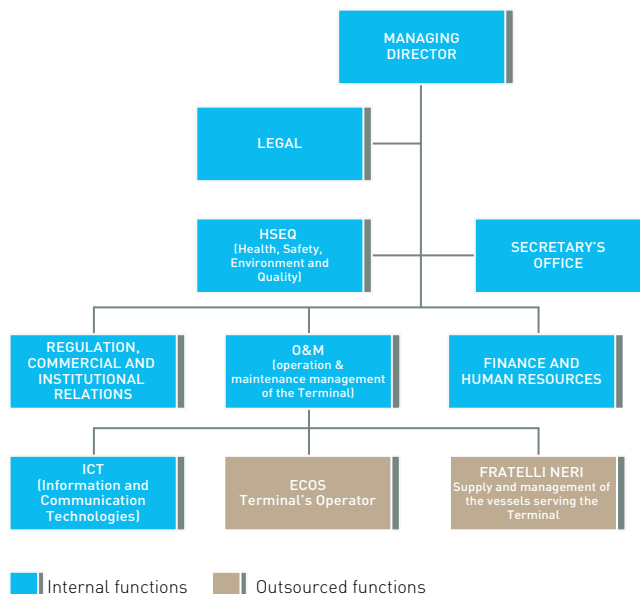
<sup>7</sup> The current By-Laws was approved on July 1, 2022.  
<sup>8</sup> The Chairman of the Board of Directors does not hold operational roles in OLT.  
<sup>9</sup> The Company was governed until June 30, 2022 by two Managing Directors appointed by the Board of Directors and who were jointly entrusted with the day-to-day administration of the company.  
<sup>10</sup> The presence of an independent Managing Director is the main measure to mitigate the risk of transactions with third parties in situations of conflict of interest. At present, there are no forms of disclosure to interested parties of any conflict of interest situations.

## Organisational structure

The Managing Director is supported by an organisational structure consisting of executives, middle management 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.

The additional share of compensation subject to the achievement of objectives, including sustainability ones, defined annually, is also recognized for executives and middle managers.

In addition to internal functions, the Company has chosen to rely on the support and collaboration of some of the most important operators in the sector for the operation of the Terminal: the company **ECOS**<sup>11</sup> is responsible for the operational management and fitting of the Terminal, whilst the company **Fratelli Neri**<sup>12</sup> manages the vessels serving the Terminal and provides the crew for them. In particular, the ECOS company is structured, like all shipping companies, with maritime and land-based personnel, respectively with operational roles<sup>13</sup> in the management of the Terminal and office roles such as technical support (including environmental and safety issues), logistics and administration.



## 1.3 THE FIXED POINTS OF OLT

### Policy and Certification

Commitment to continuous improvement of its processes and services, dialogue with all stakeholders and compliance with applicable laws and the principles set forth in the International Conventions in defence of human and labour rights 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 [HSEQ Policy](#) (Health, Safety, Environment and Quality Policy) and the [MAP Policy](#) (Major Accident Prevention Policy), which are implemented in the Organisational Model 231 and the Integrated Management System adopted by OLT in compliance with Italian Legislative Decree 105/2015<sup>14</sup> and certified on the basis of international standards.



Quality Management System



Environmental Management System



Company Social Accountability



Worker's Health and Safety Management System



The policies and documents defined in the context of the Integrated Management System<sup>15</sup>, 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.

<sup>11</sup> 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, a group operating in LNG transportation worldwide and Snam, one of the world's leading energy infrastructure companies.

<sup>12</sup> A leading company based in Livorno, part of the Neri Group, which has been operating in the Mediterranean and its various maritime sites for over 120 years.

<sup>13</sup> In addition to the Terminal Manager who has full responsibility for all activities that take place onboard the Terminal, the crew includes deck personnel who manage the regasification process, watch services, and maintenance activities in the deck areas; engine crew dedicated to the operation and maintenance of equipment in the engine room such as power generation plants; and crew and kitchen personnel.

<sup>14</sup> Italian Legislative Decree 105/2015 - Implementation of Directive 2012/18/EU (Seveso Directive) for the control of the danger of major accidents connected with hazardous substances.

<sup>15</sup> 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 the marketing of the regasification service.

### Model 231

In line with its company policies, aimed at safeguarding the legality and ethics in commercial relations and with its employees and workers, OLT has adopted an [Organisational, Management and Control Model](#) in compliance with Italian Legislative Decree 231/2001 also in order to provide a guarantee, to all stakeholders, to operate with the aim of preventing serious irregularities of criminal nature in the conduct of its business activities.

Model 231 - of which the [Code of Ethics](#) is an integral part - identifies the activities exposed to the risk of committing the crimes included in the aforementioned Decree, including issues connected with corruption and tax crimes, as well as crimes about the health, safety and the environment and dictates the main rules of conduct and control activities defined in order to prevent or impede those crimes being committed.

Model 231 is periodically updated<sup>16</sup>, based on the evolution of regulatory and organizational developments of reference and distributed to all the interested parties.

For the Model's efficacy, OLT ensures the correct disclosure and knowledge of the rules of behavior contained therein to the resources already present in the company and those to be included, with different degree of detail in relation to the different level of involvement of those resources in activities at risk. Even in the case of significant changes and / or updates to the Model, OLT provides focused insights to the knowledge of the amendments occurred, working under the supervision of the Supervisory Board that oversees its activities.

All OLT employees, including the Managing Director and the main top management functions, have received training on Model 231 and on anti-corruption.

The 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 to prevent any possible retaliation or discrimination. It should be stressed that no reports of illegitimate behavior have been recorded during the three-year period.

## 1.4 COMPLIANCE WITH LAWS AND REGULATIONS

OLT's activity is subject to a regulatory framework articulated both from the point of view of the market<sup>17</sup> and about the applicable environmental and safety legislation.

From an environmental point of view, the Terminal is subject to various procedures for assessing environmental impacts and authorization prescribed by Legislative Decree 152/2006 and subsequent amendments<sup>18</sup> and from the point of view of safety, due to the quantities of hazardous substances on board, to the application of Legislative Decree 105/2015 relating to the control of the danger of major accidents related to dangerous substances.

As part of the management approach adopted and in compliance with the provisions of the applicable legislation and the authorization measures in place, OLT implements a

monitoring and control plan that allows to constantly verify the state of compliance with environmental requirements as well as safety aspects.

The adoption of a structured and periodic first, second and third-party audit program, which involves not only OLT but also its outsourcers, further guarantees the monitoring of compliance with regulatory obligations and the effective functioning of the Integrated Management System and business processes. In 2023, there were 15 audits<sup>19</sup> at OLT and 15 at outsourcers.

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.

<sup>16</sup> On June 26, 2023, the Board of Directors approved the last update of Model 231.

<sup>17</sup> The regasification activity is one of the activities subject to regulation by ARERA, which defines the tariff and the criteria for access to the Terminal.

<sup>18</sup> Italian Legislative Decree 152/2006 – Consolidated Environmental Act.

<sup>19</sup> Including one inspection under Seveso Directive (Italian Legislative Decree 105/2015) and one under environmental regulations (EIA Decree, Italian Legislative Decree 152/2006).

# 1.5 RISK MANAGEMENT

Risk is a potential imbalance that can produce change; the quality of this change is given by the ability of an organisation to foresee 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.

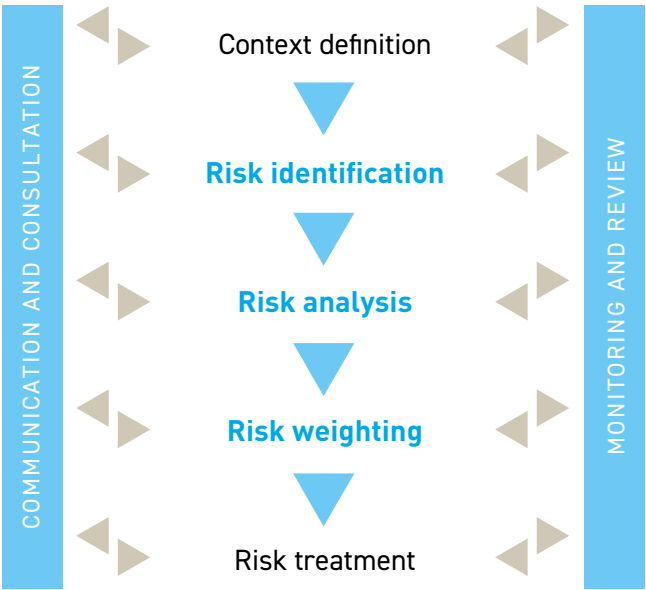
The approach to risk management is the set of rules, procedures and organisational structures aimed at allowing the main company risks being identified, measured and managed.

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.

Risk assessment process and identification of treatment

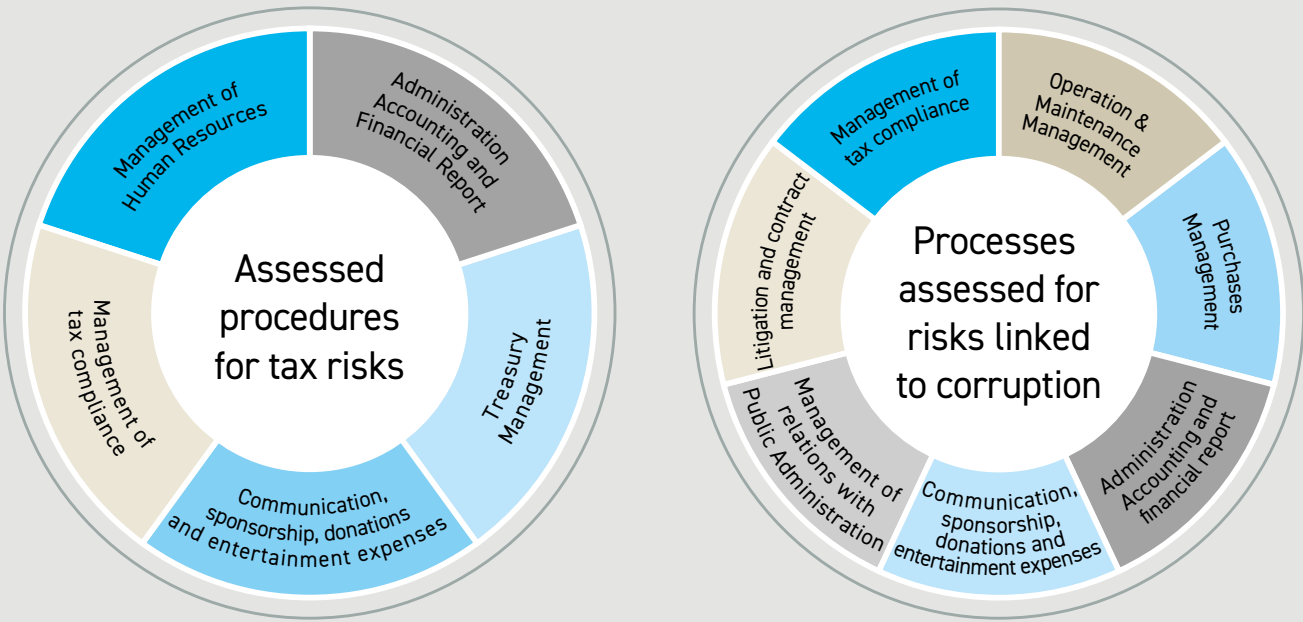


Therefore, the control tools implemented for their management and any action plans provided for the treatment of the residual risk in order to bring it to levels considered acceptable are identified for each type of risk.

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 is, and will be in the coming years, involved in the reduction of GHG (Greenhouse Gas) emissions produced during the normal activity of the plant and, in this regard, is considering short- and medium-term solutions to perform this target<sup>20</sup>.

The evaluation of OLT's performance in terms of reducing climate-changing emissions is one of the objectives assigned to management. As part of this pathway, activities have been developed in 2022 and 2023 that form the basis for defining the road map towards the reduction of GHG emissions.

To date, the financial implications for OLT due to climate change, in addition to the investments related to the modifications required by the Small Scale LNG project, which will contribute to the reduction of GHG emissions on a global scale, can be counted about 268,000 euros of costs incurred between 2022 and 2023<sup>21</sup> for activities related to the development of a project related to the reduction of GHGs from the Terminal, including a climate change risk analysis, prepared according to the *TCFD* report<sup>22</sup>. This project included the study of various solutions and technologies applicable to the nature of the Terminal, offering a shortlist of potentially feasible solutions in the short, medium and long term.

Unfortunately, because of the need for the Terminal to undergo extraordinary maintenance in the shipyard in 2024, the company will have to reschedule some of the decarbonization initiatives studied, through a review of the project timeline and its general reformulation.

<sup>20</sup> Refer to Section 1.6 for strategic and non-strategic goals.

<sup>21</sup> 250,000 euros in 2022 and 18,000 euros in 2023.

<sup>22</sup> Task Force on Climate-related Financial Disclosures.

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

## 1.6.1 ESG Framework








OLT's strategy is aimed at sustainable growth in line with the *Sustainable Development Goals (SDGs)*, the Millennium Development Goals defined by the United Nations. Although they mainly target governments, the *SDGs* are designed to engage as many organizations as possible and address to sustainable development, through a common frame of reference and global aspirations.









According to that belief, in 2023 OLT developed a framework that, from the identification of its impacts and materiality analysis, would lead it in the process of aligning its strategies with the *SDGs* and support it in measuring and managing its contributions to the achievement of the goals.

This framework was adopted as an operational tool for setting and monitoring concrete targets based on shared priorities.

### SUSTAINABLE DEVELOPMENT GOALS



SDGs	OBJECTIVE	ACTION	TARGET	ACHIEVEMENT
ENVIRONMENT (E)				
CONTRIBUTION TO CLIMATE CHANGE				
	Reduction in direct emissions (Scope 1) of CO <sub>2</sub> (baseline 2019)	Replacement of the FSRU Toscana terminal's lighting units with induction or high energy efficiency lamps	-0.47%	2024
		Seawater pump energy efficiency	-0.47%	2025
		Reduction in NG emissions through LDAR program	-0.12%	2027
DEPLETION OF ENERGY RESOURCES				
	Reduction in energy consumption (baseline 2019)	Replacement of the FSRU Toscana terminal's lighting units with induction or high energy efficiency lamps	-0.95%	2024
		Seawater pump energy efficiency	-0.95%	2025
CONTRIBUTION TO NATIONAL CLIMATE CHANGE POLICY-MAKING				
	Climate change policies and implementation of improvements resulting from risk assessment	1. Decarbonization plan: a) Feasibility studies b) Development of a decarbonization plan c) Internal communication and sharing of the results of the plan of GHG reduction d) External communication of the CO <sub>2</sub> reduction initiatives, decarbonization plan, and technological innovation initiatives e) Environmental policy update  2. Improvement plan to achieve: a) OGMP 2.1 Framework level 4 b) OGMP 2.1 Framework level 5	100% of scheduled actions	2026
PROTECTION AND SAFEGUARD OF NATURAL HERITAGE and IMPACTS ON BIODIVERSITY				
  	Support for Natural Heritage and Biodiversity	Green&Blue (CSR): environmental requalification projects	≥ 20,000 €	Annual target
SOCIAL (S)				
INJURIES				
	Zero Injuries	a) Increase safety culture through dedicated projects b) Carry-out specific training on health, safety and environment	Zero injuries	Annual target

SDGs	OBJECTIVE	ACTION	TARGET	ACHIEVEMENT
<b>IMPACT ON COMMUNITY HEALTH AND SAFETY</b>				
	Zero accidents	a) Training b) Increase safety culture c) Maintain a structured management system through verification of appropriate audit programs	Zero accidents	Annual target
	Planning improvements pursuant to Italian Legislative Decree 105/2015	a) Safety-specific training b) Identification of critical equipment as a result of modifications c) Implementation of improvements resulting from assessment of aging equipment d) Inspection of Passive Fire Protection paint e) Implementation of an instruction for change control and pre-start up	100% of scheduled actions	2024
	Support for Childhood and Health	Curiamo il futuro (CSR): projects, sponsorships and donations	≥ 10,000 €	Annual target
	Support for community safety	Codice Bianco (CSR): projects, sponsorships and donations	≥ 10,000 €	Annual target
<b>SKILLS DEVELOPMENT and CONTRIBUTION TO GROWTH</b>				
 	Support for innovation research and training	Open Lab Talent (CSR): projects, sponsorships and donations	≥ 15,000 €	Annual target
<b>CONTRIBUTION TO COMBAT POVERTY and SKILLS DEVELOPMENT</b>				
 	Support for the community (sport, culture and social welfare)	Gioco di Squadra (CSR): projects, sponsorships and donations	≥ 30,000 €	Annual target
<b>GOVERNANCE (G)</b>				
<b>CONTRIBUTION TO THE DIVERSIFICATION OF GAS SUPPLY SOURCES AND NATIONAL ENERGY SECURITY and CONTRIBUTION TO NATIONAL CLIMATE CHANGE POLICY - MAKING</b>				
  	Increase the Terminal's operation	Maximization grid injection: a) Capacity increase test for setting new capacity associated with a discharge slot b) Offer the capacity increase associated with slots already allocated and offer capacity not yet allocated with larger size slots	84% NG injected into the grid/ Maximum authorized capacity	2028
	Ensure the quality of service	a) Maintain an efficient service and in accordance with the regasification code. b) Annually monitor the level of Terminal User satisfaction with OLT's services, especially with regard to commercial services, and implement any actions resulting from such monitoring	≥ 4 Average overall rating expressed by Users on a scale of 1 to 5	2024
		Maintain an efficient infrastructure (O&M and ECOS): ensure high compliance between nominated quantities and actual regasified quantities	≤ 0.17% MWh of NG purchased at balancing/MWh injected in the year (regasified)	Annual target

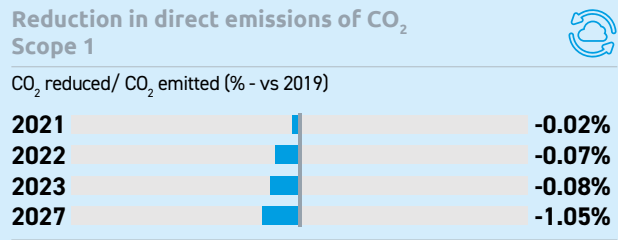
### 1.6.2 From the ESG Framework to the ESG Scorecard

OLT has defined its ESG Scorecard as a tool for monitoring corporate objectives on sustainability issues and a method of immediate and transparent communication of performance data. The ESG Scorecard, while being anchored to the sustainability issues considered material and, therefore, to the strategic goals, it also represents a performance snapshot on some sustainability issues or impacts that, even though they cannot be considered material, are part of OLT's DNA.

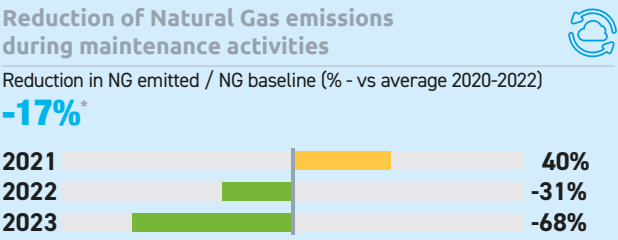


### ENVIRONMENT (E)

#### CONTRIBUTION TO CLIMATE CHANGE



The expected reduction value for 2027 (-1.05%) is pursued through three actions: lamp replacement (-0.47%), seawater pump energy efficiency (-0.47%), LDAR program (-0.12%). The contribution of reductions achieved between 2021 and 2023 is exclusively attributable to the LDAR program as the other modifications are in the process of being completed as scheduled.



In 2021, there was no reduction in NG emissions but an increase from baseline. The fluctuating performance trend is due to the five-year tank inspections that require the release of NG into the atmosphere.

Achieved target    Not achieved target    In progress    \* Target to be achieved annually

## DEPLETION OF ENERGY RESOURCES



### Reduction in energy consumption



MWh not consumed/Total MWh (% - vs 2019)

2027  -1.9%

The expected reduction value for 2027 (-1.9%) is pursued through two actions: lamp replacement (-0.95%), seawater pump energy efficiency (-0.95%). Monitoring of the results of the two actions in terms of consumption reduction is planned from 2024.

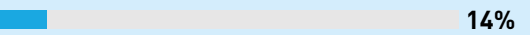
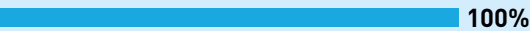
## CONTRIBUTION TO NATIONAL CLIMATE CHANGE POLICY - MAKING



### Climate change policies and implementation of improvements resulting from risk assessment



Actions taken/Actions planned (%)

2023  14%  
2026  100%

Monitoring has been started since 2023.

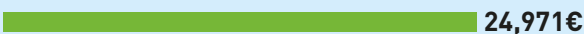
## PROTECTION AND SAFEGUARD OF NATURAL HERITAGE AND IMPACTS ON BIODIVERSITY



### Support for Natural Heritage and Biodiversity (Green&Blue – CSR)



≥ 20,000 €\*

2023  24,971€

Monitoring has been started since 2023.

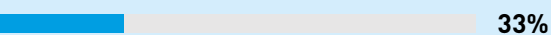
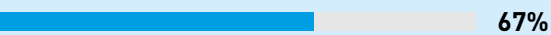
## WASTE PRODUCTION




### Support for the ministerial campaign "Plasticfree"




Actions taken/Actions planned (%)

2021  33%  
2022  67%  
2023  100%

 Achieved target

 Not achieved target

 In progress

\* Target to be achieved annually

SOCIAL (S)

INJURIES



Zero injuries



n° of injuries/1,000,000 hours worked of OLT, ECOS and Terminal subcontractors

0\*

2021 NO INJURIES  
2022 5.5  
2023 NO INJURIES

INJURIES - IMPACT ON COMMUNITY HEALTH AND SAFETY - SKILLS DEVELOPMENT

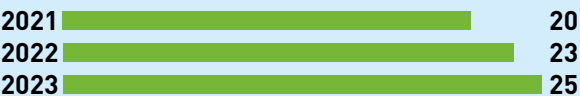


Increase corporate awareness for OLT



Hours of training attended per year/n° of employees per year

≥ 20\*

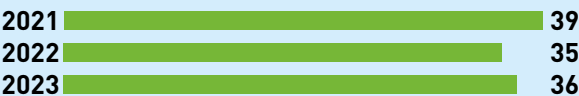


Increase corporate awareness for ECOS



Hours of training attended per year/n° of employees per year

≥ 35\*

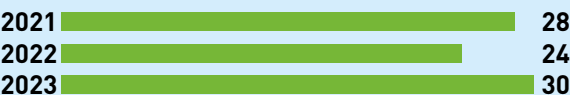


Supervise the correct implementation of safety and environmental protection measures



n° of audits per year

≥ 25



IMPACT ON COMMUNITY HEALTH AND SAFETY



Zero accidents on the terminal FSRU Toscana



n° of accidents per year

0\*

2021-2022-2023 NO ACCIDENTS

Support for childhood and health (Curiamo il futuro - CSR)



≥ 10,000 €\*

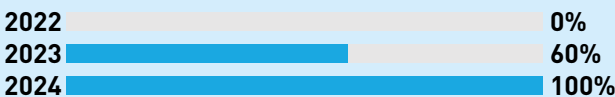


Monitoring has been started since 2023.

Planning improvements pursuant to Italian Legislative Decree 105/2015 (Terminal)



Actions taken/Actions planned in the OLT policy (%)



Support for community safety (Codice Bianco - CSR)



≥ 10,000 €\*



Monitoring has been started since 2023.

Achieved target

Not achieved target

In progress

\* Target to be achieved annually

## DISCRIMINATION



### Minimize gender diversity in OLT



n° of people of female gender/Total staff (%)

> 50%\*

2021-2022-2023 52%

## SKILLS DEVELOPMENT AND CONTRIBUTION TO GROWTH



### Support for innovation research and training (Open Lab Talent - CSR)



Monitoring has been started since 2023.

≥ 15,000 €\*

2023 17,500 €

## CONTRIBUTION TO GROWTH



### Support for the economy



Economic value Distributed/Economic value Generated (%)

> 64%\*

Year	Economic value Distributed/Economic value Generated (%)
2021	63%
2022	70%
2023	65%

### Support regional suppliers and maintain strong relationships with the community



Value of procurement from local qualified suppliers/  
Total value of procurement from qualified suppliers (%)

> 20%\*

Year	Value of procurement from local qualified suppliers/ Total value of procurement from qualified suppliers (%)
2021	35%
2022	32%
2023	27%

## CONTRIBUTION TO COMBAT POVERTY AND SKILLS DEVELOPMENT



### Support for the community (Gioco di Squadra - CSR)



≥ 30,000 € to be invested annually starting from 2023

2023 39,700 €

Achieved target

Not achieved target

In progress

\* Target to be achieved annually

# GOVERNANCE (G)

## CONTRIBUTION TO DIVERSIFICATION OF GAS SUPPLY SOURCES AND NATIONAL ENERGY SECURITY AND CONTRIBUTION TO NATIONAL CLIMATE CHANGE POLICY - MAKING



### Increase the Terminal's operation



NG injected into the grid/Maximum authorized capacity (%)

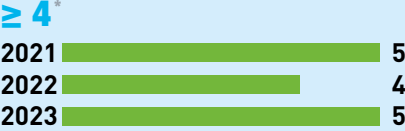


Monitoring has been started since 2023 following the increase in regasification capacity from 3.75 billion Sm³ initially authorized up to about 5 billion Sm³.

### Ensure the quality of service



Average overall rating expressed by users on a scale of 1 to 5



### Ensure the quality of service



NG purchased/NG injected into the grid in the year (%)



Low values of this index represent compliance with the regasification schedule and no need of NG purchase.

## CORRUPTIONS EVENTS



### Fight against corruption



n° of legal actions related to criminal offence

0\*

2021-2022-2023 NO CRIMINAL OFFENCE

■ Achieved target    ■ Not achieved target    ■ In progress    \* Target to be achieved annually







# OLT FOR THE MARKET

2

## 2 OLT FOR THE MARKET

OLT Terminal represents an important economic opportunity for Livorno, the Tuscany Region and for the Country as:

- it allows to diversify energy supply sources by positively impacting on raw materials costs;
- it reduces the charges the Government faces in managing energy emergencies, bringing significant benefits.

In addition, the substantial investments planned, already realized and ongoing (investment for the Small Scale service and capacity increase), have positive spillover effects on the territory both directly and in terms of allied business.

Finally, the agreements and conventions signed by OLT with local authorities result in stimulating territorial socio-economic development.

### 2.1 THE ROLE OF LNG

LNG is playing a leading role in the national and European gas market, contributing to the security of supply, diversification and competitiveness of gas supply sources.

In Italy, in the period 2016-2021, LNG imports constituted a relatively constant share of the overall gas supply<sup>23</sup>. Starting from the second half of 2021, the natural gas market has been characterized by high volatility and rising prices, influenced by the trends of the international LNG market.

The 2022 pointed out a fundamental change: the LNG has increased significantly its contribution following the conflict between Russia and Ukraine, that has imposed a replanning of the sources of the gas supply, and a reduction in pipeline gas imports caused by the uncertainty of the sharp decrease of the gas received from Russia.

In 2022, in order to face this new framework, several initiatives have been adopted – both at national and European level – to increase the gas availability, supporting the increase of additional volumes imported from non-European countries and the filling of storages in the short term.

In 2023, Europe, thanks to the commissioning of new terminals in France, Italy, Spain and Germany, and through high use of existing terminals, was able to limit gas imports from Russia against increasing LNG imports that covered as much as 37% of European annual consumption.

The observed increase in LNG capacity is completely aligned with the purpose of the European Commission's REPowerEU plan to phase out the EU's dependence on fossil fuels from Russia by 2030. New LNG infrastructure will help diversify Europe's energy sources by reducing its dependence, while expanding the range of potential suppliers and market opportunities.

### 2.2 INCREASE IN THE TERMINAL REGASIFICATION CAPACITY

Considering the need to diversify gas supply sources for national energy security and to increase the available regasification capacity, OLT verified the technical feasibility of increasing the annual regasification capacity from the current 3.75 billion Sm<sup>3</sup> to about 5 billion Sm<sup>3</sup>. Following this verification, the authorization process was started on August 2, 2022, and was completed on May 26, 2023, when OLT received authorization from the Ministry of Environment and Energy Security (MASE), in agreement with the Ministry of Infrastructure and Transport (MIT) and the Tuscany Region, to increase regasification capacity from 3.75 billion up to about 5 billion Sm<sup>3</sup> per year.

In parallel with the authorization process, OLT has put its Regasification Code under consultation, in which the necessary changes have been introduced to allow the offer of additional capacity, and the same was approved by ARERA on April 4, 2023 with Resolution 144/2023/R/Gas.

The increase in the regasification capacity did not involve plant modifications, but a greater utilization of the existing plant through increase of the quantities of LNG discharged and regasified; the increase did not result in any change in the number of berths or the size of carriers authorized<sup>24</sup>.

<sup>23</sup> Report on the monitoring of the supply contracts for the import of gas into Italy (reference paragraph 3.3 Resolution 252/2022/I/GAS of June 9, 2022).

<sup>24</sup> 59 berths and LNG carriers up to a maximum of around 180,000 m<sup>3</sup>, "New Panamax" class.

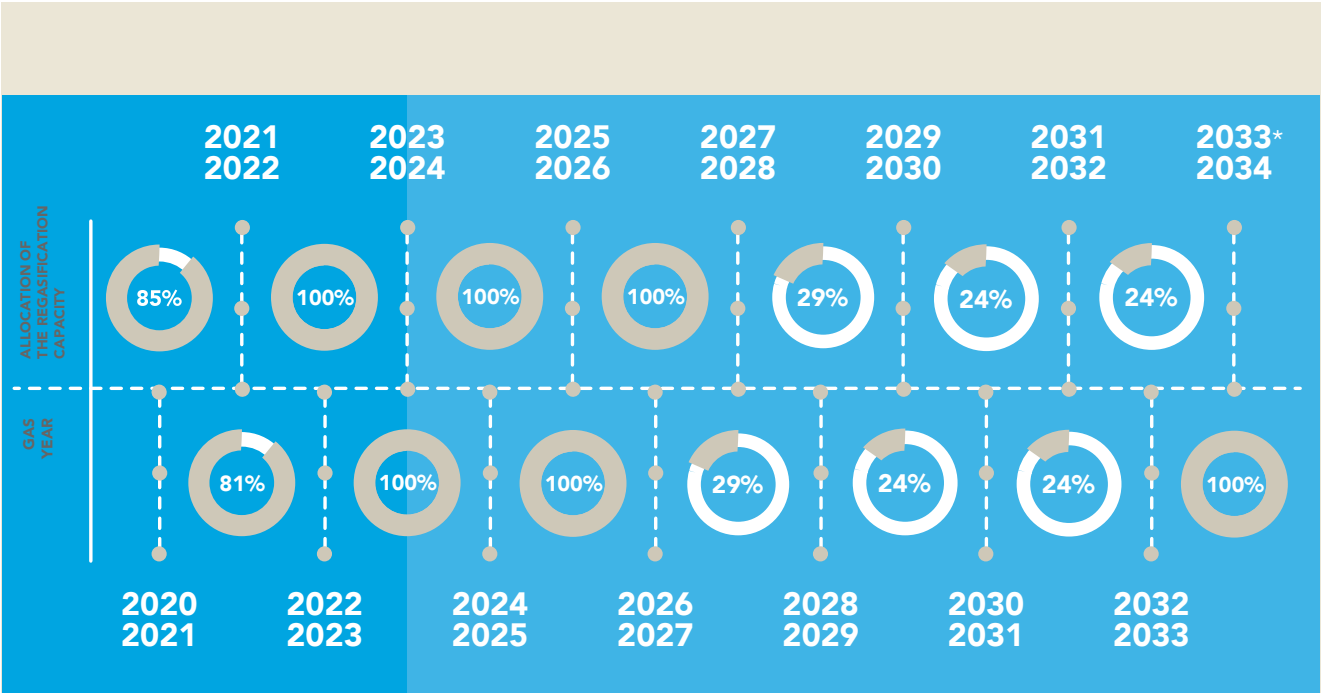
Greater plant and logistical flexibility and optimization of discharge times is possible through an increase in the hourly regasification flow rate. To ensure that the plant was technically able to cope with this increase, design checks were carried out at different hourly flow rates, followed by technical regasification tests in the last months of 2023 that showed positive results.

Additional regasification capacity is expected to be offered starting from 2024.

## 2.3 THE SERVICES OFFERED



### Terminal utilisation and current allocation for the next Gas Years



\*To date all the slots available in GY 2033/2034 equal to 7 are allocated, given the end of the Terminal's useful life in December 2033

Wobble Index system, which makes possible to correct the quality of LNG 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



The Terminal is authorised to receive about 90% of the current LNG carrier fleet, in particular those with a cargo capacity between 65,000 m<sup>3</sup> and 180,000 m<sup>3</sup> or equivalent to class "New Panamax"

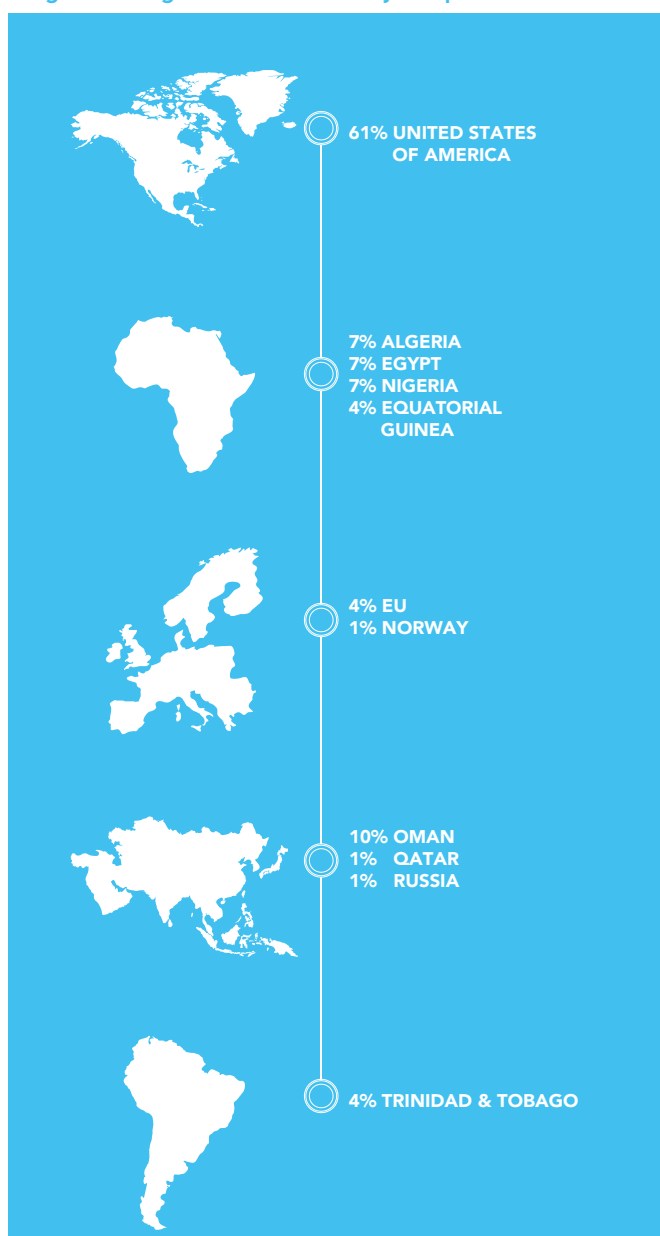
OLT provides the maximum capacity and flexibility of the Terminal, both, in terms of the cargo capacity of the authorized LNG carriers, and of the quality and origin of the LNG, ensuring at the same time high standards of safety and environmental sustainability.

Thanks to these characteristics, the Terminal represents an important guarantee for the diversification of supplies and for the country's energy security, contributing significantly to mitigate geopolitical risks such as those that occurred in the last year.

The contribution that FSRU Toscana provides to the diversification of supply is confirmed by the reception of LNG cargoes arriving from the main exporting countries.



### Origin of cargoes in the three-year period 2021-2023



### 2.3.1 The Regasification Service

The regasification service includes the mooring 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 grid or at the *Virtual Exchange Point (PSV)*. The regasification service is offered by OLT on the basis of access rules defined in a transparent and non-discriminatory way and gathered in the [Regasification Code](#)<sup>25</sup> approved by ARERA.

The current mechanism for the allocation of regasification capacity through auction procedures<sup>26</sup> define the bidding methods and the criteria for setting the reserve price for each allocation process. Since April 10, 2018, using the *Platform for the Allocation of Regasification Capacity (PAR)* managed by "Gestore Mercati Energetici" (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.

In the calendar years 2021, 2022 and 2023 30, 41 and 40 delivery slots were allocated respectively.

#### Regasification Service

	2021	2022	2023
Slot allocated	30	41	40
LNG discharged (liqm³)	2,255,137	6,020,750	6,114,775
Natural Gas injected into the grid (Sm³)	1,354,738,542	3,623,273,357	3,671,519,338

The importance of LNG is confirmed by the outcomes of the annual and multi-year auctions held between 2022 and 2023, which allowed the allocation of all the currently available capacity up to Gas Year 2026/2027, as well as part of the capacity up to Gas Year 2033/2034.

OLT provides additional flexibility services to the Terminal users – nomination and renomination of their redelivery profile, extended storage of LNG inside the Terminal tanks and the *Virtual Liquefaction* service – allowing them to seize the market opportunities.

#### Regasification:

process by which liquefied natural gas (atmospheric pressure and temperature about -160° C), transported by ship and stored in regasification plants, is returned to the gaseous state by heat exchange. The temperature variation generally occurs through the heat exchange in tube bundles between liquid gas and sea water, which transfers its heat to the gas; The pressure, on the other hand, is reduced by expanding the gas in special tanks. At this point the gas can be fed into the national distribution network.

### 2.3.2 The Emergency Services set up by MASE

Every year, MASE establishes the most suitable measures to be adopted to face energy emergencies. In particular, the "Peak Shaving Service" is one of the emergency measures established by the Ministry of Environment and Energy Security included in the "Emergency Plan" to tackle specific unfavorable situations for the National Gas System.

In case of emergency during the winter period, through the activation of this service, it is possible to regasify and send into the grid, at short notice, the LNG previously discharged and stored in the Terminal's tanks tackling the peak demand for a limited period of time.

In the last three years, even if the Peak Shaving Service has not been always requested by MASE, OLT has nevertheless contributed in terms of security of supply during the winter period through the constant reception of LNG cargoes.

<sup>25</sup> The document containing all the rules to access and use the regasification service offered by the Terminal as well as the standards of the service's quality.

<sup>26</sup> Introduced in 2017 by ARERA Resolution 660/2017/R/gas.

### 2.3.3 The Small Scale LNG Service

Natural gas (in gaseous or liquefied form) is proving to be of fundamental importance for a sustainable transition of the entire energy and transport sector.

In particular, at European and at national level, the use of LNG is supported according with the diversification strategy of the use of less pollutant fuels in the maritime sector<sup>27</sup>.

The Small Scale LNG (SSLNG) service can contribute to reduce the environmental impact of the maritime and land transport sectors, adding an important step forward into the energy logistics, allowing to complete the supply chain for the use of LNG as a sustainable fuel, reducing the polluting and climate-changing emissions in the heavy land transport and in the maritime transport, as well as, in industrial and civil uses in areas not connected to the national gas grid.

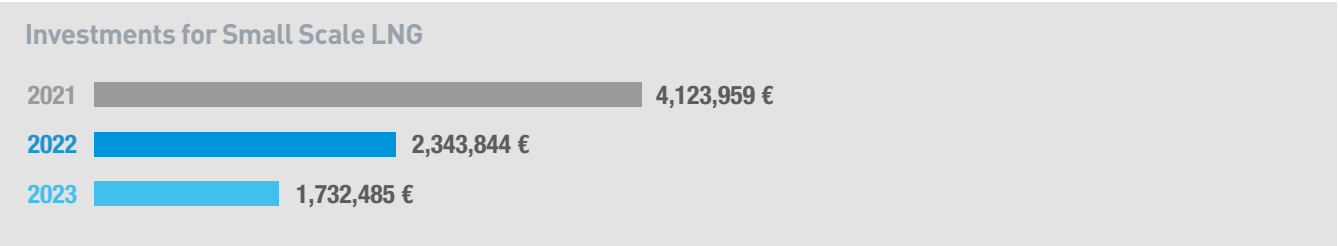
The SSLNG service provides that small LNG carriers can load LNG directly at the FSRU Toscana terminal to refuel LNG vessels or to deliver it to coastal deposits, inside the Mediterranean ports where both vessels and heavy land vehicles that use LNG for fuel can be refueled. The Terminal users have the possibility to procure the LNG dedicated to this service through the delivery of a large LNG carrier, through exchanges with other Terminal users or through the *Virtual Liquefaction* service.

The Simplification Decree<sup>28</sup> is included in this context, according to which Sardinia could become, in a short time, a pilot area where will be created the first virtual pipeline – a virtual connection for gas by sea – to supply its industrial district and develop the maritime sector in a greener way.

Thanks to the plant's versatility and strategic location, the FSRU Toscana terminal can play a decisive role in the Small Scale market. On May 26, 2023, as anticipated, OLT received authorization from the Ministry of Environment and Energy Security (MASE) in agreement with the Ministry of Infrastructure and Transport (MIT) and the Region of Tuscany, to increase regasification capacity from 3.75 billion up to about 5 billion standard cubic meters per year and for Small Scale service with the possibility of receiving up to 122 small LNG carriers per year.

The Terminal modification interventions, which started at the end of March 2021, were completed at the end of 2022, after which pre-commissioning activities were carried out in 2023, and upon completion of the extraordinary maintenance works scheduled for 2024, the commissioning activities to offer the service will be carried out.

In 2023, the OLT's investments in the Small Scale LNG<sup>29</sup> project amounted to above 1.7 million euros, representing 8% of the total investments for the year, equal to 21.5 million euros.



## 2.4 THE QUALITY OF THE SERVICE OFFERED

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

The provision of the service has always been guaranteed in the three years of reporting and the mooring of the cargoes were always received according to the planned arrival window in above 90%<sup>30</sup>, guaranteeing in any case the annual receipt of 100% of the scheduled cargoes.

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

<sup>27</sup> The Mediterranean Sea was designated as a Sulphur Emission Control Area (SECA) during the 79th session of the Marine Environment Protection Committee (MEPC). The designation will be effective from May 1, 2025. From that date, ships will have to use marine fuel with reduced sulphur content throughout the Mare Nostrum.

<sup>28</sup> Act no. 120 of September 11, 2020, enactment with amendments of Law Decree no. 76 of July 16, 2020, on "Urgent measures for digital simplification and innovation" (Simplification Decree).

<sup>29</sup> Expected life of the investment until 2033, the end-of-life date of the plant. The figures include, in addition to the works for the modifications on board the Terminal, the ancillary costs capitalised (e.g. permits, feasibility studies, consultants, personnel costs).

<sup>30</sup> Compliance with the arrival window for receiving cargoes is affected by weather conditions.

OLT has a dedicated monitoring processes for customer satisfaction and for the management of complaints. For 2023, 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 during the commercial activities. The questionnaire shows a rating scale from 0 to 5 divided into thematic areas and an evaluation is considered sufficient if higher than 3. The overall rating obtained for 2023 was equal to 5.

## 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, impartiality and non-discrimination in the operation of the Terminal and company activities.

## 2.5 THE VALUE CHAIN

### 2.5.1 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 to its stakeholders of the value that they have directly or indirectly contributed to produce: this is the contribution of OLT to the growth of economic value.

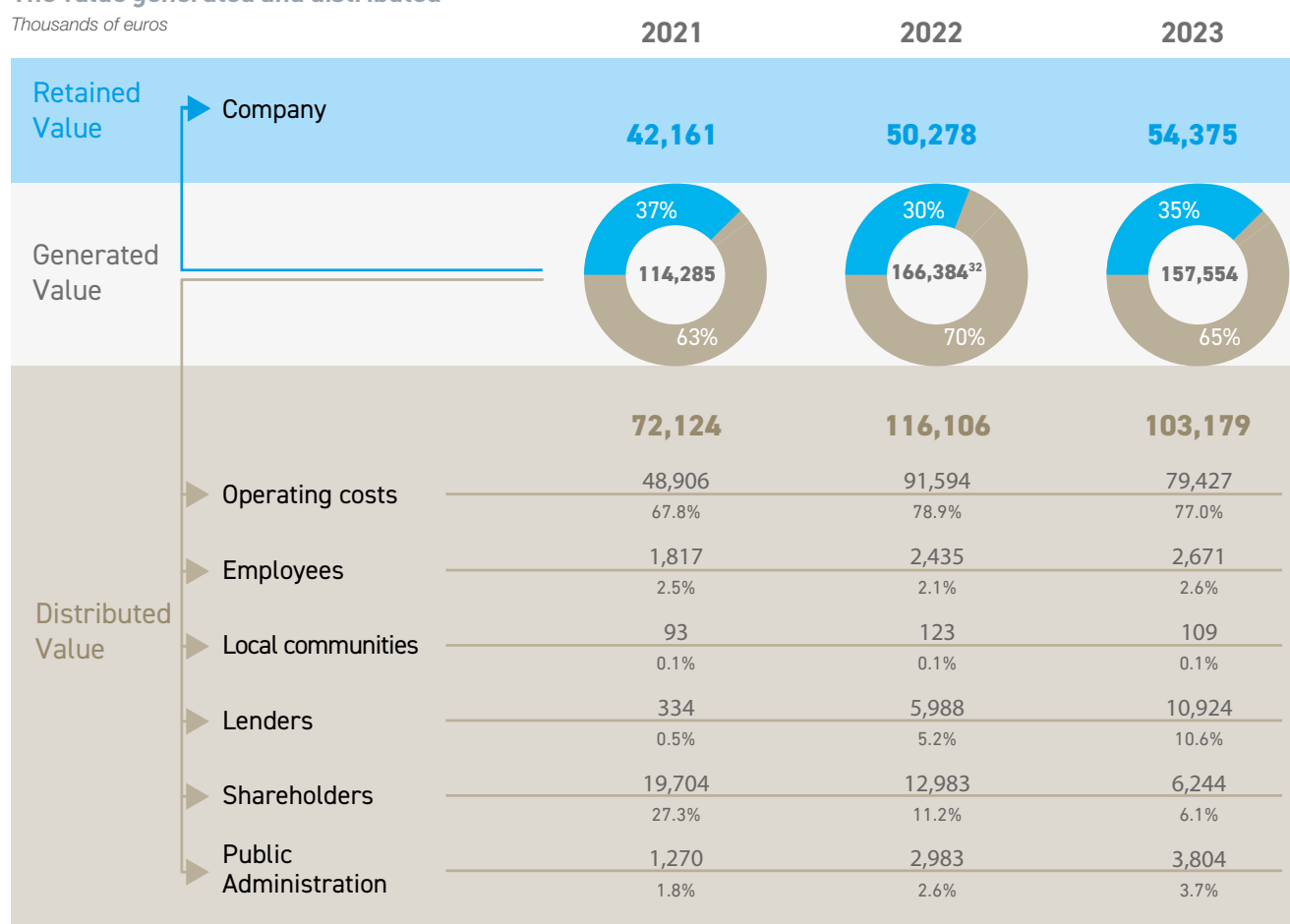
Using the analysis of the distributed economic value, we would like to highlight the flow of resources to our employees, suppliers of goods, services and capital, the Public Administration and the reference territory.

In 2023, the economic value generated by OLT was almost € 157 million, of which 35% was held back by the Company and 65% redistributed mainly to the suppliers of goods and services under the form of operating costs (77%)<sup>31</sup>.

<sup>31</sup> Operating costs include the annual contribution of 671,774 € in 2023 paid by OLT to the state property for the occupation of the maritime state property area by the Terminal.

## The value generated and distributed

Thousands of euros



In relation to the value distributed, the percentage share distributed to employees and the local community is essentially stable.

As a result of a corporate debt refinancing transaction signed in June 2022 already in the previous year, there was a decrease in the share distributed to shareholders<sup>33</sup>, and an increase in the share distributed to lenders<sup>34</sup>. In 2023, the effects of the 2022 refinancing operation, originate a further reduction of more than 50% in the share distributed to shareholders and the simultaneous increase in the share distributed to lenders in the form of interest paid to the banks that joined the operation.

The increase in the share distributed to the Public Administration<sup>35</sup> is attributable to the higher taxes due in connection with the higher profits realized in 2023.

The approach adopted by OLT for advocacy on fiscal matters includes the use of tax and law firms 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 rulings to get instructions directly from the Revenue Agency regarding the most appropriate way to define certain operations fiscally.

In addition, it should be stressed that the company has made investments in 2023 for a total of € 21 million, related to technical improvements and extraordinary maintenance, and that the same has provided for a total provision of € 10,683,000 over 20 years, to the provision for risks and charges, to cover the costs of restoring the site where the Regasification Terminal was installed, an amount based on the costs provided for the Decommissioning Plan set up during the authorization process<sup>36</sup>.

<sup>32</sup> The economic value generated in 2022 in the previous edition of Sustainability Report was incorrectly reported as 113,951 thousands of euros due to editorial mistake.

<sup>33</sup> Interest on existing shareholder loans.

<sup>34</sup> Bond holders and banking system.

<sup>35</sup> Direct and indirect taxes net of deferred taxes.

<sup>36</sup> OLT has set up an executive decommissioning plan which includes the planning of the monitoring measures to be implemented during the decommissioning phases of the plant and a description of the procedures to be implemented in order to mitigate the potential environmental impacts associated with the decommissioning activities, with the definition and quantification of the interactions with the various environmental matrices.

## 2.5.2 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.

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.

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.

In 2023, 42 suppliers (100% of critical suppliers) qualified according to quality, environmental, safety and social standards were assessed on these aspects. There is an additional three-yearly assessment for the suppliers of goods and services falling under the “critical supplies” categories<sup>37</sup>; this is aimed at identifying the suppliers to undergo annual checks on SA8000 aspects. In 2023, five suppliers were subject to an annual assessment on SA8000 aspects, representing all the suppliers to be subject to this assessment.

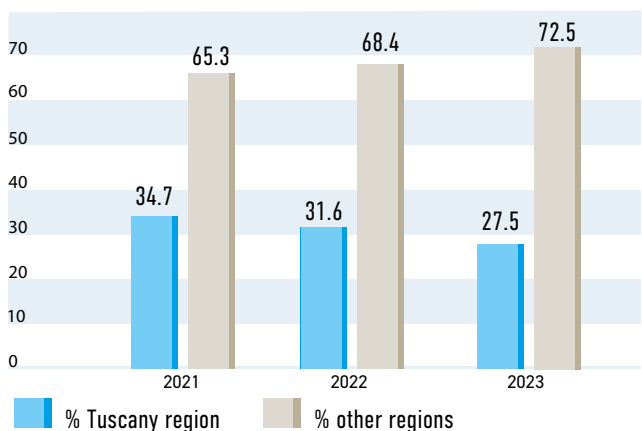
Based on the assessment made, none of the suppliers was ever exposed to significant risks with regard to the aspects concerning social impact, e.g. the freedom of association, child labour, forced labour and, more generally, the respect of human rights.

### 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

### Territorial distribution of expenditure to qualified suppliers

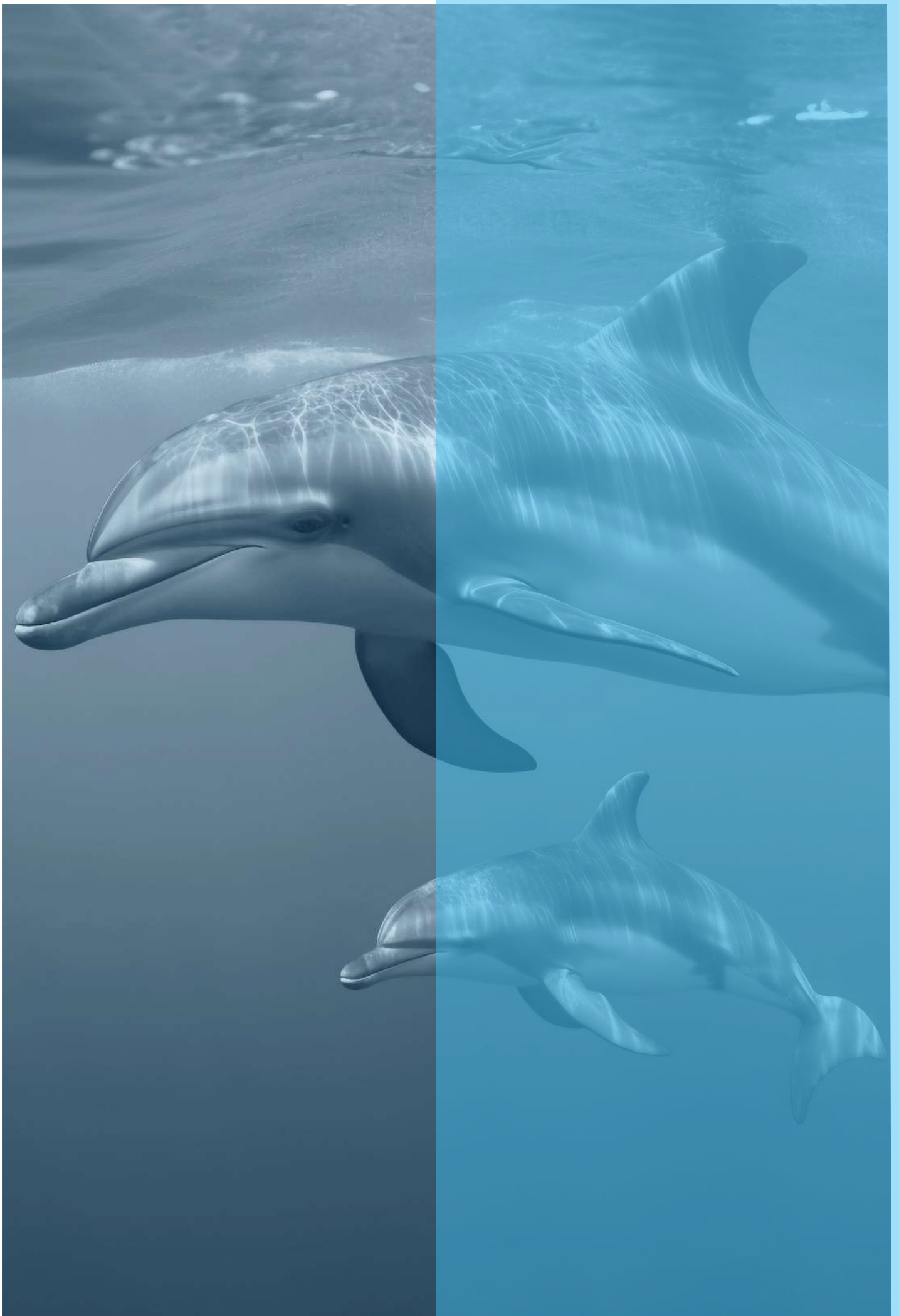


OLT contributes significantly to the local economy by offering all the firms in the regional area and the District of Livorno and Pisa, in compliance with the principles of competition, an equal opportunity to compete for the supply of the goods and services necessary for the management of the company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

In the last three years, the average percentage of expenditure to suppliers and outsourcers from the District of Livorno is 99% of the expenditure to suppliers in the Tuscany Region.

Of particular relevance, within qualified suppliers, are the outsourcers operating on and in support of the Terminal, and the suppliers of services and technical consultancy related to the Terminal's performance.

<sup>37</sup> 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.



# OLT FOR THE ENVIRONMENT

3

# 3 OLT FOR THE ENVIRONMENT

The FSRU Toscana terminal carries out its activities with full respect for the environment. The project obtained all the necessary environmental authorisations<sup>38</sup>. 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 and the necessary appropriate measure to minimise the impact on the different environmental matrices involved were prepared. The Company pursues the improvement of its performance through the continuous search for organizational and plant improvements, following the philosophy of *Best Available Techniques (BAT)*. 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 analyses the Organization's performance in relation to the environmental issues that were most relevant following the materiality analysis. Some issues based on the materiality analysis methodology adopted were negligible in terms of reporting even in view of the monitoring activities implemented by OLT and their outcomes. However, for a complete discussion of all OLT environmental performance, please refer to the [Environmental Statement](#)<sup>39</sup> prepared in compliance with the provisions of the *EMAS* Regulation.

## 3.1 ENERGY CONSUMPTION AND CLIMATE-CHANGING EMISSIONS

### 3.1.1 Energy consumption

#### Energy consumed

The electricity used by the Terminal is entirely self-produced<sup>40</sup> thanks to four steam turbogenerators, powered by boilers which exploit the LNG vapours, and diesel generators used only in case of need and/or emergency. The FSRU Toscana terminal is in fact characterized by an energy self-sustaining system that allows to optimize consumption by fully offsetting the electricity used with that produced.

#### Electricity produced and consumed within the Organisation

	2021	2022	2023
Electricity (MWh)	53,111	71,666	71,244
Electricity (GJ)	191,199	257,997	256,478

The increase in the last two years of energy consumption is due to the increase in registered regasification activity, compared to 2021. 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: the natural gas (NG) for the operation of the two boilers serving the turbogenerators and, to a lesser extent, the *Marine Gas Oil (MGO)*<sup>41</sup> used in non-normal or emergency operating conditions.

#### Energy produced and consumed within the Organisation

	2021	2022	2023
Natural Gas – NG (GJ)	1,326,293	1,599,482	1,566,347
Marine Gas Oil – MGO (GJ)	3,712	7,107	6,432
<b>Total (GJ)</b>	<b>1,330,004</b>	<b>1,606,589</b>	<b>1,572,779</b>

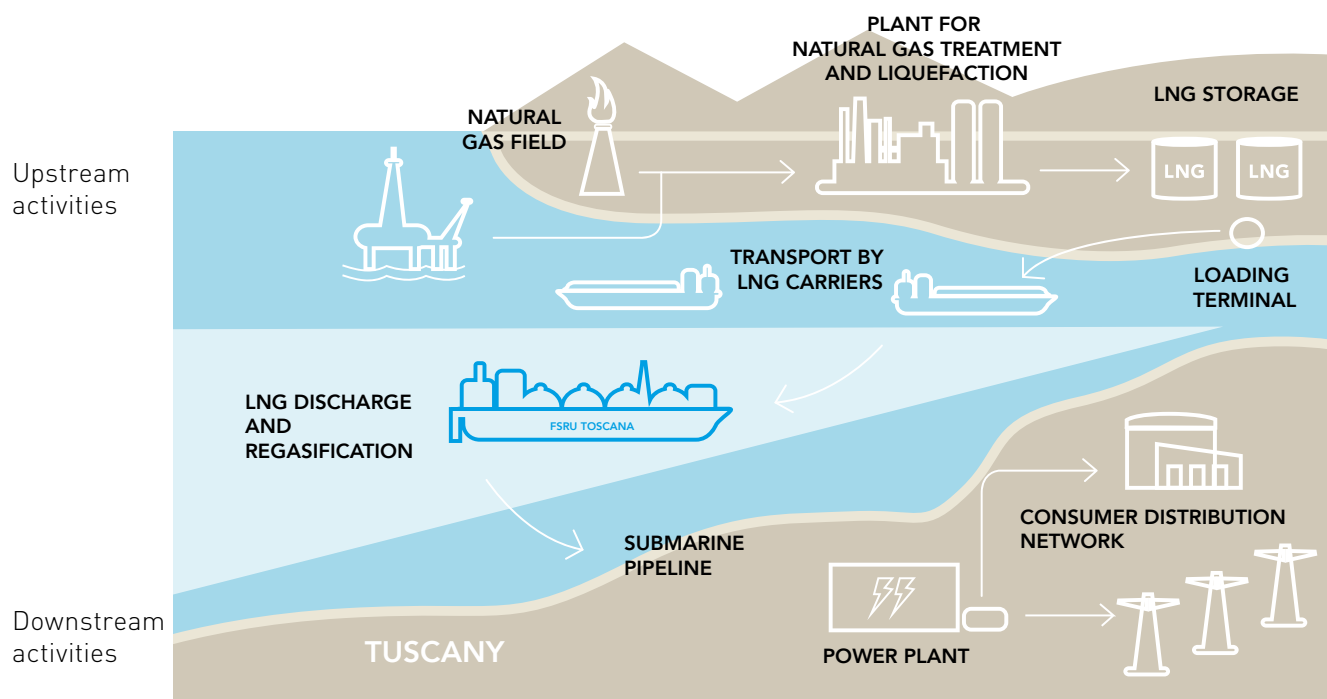
The NG consumption shows a similar trend to that of electricity production, as the two values are directly linked. In 2022 the greater use of *MGO* is due to a failure of one of the four steam turbogenerators installed on the Terminal, which led to the use of the diesel generator continuously for about 6 days for the production of electricity in conditions of non-normal operation, in accordance with the *EIA Decree*. In 2023, maintenance activities were carried out, which as longer in duration than in 2021, resulted in greater use of the *MGO*, although less overall than in 2022. OLT has no influence on energy consumption upstream and downstream the Organisation, except for consumption related to maritime services supporting the Terminal's operations, provided by the company Fratelli Neri. This consumption, relating to the vessels used for patrolling around the plant, towing and assistance to vessels arriving and leaving the Terminal and transport of people and materials, arises exclusively from non-renewable sources (*MGO*).

<sup>38</sup> In particular: Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA), Integrated Environmental Authorisation (IEA).

<sup>39</sup> An Instrument updated annually, that is the means with which the EMAS registered organisation communicates with environmental stakeholders.

<sup>40</sup> The Terminal is not connected to the national grid so all the electricity is totally consumed by itself; this energy is therefore necessary for all the activities connected with the operation of the Terminal.

<sup>41</sup> The Marine Gas Oil is used: in the boilers to replace natural gas in non-normal 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 emergency and/or anomaly conditions.



The higher overall MGO consumption recorded in 2022 and 2023, although to a lesser extent than in 2021, net of the lower consumption made possible by the initiatives taken to reduce the Guardian Vessel's CO<sub>2</sub> emissions by shutting down one of the two engines, can be attributed to the increase in regasification activity and thus related to the higher number of *ship-to-ship* operation.

### Energy consumption outside the Organisation

	2021	2022	2023
Marine Gas Oil - MGO (GJ)	83,276	102,449	96,077

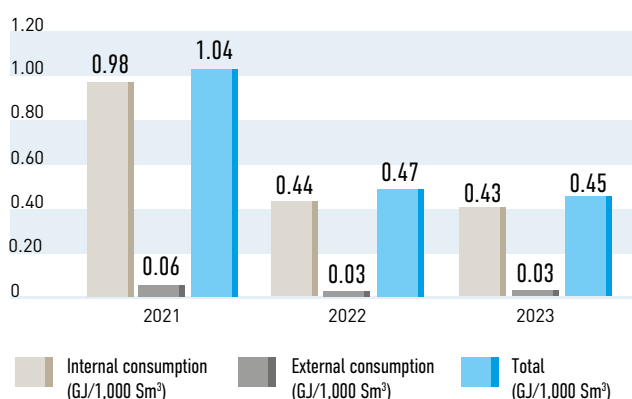
### Energy intensity

The energy intensity index measures energy consumption in relation to the quantities of regasified natural gas injected into the grid. Together with the data on energy consumed inside and outside the Organisation, this data helps to put OLT's energy efficiency into context.

The operation of the Terminal in the reference period was influenced by the pandemic scenario, the European energy crisis and the consequent high volatility of the gas market price. After a contraction of the regasification service that began in 2020 and which characterized 2021 more markedly, the Terminal returned to full operation from 2022.

The energy efficiency indices in 2023 stand at the values of 2022.

### Energy intensity



## Reduction of energy consumption

The results of the last energy diagnosis, conducted in 2023 pursuant to Italian Legislative Decree 102/2014, show energy performances on a par with the reference “best practices”; therefore, they did not suggest any energy efficiency actions for the plant, but only some improvements, the feasibility of which OLT is currently verifying.

Below are highlighted the improvements from the previous diagnosis.

**Replacement of the Terminal's lighting units.** The program provides for the replacement, by the first months of 2024, of all the lighting units of the Terminal with magnetic induction lamps, more efficient than the current ones from an energy point of view, able to guarantee a more widespread and uniform lighting and a longer useful life. Starting from 2025, the expected reduction in consumption from this program is equal to 4% of 2019 consumption, considered net of consumption of energy-intensive machines and equal to 0.95% of total annual consumption<sup>42</sup>.

As of December 31, 2023, 99% of the external lamps in the bow, 80% of the external lamps in the stern and 10% of the lamps in the accommodations have been replaced.

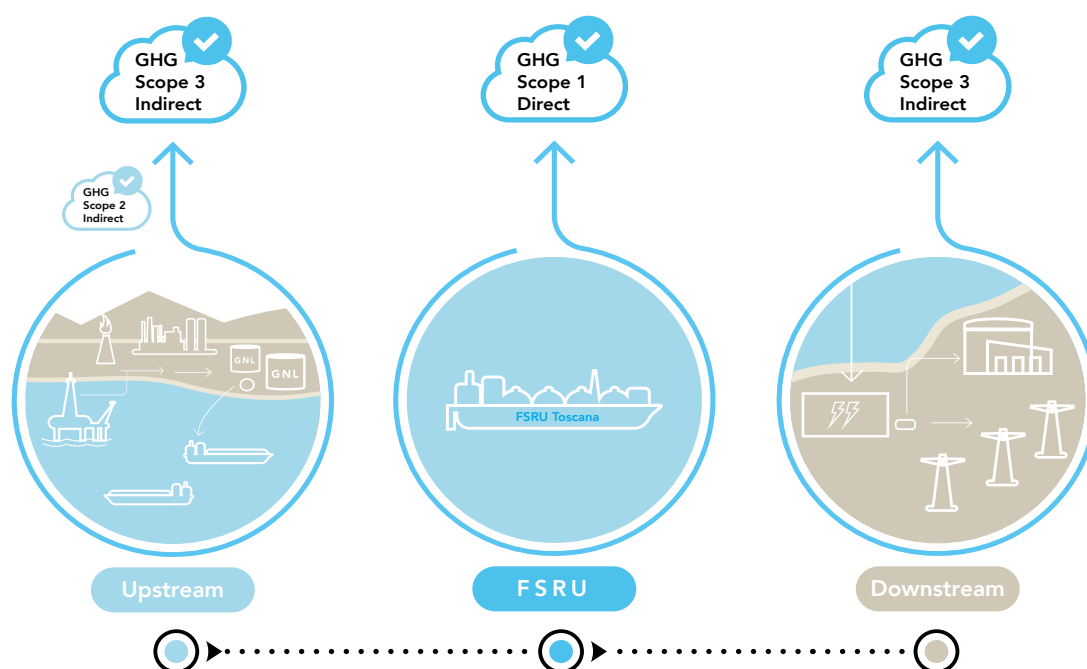
**Modification of the design of the seawater pumps.** Sea water pumps, which pump the sea water necessary for the regasification process, are very energy-consuming equipment. The design modification, which is expected to be completed by 2025, aims to increase their energy efficiency by reducing, marginally, the overall energy needs for the same operation. The expected reduction in consumption, starting from 2025, is equal to 3% compared to the consumption of sea water pumps in 2019 and equal to 0.95% compared to total annual consumption<sup>43</sup>.

As of December 31, 2023, the modifications of 2 of the 6 pumps have been completed.

Please note that details on the calculations can be found in Section 5.2 of the Technical Appendix.

## 3.1.2 Climate-changing emissions - GHG

OLT's climate-changing gas emissions are predominantly direct (Scope 1) and derive from the Terminal's energy consumption related to electricity generation process and, to a residual extent, from *fugitive emissions* and the emissions conveyed from the Terminal's venting systems (Vent), the use of which, as per *IEA Decree*, is solely provided in the event of emergency and special scheduled maintenance<sup>44</sup>.



The most widely used standard for calculating greenhouse gas emissions, such as carbon dioxide (CO<sub>2</sub>) or methane (CH<sub>4</sub>), 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 CO<sub>2</sub>eq, that expresses the impact on global warming of a certain quantity of greenhouse gas compared to the same quantity of carbon dioxide (CO<sub>2</sub>). It is used so that the contributions of different greenhouse gases.

<sup>42</sup> Reduction of 664 MWh/year compared to annual energy consumption net of consumption of energy-intensive machines (equal to 17,005 MWh) and compared to annual energy consumption of the Terminal (equal to 70,079 MWh), respectively.

<sup>43</sup> Reduction of 665 MWh/year compared to the annual energy consumption of the seawater pumps (equal to 23,033 MWh) and compared to the annual energy consumption of the Terminal (equal to 70,079 MWh), respectively.

<sup>44</sup> In 2023, venting systems were used 2 times during routine maintenance of the Terminal. In 2023, 0.6% of direct CO<sub>2</sub>eq emissions are CH<sub>4</sub>, 1 and 2.2 in 2022 and 2021, respectively. The percentage of CH<sub>4</sub> in direct CO<sub>2</sub>eq emissions ranges between 0.6 and 2.2% in the three-year period.

The emissions linked to the Terminal’s energy consumption, mainly deriving from *stationary sources*<sup>45</sup>, are overseen by a continuous monitoring system that ensures compliance with the sector standards and plant authorisation decrees.

There are no *biogenic emissions* of CO<sub>2</sub>, nor emissions related to the supply of electricity (Scope 2) because of the use of MGO.

The following emissions have been considered<sup>46</sup> for the calculation of indirect emissions (Scope 3):

- resulting from the Terminal support vessels;
- resulting from the procurement of raw materials and fuels (NG and MGO);
- resulting from waste disposal;
- related to energy consumption of the land-based office serving OLT's outsourcers.

### Emission intensity

The GHG emission intensity rate defines OLT's environmental impact normalised to the amount of natural gas injected into the grid. Together with the organisation’s total GHG emissions, it helps put its efficiency into context.

Also in this case, given the high contribution of GHG Scope 1, which is directly related to energy production, the data are influenced by the resumption at high levels of production of the regasification service of the Terminal recorded from 2022, as already reported in relation to the energy intensity index.

### Reduction of climate-changing emissions

OLT and its outsourcers are committed to reduce emissions into the atmosphere.

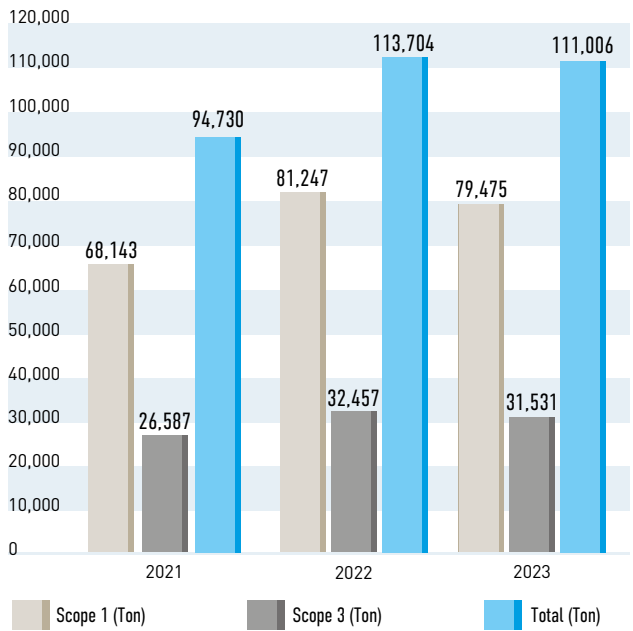
Starting from the end of 2020, an initiative was adopted to reduce CO<sub>2</sub> Scope 3 emissions by switching off one of the two engines of the Guardian Vessel, used for patrolling around the Terminal. Initial estimates predicted a reduction in the fuel consumption of the Guardian Vessel of approximately 134 tons of MGO, corresponding to a GHG reduction of approximately 413<sup>47</sup> tons of CO<sub>2</sub> equivalent, calculated on the basis of engine characteristics and fuel consumption.

The Guardian Vessel's GHG emissions in 2023 amounted to 1,957 tons CO<sub>2</sub>eq, compared to 2,755 tons of CO<sub>2</sub>eq in 2019. By benchmarking the data against hours worked, 790 tons of CO<sub>2</sub>eq were avoided in 2023.

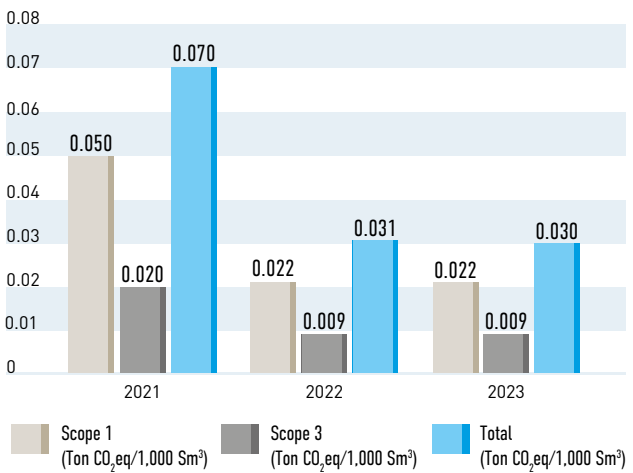
Including the reduction of 63 tons of CO<sub>2</sub>eq in *fugitive emissions* (Scope 1) made possible by interventions in the *Leak Detection And Repair (LDAR)* program, a total of 853 tons of CO<sub>2</sub>eq were avoided in 2023.

Please note that details on the calculations can be found in Section 5.2 of the Technical Appendix.

### CO<sub>2</sub>eq emissions



### GHG emissions intensity rate



Lastly, reforestation and environmental compensation initiatives aimed at recovering abandoned forests and/or those affected by natural disasters and creating new urban and/or peri-urban green areas should not be overlooked.

Indeed, the Kyoto Protocol<sup>48</sup> envisages forest absorption as a climatic mitigation activity, complementary and supplementary to the reduction of emissions “at source”. Through new forestation and the management of existing forests, it is possible, thanks to chlorophyll photosynthesis, to increase the stock of carbon immobilized in plant biomass by capturing it from the atmospheric compartment in such a way that it cannot perform its climate-changing effect in the atmosphere itself.

<sup>45</sup> In OLT, in the three-year period 2021-2023, the percentage of direct CO<sub>2</sub>eq emissions from stationary sources ranges from 97.8% to 99.4%.  
<sup>46</sup> From 2023, the GHG categories considered for the calculation of emissions Scope 3 were expanded. To ensure comparability of data, the values for 2021 and 2022 were also recalculated using the same logic. The modification also impacts the emission intensity rate values.  
<sup>47</sup> This data differs from what was published in the previous edition (417 tons CO<sub>2</sub>eq) as it was recalculated by applying a different calculation method from 2023. In the same way, the Guardian Vessel GHG emissions for 2019 (shown as 2,781 tons CO<sub>2</sub>eq in the previous edition) were recalculated.

<sup>48</sup> The Kyoto Protocol, following the United Nations Framework Convention on Climate Change (UNFCCC), is one of the most important international legal instruments aimed at combating climate change. It is the first international agreement containing commitments by industrialized countries to reduce emissions of certain greenhouse gases responsible for global warming. It was adopted in Kyoto, Japan, on December 11, 1997, and entered into force on February 16, 2005.



**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 to protect employees, the staff working on behalf of OLT and the local communities against any critical issue of interest for the social, environmental and safety sphere. It should be noted that the terminal FSRU Toscana, both because of its distance from the mainland and the substances used (LNG), does not entail any exposure of local communities to hazardous and harmful substances.

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 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 employment levels and a suitable quality of work are considered essential for achieving corporate strategies. This is why OLT offers stable and continuous employment relationships; in continuity with 2022, as of December 31, 2023 OLT has 25 employees, all with an open-ended contract except for one resource hired in 2023, at the Rome office, with a fixed-term contract.

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 and relevant operational modifications that could significantly affect employees. The Livorno operational office hosts 22 employees, 12 men and 10 women, while three employees, female, work in the Rome office.

As of 12/31/2023, there are also three workers with coordinated and continuous collaboration contracts, made necessary to cope with dedicated and specific projects.

Part-time work involves three female employees hired at the Livorno office. This figure is due to individual choices and the company's willingness to meet the need to reconcile private life and work, expressed by some employees.

The distribution of the company population by gender and contractual position in 2023 is substantially the same as the previous two-year period for middle management and executives<sup>49</sup>, both represented by the female gender for 25%. There is a slight decrease, from 71% to 65%, in the female presence in the office employee category. These changes are the result of the combined effect of 3 new hires, 1 male and 2 female.

Employee turnover over the last three years mainly involved the 30-50 age bracket (60% of hires and 86% of terminations), followed by the under-30 age group (30% of hires and 14% of terminations).

The distribution of the company population by age bracket gives the picture of a young company; 80% of the company population is in the 30-50 age bracket. Respectively, 50% of managers and 57% of board members are over-50 age.

No implementation of pension plans of supplementary type is planned. An important part of OLT activity is carried out by ECOS, the Terminal's operator responsible for the management of the Terminal. In 2023, ECOS employed 82 people all dedicated to the operation of the OLT's Terminal, of which 75 operating<sup>50</sup> onboard the Terminal (in 28-day shifts<sup>51</sup>) and 7 in their offices (one middle manager and seven employees), engaged with the National Collective Labour Contract for the shipping industry.

In 2023 employee turnover in ECOS mainly involved the 30-50 age bracket (57%) for the 14 hires and the over-50 age bracket (64%) for the 11 terminations recorded.

<sup>49</sup> The 50% of the managers lives in Livorno.

<sup>50</sup> Marine personnel are divided into 40 officers, 13 petty officers and 22 deck operators.

<sup>51</sup> The enrollment contract in the seafaring sector can be stipulated: for a given trip or several trips; on a fixed-term basis; open-ended. A further possibility is given by continuity regime (CE- Continuity of Employment), which guarantees open-ended rotation of the enrollment contract and permanence of employment even in periods of leave between each embarkation and the next one.

Recruitments and terminations in 2023 affect mainly male staff, who, partly in view of the area of operation, make up the majority of ECOS' workforce.

Please note that details on the calculations can be found in Section 5.2 of the Technical Appendix.

## 4.1.2 Protection of work and valuing resources

### Protection of work respecting diversity

OLT has among its priority commitments the improvement of the quality of the work environment, the enhancement of diversity, the promotion of equal opportunities as well as the reconciliation of work and life needs.

OLT assumes among its priority commitments the improvement of the quality of the working environment, the enhancement of diversity and the promotion of equal opportunities, as well as the reconciliation of work and life needs.

The aim is to work as a team, to add value to the result of individual work and increase the sense of belonging, creating social, cultural, professional and intellectual common ground.

The Company, in particular, by implementing its [Charter of Values](#) and setting up non-discriminatory employment procedures and practices, promotes a culture of merit and equality and implements the same policies towards all its people, without distinction of class, origin, race, gender, political beliefs or religion.

The risk of discrimination is constantly monitored and verified according to the SA8000 standard. In the three-year period considered, no claims were registered by OLT employees nor by workers of ECOS, OLT's main outsourcer and Terminal operator, and no episodes of discrimination were ever recorded.

A salary in line with the provisions of the National Collective Labour Agreements applied and, in any case, higher than the "decent minimum wage" calculated by OLT in implementation of the above-mentioned SA8000 standard is guaranteed for everyone, including the new recruits.

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.

To ensure recognition of the work of all employees, be they permanent or fixed term, some benefits are made available: meal vouchers, parking and professional and out-of-work accident insurance.

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.

Company benefits for employees are maintained even during parental leave unless strictly connected with presence in the company.

Lastly, the availability of smart working was confirmed. Introduced during the pandemic period, the smart working mode has become a company policy for two days a week.

For more details, please refer to Section 5.2 of the Technical Appendix.

### 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 to create value for people by 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 and taking into account changes in the market, regulations and technologies.

The valorisation of skills starts right from the onboarding process; new employees, in order to guarantee their effective integration in OLT, are provided with all the useful information to understand the company organisation, their role, the company values and philosophy. On the basis of the actual professionalism and experience of each employee, the necessary training courses are then outlined.

OLT allocates an annual budget for each worker to increase their skills, which has allowed the growth trend in terms of training provided to be maintained in 2023 as well.

In 2022, the company launched a program called "**Empower our energy**" dedicated to the analysis of OLT's organizational structure and personnel enhancement; this program had its first outcomes in early 2023 through the return of the results by management to all employees.

The resulting initiatives concerned:

- the establishment of a horizontal growth path for employees also through individual and structured feedback;
- the launch of a mentoring program to support people who have recently joined OLT;
- the activation of an open dialogue process between employees and management and increased attention to internal communication;
- the maintenance of smart working.

For more details, please refer to Section 5.2 of the Technical Appendix.

## 4.2 SAFETY AT THE CENTRE OF OLT CULTURE

The culture of safety is an identity element of OLT, which is committed to ensuring the safety of the Terminal and all operations connected with it for the provision of the service offered, to protect workers, suppliers and local communities.

In order to ensure a safe and healthy work environment and in compliance with the principles expressed in the [Code of Ethics](#), the [Charter of Values](#), the [HSEQ Policy](#) (Health, Safety, Environment and Quality Policy) and the [MAP Policy](#) (Prevention of Major Accidents Policy), both OLT and the Terminal's operator ECOS have adopted an Integrated Management System that complies with requirements of the ISO 45001 Standard<sup>52</sup>, UNI 10617<sup>53</sup>, Italian Legislative Decree 105/2015 and the ISM Code<sup>54</sup>.

These systems pursue compliance with applicable occupational health and safety regulations<sup>55</sup>, and ensure that appropriate measures are adopted to prevent any accidents and mitigate possible damage associated with the health and safety of the work activity, to protect both OLT employees and collaborators and ECOS staff and, more generally, all the people working onboard the Terminal as well as the plant engineering safety, in view of the risks of major accidents present on the Terminal. In particular, in the current operating phase of the Terminal, OLT and ECOS pursue the culture of prevention by putting risk assessment at the basis of their management systems and ensuring its periodic updating, also in compliance with applicable regulations. They also implement dedicated major-accident improvement plans and systematic periodic check programmes that affect all activities related to the Terminal, including the activities of other outsourcers that provide services for the management of the vessels serving the Terminal.

In 2023, specific activities related to the improvement plan pursuant to Legislative Decree 105/2015 were carried out, including scheduled inspections of intumescent paint (passive fire protection), the implementation of an appropriate operational instruction relating to the control of modifications and control in the pre-start phase of plants, and prosecution of the specific program for the inspection of piping and equipment for the prevention of ageing.

OLT, as *Plant Operator*, with reference to the FSRU Toscana terminal, promotes cooperation with the Supervisory Bodies and the competent Authorities to foster knowledge, exchange of information and the development of common emergency procedures in compliance with the regulations.

Both internal and external Emergency and Evacuation Plans are defined and emergency drills involving all personnel are included; about 140 emergency tests are conducted annually on the Terminal with the involvement of both on board staff and the suppliers present.

With a view to business continuity, for the management of any undesirable events, capable of affecting not only the Terminal but the Company itself or the main outsourcers related to it, a Crisis team has been set up, composed of experts from the Company and of the outsourcers ECOS and Fratelli Neri. The team has the task of restoring and coordinating operations in the event of a crisis, as regulated in a specific "Crisis Management Plan".

The implementation of monitoring and analysis programmes is guaranteed not only 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.

Ongoing training, with particular regard to technical and safety training, is very important especially for the Terminal operators, who are called upon to manage a strategic infrastructure with the utmost skill and attention possible.

The training of on-board personnel is planned and organized according to the Integrated Management System of the Terminal's operator and complies not only with the *Seveso Directive*, but also with the "Standards of Training, Certification and Watchkeeping for Seafarers" (STCW) that regulate the mandatory training of seafarers. STCW courses are carried out at authorised centres that issue certificates after completion of learning verification tests.

### 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 105/2015, and therefore subject to the provisions regarding plants at risk of a major accident.

<sup>52</sup> UNI ISO 45001 establishes the requirements for the design and implementation of an occupational health and safety (OSH) management system.

<sup>53</sup> UNI 10617 defines the requirements for Safety Management Systems in plants with major-accident hazards.

<sup>54</sup> ISM Code: International Safety Management Code (Maritime Management System).

<sup>55</sup> For OLT and the ECOS offices, Italian Legislative Decree 81/2008 as amended applies, whilst Italian Legislative Decree 271/1999 as amended on the health and safety of workers in the maritime sector applies.

OLT and the Terminal's operator are responsible for assessing the training needs for the Terminal and office staff; the personnel, through the Workers Safety Representative, can propose new training courses based on work and personal needs, personnel shifts, technological innovation and renewals of training required by law.

Confirming the centrality of health and safety among its core values, OLT also involves its employees and outsourcers in non-compulsory training programmes. In the last few years, the company has been working on the development of the Leadership in Health and Safety (LiHS) program, launched in 2020-21 as part of the Corporate Social Responsibility (CSR) project called "L'Energia del Mare".

LiHS is an employee training and engagement program that aims to create a strong health and safety culture in the company with the goal of capturing "hearts and minds" through emotional involvement and reference to universally shared human values. It is aimed at all levels of the OLT organization and its external contractors, with the purpose of changing the perspective and behavior of workers regarding daily activities in the workplace and beyond.

The path of meetings that began in 2020 led to the drafting of a new Health and Safety "Vision" for OLT, structured around four key principles: Culture, Behavior, Responsibility and Change. In subsequent years, a "Champion Forum" was established to play a key role in disseminating the new "Vision" within and outside the organization.

In continuation of LiHS activities, on October 19, 2023, OLT organized a high-impact emotional event called "We grow up together - OLT SAFETY DAY", which involved the entirety of OLT workers and key outsourcers (ECOS and Fratelli Neri) as well as numerous OLT and Terminal suppliers, in a moment of engagement and awareness raising to further promote the vision of health and safety and the *no blame culture*. The event, which was also organized to celebrate the 200th ship since the start of commercial operations, ended with a "Call to Action" moment, with all participants signing the commitments made during the event and OLT's Health and Safety vision.

OLT's commitment to safety issues is reflected in the results achieved; in the three-year period under consideration, OLT has not received any complaints for non-compliance with the law, no non-compliance with voluntary codes or inherent to safety issues has been highlighted, nor have there been any events at the Terminal that resulted in spills of hazardous substances, major accidents pursuant to Legislative Decree 105/2015, deaths and/or serious injuries<sup>56</sup> among OLT or ECOS personnel.

No accident directly involved OLT personnel between 2021 and 2023. With regard to Terminal suppliers, one minor injury occurred in 2021 involving a worker from an ECOS supplier<sup>57</sup>. No injuries occurred in 2022 or 2023.

Attention to the health, as well as the safety, of its employees and collaboration with competent doctors pursue the prevention of occupational diseases, which have never occurred to date. Specifically, health protocols make it possible to monitor, while ensuring the protection of information, the health status of individuals exposed to specific risks and to prevent occupational diseases. In addition, ECOS, as an occupational health promotion initiative, carried out an awareness-raising campaign in 2021 on proper nutrition for seafarers. This initiative was reactivated in 2023 with a new campaign scheduled to end in 2024.

For details of the injury calculations and details of the specific risks, please refer to Section 5.2 of the Technical Appendix.



<sup>56</sup> To be referred to as injuries with permanent consequences.

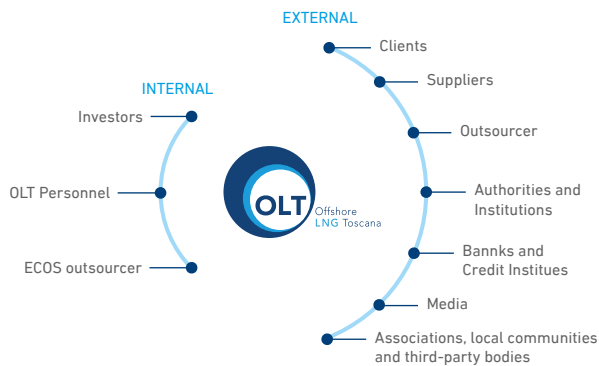
<sup>57</sup> In 2021, the accident rate considering OLT, ECOS and the Terminal suppliers together is 5.5.

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

## 4.3.1 Participation and involvement

In a perspective of proactivity and consistency with its corporate policies, OLT carries out ongoing dialogue with its stakeholders, both external and internal, with the aim of developing a constructive comparison and two-way exchange.

### Stakeholders network



There are numerous initiatives for listening, dialogue and involvement with its stakeholders. The tools and channels used are multiple and different according to the stakeholders they are addressed to and the type of relationship that ties them to OLT: from involvement in determining the materiality of the issues to be reported in the sustainability report, to the disclosure of the *EMAS Environmental Statement*<sup>58</sup>, from the organisation of conferences to the activation of commercial and operational channels.

The involvement and participation of employees is 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 opportunity to provide 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.

Furthermore, 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 81/2008;
- **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.



<sup>58</sup> An annually updated tool that is the instrument by which the EMAS-registered organization communicates with environmental stakeholders.

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, S48000). 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.

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 issues that have aroused much interest among stakeholders and have been considered in depth since the design phase. In relation to these aspects, authorisation requirements have been provided for the implementation of specific Monitoring Plans. In particular, the implementation of the twenty-year Marine Monitoring Plan around the Terminal entails significant linked activities on the territory.

Moreover, during the plant's authorisation process, in agreement with the Region of Tuscany and the municipalities of Livorno, Collesalveti and Pisa, environmental compensation measures were planned for the local communities, some of which have already been implemented.

## Offset works still open in 2023

### 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.

In order to guarantee sector-participated development and a continuous dialogue with the stakeholders, OLT has confirmed, also in 2023, its participation in a thick network of Associations that carry forward, at national and international level, the instances that OLT considers relevant for its own business and the sector it operates in; among these Gas Infrastructure Europe (GIE), which deals in particular with issues regarding European policies for the energy sector.

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 them<sup>59</sup>.



OLT participates actively in different work groups organised by *Society of International Gas Tanker and Terminal Operators (SIGTTO)* and *Oil Companies International Marine Forum (OCIMF)* and has representatives in the expert committees and groups. In particular:

#### SIGTTO:

- Working Group Reduction of Gas Carrier CO<sub>2</sub> Emissions;
- Working Group Reduction of LNGC Methane Emissions;
- Publication of 'Emergency Release Systems'.

#### OCIMF:

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

<sup>59</sup> The CEO of OLT in 2022 was appointed President of the GPC, the Technical Committee of SIGTTO, for a period of 3 years; SIGTTO is the International Association of Gas Carrier and Terminal Operators. Mrs. Venturi, Institutional Relations, Regulation and Commercial Manager of OLT, is a member of the Board of Directors of Assocostieri and of the Gas Emergency Committee chaired by Ministry of Environment and Energy Security (MASE).

OLT is an active part in a series of external initiatives for the progress of the sector and sustainable development and participated in some conferences focused on the role of LNG in the energy transition.

## Initiatives and events in 2023

**Italian LNG Summit 2023 - Sustainability, Market, Stakeholders** forum organized and promoted by OLT - under the patronage of the Ministry of Environment and Energy Security, PROXIGAS, GIE and SIGTTO - to discuss the European scenario of LNG operators and the future of LNG between security of supply and energy transition.

Assocostieri Annual Meeting, titled **"Energy Logistics, a Strategic Asset of the Mediterranean"**, speech by OLT within the panel "Transitional Fuels and the Future of the Ship and Land Sector".

**GIE Annual Conference 2023 @Riga**, which brought together hundreds of energy industry players to discuss the short, medium and long term prospects for the future of the European Union.

**SIGTTO Regional Panel** - focus on safety and technology in the LNG industry.

Webinar titled **"Infrastructure and territory, a sustainable combination"**, organized by Canale Energia, with OLT presenting its Sustainability Report 2022.

**Capraia Smart Island 2023: Ecological Transition Projects for Smaller Islands**, OLT attended the event with a speech on the upcoming Small Scale LNG Service in view of energy transition.

**Master's degree in Energy and Environmental Sustainability from 24ORE Business School**, OLT intervention on safe and sustainable energy infrastructure, reporting and social responsibility.

### 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, confirmed by the absence of claims. The Company believes in the social role that a company can and must play in the territory, providing its contribution in supporting local communities in achieving certain objectives that it has set itself.

OLT participates in the local economy in different forms, starting from the commitment, taken on right from the beginning, to search for and select personnel possibly locally, as well as the use of local suppliers.

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 developed in the following years, 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.



Several initiatives completed in 2023. As a result of the emergency situation that the community had to face in the pandemic and post-pandemic period, OLT decided to focus its resources on supporting social welfare and the weakest brackets of the local population.



#### Municipality of Livorno

As a further development of “Inclusive Social Tax<sup>60</sup>” project, also supported by OLT in 2023, the initiative included the purchase of removable ramps to provide access for people with reduced mobility to local businesses.

#### Fondazione Caritas Livorno

Even in 2023 OLT made a donation to the Fondazione Caritas Livorno for the construction of the student residence “Casa Quinto Moro” aimed at accommodating off-site university students.

#### 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. With the contribution of OLT disbursed in 2023, Assonautica has been able to carry out various projects including, for example: the Association's participation in the sailing regattas of the “Settimana Velica Internazionale – Accademia Navale Città di Livorno”, the repair, cutting and maintenance of a forklift as well as, the repair and maintenance costs of a crane to support the boats.

#### Italian Sailing Federation - FIV

In 2023, OLT supported the “ParaSailing” project promoted by the section of the FIV - Regional Committee of Tuscany and Umbria dedicated to children with disabilities. The initiative combined several elements and values that are an integral part of OLT's mission: solidarity, sports, environmental sustainability.

#### Palliative Care Association Livorno

Non-profit volunteer association, that provides medical and health care services home care, to terminally ill cancer patients and others, and operates in collaboration with Azienda USL Nordovest Toscana. OLT in 2023 decided to support the association through donating a liberal contribution.

#### Project “Bimbe in Rosa – una pagaiata per la vita”

A project sponsored by the ASD Canoe Club of Livorno, which promotes the use of Dragon Boat as a means of psycho-physical rehabilitation for women who have undergone breast cancer surgery. OLT supported the initiative by donating a liberal contribution.

#### International Sailing Week

OLT sponsored the 2023 edition of International Sailing Week, sailing event sponsored and organized by the Naval Academy and the City of Livorno.

#### Livorno Half Marathon

OLT sponsored the 2022 edition of the Livorno Marathon, financially supporting the organization of the sporting event.

Other realities and initiatives supported by OLT in 2023 are: in favor of SVS Livorno to support the activities of the P.A. Voluntary Relief Society and the Misericordia of Livorno, with a contribution towards the purchase of a vehicle to repair the damage caused by the floods that hit Tuscany in 2023.



#### Livorno Hospital: psychology service for paediatric diabetology

OLT supports psychology service for pediatric diabetology at Livorno Hospital, through a three-year scholarship (2023-2025) to guarantee the figure of the psychologist within the team.

#### Il Porto dei Piccoli Onlus

Since 2013, OLT has supported the non-profit association Il Porto dei Piccoli Onlus, which through its activities brings the culture of the sea closer to hospitalised children and their families.

#### Unicef

Also in 2023, OLT made a donation to UNICEF over the Christmas period through the purchase of electronic Christmas cards to be sent to its mailing list.

<sup>60</sup> Transportation service to facilitate movement in the city for people with reduced autonomy.

### Leadership in Health and Safety

In 2020 the Company joined the "Leadership in Health and Safety" project of the LHS Foundation, for the development and consolidation of health and safety values within the Organization. The program, which ran from 2020 to 2022, involved staff from OLT, Ecos, and Fratelli Neri.

As a follow-up to the LHS program carried out in previous years, the "We Grow Up Together – OLT Safety Day" event on the topic of safety was organized in 2023, involving all OLT, Ecos and Fratelli Neri employees, as well as all major suppliers.

### In testa, la sicurezza 2023

Organization of the event "In testa, la sicurezza 2023" in collaboration with the City of Livorno, the newspaper Il Tirreno and under the patronage of LHS Foundation; the project featured an improvisational theater performance to raise awareness of workplace safety among young people, with the participation of local secondary schools.



### Project Scuola2030 - Il Tirreno

Project promoted by the newspaper Il Tirreno, with the aim of creating a virtuous synergy between the schools of Tuscany and the most representative companies of the territory, to bring students closer to the world of work. The project provides for some meetings in secondary schools, whose planning is underway.



### Reforestation projects 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 del Monte Pisano 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 Montegrando, was inaugurated in June 2021, while a second project, related to Monte Serra (La Croce), is in progress<sup>61</sup>.

### 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 periurban area of the municipality of Pisa, with inauguration held at the end of January 2022 and subsequent maintenance of the area. The project was completed in December 2023, with handover of the area to the Municipality of Pisa expected during 2024.

In the Municipality of Livorno an urban forest of over 1800 trees was created, the planting activity ended in December 2022 and the maintenance activities on the areas planted are in progress.

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<sup>61</sup>.

### Lions Club Livorno Host

OLT has joined the "PiùBlu" project promoted by the Lions association to safeguard Livorno's sea, participating in the purchase of a compactor to prevent plastic from being dispersed into the sea, a tool for involving people who are encouraged to take actions in favour of the environment, recycling PET bottles and CO<sub>2</sub> reduction. The installation of the compactor took place in 2023 at the Livorno Aquarium.

### Capraia Smart Island 2023

Event titled "Capraia Smart Island 2023: Ecological Transition Projects for Smaller Islands", with the aim of presenting the main experiences to increase the sustainability of the energy, waste, water cycle, energy efficiency in buildings, port management, and sustainable mobility supply chains, both land and marine. OLT attended the event with a speech on the new SSLNG service with a view to energy transition.

The Company is determined to continue the CSR project in the years to come; a number of programs are currently being developed, such as: reforestation projects, restoration of coralligenous mantle damaged by human activities and reclamation of marine habitat on the Tuscan coast, and social projects on the territory.

<sup>61</sup> The reforestation and environmental compensation interventions completed to date by OLT will be able to contribute a total of more than 5,700 tons of CO<sub>2</sub> sequestration in 30 years starting in 2021 (estimate provided by the Tuscany Region and the University of Tuscia, based on the projects implemented).

# 5 ADDITIONAL INFORMATION

## 5.1 METHODOLOGICAL NOTE

### 5.1.1 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 January 1, 2023 – December 31, 2023.

In the drafting of the Sustainability Report the industry standard “GRI 11: Oil & Gas Sector 2021”, was used, insofar as applicable to the company’s 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 terms in the text of the document indicated in *italics* are given in the glossary for a more complete understanding.

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

- **accuracy:** additional information includes references to the standards, assumptions and calculation methods used, to the extent deemed necessary due to the type of information. Data shown have been rounded to no more than three decimal point. The level of detail in the contents of the document is considered appropriate for understanding and evaluating OLT’s performance and its impacts. Where deemed useful, or of possible interest to stakeholders, external references are provided for the retrieval of additional detailed information;
- **balance:** the contents of this document report the positive and negative impacts of the company on an annual basis in a fair and impartial manner;
- **clarity:** the choice of clear language, graphs and tables to show performance, and the availability of a glossary make the content usable and easy to understand for stakeholders. OLT also makes the document available in English on its website;
- **comparability:** performance indicator data are reported for the three-year period 2021-2023 so that stakeholders can appreciate the evolution of OLT’s performance 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. In the case of revisions concerning information relating to previous reporting periods, the amended information shall be accompanied by a note explaining the reasons for the revision and its effects;
- **completeness:** the material topics that guide the content of this Report are covered in their entirety and represent the economic, environmental, and social impacts most relevant for the activities of OLT;
- **sustainability context:** OLT’s performance is set in the broader sustainable development and business including scenario information in relation to the main material topics addressed;
- **timeliness:** the Report takes into account events occurred after December 31, 2023 which may be significant for the stakeholders’ assessment of the performance of OLT. The Report is scheduled to be published annually within the first half of the year following 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 Director.

In line with previous years, OLT decided again this year to have the document audited by an independent third-party, whose declaration of assurance can be found in the annex “Assurance Statement”.

The person to contact for information and suggestions is:  
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E-mail: [sostenibilita@oltoffshore.it](mailto:sostenibilita@oltoffshore.it)

## 5.1.2 Materiality analysis

Materiality analysis is the tool through which OLT annually defines and reviews the universe of significant issues and the list of material topics on which to focus reporting. In 2023, the Company updated its materiality analysis to ensure consistency not only with the 2021 GRI Sustainability Reporting Standards, including GRI 11: Oil & Gas Sector Standards, but also with the evolving sustainability environment.

In particular, the *SDGs* were taken into account in the analysis and a first application exercise was carried out of the concept of “dual materiality” introduced by EU Directive 2022/2464<sup>62</sup> and the European Sustainability Reporting Standards (ESRS)<sup>63</sup>, which requires identifying not only the sustainability impacts of the company (inside-out perspective) but also the risks and opportunities for the company (outside-in perspective).

Internal and external documentary sources, including comparative analysis, sustainability trends and pressures for the Oil & Gas sector, were analyzed to understand the context in which OLT operates and to identify impacts.

The following aspects were considered for each impact identified:

- category of stakeholders involved;
- category of impact, distinguishing between:
  - a) positive and negative impacts based on the possible benefits or disadvantages resulting from their effects;
  - b) current impacts, i.e., which have already occurred, and potential impacts, i.e., which are probable to occur;
- stage in the value chain at which the impact occurs;
- human rights impacts.

Then, the impacts were evaluated through the analysis of “impact materiality” and “financial materiality” by assigning a score, variable in predefined ranges, for each of the considered criteria. This resulted in a final score, given by the sum of impact materiality and financial materiality, which allowed impacts to be classified as having “negligible”, “low”, “medium” or “high” materiality.











Impacts with “negligible” significance are not considered material for the purpose of Sustainability Reporting. All other impacts have been clustered into 5 Material topics.

Hence, the materiality analysis process was submitted to the evaluation of a panel of stakeholders who basically confirmed the results obtained.



<sup>62</sup> Corporate Sustainability Reporting Directive (CSRD), which entered into force in January 2023.

<sup>63</sup> At the time of the analysis, ESRS 1 and 2 were available in draft (April 2022).

MATERIAL TOPICS 2023	IMPACT	TYPE	DESCRIPTION	RELEVANCE	GRI RELATED
Fight against climate change	Contribution to climate change	Current	The impacts of climate change are affecting the effective enjoyment of human rights. Climate- changing gas emissions related to OLT's operations are: «direct», related to the operation of the Terminal, and «indirect», related to the fuel consumption of the vessels serving the Terminal.	 High	201-2/11.2.2 305-1/11.1.5 305-3/11.1.7 305-4/11.1.8 305-5/11.2.3
					
	Contribution to national climate change policy-making	Potential	The transition to a low-carbon economy can have repercussions on employment, public revenues and economic development in the regions where the sector operates. OLT joins a large network of Associations that bring forward the demands that OLT considers relevant to its business and the sector in which it operates.	 High	
					
Energy consumption	Depletion of energy resources	Current	An organization can consume energy in various forms, generate it itself or purchase it from external renewable or non-renewable sources. The electricity used by the Terminal is entirely self-generated. The primary energy consumption required to ensure the Terminal's operations for plant reasons is related exclusively to the use of non-renewable sources: Natural Gas (NG) and, to a minor extent, Marine Gas Oil (MGO). To these are added the consumption related to the marine services supporting the Terminal's operations provided by the Fratelli Neri Company.	 Low	302-1/11.1.2 302-2/11.1.3 302-3/11.1.4 302-4
					
LNG market and energy transition	Contribution to the diversification of gas supply sources and national energy security	Current	Among the indirect economic impacts that an organization can have on its stakeholders and the economy is the availability of products and services for people with low incomes. The development of regasification capacity contributes to increase the security and flexibility of the gas system by reducing the exposure of those in vulnerable situations to economic and social shocks. OLT contributes to diversification of gas supply sources and national energy security by increasing available regasification capacity.	 High	201-2/11.2.2 203-1/11.14.4 203-2/11.14.5 11.2.4
					
	Contribution to the sustainable transition of the energy and transport sector	Potential	Technological developments and scientific research and innovation are essential to find long-term solutions to economic and environmental challenges. OLT's Small Scale LNG (SSLNG) service can make its contribution in reducing environmental impact in the maritime and land transport sector, as well as for industrial and civil uses in areas not served by the national transport network.	 Medium	
					

Current or Potential negative impact



Social impact



Governance and market impact











Current or Potential positive impact



Environmental impact



Impact on human rights

MATERIAL TOPICS 2023	IMPACT	TYPE	DESCRIPTION	RELEVANCE	GRI RELATED
Health and safety for people	Occupational injuries	Potential	Low levels of safety at work in conditions of potential risk, together with the absence of training in this area, can lead to serious workplace injuries. The safety culture is an identity element of OLT, which is committed to ensuring the safety of the Terminal and all related operations to protect workers.	 Medium	403-1/11.9.2 403-2/11.9.3 403-3/11.9.4 403-4/11.9.5 403-5/11.9.6 403-6/11.9.7 403-7/11.9.8 403-8/11.9.9 403-9/11.9.10 403-10/11.9.11 413-2/11.15.3 416-1/11.3.3 416-2
					
	Impact on community health and safety	Potential	The topic includes the systematic efforts dedicated by an organization to manage health and safety matters in the entire life cycle of a product or service. The safety culture is an identity element of OLT, which is committed to ensuring the safety of the Terminal and all related operations to protect workers, suppliers and local communities.	 Medium	
					
Commitment and responsibility to community	Contribution to growth	Current	The lack of work and its poor quality indirectly affect the increase of poverty and inequalities at the global level. OLT contributes to growth by generating value with initiatives and conduct that allow the Company to operate successfully in the reference market, achieving sustainable results and ensuring a balanced distribution towards its stakeholders of the value that they, directly or indirectly, have contributed to produce.	 Medium	201-1/11.14.2/11.21.2 201-3 202-1 202-2/11.11.2/11.14.3 203-1/11.14.4 203-2/11.14.5 204-1/11.14.6 205-1/11.20.2 205-2/11.20.3 205-3/11.20.4 206-1/11.19.2 207-1/11.21.4 207-2/11.21.5 207-3/11.21.6 401-1/11.10.2 401-2/11.10.3 402-1/11.10.5 404-1/11.10.6/11.11.4 404-2/11.10.7 404-3/11.10.7 405-1/11.11.5 405-2/11.11.6 406-1/11.11.7 413-1/11.15.2 413-2/11.15.3 414-1/11.10.8 11.12.3 414-2/11.10.9 415-1/11.22.1/11.22.2 11.15.4 11.20.5 11.20.6
					
	Discrimination	Potential	Peaceful and inclusive societies are further challenged by structural injustices, inequalities and emerging human rights issues. OLT provides regasification service based on transparently defined and non-discriminatory access rules; promotes a merit and equality culture through the Charter of Values and non-discriminatory employment procedures and practices. The risk of discrimination in the workplace is monitored and audited according to the SA8000 standard.	 Low	
					
	Impact on informed decisions	Current	OLT has started a voluntary path of reporting and certifying its performance, which is implemented in the Integrated Management System (Quality, Environment, Safety and Social Responsibility) and, from 2021, in the publication of the Sustainability Report drawn up in accordance with the GRI Standards.	 Low	
					

Current or Potential negative impact

 Social impact

 Governance and market impact

Current or Potential positive impact

 Environmental impact

 Impact on human rights

The different stages of the update process of the materiality analysis, and its results, were approved by the Managing Director.

The following material topics of 2022 were merged under the item **"Health and Safety for People"**:

- decommissioning and restoration, limited to the management of potential environmental and safety impacts, associated with a future decommissioning of the Terminal;
- asset integrity and incident management.

The focus of the new topic **"Commitment and Responsibility to the Community"** is driven by the impacts materialized and merged under this theme, and then explores aspects related to contribution to growth in its various forms, discrimination in business and labor relations, and information sharing. In particular, the following 2022 material topics were partially and/or with different shades merged into the new topic **"Commitment and Responsibility to the Community"**:

- **Ethics and integrity**, limited to aspects that have or can have a growth spillover, such as approach to taxation and anti-competitive conduct. Specific aspects, such as tax credits, were not considered material due to their irrelevance in terms of their impact on community growth. The issue of corruption, although found to be non-material considering the control system in place, is qualitatively addressed within the text since preventing and combating corruption is one of OLT's fixed points;
- **Service quality**, limited to the non-discriminatory and transparent approach adopted in business relations;
- **Diversity and equal opportunity**, limited to the aspects of promoting non-discriminatory employment procedures and practices, as the impacts on equal opportunity were not found to be significant. It was chosen, however, to report some quantitative data in the appendix to give evidence of the state-of-the-art in equal opportunity;
- **Employment practices and work protection**, limited to aspects related to job creation, as impacts related to freedom of association and child and forced work were not found to be significant. Regarding personnel skills development, although found to be non-material, we have chosen to report some quantitative data in the appendix to give evidence of OLT's focus on developing the skills of its resources;
- **Commitment to communities**, fully merged;
- **Economic impacts**, fully merged.

The topic "Approach to Risk Management" was removed as not material due to the different identification and assessment methodology adopted. However, as this aspect is part of the constituent characteristics of corporate identity, it is the subject of qualitative discussion within the text.

Similarly, the topics "Air Quality", "Waste Management" and "Effects on Biodiversity" were not found to be material. In relation to these topics, for those interested, please refer to the [Environmental Statement](#) prepared in compliance with the provisions of the EMAS Regulation.

### 5.1.3 Reporting scope

The reporting scope varies according to the relevance of the topics. In particular:

- with reference to environmental issues, only environmental aspects related to the Terminal are considered, as environmental impacts connected with office activities are considered negligible;
- with reference to information related to personnel management, particularly on occupational health and safety, the scope is extended to include ECOS, the main outsourcer of OLT and Terminal's operator;
- for governance-related and economic issues, OLT is considered in its entirety, consistent with the scope of the Financial Report.

## 5.2 TECHNICAL APPENDIX

### 5.2.1 Energy consumption

The data on energy consumed within the Organisation only consider energy consumption at the Terminal. Energy consumption related to the offices for lighting and heating is in fact considered negligible compared to the Terminal's consumption (< 1%).

Also negligible, and therefore excluded from reporting, is consumption related to business travel and employee home-work trips.

The data relating to the total Electricity produced are measured by fiscal meters in MWh and converted to GJ according to the relation  $1 \text{ MWh} = 3.6 \text{ GJ}$ .

NG consumption data derive from plant meters (gas chromatograph and flow meter) that provide the annual cumulative value in GJ based on the *Lower Calorific Value* (LCV) of the NG metered.

MGO consumption data are measured in tons and converted to GJ using the LCV value of 42.873 GJ/Ton (source ISPRA: UNFCCC<sup>64</sup> - national inventory - table of standard national parameter - coefficients used for the CO<sub>2</sub> inventory in the UNFCCC national inventory - average values for the years 2020-2022).

The values expressed in GJ of MGO consumption by the vessels supporting the Terminal's operations are a reprocessing of data provided in tons by the outsourcer Fratelli Neri.

### 5.2.2 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 CO<sub>2</sub> emissions:

- the values of CO<sub>2</sub> emitted by boiler funnels and the minor utilities, which represent the main contribution, calculated according to the methodology provided by the *Emission Trading System*;
- *fugitive emissions* calculated in accordance with the *IEA Decree* for the Terminal and following the reference standards: UNI EN 15446, EPA 453/R95, EPA Method 21, ISPRA protocol n. 0018712 as amended;
- vent emissions, for example 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*;
- pneumatic emissions from gas chromatograph vents (very small emissions) calculated considering design flow rate and hours of use;
- emissions coming from boilers, calculated on the basis of direct measurement of the VOCs from the continuous monitoring system.

The 100-year *Global Warming Potential* (GWP) values used to convert CO<sub>2</sub> and CH<sub>4</sub> emissions to CO<sub>2</sub>eq are CO<sub>2</sub> = 1; CH<sub>4</sub> = 28 respectively (Source: VI<sup>th</sup> IPPC Report<sup>65</sup> - GHG Protocol).

This calculation method led OLT to reach OGMP 2 level 4, as planned by the actions of the "Climate change Policies" objective.

For the calculation of **indirect emissions** (Scope 3) from this report, in accordance with the approach outlined in the GHG protocol, not only emissions from Terminal support vessels were considered as in previous years, but also emissions:

- arising from the procurement of raw materials and fuels (NG and MGO);
- arising from waste disposal;
- related to energy consumption of the land base serving OLT's outsourcers.

Specifically, for each GHG Category<sup>66</sup>, each activity data considered was multiplied by the relevant emission factor (Sources: IPCC 2006; IEA 2019; Ecoinvent 3.10; UK DEFRA 2021). This approach resulted in a significant improvement in the accuracy of Scope 3 emissions information.

A different emission factor (3081.41 KgCO<sub>2</sub>eq/tons of MGO) was applied to estimate the **reduction in GHG emissions** related to the shutdown of one of the two Guardian Vessel engines, which had been calculated in previous years based on engine characteristics and fuel consumption, from 2023 onwards.

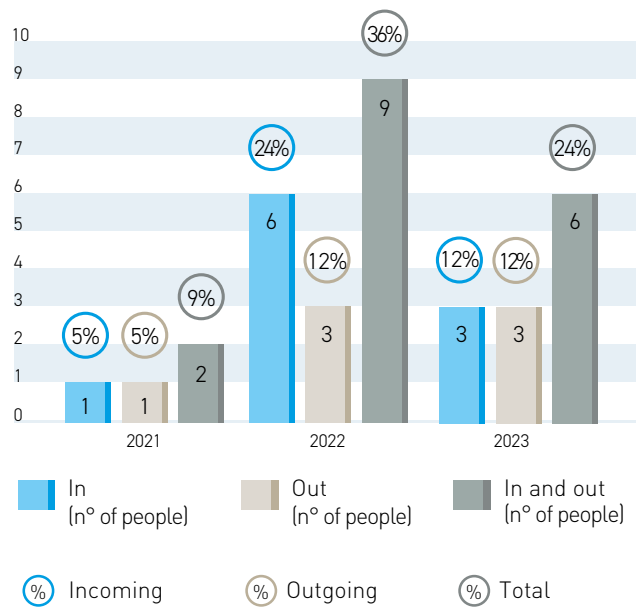
<sup>64</sup> The UNFCCC National Inventory describes the reporting of greenhouse gas emissions that Italy officially reports in accordance with provisions under the United Nations Framework Convention on Climate Change (UNFCCC), the Kyoto Protocol and the European Union's Greenhouse Gas Monitoring Mechanism.

<sup>65</sup> The Intergovernmental Panel on Climate Change (IPCC) is the leading international body for the assessment of climate change.

<sup>66</sup> The GHG Protocol divides Scope 3 emissions into 15 categories, which in turn are organised into two types: upstream or downstream emissions in the value chain.

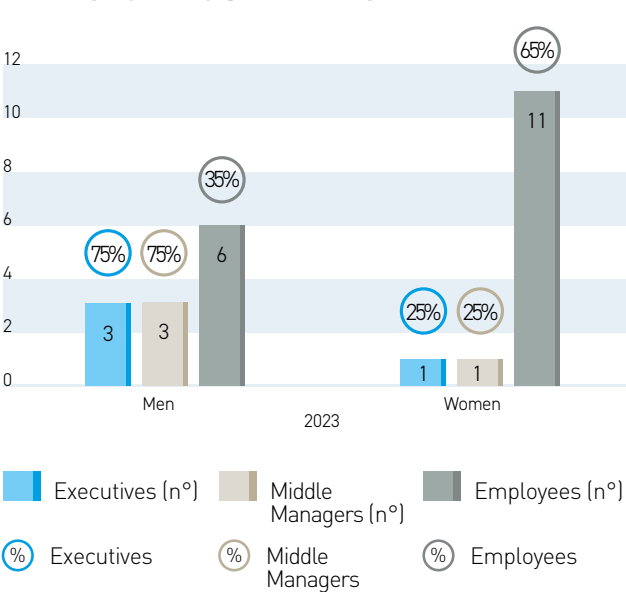
### 5.2.3 The OLT team

Ins and Outs in OLT and turnover rate

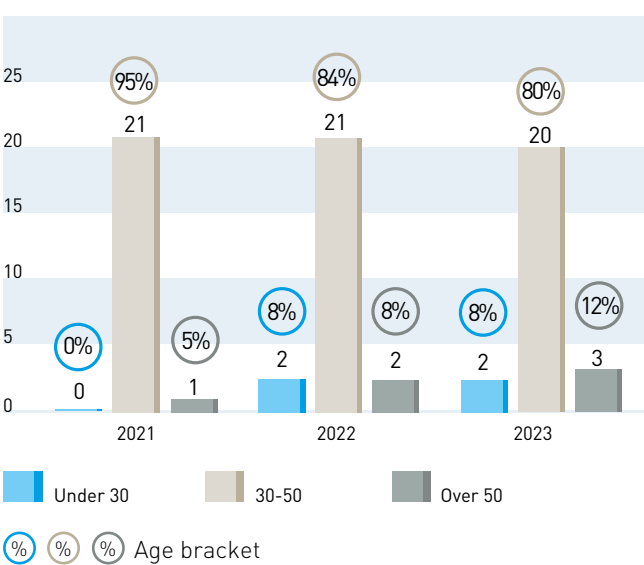


The incoming turnover rate<sup>67</sup> was calculated as follows: incoming in the period/overall at the end of the period\*100.  
The outgoing turnover rate was calculated as follows: outgoing in the period/overall at the end of the period\*100.  
The total turnover rate was calculated as follows: incoming + outgoing in the period /overall at the end of the period\*100.

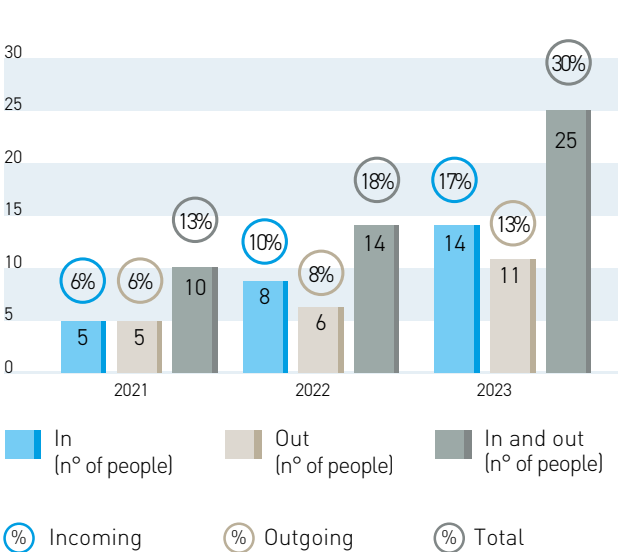
OLT employees by gender and position



Employees by age bracket



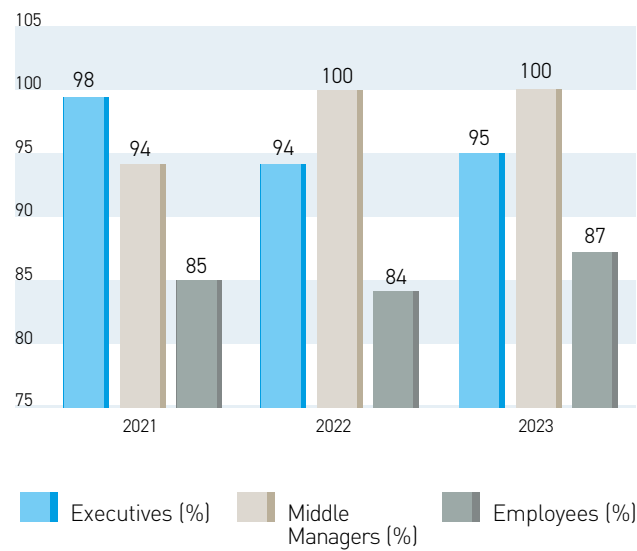
Ins and Outs in ECOS and turnover rate



<sup>67</sup> The turnover rate, or staff turnover rate, is a metric used by companies to measure how often employees leave the organization over a given period of time. It is a key indicator that can reflect various aspects of an organization's well-being, such as employee satisfaction, management quality and financial stability.

### 5.2.4 The protection of work while respecting diversity

Base Salary Women/Base Salary Men

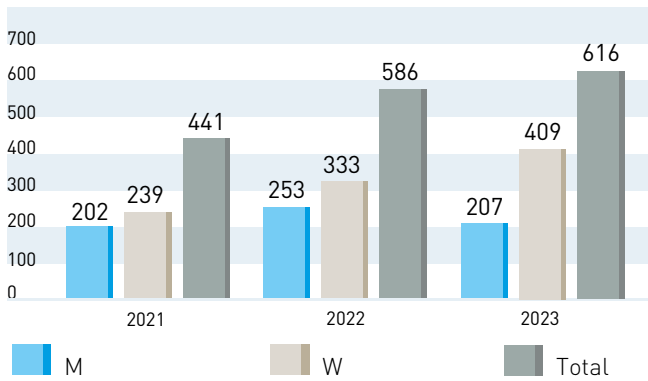


The graph shows average values calculated by contractual framework, considering gross annual remuneration including seniority steps, net of variable pay and overtime.



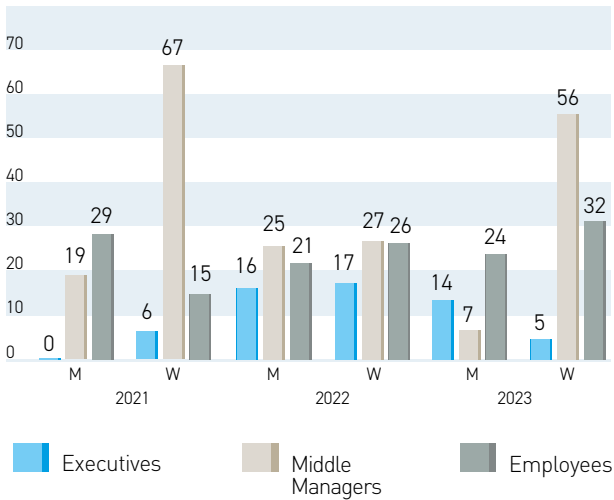
### 5.2.5 The growth of skills and the promotion of professional culture

Hours of training provided by gender

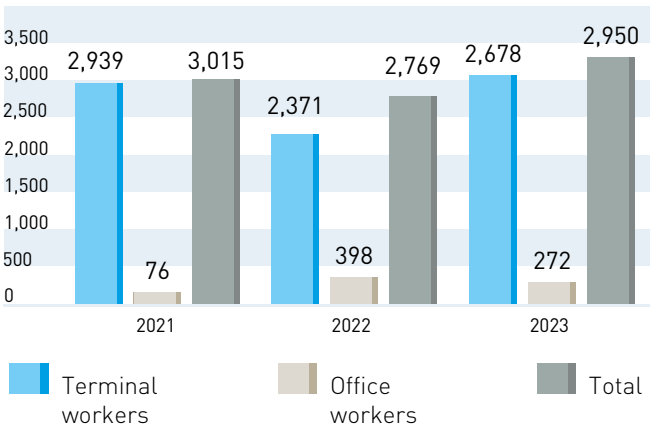


Note: 59% of the training focused on safety issues.

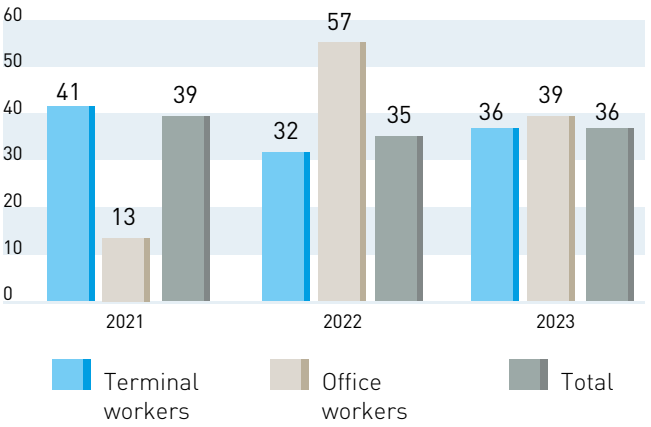
Average hours of training per head by gender and position



Hours of training, ECOS personnel



Average hours of training per head, ECOS personnel



Note: 74% of the training hours for the Terminal personnel and 56% of the office personnel focused on safety issues.

5.2.6 Safety at the heart of OLT’s culture

For the determination of the “Total injury rate of OLT, ECOS and the Terminal’s suppliers” reference is made to the recordable work accident rate calculated by adding the number of recordable work accidents of OLT, ECOS and the Terminal’s suppliers and comparing it with the number of hours worked by the employees of the same companies.

In order to assess the prevention of injuries and occupational diseases, OLT and ECOS in accordance with the applicable regulations in the offices and onboard the Terminal drew up a risk assessment document for appropriate identification, evaluation, and mitigation of risks that includes monitoring through the health protocol. All risks were considered acceptable. Risks related to the possibility of occurrence of an occupational disease are related to work as a video screen operator for both the offices and the Terminal and physical risks (such as vibration and noise) exclusively related to some work performed on the Terminal. Work-related stress is also constantly monitored.



# GRI CONTENT INDEX

The Sustainability Report of OLT Offshore LNG Toscana S.p.A. has been prepared following the “GRI Standards” of the Global Reporting Initiative (GRI) for the period January 1, 2023 – December 31, 2023

Reporting principles 2021 (GRI 1)

Applicable industry standards: Oil & Gas Sector 2021 (GRI 2021)

GRI STANDARD	INFORMATION	PLACE	OMISSION/NOTES	INDUSTRY STANDARD GRI
<b>GENERAL INFORMATION</b>				
<b>The organization and its reporting practices</b>				
	2-1 Organisation details	1.1 About OLT 1.1.1 The Shareholders		
	2-2 Entities included in the organization's Sustainability Report	5.1.3 Reporting scope		
	2-3 Reporting Period, frequency and point of contact	5.1.1 Reporting approach and quality principles		
	2-4 Review of information	5.1.1 Reporting approach and quality principles		
	2-5 External Assurance	5.1.1 Reporting approach and quality principles Statement of assurance		
	2-6 Activity, value chain and business relations	1.2 Governance and organisational structure 2.3 The Service offered 2.3.1 The Regasification Service 2.3.2 The Emergency Service established by MASE 2.3.3 The Small Scale LNG Service 2.5.2 Partnership with suppliers		
<b>Activity and employees</b>				
	2-7 Employees	4.1.1 The OLT team		
	2-8 Non-Employees	4.1.1 The OLT team		
<b>Governance</b>				
	2-9 Structure and composition of the governance	1.2 Governance and organisational structure		
	2-10 Assignment and selection of the biggest governance body	1.2 Governance and organisational structure		
<b>GRI 2: General information 2021</b>	2-11 Chairman of the highest governing body	1.2 Governance and organisational structure		
	2-12 Role of the highest governance body in overseeing impact management	1.2 Governance and organisational structure		
	2-13 Delegation of responsibility to manage impacts	1.2 Governance and organisational structure		
	2-14 Role of the highest governance body in sustainability reporting	5.1.1 Reporting approach and quality principles 5.1.2 Materiality Analysis		
	2-15 Conflicts of interest	1.2 Governance and organisational structure		
	2-16 Communication of critical issues	1.3 The fixed points of OLT 4.3.1 Participation and involvement		
	2-17 Collective knowledge of the highest governing body	1.2 Governance and organisational structure 1.3 The fixed points of OLT 5.1.2 Materiality Analysis		
	2-18 Performance evaluation of the highest governing body	1.2 Governance and organisational structure		
	2-19 Remuneration policies	1.2 Governance and organisational structure	The rules regarding the remuneration of members of the highest governing body and senior executives do not include: bonus conferred at the beginning of the appointment and incentives for appointment; payments at the end of the employment contract excepts as provided for in the applicable collective bargaining agreements; reimbursement of compensation if certain conditions of employment or objectives are not met; retirement benefits Information 2-19b cannot be published for confidentiality reasons Given the small number of employees it would provide information that could potentially be traced to individual employees	
	2-20 Remuneration determination process	1.2 Governance and organisational structure 4.1.2 Protection of labour and valuing resources	2-20 a Consultants do not participate in determining remuneration Remuneration is determined by the Managing Director 2-20 b Not applicable	
	2-21 Rate of total annual earnings		The indicator cannot be published for reasons of confidentiality Given the small number of employees, it would provide information potentially attributable to individual employees	

GRI STANDARD	INFORMATION	PLACE	OMISSION/NOTES	INDUSTRY STANDARD GRI
GENERAL INFORMATION				
Strategy, policies e practices				
	2-22 Sustainable Development Strategy Statement	Letter to the Stakeholders 1.6 OLT: today's results and tomorrow's commitments		
	2-23 Policy and commitments	1.3 The fixed points of OLT 2.5.2 Compliance with laws and regulations		
	2-24 Political integration and commitments	1.3 The fixed points of OLT		
	2-25 Processes to remedy negative impacts	1.3 The fixed points of OLT 2.4 The quality of the service offered 4.3.1 Participation and involvement		
	2-26 Mechanisms for seeking advice and reporting concerns	1.3 The fixed 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 heart of OLT culture		
	2-28 Participation in associations	4.3.1 Participation and involvement		
Stakeholder engagement				
	2-29 Stakeholder engagement approach	2.2 Increase in Terminal regasification capacity 2.4 The quality of the service offered 4.3.1 Participation and involvement 5.1.2 Materiality analysis		
	2-30 Collective bargaining agreements	4.1.1 The OLT team		
MATERIAL TOPICS				
	3-1 Processes of determining material topics	5.1.2 Materiality analysis		
GRI 3: Material Topics 2021	3-2 List of material topics	5.1.2 Materiality analysis		
COMBATING CLIMATE CHANGE				
GRI 3: Material Topics 2021	3-3 Management of material topics	Letter to the Stakeholders 1.3 The fixed points of OLT 1.4 Compliance with laws and regulations 1.5 Risk management 1.6 OLT: today's results and tomorrow's commitments 2.3.3 The Small Scale LNG Service Chapter 3 - OLT FOR THE ENVIRONMENT 3.1.2 Climate-changing emissions - GHG		11.1.1 11.2.1
GRI 201: Economic Performance 2016	201-2 Financial implications and other risks and opportunities arising from climate change	1.5 Risk management 2.3.3 The Small Scale LNG Service		11.2.2
	305-1 Direct GHG emissions (Scope 1)	3.1.2 Climate-changing emissions - GHG 5.2.2 Climate-changing emissions		11.1.5
GRI 305: Emissions 2016	305-3 Other indirect GHG emissions (Scope 3)	3.1.2 Climate-changing emissions - GHG 5.2.2 Climate-changing emissions		11.1.7
	305-4 GHG emission intensity rate	3.1.2 Climate-changing emissions - GHG 5.2.2 Climate-changing emissions		11.1.8
	305-5 Reducing GHG emissions	3.1.2 Climate-changing emissions - GHG 5.2.2 Climate-changing emissions		11.2.3

GRI STANDARD	INFORMATION	PLACE	OMISSION/NOTES	INDUSTRY STANDARD GRI
ENERGY CONSUMPTION				
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fixed points of OLT 1.6 OLT: today's results and tomorrow's commitments Chapter 3 - OLT FOR THE ENVIRONMENT		
	302-1 Energy consumed within the organization	3.1.1 Energy consumption 5.2.1 Energy consumption		11.1.2
GRI 302: Energy 2016	302-2 Energy consumed outside the organization	3.1.1 Energy consumption 5.2.1 Energy consumption		11.1.3
	302-3 Energy intensity	3.1.1 Energy consumption		11.1.4
	302-4 Reduction of energy consumption	3.1.1 Energy consumption		
LNG MARKET AND ENERGY TRANSITION				
GRI 3: Material Topics 2021	3-3 Management of material topics	Letter to the Stakeholders 1.6 OLT: today's results and tomorrow's commitments 2.1 The role of LNG 2.2 Increase in Terminal regasification capacity 2.3 The Services offered 2.3.3 The Small Scale LNG Service Chapter 3 - OLT FOR THE ENVIRONMENT		11.2.1
	203-1 Investments in infrastructure and supported services	2.3.3 The Small Scale LNG Service		11.14.4
GRI 203: Indirect economic impacts 2016	203-2 Significant indirect economic impacts	2.1 The role of LNG 2.3.3 The Small Scale LNG Service 2.5.1 Our contribution to growth		11.14.5
GRI 11: Oil & Gas Sector 2021	11.2 Climate adaptation, resilience and transition	4.3.1 Participation and involvement		11.2.4
HEALTH AND SAFETY FOR PEOPLE				
GRI 3: Material Topics 2021	3-3 Management of material topics	1.3 The fixed 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 4.3.1 Participation and involvement		11.7.1 11.8.1 11.9.1
	403-1 Occupational Health and Safety Management System	1.3 The fixed points of OLT 1.2 Governance and organisational structure 4.2 Safety at the heart of OLT's culture		11.9.2
GRI 403: Occupational Health and Safety 2018	403-2 Hazard identification, risk assessment and incident investigation	4.2 Safety at the heart of OLT's culture 4.3.1 Participation and involvement		11.9.3
	403-3 Occupational health services	4.2 Safety at the heart of OLT's culture		11.9.4
	403-4 Participation and consultation of workers on occupational safety and health programmes and related communication	4.2 Safety at the heart of OLT's culture 4.3.1 Participation and involvement		11.9.5
	403-5 Training of workers on occupational health and safety	4.1.2 Protection of work and valuing resources		11.9.6
	403-6 Promotion of workers' health	4.1.2 Protection of work and valuing resources 4.2 Safety at the heart of OLT's culture		11.9.7
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	2.4.2 Partnership with suppliers 4.2 Safety at the heart of OLT's culture		11.9.8
	403-8 Workers covered by an occupational health and safety management system	4.2 Safety at the heart of OLT's culture		11.9.9
	403-9 Occupational accidents	4.2 Safety at the heart of OLT's culture 5.2.6 Safety at the heart of OLT's culture		11.9.10
	403-10 Occupational diseases	4.2 Safety at the heart of OLT's culture		11.9.11
GRI 413: Local Communities 2016	413-2 Activities with significant potential and current negative impacts on local communities	Chapter 4 - OLT FOR PEOPLE		11.15.3

GRI STANDARD	INFORMATION	PLACE	OMISSION/NOTES	INDUSTRY STANDARD GRI
<b>GRI 416: Consumer Health and Safety 2016</b>	416-1 Assessment of health and safety impacts by product and service categories	4.2 Safety at the heart of OLT's culture		11.3.3
	416-2 Incidents of non-compliance concerning impacts on the health and safety of products and services	4.2 Safety at the heart of OLT's culture		
<b>GRI 11: Oil &amp; Gas Sector 2021</b>	11.8 Asset integrity and critical event management	4.2 Safety at the heart of OLT's culture	11.8.4 Additional Industry Information for Organisations with Tar Sands Mining Operations Non Applicable: OLT does not perform tar sands extraction operations	11.8.2 11.8.3
<b>COMMITMENT AND RESPONSIBILITY TO THE COMMUNITY</b>				
<b>GRI 3: Material Topics 2021</b>	3-3 Management of material topics	1.3 The fixed points of OLT		11.7.1
		1.4 Compliance with laws and regulations		11.7.6
		1.5 Risk management		11.10.1
		1.6 OLT: today's results and tomorrow's commitments		11.11.1
		2.3 The Services offered		11.12.1
		2.3.1 The Regasification Service		11.13.1
		2.3.2 The Emergency Services set up by MASE		11.14.1
		2.3.3 The Small Scale LNG Service		11.15.1
		2.4 The quality of the service offered		11.19.1
		2.5.1 Our contribution to growth		11.20.1
		Chapter 3 - OLT FOR THE ENVIRONMENT		11.21.1
		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		
		4.3.2 The path of social and economic integration with the community		
		5.1.2 Materiality analysis		
<b>GRI 201: Economic Performance 2016</b>	201-1 Direct economic value generated and distributed	2.5.1 Our contribution to growth		11.14.2 11.21.2
	201-3 Obligations regarding defined benefit plans and other retirement plans	4.1.1 The OLT team		
<b>GRI 202: Market Presence 2016</b>	202-1 Relationship between the standard basic wages to gender and the local minimum wage	4.1.2 Protection of work and valuing resources		
	202-2 Percentage of senior management hired from the local community	4.1.1 The OLT team		11.11.2 11.14.3
<b>GRI 203: Indirect Economic impacts 2016</b>	203-1 Investments in infrastructure and supported services	2.3.3 The Small Scale LNG Service 2.5.1 Our contribution to growth		11.14.4
	203-2 Significant indirect economic impacts	2.5.2 Partnership with suppliers		11.14.5
<b>GRI 204: Pratiche di Procurement 2016</b>	204-1 Proportion of expenditure made to local suppliers	2.5.2 Partnership with suppliers		11.14.6
<b>GRI 205: Anti-corruption 2016</b>	205-1 Transactions assessed to determine corruption risks	1.5 Risk management	Non-material topic. However, as part of the constituent characteristics of corporate identity, it is the subject of qualitative discussion within the text	11.20.2
	205-2 Communication and training on anti-corruption regulations and procedures	1.3 The fixed points of OLT	Non-material topic. However, it is subject to discussion qualitative within the text as the prevention and fight against corruption are among the key points of OLT	11.20.3
	205-3 Confirmed corruption incidents and measures taken	1.4 Compliance with laws and regulations	Non-material topic. However, it is subject to discussion qualitative within the text as the prevention and fight against corruption are among the key points of OLT	11.20.4

GRI STANDARD	INFORMATION	PLACE	OMISSION/NOTES	INDUSTRY STANDARD GRI
GRI 206: Anti-competitive behavior 2016	206-1 Lawsuits relating to anticompetitive conduct, trusts and monopolistic practices	1.4 Compliance with laws and regulations		11.19.2
	207-1 Approach to taxation	2.5.1 Our contribution to growth		11.21.4
GRI 207: Taxation 2019	207-2 Tax-related governance, control and risk management	1.5 Risk management 2.5.1 Our contribution to growth		11.21.5
	207-3 Stakeholder engagement and management of tax-related concerns	2.5.1 Our contribution to growth		11.21.6
GRI 401: Employment 2016	401-1 Recruitment of new employees and employee turnover	4.1.1 The OLT team 5.2.3 The OLT team		11.10.2
	401-2 Benefits for full-time employees that are not available for temporary or part-time employees	4.1.2 Protection of work and valuing resources		11.10.3
GRI 402: Work and Relationship Management 2016	402-1 Minimum notice period for operational changes	4.1.1 The OLT team		11.10.5
GRI 404: Training and Education 2016	404-1 Average number of training hours per year per employee	5.2.5 The growth of skills and the promotion of professional culture	Non-material topic. Data included in appendix for additional information	11.10.6 11.11.4
	404-2 Employee upskilling and transition assistance programs	5.2.5 The growth of skills and the promotion of professional culture		11.10.7
	404-3 Percentage of employees receiving periodic evaluations of their performance and professional development	5.2.5 The growth of skills and the promotion of professional culture	Non-material topic. Data included in appendix for additional information	
GRI 405: Diversity and Equal Opportunities 2016	405-1 Diversity in governing bodies and among employees	1.2 Governance and organisational structure 4.1.1 The OLT team 5.2.3 The OLT team		11.11.5
	405-2 Relationship between basic salary to women's pay and men's pay	5.2.4 The protection of work while respecting diversity	Non-material topic. Data included in appendix for additional information	11.11.6
GRI 406: Non-Discrimination 2016	406-1 Incidents of discrimination and remedies taken	4.1.2 Protection of work and valuing resources		11.11.7
GRI 413: Local Communities 2016	413-1 Activities involving local communities, impact assessments and development programmes	4.3.1 Participation and involvement 4.3.2 The path of social and economic integration with the community		11.15.2
	413-2 Activities with significant potential and current negative impacts on local communities	1.1 Who is OLT Chapter 3 - OLT FOR THE ENVIRONMENT Chapter 4 - OLT FOR PEOPLE 4.3.1 Participation and involvement 5.1.2 Materiality analysis		11.15.3

GRI STANDARD	INFORMATION	PLACE	OMISSION/NOTES	INDUSTRY STANDARD GRI
<b>GRI 414: Social Evaluation of Suppliers 2016</b>	414-1 New suppliers that have been evaluated through the use of social criteria	2.5.2 Partnership with suppliers		11.10.8 11.12.3
	414-2 Negative social impacts on the supply chain and actions taken	2.5.2 Partnership with suppliers		11.10.9
<b>GRI 415: Public policy 2016</b>	415-1 Political contributions	OLT does not make contributions to political parties		11.22.1 11.22.2
<b>GRI 11: Oil &amp; Gas Sector 2021</b>	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
<b>GRI 11: Oil &amp; Gas Sector 2021</b>	11.20 Anticorruption	1.1.1 The Shareholders 2.3.1 The Regasification Service		11.20.5 11.20.6

#### TOPICS IDENTIFIED AS APPLICABLE IN GRI SECTOR STANDARDS CONSIDERED AS NOT APPLICABLE

THEME	EXPLANATION
<b>GRI 11: Oil &amp; Gas Sector 2021</b>	
11.1 Climate-Changing emissions (GHG)	Disclosure 11.1.6 "Indirect (Scope 2) Greenhouse Gas (GHG) Emissions" is not applicable as the Terminal uses only self-generated energy, for the Livorno office OLT procures 100% renewable electricity while for the head office and operational office in Rome the consumption of Electricity is insignificant.
11.3 Air emissions	From the Materiality Analysis, the air quality impacts of OLT's activities were found to be non-material. These impacts are attributable to emissions of nitrogen oxides (NOx), Particulate Matter (PM), carbon monoxide (CO), volatile organic compounds (VOCs), and carbon dioxide (CO <sub>2</sub> ) generated by the Terminal and monitored continuously. The Terminal's processes do not involve the emission of persistent organic pollutants or other hazardous air pollutants. Those interested, however, in learning more about these topics can refer to the Environmental Statement.
11.4 Biodiversity	From the Materiality Analysis, the impacts on biodiversity of OLT activities were found to be non-material. Monitoring over time of these impacts, which are attributable to the presence of the Terminal within the Site of Community Importance dedicated to the protection of the dolphin species (Tursiops Truncatus), showed the absence of interference due to the presence of the Terminal and the insignificance, therefore, of the risks to the marine ecosystem. However, those interested in a more in-depth study of these issues can refer to the Environmental Statement.
11.5 Waste	From the Materiality Analysis, the impacts related to waste generation at the Terminal were found to be non-material. The Terminal's wastes, mainly generated by maintenance activities and activities related to the performance of life on board by personnel, are contained in quantitative terms and have ensured their proper management, in compliance with the relevant maritime and land regulations, from the moment of their generation until their disposal at the Port of Livorno Concessionaire. However, those interested in a more in-depth study of these topics can refer to the Environmental Statement.
11.6 Water and water discharges	From the materiality analysis, the impacts on the water matrix of OLT's activities were non-material. These impacts are attributable to the water discharges into the sea of the Terminal. Those interested, however, in an in-depth analysis on these topics can refer to the Environmental Statement.
11.7 Closure and rehabilitation	11.7.4 Closed operational sites, being closed, with decommissioning plans in place; 11.7.5 Disused structures left on site and justification Not applicable: OLT has a single operational site in operation and has no brownfield sites. Similarly, end-of-career management (11.7.2 and 11.7.3), due to the age profile of employees and OLT's focus on consolidation of employment relationships, has not been assessed as a relevant issue to date and consequently is not the subject of specific business plans.
11.10 Occupational practices	Disclosure 11.10.4 "Parental Leave" is not found to be material by the Materiality Analysis.
11.11 Non-discrimination and equal opportunity	Disclosure 11.11.3 "Parental Leave" is not found to be material by the Materiality Analysis.
11.12 Forced labor and modern slavery	Not applicable. Given the geographic and socio-economic context in which OLT operates, the topic is not material.
11.13 Freedom of association and collective bargaining	Not applicable. Given the geographic and socio-economic context in which OLT operates, the topic is not material.
11.16 Rights to land and resources	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 work.
11.17 Rights of indigenous peoples	OLT operates only in Italy and does not generate impacts on indigenous peoples as defined by Convention No. 169/1989 on Indigenous and Tribal Peoples (International Labour Organization - ILO).
11.18 Conflicts and security	OLT does not operate in conflict areas and does not employ personnel hired for the purpose of protecting assets, controlling the flow of customers, preventing theft, and escorting people, goods, and valuables.
11.21 Payments to governments	Aspects related to financial assistance received from the government (11.21.3) are not considered material because they are considered non-determinant in terms of their impact on community growth. Disclosure requirement regarding taxation broken down by country (11.21.7) is not applicable, as OLT's only Fiscal residence is Italy. Disclosure 11.21.8 "Gas purchased by the State or third parties mandated by the State" is not applicable because OLT offers a service, does not buy or sell gas.

# GLOSSARY

**Best Available techniques:** the plant, control and management techniques that, among those technically feasible and economically sustainable for each specific context, guarantee low levels of pollutant emissions, optimization of the consumption of raw materials, products, water and energy and adequate accident prevention.

**Biogenic emissions:** emission of CO<sub>2</sub> originating from the combustion or degradation of biomasses.

**CSR (Corporate Social Responsibility):** corporate social responsibility describes a concept whereby companies integrate social and environmental concerns in their business operations and in their interaction with their stakeholders on a voluntary basis.

**EIA Decree (Environmental Impact Assessment):** pursuant to Legislative Decree 152/2006, the EIA is a technical-administrative procedure that aims to identify, describe and evaluate, prior to the realization of the works, the effects on the biogeophysical environment, on health and human well-being of certain public or private projects, as well as to identify measures to prevent, eliminate or minimize negative impacts on the environment, before they actually occur. The authorization is issued by a Decree (EIA Decree).

**EMAS (Eco-Management and Audit Scheme):** a voluntary tool created by the European Community that organisations (companies, public institutions, etc.) can join to assess and improve their environmental performance and provide the public and other stakeholders with information on their environmental management. The European Regulation currently in force is No. 1221 issued in 2009 and updated by European regulation No. 1505 of 2017.

**Emission Trading System:** this term generically refers to a system adopted internationally to control emissions and trade in greenhouse gases and pollutants; the "Emission Trading" Directive is the European Directive that regulates trading and monitoring.

**Fugitive emissions:** emissions deriving from an industrial process that are not conveyed because they originate from physiological (and therefore not accidental) leaks in plant systems. In particular, physiological leaks from gaskets, valves, etc.

**Gas Year:** reference period used in the gas market which goes from 06.00 hours of October 1 to 06:00 hours of October 1 in the calendar year immediately after.

**Global Reporting Initiative:** an independent international organisation born with the purpose of creating Reference standards for sustainability reporting (GRI Standards).

**GWP (Global Warming Potential):** represents the warming potential, i.e. the contribution to the greenhouse effect and global warming. It is measured in relation to the effect of the CO<sub>2</sub>, whose reference potential is 1.

**IEA Decree (Integrated Environmental Authorisation):** it is the measure that authorises the functioning of an installation under certain conditions that must guarantee compliance with the requirements as of the second part of Italian Legislative Decree 152/2006. The authorisation is issued by means of a Decree (IEA Decree).

**IFUC (Integrated Functional Unbundling Code):** set of provisions that lays down rules on functional unbundling, i.e.

regulates corporate governance arrangements in case of vertically integrated companies, or groups of companies, operating concurrently in the electricity and gas infrastructure sectors (e.g., distribution) and in the free sectors (generation and sales).

**LDAR (Leak Detection And Repair):** monitoring and containing programme for fugitive emissions from plant components such as valves, flanges, line ends, pump/compressor/agitator seals. Implementing a LDAR programme gives the possibility of identifying critical sources and carrying out targeted maintenance operations guaranteeing a significant reduction in emissions with the consequent advantages: financial savings, safety improvements, environmental protection and CO<sub>2</sub> reduction.

**MGO (Marine Gas Oil):** a fuel similar to diesel but with a slightly higher density, suitable for use in marine engines.

**Nitrogen oxides (NO<sub>x</sub>):** Nitrogen oxides are produced by all high-temperature combustion processes, by oxidation of atmospheric nitrogen and, to a small extent, by oxidation of nitrogen compounds contained in fuels. Among the nitrogen oxides the most important for air pollution are nitrogen oxide NO and nitrogen dioxide NO<sub>2</sub>.

**No blame culture:** culture of no blame on the individual, it describes the tolerance of mistakes within an organization providing that people learn from these mistakes. No blame cultures embrace the possibility of errors and encourage their reporting.

**OCIMF (Oil Companies International Marine Forum):** voluntary association of oil companies with an interest in the shipment and terminalling of crude oil, oil products, petrochemicals and gas.

**OGMP 2.0 (Oil & Gas Methane Partnership 2.0):** multi-stakeholder initiative launched by the UNEP (United Nations Environment Programme) and the Climate and Clean Air Coalition. The OGMP 2.0 is the only complete reference framework based on measurements for the oil and gas industry which improves the accuracy and transparency of communications for methane emissions in the Oil & Gas sector. Over 70 companies with assets in five continents representing 50% of world oil and gas production are members of the partnership.

**PAR (Platform for the Allocation of Regasification Capacity):** IT platform organised and managed by GME, within the framework of which the procedures for the allocation of regasification capacity at the terminals managed by regasification companies that have requested to use this service are managed.

**Plant Operator:** natural or legal person who owns or manages a facility or plant, or to whom the economic or decision-making power to run that facility or plant has been delegated (Italian Legislative Decree 105/2015 and Italian Legislative Decree 152/2006).

**Root Cause Analysis:** systematic analytical process to discover the causes existing at the root of breakdowns, accidents or injuries with the final aim of identifying the most appropriate solutions to solve them.

**SA8000 (Social Accountability):** International Certification Standard prepared by CEPAA (Council of Economical Priorities Accreditation Agency) and aimed at certifying some aspects of the company's management with reference to social accountability.

**SDGs (Sustainable Development Goals):** the 17 sustainable development goals of the United Nations 2030 Agenda for Sustainable Development. By pursuing the SDGs it will be possible to guarantee fully sustainable development which respects people, the community and the environment.

**Ship-to-Ship operation:** transfer of part of the load of a vessel to a smaller sized vessel. By extension, the term is used in this document for all operations starting from the manoeuvring stage through to the departure of the vessel after the load has been fully transferred.

**SIGTTO (Society of International Gas Tanker and Terminal Operators):** international association, whose activity consists mainly analysing both gas transport operations by sea and the handling of gas at the terminals, with the aim of make these activities safer and more environmentally friendly.

**Stationary sources:** stationary plants subject to the Emission Trading scheme listed in Annex I of Italian Legislative Decree 47/2020.

**Standards of Training, Certification and Watchkeeping for Seafarers (STCW):** international convention on the training, certification and watchkeeping standards for seafarers.

**TCFD (Task Force on Climate-related Financial Disclosures):** set of recommendations to enable organizations to be transparent to their stakeholders on climate change-related risks, including in the financial sector.

**Virtual Exchange Point (PSV):** virtual point, located between the entry and exit points of the national transport network, where users and other authorised parties may, on a daily basis, exchange and sell gas injected into the network.

**Virtual liquefaction:** service that allows users to deliver gas at the PSV by receiving an equivalent quantity of LNG in the Terminal's tanks. This quantity of LNG can be either received, as liquid, into small scale carriers or, as natural gas, at the entry point of the National grid.

**VOC (Volatile Organic Compounds):** class of organic substances that includes several different chemical compounds formed by molecules having different functional groups but characterised by a certain volatility. VOCs are released by many human activities and can have a range of harmful effects, including a contribution to the formation of tropospheric ozone.



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