

# GENERAL STAKEHOLDER ENGAGEMENT POLICY



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# CONTENTS

<b>1. INTRODUCTION AND PURPOSES OF THE DOCUMENT</b>	<b>3</b>
<b>2. REFERENCE CONTEXT</b>	<b>4</b>
2.1 EXTERNAL REGULATORY AND LEGISLATIVE CONTEXT	4
2.2 MAIN RELATED INTERNAL REGULATIONS	5
<b>3. SCOPE OF APPLICATION</b>	<b>5</b>
<b>4. GENERAL PRINCIPLES</b>	<b>6</b>
<b>5. STAKEHOLDER ENGAGEMENT</b>	<b>6</b>
5.1 OBJECTIVES OF STAKEHOLDER ENGAGEMENT	6
5.2 THE PROACTIVE ENGAGEMENT PROCESS	7
5.2.1 STAKEHOLDER MAPPING	7
5.2.2 DEFINITION OF THE STRATEGY AND APPROACH FOR ENGAGING STAKEHOLDERS	8
5.2.3 INTERACTIONS WITH STAKEHOLDERS	10
5.2.4 EVALUATION OF THE RESULTS OF STAKEHOLDER ENGAGEMENT ACTIVITIES, DEFINITION OF ACTION PLANS AND CONTINUOUS MONITORING	10
5.3 THE REACTIVE ENGAGEMENT PROCESS	10
<b>6. ROLES AND RESPONSIBILITIES</b>	<b>11</b>
<b>7. TRANSPARENCY AND ACCOUNTABILITY</b>	<b>13</b>
<b>8. ANNEXES</b>	<b>14</b>
8.1 GLOSSARY	14

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# 1. INTRODUCTION AND PURPOSES OF THE DOCUMENT

Cassa Depositi e Prestiti S.p.A. (CDP) plays a key role in sustainable development and is committed to ensuring that its operations are conducted in a manner that promotes long-term economic, social and environmental sustainability that benefits shareholders and considers the interests of other relevant stakeholders. This principle is an integral part of its Articles of Association and enables CDP to make a significant contribution to achieving the goals of the United Nations 2030 Agenda. In carrying out its activities, CDP adopts an approach focused on creating shared and long-term value to actively contribute to a sustainable future and innovation in key sectors for the country.

For CDP, building a sustainable future also means managing the relations with its stakeholders with care and transparently, through both a proactive and reactive engagement.

This awareness is in line with the growing international focus on this issue. Indeed, we recognise that it is essential for companies to be able to understand and manage the views and expectations of key stakeholders, such as customers, suppliers, business partners, employees, civil society, policymakers and the rating agencies that provide independent assessments of a company's sustainability, all of whom can influence the business in the long term. In particular, a constant and constructive dialogue with the territories and local communities is key to the proper functioning of the company's business model, which is based on drawing resources from the territories and returning them in form of economic, social and environmental value. Finally, in line with the commitment to promote sustainable choices within its value chain, dialogue with its investee companies is important to ensure the sharing of knowledge and the definition of joint strategies to contribute to the growth of the national economic system.

In this context, CDP has adopted a policy that governs the ongoing dialogue and relationship between CDP and all of its stakeholders, further consolidating and strengthening the company's transparency and commitment to all of its stakeholders, thus helping to promote a sound and sustainable corporate governance.

Accordingly, this Stakeholder Engagement Policy ("Policy") sets out the principles and criteria that CDP applies in engaging with its stakeholders, distinguishing between:

- proactive engagement, which involves consistently involving key stakeholders in ongoing dialogues and discussion initiatives. This practice fosters a deeper comprehension of their perspectives and expectations, nurturing stronger and sustainable long-term relationships. It also entails establishing dedicated channels for stakeholders to raise concerns to CDP, ensuring joint and suitable resolutions, such as complaint filing, whistleblowing, and grievance procedures. In fact, CDP acknowledges the significance of actively engaging both internal and external stakeholders through organized listening and discussion processes. These processes are vital for shaping an inclusive and collaborative strategy aligned with the company's sustainability commitments. Additionally, CDP values empowering stakeholders to voluntarily communicate any concerns through designated channels. Strengthening continuous reciprocal exchange with stakeholders is deemed essential by CDP to foster transparency, accountability, and ethical business practices. This commitment aims to generate a positive impact on business performance and the broader economy;
- reactive engagement, in which CDP responds to critical events or stakeholder reports by implementing targeted initiatives and actions that occur at times and through channels different from those proactively proposed by CDP. In this context, CDP is dedicated to promptly addressing stakeholder requests, concerns, or criticisms. The commitment involves demonstrating a willingness to resolve raised issues and reinforcing the dedication to cultivating constructive, enduring, and transparent relationships. This proactive approach aims to prevent potential problems in relations.

This document describes:

- the reference context (section 2);
- the scope of application (section 3);
- stakeholder engagement (section 5);
- the roles and responsibilities of the parties involved (section 6);
- how transparency and accountability are ensured (section 7).

This document is subject to periodic review, partly (but not exclusively) to reflect regulatory and legislative developments, changes to the reference context and consequent revisions of the CDP strategy. In any case, this document is reviewed every 3 years.

This Policy should be read in conjunction with other policies and relevant company regulatory texts.

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## 2. REFERENCE CONTEXT

### 2.1 External regulatory and legislative context

Over the years, there has been a significant increase in the focus on stakeholder engagement by organisations and regulators. There is a growing recognition that in order to operate in a sustainable and responsible manner, companies can no longer limit themselves to considering the interests of their shareholders but must also take into account the expectations and needs of a wide range of stakeholders, such as employees, customers, local communities, non-governmental organisations, institutions and other key players. In this context, international standards and frameworks encourage companies to engage in a structured and inclusive dialogue with their stakeholders, setting out principles and objectives. They are also intended to respond to growing external pressure from civil society on the role of companies and their impact on society and the environment, as well as from ESG rating agencies' assessments of companies' sustainability performance, which are of great value to investors in their decision-making processes.

In this context, shareholder activism is becoming increasingly important in the sustainable and responsible investing landscape. This approach is based on the belief that investors have not only the right but also the responsibility to influence the policies and practices of the companies in which they invest to promote sustainability and the creation of economic, environmental, and social value.

This General Stakeholder Engagement Policy is based on recognised international standards to ensure a structured and consistent approach to managing stakeholder relationships, including the AA1000 Stakeholder Engagement Standard and the GRI standards.

In particular, the AA1000 Stakeholder Engagement Standard provides methodological guidance for identifying, analysing and engaging with stakeholders to understand their expectations, needs and concerns.

The GRI Standards recognise the central role of stakeholder engagement as a strategic tool both for shaping corporate strategy and governance and for improving the effectiveness of corporate reporting. The 2021 update of the GRI Standards places greater emphasis on stakeholder engagement: numerous indicators have been updated to disclose how stakeholder perspectives are considered in different business processes. In addition, as part of the materiality process, the Standard requires that stakeholders (together with industry experts) are actively involved throughout the impact analysis and identification process.

The European Sustainability Reporting Standards (ESRS) issued by the European Financial Reporting Advisory Group (EFRAG) in accordance with the provisions of the Corporate Sustainable Reporting Directive (CSRD) are also part

of this process. Specifically, ESRS 1 sets out general reporting criteria, including the dual materiality analysis required to identify material issues to report on and for which stakeholder engagement is required. ESRS 2 requires companies to disclose their key stakeholders, how they are engaged and how their interests and views are taken into account in the company's strategy and business model. This approach recognises the importance of stakeholder engagement as a key element of corporate reporting and encourages structured and meaningful dialogue with stakeholders.

## 2.2 Main related internal regulations

From an internal regulatory perspective, this Policy serves as a link between the various regulatory documents in which CDP sanctions, recognises the importance of, and governs the relationships with the various categories of stakeholders in its business:

- Articles of Association;
- Code of Ethics;
- Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001;
- Principles of Corporate Governance;
- Group Policy on "Sustainability Framework";
- General Responsible Lending Policy;
- General Responsible Investment Policy;
- CDP General Diversity, Fairness and Inclusion Policy;
- General "Stakeholder Grievance Mechanism" Policy;
- General "Responsible Procurement" Policy;
- Group Policy - "Management of Whistleblowing Reports";
- Complaints Regulation.

The regulatory and legislative framework of reference is supplemented by additional internal regulatory sources, which lay down the principles, methodologies and operating methods through which CDP interacts with the various categories of stakeholders.

## 3. SCOPE OF APPLICATION

The corporate scope of application of this document is that of Cassa Depositi e Prestiti S.p.A. ("CDP"). CDP undertakes to ensure that this Policy is gradually extended to the Companies subject to management and coordination, in accordance with the principle of proportionality and taking into account the decision-making autonomy of the Group Companies<sup>1</sup> Corporate Bodies.

The document is primarily intended for use by anyone who, in the course of their work, is required to interact with stakeholders, such as corporate bodies<sup>2</sup>, corporate management, employees, contractors and anyone acting on behalf of or under the supervision of CDP.

CDP undertakes to disseminate the contents of this Policy and to make it available to all stakeholders on the company intranet and on its website with a view to transparency and cooperation.

<sup>1</sup> Pursuant to Articles 2497 et seq. of the Italian Civil Code.

<sup>2</sup> Whenever they speak in the name and on behalf of CDP S.p.A.

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## 4. GENERAL PRINCIPLES

In accordance with the Code of Ethics, CDP pursues its objectives by establishing an open dialogue with its Stakeholders aimed at ensuring honesty, transparency and fairness, in full compliance with applicable ethics, rules and best practices from a long-term perspective. Other principles on which CDP bases the management of its stakeholder relationships are: inclusiveness, considering the views and needs of each stakeholder group; equal treatment, a core value for the Group, which is committed to interacting with stakeholders in an equitable manner, whilst considering their different perspectives and needs; and materiality, as a fundamental criterion for identifying the most relevant issues for stakeholders and focusing engagement efforts on these key issues.

Finally, CDP believes that ongoing dialogue is essential to building a relationship of trust and mutual exchange with stakeholders, encouraging open and constructive communication, and striving for continuous improvement by regularly reviewing stakeholder engagement mechanisms to ensure that they are meeting specific needs as effectively as possible.

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## 5. STAKEHOLDER ENGAGEMENT

### 5.1 Objectives of stakeholder engagement

In line with the main reference standards, CDP identifies its stakeholders as any party or group whose interests are or may be affected by the organisation's business activities, and any individual, group of individuals or organisation that influences and/or may influence the organisation's business activities and performance.

Given the range of its activities, its strong links with local communities, institutions and civil society, and its belief that collaboration is a fundamental element of effective corporate strategy, CDP considers it necessary to engage with a large and diverse range of stakeholders.

The objectives that CDP associates with efficient and effective stakeholder engagement and dialogue include, but are not limited to, the following:

- gathering input and recommendations on strategy and commitments made, including those of an ESG nature, including through stakeholder involvement in the materiality analysis process to identify priority issues for action in line with stakeholder expectations and needs;
- ensuring transparency and sharing timely and accurate information with stakeholders, demonstrating a commitment to operate in an open and responsible manner, and providing stakeholders with a clear understanding of the objectives, policies and actions taken;
- identifying potential opportunities, including through collaboration and open innovation;
- anticipating potential critical issues related to policies, initiatives and projects that CDP has developed, is developing or plans to implement, and identifying potential risks, including reputational risks;
- consolidating stakeholder trust in order to build lasting, stable and robust relationships capable of creating shared value, in line with the Group's mission.

CDP also recognises that in order to engage with stakeholders effectively dialogue and discussion activities organised by the Company must be integrated with channels for listening, including channels for the reporting of concerns that stakeholders may wish to bring to CDP's attention, such as complaints, grievances and whistleblowing as defined in the relevant regulations.

Finally, in order to respond promptly to a critical event or stakeholder report at times and through channels other than those proactively proposed by CDP, the Company implements specific initiatives and actions, always demonstrating respect for and attention to the views of all stakeholders and a willingness to resolve the issues raised, and reinforcing its commitment to building constructive, lasting and transparent relationships that can prevent critical issues from arising in these relationships.

## 5.2 The proactive engagement process

The stakeholder engagement process is based on ongoing and proactive communication between CDP and its stakeholders and is designed to foster the continued growth of trust and cooperation on both sides.

Effective engagement must be aligned with corporate strategy and objectives to determine the scope of engagement activities and identify the issues and priorities to be discussed. To structure its stakeholder engagement, the Company adopts an integrated approach to managing stakeholder engagement activities, including engagement with investee companies, as a tool for dialogue on development pathways to maximise positive environmental and social impacts and, where possible, promote the area of focus envisaged in the CDP strategy.

The Company is therefore committed to implementing a stakeholder engagement process that is fully integrated into corporate governance and strategy, involving the different organisational structures according to the contribution they can make.

The key stages of the approach adopted are as follows:

1. Stakeholder mapping;
2. Defining the strategy and the different ways of involving stakeholders, including the listening channels to be made available to establish a dialogue with CDP at any time;
3. Interacting with stakeholders in accordance with the times and methods established by CDP and/or when activated by stakeholders through the channels made available to them;
4. Evaluating the results of stakeholder engagement activities, establishing action plans where appropriate, and monitoring on an ongoing basis.

### 5.2.1 Stakeholder mapping

To ensure the effectiveness of stakeholder engagement processes, it is essential to start with a clear identification and understanding of the categories of stakeholders to be engaged. CDP is therefore committed to classifying stakeholders, adopting objective and clear criteria and ensuring that engagement is driven by strategic considerations.

Based on the definition of a stakeholder set out in section 6.1 “Objectives of stakeholder engagement” and in line with key reference standards, CDP identifies stakeholders according to the following criteria:

- Dependence: groups or individuals who are directly or indirectly dependent on CDP’s activities, services and performance, or on whom the Company depends on to carry out its activities;
- Responsibility: groups or individuals to whom CDP has, or may in the future have, legal, commercial, operational or ethical/moral responsibilities;
- Tension: groups or individuals that require CDP’s immediate attention on financial, economic, social or environmental issues;
- Influence: groups or individuals who may have an impact on CDP or influence its strategic or operational decisions;
- Diverse Perspective: groups or individuals whose different points of view may lead to a new understanding of the situation and the identification of new opportunities or actions that would not otherwise be identified.

To effectively plan its stakeholder engagement processes, CDP reviews and updates, as necessary, the stakeholder categories with which it engages in dialogue and is involved with in the course of its activities at least annually, when updating the materiality matrix required by Non-Financial Reporting Principles, and whenever significant events

occur (such as the Multistakeholder Forum<sup>3</sup>).

The main categories of stakeholders considered in this policy are listed below. It should be noted that this list is not exhaustive:

- Shareholders
- Financial community (rating agencies and investors)
- Business counterparties (local authorities, other public administrations, enterprises, start-ups/innovative enterprises)
- Employees
- Suppliers
- Media
- Ministries and Institutions
- New generations
- Partners (investee companies, international multilateral organisations, government agencies)
- Peers (Private financial institutions, National Promotional Banks and Institutions/Development Banks)
- Regulators and Policy Makers
- Savers/retail
- Trade unions
- Civil society organisations (NGOs, trade associations, third sector, formal and informal groups of citizens)
- Universities and Think Tanks

## 5.2.2 Definition of the strategy and approach for engaging stakeholders

CDP acknowledges that each stakeholder has unique needs, interests and expectations with respect to the organisation. While recognising these individualities, the Company is committed to identifying and analysing the priorities and expectations of each stakeholder category identified in the previous stage, and tailoring engagement strategies and actions accordingly. This analytical process enables the adoption of targeted, tailored and proactive engagement plans to promote effective communication, accurate information sharing, and meaningful collaboration with key stakeholders. CDP also defines the ways in which stakeholders can independently communicate any observations and/or requests to the Company, providing dedicated listening channels.

CDP is committed to carefully selecting engagement tools and strategies based not only on the needs and expectations of identified stakeholders, but also on the engagement objectives. These activities may include one-to-one meetings, online consultations, issue-based working groups, communities, multi-stakeholder forums or other forms of interaction. The aim at this stage of the process is to strike a balance between the desired level of interaction, the purpose of the engagement and the nature of the relationship with stakeholders.

CDP is committed to using inclusive engagement methods to enable all stakeholders to participate fully in engagement processes, and to implementing mitigating measures to avoid or prevent exclusion.

The level of engagement is defined by considering three variables:

- the goal of the engagement activity;
- mutual influence between the stakeholder and CDP;
- the nature and status of the relationship between CDP and the stakeholder.

Once the level of involvement has been identified, the methods and frequency of interaction need to be determined. These mechanisms may vary from a purely one-way informational contact to two-way communication, consultation or empowerment where stakeholders are involved in the decision-making process, as shown in Table 1.

<sup>3</sup> Annual meeting devoted to listening to and dialogue with stakeholders on the key sustainable development issues.



**Table 1:** Classification of engagement methods by level of involvement, based on the 2015 AA1000SES

Level of engagement	Engagement method (non-exhaustive list)
<p><b>Inform</b> (unidirectional engagement by the Company with stakeholders, with no invitation to respond)</p>	<ul style="list-style-type: none"> <li>• Press releases and letters</li> <li>• Pamphlets</li> <li>• Reports and website</li> <li>• Public presentations and speeches</li> <li>• Periodic notices</li> </ul>
<p><b>Consultation</b> (limited two-way engagement where stakeholders respond to specific and limited questions posed by the organisation)</p>	<ul style="list-style-type: none"> <li>• Surveys</li> <li>• Focus group</li> <li>• Meetings with selected stakeholders</li> <li>• Consultation panels</li> <li>• Public meetings</li> <li>• Workshops</li> </ul>
<p><b>Negotiate</b> (limited two-way engagement, focused on discussing specific issues to reach agreement)</p>	<ul style="list-style-type: none"> <li>• Collective bargaining with trade union representatives</li> <li>• Negotiation with counterparties</li> <li>• One-to-one meetings</li> </ul>
<p><b>Involve</b> (two-way or multi-directional engagement, where the organisation and stakeholders work independently towards agreed objectives)</p>	<ul style="list-style-type: none"> <li>• Multistakeholder forum</li> <li>• Consensus-building processes</li> <li>• Participatory decision-making processes</li> <li>• Focus group</li> <li>• Online engagement tools</li> <li>• Dedicated listening channels</li> </ul>
<p><b>Collaboration</b> (two-way or multi-directional engagement aimed at learning together and identifying joint decisions and actions)</p>	<ul style="list-style-type: none"> <li>• Joint projects</li> <li>• Co-design</li> <li>• Joint venture</li> <li>• Partnership</li> <li>• Multistakeholder initiatives</li> <li>• Online collaboration platforms</li> <li>• Joint Trade Union Commissions (company and territorial)</li> </ul>
<p><b>Empowerment</b> (stakeholders involved in defining strategies)</p>	<ul style="list-style-type: none"> <li>• Improve and progressively introduce consultation processes where strategic policy documents are presented to stakeholders for review</li> </ul>

## 5.2.3 Interactions with stakeholders

CDP engages with its stakeholders throughout the year, based on what has been planned in the previous stage. In order to make their participation effective and efficient, CDP seeks to engage them at appropriate times, provide them with adequate information and materials, and be transparent about how it engages with them.

The annual engagement initiatives also include a process to identify the most material issues for the Group, based on the identification and assessment of the impacts generated and/or experienced by the Group. This is done to update the Materiality Matrix, which serves as a tool for identifying material sustainability issues for public disclosure in the Group's Sustainability Report.

In addition to the engagement activities organised by CDP, stakeholders may also choose to interact with the Company by using the listening channels made available to them to report concerns (e.g. complaints, whistleblowing, grievances) or to provide suggestions/observations.

The results of engagement activities are appropriately documented (e.g. survey results, minutes of meetings) and analysed, so that they can be considered in CDP's decision-making process and to identify any action plans and response/follow-up plans for the stakeholders involved.

## 5.2.4 Evaluation of the results of stakeholder engagement activities, definition of action plans and continuous monitoring

CDP is committed to reviewing the effectiveness of its stakeholder engagement strategy, assessing the results achieved and identifying opportunities for improvement throughout the process.

Based on the results and opportunities for improvement identified, CDP assesses the possibility of developing action plans aimed at continuously improving stakeholder dialogue and engagement activities.

The evaluation phase of the stakeholder engagement process also includes regular monitoring to verify the overall quality of the process and to ensure that CDP's commitments are met, thereby helping to build a relationship of trust with stakeholders.

## 5.3 The reactive engagement process

CDP recognises reactive stakeholder engagement as a critical process for managing relationships with stakeholders, including civil society representatives, investors, analysts and ESG rating agencies, when they identify issues with the activities of the Group or its investees.

In critical situations, stakeholder expectations and needs can change rapidly, requiring a timely and targeted response to address their concerns and requests.

To respond to specific critical issues raised, at times and through channels other than those proactively suggested by CDP, a corporate process has been specifically developed to listen and respond in a timely manner. This includes the involvement of a dedicated task force to analyse and manage the critical issues/concerns raised by civil society and potential disputes, including those related to ESG ratings, received by CDP, with a view to developing a mutually acceptable proposal.

In this context, CDP is committed to implementing a controversy management process and to proactively monitor, collect and manage the critical issues identified in order to mitigate reputational damage and resolve potential disputes, thereby pursuing the achievement of expected business objectives through a process of dialogue and shared responsibility.

The objective of the reactive engagement process is therefore to identify and implement the most appropriate response methods to manage the requests made by stakeholders, in particular by the civil society, investors, analysts and ESG rating agencies. Examples of stakeholder requests CDP is required to respond include, but are not limited to:

- requests for official comment on articles, studies and reports in preparation;
- complaints/requests for clarification received in relation to initiatives and actions taken by CDP and its investee companies;
- criticism and requests for comment published in the press/social media, to which it has been decided to respond;
- disputes attributed to CDP and identified on the basis of publicly available information and data that could lead to a reduction in the ESG ratings issued by specialised rating agencies.

Such cases may be brought to CDP's attention through a variety of channels, such as: communications to senior management, open letters, press articles, notification by ESG rating agencies of a new dispute and the resulting potential change in the underlying ESG ratings, or other specific tools (e.g. institutional mail). Once a potentially critical issue or report from the relevant stakeholder categories is identified, the process for managing and resolving it is initiated with the support of a cross-functional task force.

The reactive engagement process consists of the following macro-activities:

- acknowledgement and analysis of the report or critical issue to analyse the stakeholder category, the subject of the report (assessing its relevance and merit) and the communication channel used, as well as activation of a monitoring process on social and other media of the impact over time (e.g. how viral the information is)<sup>4</sup>;
- identifying parties, internal and/or external to CDP, such as consultants/experts, to be engaged to address the issue. This phase also considers the need to engage with investee companies affected by the report/criticism through targeted engagement activities in line with the General Responsible Investment Policy;
- formulating the response by gathering input from stakeholders, preferably referring to official public documents such as policies or guidelines, and communicating the actions taken;
- notifying the Chief Executive Officer, Chairman and corporate bodies of CDP;
- sending the response to the relevant counterparty;
- engaging the counterparty in a constructive dialogue to avoid further critical issues;
- archiving the documentation collected and produced during the process to ensure traceability and transparency.

The process described exclusively covers the key activities underlying the management of stakeholder requests and critical issues. CDP is therefore committed to adapting this process and its constituent phases to the specific needs and characteristics of the situations under consideration, in order to manage any critical situations in an effective and timely manner. For the effective management of reactive engagement processes, computer applications will be made available to track and manage all information flows related to cases and, where envisaged, to provide transparency to external parties on the status and outcome of the case management process.

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## 6. ROLES AND RESPONSIBILITIES

In the light of the context outlined – in compliance with the regulatory and organisational system and with company powers and internal delegations – the roles and responsibilities of the various parties involved are defined below:

### **Board of Directors:**

- approves this document, as well as any non-formal revision and the possible repeal thereof, on an exclusive and non-delegable basis;
- based on the information flows received, oversees the stakeholder engagement process.

<sup>4</sup> It should be noted that if the report is misdirected, the receiving function will still need to take steps to ensure that it is handled properly, by promptly forwarding the report to the correct recipient who will manage it.

**Risk and Sustainability Committee:**

- issues an opinion to the Board of Directors on this document and on any revisions;
- assists the Board in regularly evaluating the effectiveness of the stakeholder engagement process.

**Chief Executive Officer:**

- proposes the approval of the General Stakeholder Engagement Policy, as well as any modifications, to the Board of Directors;
- oversees the ongoing implementation of the Policy, ensuring an organisational structure that is functional to the objective.

**“Communications, External Relations and Sustainability” Department:**

- ensures, together with the Policy, Evaluation and Advisory Department, the definition of proposals for updating this document in accordance with the strategic guidelines defined from time to time, while ensuring appropriate awareness and training initiatives;
- carries out, with the support of the other units involved, at least once a year, and in any case whenever there are significant events, a review and possible update of the categories of stakeholders with whom it engages in dialogue and in the performance of its activities;
- coordinates and guides, together with other organisational units, the implementation and overall monitoring of the various engagement activities so that they are consistent and in line with this policy, and ensures that all different categories of stakeholders are informed and regularly updated;
- coordinates the management of critical issues (the “reactive engagement process”), supported by the dedicated task force. When critical issues are reported by ESG rating agencies, the process is coordinated with the Administration, Finance and Control Department;
- updates the Board of Directors, with input from the other organisational units involved, on progress and key initiatives taken in dialogue with all stakeholders.

**“Policy, Evaluation and Advisory” Department:**

- ensures the monitoring of developments on the subject in the context of a broader ESG strategy and, together with the Communications, External Relations and Sustainability Department, the definition of proposals for updating this document in compliance with the strategic guidelines defined from time to time, while guaranteeing appropriate awareness-raising and training initiatives as well as continuous advisory support on the relevant interpretation.

**“Administration, Finance and Control” Department:**

- coordinates with the Communications, External Relations and Sustainability Department the process for managing issues (the “reactive engagement process”) when the report comes from ESG rating agencies, taking into account the specific nature of the stakeholder and the potential impact of the report on the ESG rating (with possible repercussions on the Group’s operations, such as the cost of funding linked to “sustainability-linked” instruments).

**Reactive engagement task force:**

A task force set up to assist the Communications, External Relations and Sustainability and Administration, Finance and Control Departments in analysing and managing critical issues/reports from civil society and potential disputes, including those related to ratings, received by CDP. The task force is composed of representatives from the Internal Audit, Communications, External Relations and Sustainability, Policy, Evaluation and Advisory, and Administration, Finance and Control Departments. Where appropriate, representatives from other departments not mentioned above are also involved.

CDP’s operations involve different functions, as defined by the function chart and the current system of delegated authority, which manage relationships with different categories of stakeholders. Depending on the category of stakeholder, each corporate function is responsible for selecting and implementing the most appropriate engagement strategy, analysing expectations, and evaluating results, always ensuring compliance with the principles and processes set out in this Policy. If these functions intend to engage stakeholder through activities that are not covered by this Poli-

cy, they must inform the Communication, External Relations and Sustainability Department in advance to guarantee that appropriate and consistent engagement practices are adopted, and allow for the monitoring and coordination of the planned engagement processes within the Company.

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## 7. TRANSPARENCY AND ACCOUNTABILITY

CDP recognises the value of transparency and ongoing dialogue with its stakeholders and is committed to ongoing and transparent reporting both inside and outside the Company, including on the results of the stakeholder engagement process.

To this end, CDP publishes an annual non-financial report on its website, including the Consolidated Non-Financial Statement (NFS) pursuant to Italian Legislative Decree 254/2016 as amended, drawn up according to recognised standards (e.g., GRI Sustainability Reporting Standards, Integrated Reporting Framework, Sustainability Accounting Standards Board) and including its activities and the impacts generated, also by its internal operations.

Transparency on engagement activities is also ensured through information published on the corporate website, ad-hoc events and webinars.

This document is available on CDP's website.

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## 8. ANNEXES

### 8.1 Glossary

- **AA1000SES - AA1000 Stakeholder Engagement Standard:** a framework published in 2015, designed to inspire and guide organizations through the various phases of stakeholder activity (assessment, design, implementation, and communication).
- **Company:** Cassa Depositi e Prestiti S.p.A.
- **Proactive engagement:** this includes both the ongoing and continuous involvement of key stakeholders in dialogue and discussion initiatives defined by CDP, which can help to ensure a better mutual understanding of their perspectives and expectations, so that these can be considered in CDP's strategic and operational decisions and build stronger, more sustainable relationships over the long term, and the provision of dedicated channels for any concerns (such as, but not limited to, complaints, grievances, whistleblowing) that stakeholders wish to bring to CDP's attention, so that they can be resolved jointly and in a timely manner.
- **Reactive engagement:** specific initiatives and actions taken in response to a critical event or stakeholder report, at times and through channels other than those proactively offered by CDP.
- **Environmental, Social and Governance (ESG):** the environmental, social and governance factors which qualify a business as sustainable.
- **Grievance:** petition or declaration, presented in writing by the Community who believes to be or could be negatively impacted, or to have been subjected to or could be subjected to damage to an environmental and/or social nature by a project financed by CDP or in any case by an operation for which the financial support of CDP was requested (for more information, see the General Stakeholder Grievance Mechanism Policy).
- **CDP Group:** Cassa Depositi e Prestiti S.p.A. and Companies subject to management and coordination by CDP S.p.A. pursuant to Articles 2497 et seq. of the Italian Civil Code.
- **Complaint:** declaration of dissatisfaction presented by customers in writing to CDP S.p.A. regarding a behaviour or omission of CDP S.p.A. that could involve economic and/or reputational damage for CDP S.p.A. (for more information, see the Complaints Regulation).
- **Whistleblowing:** a written or oral communication containing information about behaviour, acts or significant omissions, as defined by Legislative Decree no. 24/2023, which are detrimental to the public interest or the integrity of the public administration or private entity (i.e. violations) and which have come to the attention of the whistleblower in the course of his or her work (for further details on how this is handled, please refer to the Group Policy on the Management of Whistleblowing Report).
- **Stakeholder:** parties or groups whose interests are or may be affected by the organisation's business activities, including individuals, group of individuals or organisations that influence and/or may influence the organisation's business activities and performance.