

STAKEHOLDER GRIEVANCE MECHANISM POLICY



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1. REFERENCE CONTEXT

As Financial Institution for Development Cooperation¹, CDP promotes initiatives targeted towards reaching the sustainable development goals. The main areas of intervention, in this context, concern:

- access to renewable energy, promotion of the energy transition and combatting climate change;
- sustainable agriculture and food safety;
- financial inclusion and access to credit for micro, small and medium-sized companies.

As indicated in the Regulation “Sustainability Assessment Framework in the International Cooperation”, in exercising its role, CDP considers the involvement of the communities as essential. Therefore, if affected or potentially affected by the projects financed by CDP or for which its financial support is requested, it allows the stakeholders to be suitably informed and offers them the opportunity to express their opinions regarding the activities of these projects.

CDP will in fact work so that in relation to projects at greatest risk on a social-environmental level², the communities potentially affected by the financing activities (both groups as well as single individuals) are suitably protected, foreseeing, for example, the possibility that the community:

- is consulted, already during the planning phase, by the promoter to be funded, in order to understand and take into account the specific local aspects and collect opinions on possible risks and impacts regarding the planned activities;
- can express itself, also during the phase following planning and financing, about the activities and possible measures adopted to mitigate the impacts, also by reporting any abuses or presumed abuses of an environmental and/or social nature deriving from them.

Dialogue with the stakeholders plays a fundamental role for the Development Financial Institutions that, in consideration of their mission, attribute maximum importance to managing the impacts produced on the communities by the activities implemented thanks to their support, in particular when the local institutions concerned by the project do not offer effective tools for collecting grievances from the communities.

In this context, CDP has established a Stakeholder Grievance Mechanism (hereafter also “Mechanism”) that has the purpose of:

- facilitating the presentation of any grievances deriving from the current or potential negative environmental and/or social impacts produced by projects financed by CDP or in any case by operations for which financial support of CDP was requested;
- searching for a resolution of disputes, using a mediation process if appropriate;
- improving the environmental and social impact of the projects financed by CDP or in any case of operations for which the financial support of CDP is requested and reducing the relative risks;
- promoting the accountability of CDP’s action.

The purpose of this document is to describe this mechanism and, in particular:

- the scope of application, the guiding principles and the applicable standards;
- the relative operation in terms of the grievances management process, with the indication of the main organisational structures involved.

This document must be read together with the Group’s Sustainability Framework, CDP’s General Responsible Lending Policy, CDP’s General Responsible Investment Policy and CDP’s regulation “Sustainability Assessment Framework in the International Cooperation”. In compliance with these company regulations:

¹ CDP operates within the Italian international cooperation system, in line with the perimeter defined by law no. 125/2014, by Decree 28 September 2016 of the Ministry of the Economy and Finance together with the Ministry of Foreign Affairs and International Cooperation and by Decree Law dated 30 September 2003, no. 269.

² As foreseen by the regulation “Sustainability Assessment Framework in the International Cooperation” for the operations classified as most at risk (category A and B), the documentation produced during the analysis phase is made available to the public at least 30 days prior to the final decision on the operation, through an announcement on the CDP corporate website.

- CDP is committed to promoting the best environmental and social practices and standards, within the scope of each financed project or project for which financial support is requested, in order to create wealth and employment, implement infrastructures and integrate Countries in world trade, while recognising a broader social responsibility of the entire private sector, which is required to engage actively and responsibly in the achievement of development that is truly sustainable and inclusive;
- CDP considers it essential that its customers, understood as recipients of the financing granted by CDP, observe the laws, regulations and administrative and/or legal procedures in force in the host country and/or applicable to the operation of reference;
- CDP considers it important that also its customers suitably deal with the environmental, social and related requests connected with the activities they perform, encouraging them, where possible, to adopt appropriate mechanisms and procedures for the transparent management of the requests of the communities affected by the presumed current or potential negative impacts of the operations that were financed or for which financial support was requested.

These mechanisms will be necessary when directly providing loans for projects with a high social-environmental impact. Therefore, CDP encourages the concerned parties to first contact the borrowers, if the initiatives promoted by the latter are considered the cause of the presumed current or potential negative impacts of an environmental and/or social nature. In any case, CDP's Stakeholder Grievance Mechanism is a tool that the Community can use if the requests presented to the borrowers were not completely resolved.

2. GENERAL PRINCIPLES

2.1 Scope of application

The mechanism foresees the management of grievances that result from operations financed by CDP, or operations for which the financial support of CDP was requested, within the scope of the International Cooperation and Development Finance Area (ICDF), as well as through debt and equity financial instruments. Subsequently, CDP can evaluate the opportunity to extend the scope also to other activities.

The following are not part of the scope of requests managed with the Stakeholder Grievance Mechanism:

- complaints, whose definition and relative management process is regulated by the "Complaints" regulation;
- reporting of illicit conduct (so-called whistleblowing reporting) pursuant to Leg. Decree 10 March 2023, no. 24, implemented by EU Directive 2019/1937, concerning the protection of the people who report violations of Union law, whose management is regulated by the Group Policy "Management of Whistleblowing Reports";
- requests for exercising the rights of the concerned parties according to the regulations in force at that time concerning the processing of personal data (e.g. article 15 – 22 GDPR);
- grievances referring to operations for which CDP has not been involved financially for more than two years (for example because the financing was completely repaid or the equity investment has been sold). CDP reserves the right in any case to accept the management of these requests if exceptional circumstances are ascertained during the check of eligibility that have made it impossible to present them within those terms;
- requests to access the environmental and/or social documents proposed pursuant to the regulations applicable to CDP (this includes, for example, but is not limited to Law No. 241/1990, Leg. Decree 195/2005) not included within the scope of a Grievance.

Through the adoption of the Stakeholder Grievance Mechanism, CDP aims to promote with its stakeholders a channel of communication and timely resolution of grievances, with a view to promoting greater knowledge and understanding of the specific aspects of the territories where CDP performs financing operations.

From this point of view, it represents a fundamental element for identifying, through communications with stakeholders, the possible environmental and social grievances related to a project financed by CDP or for which the financial support of CDP was requested, that can also lead to reputational and business risks if not managed correctly and in a timely manner.

2.2 Guiding principles

The function of the mechanism is based on compliance with the following principles:

- **equitability and correctness:** the management of the requests is based on maximum correctness towards the stakeholders - furthermore the requests are processed in an impartial and non-discriminatory manner;
- **independence:** guaranteed thanks to i) the attribution, for the management of the requests, of a central role, to a grievance body made up of organisational structures within CDP that are independent of the organisational owners of the business activities (the **"Body"** or **"Grievance body"**); ii) support of independent external experts if considered necessary by the Body; iii) involvement of the Risk Assessment Committee and, subsequently, the Chief Executive Officer/ Board of Directors, to which the Body submits the results of their assessments related to the main requests;
- **transparency:** accessibility to the assessments performed and the relative results, in compliance with the internal and external regulations applicable to CDP³;
- **confidentiality:** with respect to protecting the information that CDP receives in compliance with the regulations in force at that time concerning the protection of personal data;
- **retention of documentation and traceability:** the data and information managed within the Mechanism as well as the documentation produced during all phases of the request management process, both electronic and paper documents, are traceable and suitably retained and archived to be able to reconstruct the various phases of the process while guaranteeing compliance with the contractual provisions defined with the customer in relation to confidentiality and provisions on the protection of personal data. In particular, the original paper and/or digital documentation is stored for the time periods specified in Annex 2.

2.3 Applicable standards

The strategic approach defined by CDP to pursue its own objectives regarding sustainability and cooperation for development is created in compliance with the declarations and conventions, standards, principles, guidelines and recommendations disseminated on a national and international level. These include, for example: the performance standards of the International Finance Corporation ("IFC"), guidelines on the environment, health and safety ("EHS") of the World Bank Group, the guidelines of the Organisation for Economic Co-operation and Development (OECD) for multinational companies, the Conventions of the United Nations and its Agencies on fundamental human rights.

In consideration of the applicable standards, in order to align its actions with the best international practices and improve over time its approach to grievances management, CDP maintains a close relationship, based on continuous dialogue, with other international financial institutions, such as, for example, the other members of the International Development Finance Club ("IDFC") and the association European Development Finance Institutions ("EDFI") and the multilateral financial institutions.

³ If in the case of a request for information, the information cannot be provided in compliance with the principle of confidentiality, a transparent indication of this circumstance must be provided.

3. FUNCTION OF THE STAKEHOLDER GRIEVANCE MECHANISM

In order to permit the function of the mechanism, as described below, CDP, through the internal structures that originate the operation, will negotiate the necessary measures, where possible, in the contracts with their customers. These measures include those related to the access of customer information (including access to their premises and senior management), in relation to financed projects and social-environmental issues, also for the purposes of performing more in-depth audits, if suitable, in consideration of the counterparty and the subjects of the request, in compliance with the provisions on confidentiality and the personal data protection, with particular reference to the requirements in terms of information and the possible consent to its dissemination and/or publication.

If it is found that the contractual measures are not in place, it is necessary for CDP and the customer to agree on the methods for making it possible to effectively manage the received requests. This may require additional time and, depending on the scope and complexity of the contractual agreements that were actually defined, this may involve exceptions and/or limitations to what is defined in this document. If an approach is required that deviates from what is defined in this document, all involved parties are properly informed.

For CDP it is important that the mechanism functions in a clear and transparent manner. For this reason, a summary of its function is provided on CDP's corporate website.

The description of the overall operation of the mechanism as described in this document can be reviewed if necessary, for example upon introduction of new laws, regulations (national or international) or internal CDP policies and updated if considered necessary.

3.1 Request eligibility criteria

The grievances must be presented by sending the form available on CDP's corporate website by ordinary mail addressed to CDP, by e-mail, also certified email, and must be written in Italian or English or in an official language of the Country of the applicant or where the financed operation took place or in which the request for CDP's financial support was considered the origin of the presumed damage. The requests presented in a language other than Italian or English must be accompanied by a translation in Italian or English.

The request must contain at least⁴:

- **information about the operation:** a summary of the operation financed by CDP or for which the financial support of CDP was requested, the location and the circumstances to which the request refers;
- **reasons for the request:** a clear description of the reasons for the grievance, including an indication of the relationship between the operation financed by CDP or for which the financial support of CDP was requested and the presumed negative impacts that were produced by it or could potentially be produced; where possible, the reasons for which the relevant legislation (Italian, international or the host country) and/or the applicable national and international standards and/or internal CDP policies were presumably violated;
- **data of the party presenting the request:** complete name and address, telephone number and, if possible, e-mail address;
- **contacts with CDP/customer:** if applicable, indication of the names of CDP employees and/or CDP customers with whom the party who presented the application already had contact;
- **possible actions for resolution:** a clear description of any actions (e.g. legal actions or contacts with the recipient of the funding) that were already taken to attempt to reach a resolution of the request and the solutions already proposed for the possible resolution.

⁴ For more details, refer to Annex 1 - Eligibility checklist

Requests can be presented by any individual or groups of individuals directly impacted by the initiatives that were financed or for which the financial support of CDP is requested, within a maximum period of two years from the end date of the financing (for example due to the complete repayment of the financing) or sale of the equity investment.

To be eligible, the requests must satisfy all the following criteria:

- the elements defined in the above list must be made available to CDP according to the methods described and in the requested forms;
- the party presenting the request must have been damaged or could be damaged by an operation financed by CDP or for which the financial support of CDP has been requested; if the request is presented in representation of other parties, the represented person/people must be clearly identified and explicit proof of the representative authority must be provided (e.g. proxy, powers granted by by-laws or a contract, etc.), obviously always considering the means available to the impacted Communities;
- there must be an active financial relationship, or it must be in the assessment phase or have existed during the last two years between CDP and the recipient of financing granted by CDP whose operation is considered the origin of the presumed current, future or potential damage;
- the mechanism for managing the grievances, if established, of the recipients of CDP financing who generated the presumed negative impacts must have been previously activated and it was not possible to identify a complete resolution through use of this mechanism.

Furthermore, the requests must include the indication of the other administrative and/or legal procedures available in the host country that are already active/in progress.

The requests are not considered eligible if:

- they do not satisfy the all requirements and criteria listed in this paragraph and Annex 1 - Eligibility checklist;
- they fall outside the scope of application, as described in paragraph 2.1;
- they challenge the mission, the guidelines of the credit granting policy or other general aspects inherent to the role and strategy of CDP (for example, CDP's business model, its role as the National Promotional Institution, its role as the Financing Institution for International Cooperation & Development Finance, etc.);
- they aim to obtain a competitive economic advantage;
- they are obviously unfounded or clearly inconsistent, inappropriate or slanderous;
- were already accepted, managed or resolved by other higher-level administrative mechanisms or by judicial review mechanisms;
- were presented anonymously, without prejudice to the right of the party presenting the request to have it handled confidentially. Any reports presented anonymously will still be paid attention to by CDP, with respect to the activities described in section 3.2.4.

3.2 Description of the Request Management Process

3.2.1 Presentation of the request

The community, if it believes to have suffered/could suffer environmental and/or social damage connected to projects financed by CDP or in any case operations for which the financial support of CDP was requested and a complete resolution was not reached for the requests presented first to the recipients of the financing, transmits a request to CDP by sending the form available on CDP's corporate website by ordinary mail or e-mail, also certified electronic mail, in compliance with the methods defined in paragraph 3.1 and Annex 1, in Italian or English. Please note that all dialogue between CDP and the involved parties, during the entire process, takes place in Italian or English.

3.2.2 Receipt and check of eligibility

Upon receipt of the request, the Internal Audit organisational unit, as the entry point for the process, checks if the presented request falls within the scope of applicability on the basis of the criteria defined in para. 3.1 and, if so, it will engage the Policy and Sustainability organisational unit, as the coordinator of the Stakeholder Grievance Mechanism, to check if the received request is eligible based on the criteria defined in para. 3.1 and Annex 1. The Grievance Body is informed promptly of the received request and the analysis performed by the responsible organisational units regarding their eligibility.

If the grievance is connected also to a request to access the environmental and/or social documents, Policy and Sustainability will engage the Grievance Body for the proper evaluations, as per the process described in this document, making sure that the legal time limits for sending the documentation have been complied with.

If the Internal Audit organisational unit qualifies the request as a “complaint” or a “whistleblowing report” it will transmit the request to the organizational units responsible for their management, according to what is specified by the regulations/policies of reference.

If considered suitable, the Grievance Body can be involved in order to carry out more in-depth analyses. Already during this phase, further information may be requested from the party presenting the request, from the competent CDP organisational units as well as from the institutional partners from time to time involved in the initiative object of the request.

If the operation financed by CDP subject of the request is co-financed by another institution or other institutions, CDP can notify the co-financing institutions the receipt of the request, without prejudice to any contractual obligations (including signed confidentiality agreements), and can communicate and cooperate with the mechanism(s) established at that institution(s). If appropriate, an agreement will be reached with the co-financing institutions, including the signing of a possible cooperation agreement, addressing issues such as confidentiality and information sharing.

After these checks are performed, the Policy and Sustainability organisational unit will prepare a report for the Grievance Body that explains the eligibility or ineligibility of the request.

As described in this paragraph, the eligibility check must be completed within twenty working days of receiving the request⁵.

3.2.3 Communication of the outcome of the eligibility check

Within 25 days of receiving the request, the Institutional Relations and Civil Society organisational unit, upon receiving the report from Policy and Sustainability, informs the party that presented the request of the outcome of the check of eligibility and if it was accepted, by means of a letter and/or e-mail in Italian or English.

If it is not possible to provide a response within the indicated deadlines (e.g. if a request refers to operations already held in the portfolio prior to the creation of the mechanism), the reporting party will be informed of the causes of the delay, indicating the estimated time of response.

Communication must take place using language that is simple, clearly understandable and comprehensive, and must contain information about:

- the methods and deadlines with which CDP is committed to managing the request, if considered eligible;
- the reasons for rejection, if the request was considered ineligible. If applicable, evidence can be provided of alternative systems for the resolution and, if possible, of the institution(s) to which the request can be directed.

⁵ If the request is received as a paper document, the date of receipt corresponds to the filing date.

3.2.4 Request analysis

Once the request was declared as eligible and a communication was sent to the party who presented it, the Policy and Sustainability organisational unit will request the Grievance Body to start the analysis of the request that was presented.

During this phase, the Body, relying on the different contributions of its components based on their area of responsibility, analyses the issues concerned with the request to verify that CDP's work was compliant with the relevant applicable policies and standards, examining the documentation and the pertinent archives.

To perform the activities, in consideration of the characteristics of the request, the Body can rely on a multitude of additional investigative methods⁶ in addition to the analysis of the documents.

These include, for example, but are not limited to:

- involvement of additional internal organisational units, ensuring coordination;
- contacts with the party who presented the request and/or other external parties involved with the request (for example, the customer, government officials, other authorities of the country in which the operation financed by CDP or for which the financial support of CDP was requested took place, the representatives of local and international non-governmental organisations, etc.), by holding meetings (preferably virtual, or in person if strictly necessary, in Italy or the host country), or requesting observations and contributions for specific issues, in order to collect the information necessary for performing the analysis;
- visits to the project sites;
- contracting independent experts to carry out research activities on specific issues related to the request.

Based on the collected evidence, the Body can decide whether to also resort to external mediation.

The Body is committed to completing the analysis within a reasonable period of time. The number of days estimated to be actually necessary to complete the analysis depends on the complexity of the case and is communicated to all involved parties.

3.2.5 Opinion on the analyses performed and approval

After the analysis of the request is complete, the Body, coordinated by the Policy and Sustainability organisational unit, prepares a final report that illustrates the result of the analysis (and any recommendations on CDP internal policies/procedures, corrective actions and the relative implementation timing, including the possibility of resorting to mediation) (the **Final Report**).

The proposal for managing the request that was received by the Grievance Body during the analysis phase, is illustrated in the Final Report, which also includes the proposal of the party that approved the Report (Chief Executive Officer or Board of Directors, depending on the complexity and importance of the relative request). The Final Report is submitted to the Risk Assessment Committee for the release of a non-binding opinion, at their next possible meeting and subsequently, in consideration of the proposal made in the Report itself, upon approval by the Chief Executive Officer or the Board of Directors (after informing the Chief Executive Officer). If the approving party is the Chief Executive Officer, they will evaluate the possibility of providing information to the Board of Directors regarding the received requests and the relative methods of managing them.

3.2.6 Communication of the result of the analyses

Within five days after approval of the Final Report by the Chief Executive Officer/Board of Directors, the Institutional Relations and Civil Society organisational unit informs the party who presented the request of the result of the analysis carried out, including any decision to resort to the mediation process, by means of a letter and/or e-mail in Italian or English.

⁶ Any additional costs resulting from the use of the additional investigative costs will be paid by CDP.

3.2.7 Mediation (possible)

During the analysis phase, the Grievance Body can decide to resort to mediation in order to facilitate the reaching of a mutually acceptable solution as regards the negative impacts indicated in the request.

The mediation phase, which is managed by the Policy and Sustainability organisational unit as the coordinator of the Stakeholder Grievance Mechanism, is carried out using external mediators who were selected suitably in agreement with all the concerned parties, with the support, only if during the request analysis phase a justified risk emerges that the Grievance could result in a legal dispute, of the Litigation Department organisational unit.

The mediation activities can include the sharing of information, the determination of facts and dialogue. The mediation process lasts the time necessary to reach a solution, thanks to the commitment of all participants. This duration must not exceed one year from the start of the process, without prejudice to the right of the party who presented the request to interrupt participation in mediation.

Following the mediation phase, the Body, coordinated by the Policy and Sustainability organisational unit, prepares a Final Report on the result of the mediation, which also includes the proposal of the party that approved the Report (Chief Executive Officer or Board of Directors, depending on the complexity or importance of the request itself). The Final Report is submitted to the Risk Assessment Committee for the release of a non-binding opinion, at their next possible meeting and subsequently, in consideration of the proposal made in the Report itself, upon approval by the Chief Executive Officer or the Board of Directors (after informing the Chief Executive Officer). If the approving party is the Chief Executive Officer, they will evaluate the possibility of providing information to the Board of Directors regarding the received requests and the relative methods of managing them.

Within five days after approval of the Final Report by the Chief Executive Officer/Board of Directors, the Institutional Relations and Civil Society organisational unit informs the party who presented the request of the result of the mediation, by means of a letter and/or e-mail in Italian or English.

3.2.8 Publication of the result of the Request Management Process

In order to make the process of managing the requests transparent by means of the Mechanism, the Communication, Identity and Content organisation unit engaged by the Policy and Sustainability organisation unit will publish a Final Report on CDP's corporate website within 20 days following the relative approval by the approving body.

Furthermore, CDP, also through the Communication, Identity and Content organisational unit, periodically publishes information about the received requests and the ones considered inadmissible on CDP's corporate website.

Publication takes place in accordance with the contractual provisions defined with the customer regarding confidentiality and provisions on the protection of personal data.

3.2.9 Monitoring

The Policy and Sustainability organisational unit, which involves the Grievance Body if necessary, monitors the implementation of the agreed corrective actions within the time periods specified in the Final Report and provides evidence of such in a report, prepared annually, to the Board of Directors, after informing the Grievance Body. If during the monitoring phase the Policy and Sustainability organisational unit detects the risk that the time periods defined in the Final Report were not observed for the closure of the corrective actions, it engages the Grievance Body for the suitable evaluations regarding the initiatives to be taken (this includes, for example, but is not limited to any rescheduling of deadlines).

Furthermore, it also updates the Board of Directors at least once a year, unless otherwise necessary, regarding the activities carried out by the Mechanism, such as, for example:

- number of requests received;
- number of inadmissible requests and the rationale for inadmissibility;
- number of eligible requests and working status;
- any agreed rescheduling of the corrective actions proposed in the Final Report and the relative motivations.

Furthermore, based on the activities performed, it periodically provides information and recommendations to its management from the point of view of continuous improvement.

4. ROLES AND RESPONSIBILITIES

In light of the described process, the main roles and responsibilities of the involved parties are summarised below.

Internal Audit, as the entry point:

- checks if the presented request lies within the scope of applicability, based on the criteria defined in paragraph 2.1;
- if the request is qualified as a “complaint” or as a “whistleblowing report”, it will send it to the responsible organisational units according to what is required in the relative regulations/policies.

Policy and Sustainability, as the process coordinator:

- checks, following the engagement of the Internal Audit organisational unit, if the presented request is eligible based on the criteria defined in para. 3.1 and Annex 1, involving the Grievance Body if necessary.
- involves the functions that make up the Grievance Body to start the analyses;
- coordinates the Grievance Body and any other internal counterparties and/or external experts, including possible external mediators, if involved;
- coordinates the preparation of the final report prepared by all the company functions that make up the Grievance Body and that were actually involved in managing the Grievance;
- submits the report to the Chief Executive Officer/Board of Directors and, previously, to the Risk Assessment Committee, that illustrates the result of the analysis and, if applicable, the mediation process;
- involves the Communication, Identity and Content organisational unit to publish a summary of the final report approved by the Chief Executive Officer/Board of Directors on the corporate website;
- periodically informs the Board of Directors about the activities concerning the Mechanism and the other activities for monitoring the suggested corrective actions.

Grievance Body, as the entity responsible for the analyses:

A collegiate body with transversal skills regarding environmental, social, legal and financial aspects and is independent of the business functions. It carries out the analyses of the requests raised, relying on the contributions of its members based on their area of responsibility, also involving other internal counterparties and/or external experts if considered necessary, and decides if it is advisable to resort also to mediation and proposes the party that approved the Final Report. It is comprised of the Managers of the following Organisational Units⁷:

- Internal Audit Department Manager (entry point);
- Policy and Sustainability (coordinator);
- Compliance and Anti-Money Laundering;
- Institutional Relations and Civil Society;
- Sustainability and Artistic Heritage;
- Group Legal Coordination, Real Estate and Litigation;
- Legal, Loans and Guarantees;

⁷ Each effective member of the Body can identify a representative who can participate on their behalf, if necessary.

- Risk Management;
- International Institutional Relations.

If a member of the Body is in a situation of conflict of interest in relation to a specific request, he or she must immediately communicate this in advance to the other members, specifying the reasons in particular. In particular, a conflict of interest arises if, with reference to the specific request, the impartial and subjective performance of the evaluation activity required as a member of the Body is compromised⁸.

In the cases in which a majority of the other members of the Body agree on the effective existence of a conflict, they will communicate to the member with the conflict of the need to:

- refrain from performing any evaluation
- inform the Compliance Function for updating the conflict of interest register.

The coordination and performance of the Body's operating activities is guaranteed by the Policy and Sustainability organisational unit.

Risk Assessment Committee, as the consultative body:

- release a non-binding opinion on the Final Report prepared by the Grievance Body containing the result of the analyses of the presented requests and the mediation, if performed.

Chief Executive Officer/Board of Directors, as the decision-making body:

- it approves the Final Report that illustrates the result of the analysis of the presented requests and mediations, if performed.

Board of Directors:

- it is periodically informed about the activities concerning the Mechanism and the other activities for monitoring the suggested corrective actions;

Institutional Relations and Civil Society, as responsible for the management of relations with stakeholders:

- during the entire request management process, it ensures and manages the institutional relations with the Institutions and stakeholders of civil society, in coordination with the structures of the "European and International Affairs" Department, for initiatives with an impact on a European or International level;
- it sends a communication to the party that presented the request that certifies:
 - the result of the check of eligibility of the request and its possible acceptance;
 - the result of the performed analyses;
 - the result of the mediation process, if applicable.

International Cooperation & Development Finance:

- it will negotiate, if possible, the introduction of the necessary measures in contracts with customers. These measures include those related to accessing customer information, their premises and senior management;
- it encourages, if possible, their customers to adopt mechanisms and procedures for the transparent management of the requests of the communities concerned with the presumed current or potential negative impacts of the financed operations (e.g. grievance mechanism). These mechanisms will be necessary when directly providing loans for projects with a high social-environmental impact.

⁸ The sole fact of having followed the operation does not in itself represent a situation of conflict of interest.

ANNEXES

Annex 1 – Eligibility checklist

FORMAL REQUIREMENTS	Written form.
	The form available on CDP's corporate website is received by ordinary mail or a dedicated email address, also certified email.
	Prepared in, or translated into, Italian or English.
CONTENT REQUIREMENTS	Information about the operation: - a summary of the operation financed by CDP or for which the financial support of CDP was requested; - indication of the location and circumstances to which the request refers.
	Reasons for the request: - clear indication of the reasons for the request; - indication of the relationship between the operation financed by CDP or for which the financial support of CDP was requested and its presumed negative social-environmental impacts.
	Data of the party presenting the request: complete name and address, telephone number and, if possible, e-mail address.
	Contacts with CDP or with a CDP customer: if applicable, indication of the names of CDP employees and/or CDP customers with whom the party who presented the application already had contact.
	Possible actions for resolution: a clear description of the actions (e.g. legal actions or contacts with the customer) that were already taken as an attempt to reach a resolution and the proposed solutions for the possible resolution.
REQUIREMENTS ON THE PARTY PRESENTING THE REQUEST	The party presenting the request must have been damaged or could be damaged by an operation financed by CDP or for which the financial support of CDP was requested.
	If the request is presented by an external party representing another party, it is necessary to: - identify the people represented; - provide explicit proof of the representative authority.
PROCESS REQUIREMENTS	The mechanism established at CDP customers who generated the presumed negative impacts is activated and it was not possible to find a solution.
REQUIREMENTS ON THE OPERATION THAT IS THE ORIGIN OF THE NEGATIVE IMPACT	Initiative promoted by CDP's International Cooperation and Development Finance Area.
	An active financial relationship must exist, be in the assessment phase or have existed during the last two years between CDP and the recipient of financing granted by CDP whose operation is considered the origin of the presumed current, future or potential damage.

Annex 2 – Form to complete for the presentation of the request

Data of the party presenting the request:

First name and Surname/
Company name*

.....

Tax Code/VAT no.*

.....

Street address (street, square)*

.....

Street number*/Postal code*

.....

City*/Province*/Country*

.....

Provide contact information if it is necessary to make contact for requesting additional information

Email

.....

Certified email address

.....

Telephone number

.....

IN CASE OF A REQUEST SUBMITTED BY A REPRESENTATIVE:

Representative party/
organisation

.....

Attach explicit proof of the
representative authority

.....

Information about the operation to which the request refers

Specify the subject matter of the request in this section (the operation financed by CDP or for which the financial support of CDP was requested to which it refers) *

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Specify in this section the location and circumstances to which the request refers*

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Annex 1	
Annex 2	
Annex 3	

Provide a clear indication of the reasons for the request in this section*

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.....

Provide clear and detailed assertions regarding these negative impacts (current or potential, direct or indirect) of the operation financed by CDP or for which the financial support of CDP was requested in this section*

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.....

Provide in this section an indication of the relationship between the operation financed by CDP or for which the financial support of CDP was requested and its presumed impacts*

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Provide in this section the reasons for which the operation allegedly violates the relevant legislation and/or applicable national/international standards and/or CDP policies

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Provide in this section other useful information regarding the reason for the request

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Annex 1	
Annex 2	
Annex 3	

Data of the party presenting the request:

Provide in this section possible actions for resolution: a clear description of the actions (e.g. legal actions or contacts with the customer) that were already taken to attempt to reach a resolution or the proposed solutions for the possible resolution. In particular:

Provide a description of the actions taken regarding the activation of the grievance mechanism of the CDP customer and the relative outcome* (mandatory field if the CDP customer has activated the grievance mechanism)

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Provide a description of any other administrative and/or legal procedures that were started and the relative outcome

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Annex 1	
Annex 2	
Annex 3	

Specify in this section, if applicable, indication of the names of CDP employees and/or CDP customers with whom the party who presented the request already had contact;

CDP employee name

.....

.....

.....

CDP employee name

.....

Date

Signature

.....

Information notice pursuant to Article 13 of European Regulation 2016/679 (GDPR)

Data Controller

Pursuant to European Regulation 2016/679 (hereafter the GDPR), Cassa Depositi e Prestiti S.p.A. (hereafter, CDP), based in Rome, via Goito No. 4 (00185), processes your personal data as the "Data Controller" of the data processing in accordance with law, and informs you of the use of the aforementioned personal data.

The Personal Data Protection Officer (DPO) can be contacted by writing to the following e-mail address privacy@cdp.it.

Purposes of the processing

Your data will be processed: a) for the processing of the request; b) for fulfilment of the obligations required by community laws, regulations, provisions issued by authorities authorised to do so by law or supervisory and control bodies pursuant to art. 6.1.c) of the GDPR.

Data processing methods

Personal data are processed, for the purposes indicated, using manual, IT or telecommunications means, applying logics that are strictly related to those purposes and, in any case, in a way that ensures such data may be kept secure and confidential. Protection is ensured also if innovative instruments are introduced by CDP.

Storage of personal data

Your Personal Data may be kept only for such time as necessary in relation to the purposes for which they are collected, in compliance with the principle of data minimisation pursuant to Article 5.1.c) of the GDPR and for a maximum of 10 years. CDP may retain some data after the end of that period, depending on the amount of time required in order to manage specific contractual or legal compliance obligations, and also for purposes of administrative, tax and/or contributions payment compliance, for the period of time imposed by applicable legislative and regulatory provisions and required in order to enforce any rights and entitlements in legal proceedings. In any case, the data will also be processed in compliance with current regulations, according to the principles of confidentiality, inherent to the performance of the financial activity, which have always guided CDP.

Categories of persons to whom data may be communicated

For the pursuit of the above purpose, CDP may communicate your data to third parties who were appointed as data processors or who act as autonomous controllers if the data communications operations are necessary for the required and performed services and/or required by specific regulatory obligations.

Transfer of data outside the EU

With regard to any transfer of Data to third countries, CDP will process that data in accordance with the procedures permitted by applicable law, such as the consent of the data subject, the adoption of Standard Clauses approved by the European Commission, the selection of entities participating in international programmes for the free movement of data or operating in countries considered safe by the European Commission.

Rights of the data subject

Lastly, we inform you that Articles 15-22 of the GDPR give data subjects the possibility of exercising specific rights.

Accordingly, data subjects can obtain the following from CDP: access, rectification, erasure, restriction of processing, withdrawal of consent and portability of the data concerning them.

The data subject also has the right to object to the processing. If this right is exercised, CDP reserves the right not to concede to the challenge and, instead, to continue the data processing provided there are legitimate and compelling reasons to do so which prevail over the data subject's interests, rights and freedoms.

The above rights may be exercised by sending a request by post to Cassa Depositi e Prestiti S.p.A., via Goito 4, 00185 - Rome, to the attention of the Data Protection Officer, or by e-mail directly to said Officer, at the addresses provided in the paragraph "Data Controller".

The data subject is also entitled to file a complaint with the Italian Data Protection Authority.

(*) Mandatory fields: the failure to complete the mandatory fields, or the possible omission of annexes, may make it impossible to respond to the request.

Annex 3 - Glossary

Community or party presenting the request: groups or single individuals who believe that they are or could be negatively impacted, or to have been subjected to or could be subjected to damage of an environmental and/or social nature by a project financed by Cassa Depositi e Prestiti S.p.A. ("CDP") or in any case by an operation for which the financial support of CDP was requested.

Complaint: declaration of dissatisfaction presented by a customer 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. (see the Complaints Regulation).

Development Finance Institution (DFI): financial institution that supports the social- economic growth of countries in high-potential geographical areas through its financing and investment programs in areas that are strategic to or significant for sustainable development.

Grievance: request or declaration, presented in writing by the Community which believes to be or could be negatively impacted, or to have been subjected to or could be subjected to damage of 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.

Stakeholder Grievance Mechanism: mechanism that permits facilitating the presentation of requests by the community impacted/that could be impacted negatively by projects financed by CDP or in any case by an operation for which the financial support of CDP was requested, as well as the search for a constructive resolution of disputes, while guaranteeing an improvement in the environmental and social impacts of the financed projects and the promotion of accountability of the action of the lenders. The mechanism does not replace judicial recourse and does not prevent, therefore, access to other judicial or administrative remedies.

Whistleblowing report: written or verbal communication of information regarding violations, including justified suspicious, that can concern administrative, accounting, civil, criminal offences, relevant conduct pursuant to Leg. Decree 231/01, offences that concern acts of the European Union⁹ or national regulatory provisions (see the Group Policy - "Management of Whistleblowing Reports").

⁹ In sectors of public contracts, services, products and financial markets and prevention of money laundering and terrorist financing, safety of transport, environmental protection, etc.