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Chief Executive Officer and General Director

"Sustainability Policy"

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DISCLAIMER

The principles and rules of conduct set out in this document also constitute control measures for anti-corruption purposes and for the prevention of risks of offences pursuant to Legislative Decree No. 231/2001, implementing the provisions of the Organisation, Management and Control Model adopted by the Companies pursuant to Legislative Decree No. 231/2001 (Model 231), the FS Italiane Group Code of Ethics, the FS Engineering Data Protection Framework and the FS Italiane Group Information Classification and Confidentiality Protection Framework, as well as the Internal Control and Risk Management Model for Financial Reporting (the so-called Model 262). The Heads of the organisational units involved are advised to continuously monitor compliance with this document in order to ensure its proper implementation and ongoing updating, with a view to maintaining its effectiveness. Anyone who becomes aware of any violations or attempted circumvention of this document is required to promptly inform the Supervisory Body and/or the Company's Ethics Committee, in accordance with the procedures laid down in the Whistleblowing Management Procedure and Model 231.

- ☑ Legislative Decree No. 231/2001
- ☑ Anti-Corruption Control Measure

1. PURPOSE AND SCOPE

1.1 Purpose and Contents

The Sustainability Policy aims at identifying the sustainability principles that guide FS Engineering, in line with the FS Group Sustainability Policy, in fulfilling its mission across all areas and contexts in which the Company operates. It also sets out the Company's commitments to promoting a culture of sustainability and responsibly managing its impacts, both on the communities involved and on its own people, while encouraging sustainable practices in its relationships with customers and suppliers throughout the value chain. To this end, the Policy establishes related objectives for all business processes, corporate activities and subsidiaries, with a view to continuous improvement and the effective achievement of the United Nations 2030 Agenda, in line with the long-term 2030–2050 objectives established by the FS Italiane Group and with the Business Plan in relation to sustainability matters. This Policy supersedes and replaces SO_PY No. 38, Version 01 of 3 July 2025, and is communicated both within and outside the Company, in accordance with the procedures established for the management of organisational documentation.

1.2 Scope and Organisational Units Involved

The provisions of this document must be applied by all organisational units of FS Engineering, its subsidiaries and the relevant individuals appointed to the specified roles, insofar as the matters defined in this Policy and in the more detailed Management Systems Policy fall within their respective areas of responsibility.

2. SUSTAINABILITY POLICY

FS Engineering promotes and implements a culture of sustainability in the design, construction and maintenance of infrastructure works, establishing a new engineering model capable of combining well-established technical know-how with an increasing focus on environmental, social and economic sustainability. This approach recognises the role of infrastructure as an active component in shaping territories and landscapes and enhancing communities, with a view to efficiency, resilience, inclusion and cohesion.

Within this vision of infrastructure development, sustainability becomes an essential driver in guiding territorial transition processes towards models inspired by the objectives of international agendas, aimed at improving quality of life and local areas while protecting the environment, through the development of integrated and efficient infrastructure and transport solutions, with particular emphasis on urban environments.

Sustainability also serves as a driver for promoting an ethical corporate culture, fair and responsible conduct in resource management and risk prevention, as well as innovation aimed at environmental protection and supporting communities throughout the value chain and in relationships with customers and suppliers. We undertake these commitments in accordance with the principles set out below:

- CREATION OF SHARED VALUE. Reconciling economic objectives with social and environmental goals, generating value for the Company, its stakeholders and the areas in which we work, thus enhancing positive externalities while avoiding or minimising negative ones. This approach is also based on the continuous monitoring of sustainability performance and results and their transparent external communication, in accordance with applicable national and European Union legislation.
- COMMUNITY AND STAKEHOLDER ENGAGEMENT. Pursuing sustainable development by promoting systematic stakeholder engagement in business processes, firmly believing that analysing the context in which we work, thus identifying and understanding community needs, and involving communities must constitute fundamental elements of FS Engineering's decision-making processes.
- PEOPLE'S SAFETY. Continuously improving occupational health and safety performance and safety standards in all activities involving risks to employees, passengers and the general public, both by strengthening the culture of risk management and prevention and by promoting a safety culture and developing new dedicated tools.
- SERVICE QUALITY. Integrating sustainability criteria into the design, construction and maintenance processes of infrastructure works, thus providing increasingly high-quality and efficient engineering services. Promoting projects aimed at enhancing intermodality and integration with local areas, climate change adaptation and mitigation, the circular economy, resource conservation, biodiversity protection and the widespread adoption of renewable energy, establishing lasting relationships with relevant stakeholders and implementing an organisational approach centred on stakeholder satisfaction and improved sustainability performance.
- EMPLOYEE VALUE AND DEVELOPMENT. Always placing our people at the centre of our daily activities by promoting initiatives aimed at well-being, personal and professional development, full inclusion

and participation, through the development of skills and competencies and the provision of information and training activities at all organisational levels. Ensuring that recruitment, training, professional development and career advancement are based on merit and free from any form of discrimination. Promoting integrity and discouraging corrupt practices in every possible way.

- EFFICIENT USE OF RESOURCES AND ENVIRONMENTAL PROTECTION. Encouraging the adoption, across all processes and from the earliest design stages, of solutions that make efficient use of resources and respect the environment, supporting operational decisions in the field of sustainability through innovation and digitalisation initiatives. From this perspective, promoting the efficient use of energy resources and the reduction of greenhouse gas emissions through highly energy-efficient solutions, making use of renewable energy sources wherever possible. Promoting a design approach based on Life Cycle Assessment (LCA) in order to minimise the environmental impact of our activities, with special attention to water consumption, waste management and the prevention of soil pollution, thus encouraging our customers and suppliers to improve their environmental performance and, wherever possible, guiding and supporting them in their improvement efforts.
- RESPECT FOR HUMAN RIGHTS. Ensuring and promoting respect for human rights throughout our activities and among suppliers and business partners, working within the framework of the United Nations Universal Declaration of Human Rights and contributing to the development of a responsible supply chain. We reject all forms of irregular employment and promote policies aimed at safeguarding the physical and psychological well-being of personnel. In line with the above, FS Engineering's activities are carried out in compliance with the ten principles of the United Nations Global Compact, a voluntary initiative promoting shared sustainability values (human rights, labour, environment and anti-corruption). We are therefore committed to a process of continuous improvement, monitoring progress, publicly reporting results and actively engaging our stakeholders.

Prepared by:	
DSCEBAS – Sustainability	S. Martini, C. Ravagnan
Checked by:	
DABC – Officer Responsible for Preparing Financial Reports	Acting Head
DAL – Compliance	Acting Head
DHSC – Occupational Health and Safety	Acting Head
DHSC – HSQE Systems	Acting Head
DHSC – HSQE Systems and Certifications	Acting Head
DRUO – Organisation and Development	G. Mandato
International Business Development, Business Affairs and Sustainability Department	Acting Head
DTSDRIDCP – Digital Rail Infrastructure Monitoring & Technical Advisory	Acting Head
Anti-Corruption Control Function	Acting Head
Risk Officer	Acting Head
Approved by:	
Chief Executive Officer	Acting Head of ADDG
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VERSION/DATE	DOCUMENT	REASON FOR REVISION
00 of 30/03/2009	Formerly PPA.0000786 REV. A	First issue
01 of 02/03/2010	Formerly PPA.0000786 REV. B	Integration of Objectives
02 of 07/06/2011	Formerly PPA.0000786 REV. C	Revision of Objectives
03 of 02/11/2015	Formerly PPA.0000786 REV. D	Update to UNI EN ISO 9001:2015 and UNI EN ISO 14001:2015 standards
04 of 10/05/2018	Formerly PPA.0000786 REV. E	Updated UNI ISO 45001:2018 standard
05 of 15/09/2020	Formerly PPA.0000786 REV F CO No. 162 AD	Integration of principles pursuant to Management Directive No. 269/AD of 30 May 2019 – FSI S.p.A. Group Sustainability Policy.
01 of 04/11/2022	CO No. 162.1 AD	Corresponding Issue as an Organisational Communication (CO)
01 of 03/07/2025	SO_PY "Sustainability Policy" No. 38, v. 01	Update of the document in line with the issuance of the Management Systems Policy.
02 of 01/10/2026	SO_PY "Sustainability Policy" No. 38	Update of organisational references in line with the organisational structure

This document does not alter either its content or its validity but updates only the organisational references in line with the current organisational structure, in order to address specific compliance measures pursuant to Legislative Decree No. 231/2001.

International and National Documents and Standards

- United Nations 2030 Agenda;
- United Nations Global Compact;
- National Sustainable Development Strategy.

FS Documents

- FS Group Sustainability Policy, Management Directive No. 269/AD of 30 May 2019.

FS Engineering Documents

- Management Systems Policy, SO_PY No. 37, Version 01 of 3 July 2025.