SOGIN | nucleare e ambiente

SOGIN GROUP SUSTAINABILITY REPORT

2023

Sogin Group Sustainability Report for 2023
We would like to thank everyone in the Sogin Group who contributed, in their different capacities, to preparing the *2023 Sustainability Report*.

Approved by the Sogin Board of Directors on 18 July 2024
SO.G.I.N. S.p.A. - Società Gestione Impianti Nucleari per azioni
Registered office: Via Marsala 51 C, 00185 Rome - Italy
Rome Companies Register - Tax Code and VAT no. 05779721009
Economic and Administrative Index (R.E.A.) 922437 - Court of Rome no. 130223/99
Sole Shareholder Company – Fully paid-up share capital € 15,100,000.

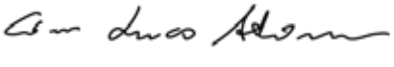
Summary

LETTER TO THE STAKEHOLDERS

2023 has been a year of transition for our Group, marked by numerous changes that have laid the foundations for a new phase of re-launch and development. In August, with the appointment of the new Board of Directors and the new management team, intense work began to make the organisation more efficient, to enhance internal skills and to put innovation and sustainability at the heart of our processes.
During the year, the Group's first sustainability plan was approved. This is a fundamental step on the path undertaken and reported on since 2005, which defines the areas and objectives that measure our active and voluntary contribution to the country's sustainable development. This document, produced with the transversal contribution of all the corporate functions, demonstrates the growing commitment to planning activities that integrate sustainability into every business process.
Making sustainable mid-long term choices means creating value for our stakeholders. That is also why, for years now, we have been creating opportunities to share and discuss aspects with the communities of the areas in which our nuclear sites are situated. In 2023 we welcomed about 800 visitors, mostly school and university students, to our facilities and they were able to learn about the complexity and value of our work.
In addition to promoting opportunities for discussion and dialogue, we have continued to support the development and growth of the areas in which we operate by implementing, for example, eco-sustainable projects with local communities. We have also worked on various proposals to enhance our nuclear sites, from protecting biodiversity to assessing how to reuse sites and buildings in favour of advanced technologies and innovative practices in the strategic sectors of the green economy.
The actions taken by our new Top Management allowed us to close the year with a 43.4% physical progress in decommissioning. In the Garigliano power plant, we opened the upper part of the vessel, the steel container in which the nuclear reaction took place when the plant was in operation. This is the most complex activity, from an engineering and operational point of view, in the decommissioning of a nuclear plant, and it marks the start of the final phase of the decommissioning of the Campania site. In the Caorso plant, we completed the treatment project of the sludge and radioactive resins, with the return to site of all the items produced by the conditioning activities carried out in Slovakia. A further significant milestone in the progress of the dismantling programme was reached with the delivery to the ITREC site in Rotondella, of the two metal containers known as casks, in which the 64 Elk River irradiated fuel elements, currently stored in the plant's pond, will be deposited.
In the context of the circular economy, which has always guided our decommissioning strategy, despite operating on old plants which were not designed according to these principles and that derive from historically earlier industrial ideas and techniques, we believe that the procurement phase is also fundamental in a path of sustainable growth. For this reason, during 2023, we continued working to introduce sustainability criteria in the supply chain and supplier qualification processes, as well as in the more strictly operational phases.
2023 was also an important year for the National Repository project. In July we sent the updated proposal of the National Map of Suitable Areas (CNAI) to the Italian Ministry of the Environment and Energy Security (MASE) and, in December, the MASE published the list of suitable areas included in the CNAI on its website.
Also at MASE, Sogin participated in the activation and launch of the National Platform for Sustainable Nuclear Energy (PNNS). The PNNS defines a path for the potential resumption of the use of nuclear energy in Italy and for the development of the national industrial chain.
As the steering committee of the Working Group no. 5 for "Waste and Decommissioning", we promote energy safety and decarbonisation through the development of innovative solutions for managing nuclear waste and for decommissioning nuclear plants.
We have participated in numerous events and in various working groups within the principal international organisations in the sector, continuing to enhance our distinctive skills and to affirm Italian know-how abroad. In particular, in September the agreement between the International Atomic Energy Agency (IAEA) and Sogin was renewed, confirming our company as a Collaborating Centre of the Agency, a recognition obtained in 2019.
Precisely in this context, in October, we completed the Artemis mission, a peer review on the national radioactive waste and spent fuel management programme, conducted by experts from several IAEA member states. The final report acknowledged the effectiveness of the methodological and operational approach adopted by our Company which, it should be remembered, operates in a technical-regulatory context, the Italian one, which is among the most stringent in the world.
The activities carried out and the path undertaken in 2023 are the result of the work done by the Group's more than one thousand employees, who represent the most significant pool of expertise in Italy in the nuclear and environmental field, at the service of the entire Italian industrial chain. A unique know-how that, over the years, and through specific training programmes, we have been able to maintain, update and transfer.
We believe that, in a particularly complex and constantly evolving sector, such as the one in which we operate, it is essential to create the best conditions for the country's sustainable development, since future generations will be the true drivers of change.

Carlo Massagli
Chairman

Gian Luca Artizzu
Chief Executive Officer



METHODOLOGICAL NOTE

The Sustainability Report is an official source of information on the Sogin Group. It includes important data on the economic, industrial, social and environmental performance of the Group and is intended for all its Stakeholders. The document, approved by the Sogin Board of Directors on 18 July 2024, refers to the financial year 2023 (01/01/2023 - 31/12/2023) and includes some significant events which occurred in the first half of 2024.

SCOPE OF REPORTING

The reporting scope of the Group's 2023 Sustainability Report covers the following:

- Sogin S.p.A. (the Parent Company), the company in charge of the safe maintenance and dismantling of Italian nuclear plants and of radioactive waste management;
- Nucleco S.p.A. (of which Sogin holds 60% of the share capital), in charge of the treatment and interim storage of radioactive waste and sources resulting from medical and hospital activities and scientific and technological research activities.

To guarantee the comparability of data and information, and assess the performance of the two companies, the data and figures contained in the Report are compared, where possible, to those referring to the previous two financial years. The figures provided in the Report were accurately calculated according to the results of the financial accounts and other information systems. The use of estimates to define indicators was limited, with the method applied to calculate them specified, where applicable. No limitations and changes to the previous Sustainability Reports have been adopted that can significantly affect the comparability between periods.

ACCOUNTING PRINCIPLES AND STANDARDS

The methodology reference used for the information presented in this Report was the *"GRI Sustainability Reporting Standards"* issued by the ***Global Reporting Initiative*** **(GRI)**, a leading international association in the development of sustainability reporting standards. In preparing the information, the Group has taken into account the principles set out in the GRI Standards: completeness; sustainability context; balance; comparability; accuracy; timeliness; clarity and verifiability. The report was prepared to provide reliable, complete, balanced, accurate, understandable and comparable information, in line with the GRI reporting standards issued in 2016, based on the *"in accordance with"* option, following the more recent updated version of 2021.

The Global Reporting Initiative is a multi-stakeholder network of thousands of experts worldwide, aimed at defining sustainability reporting procedures and disseminating them as widely as possible. The *"in accordance with"* reporting method indicates that the organisation is able to meet all 9 of the standard's mandatory requirements.

Starting from the 2019 Sustainability Report, the latest 2018 version of the GRI 303 (Water and Effluents) and the GRI 403 (Occupational Health and Safety) were adopted in the report. The specific 2019 GRI 207 (Taxes) standard was also adopted from the 2020 Sustainability Report onwards. Furthermore, the 2020 updated Specific Standard GRI 306 (Waste) was adopted starting from the 2021 reporting period. Moreover, the document also complies with the principles of inclusiveness, impact, materiality, and compliance as foreseen in the AA1000 Accountability standard.

AccountAbility is a global consulting and standards firm that works with businesses, governments and multi-lateral organisations to promote responsible business practices and improve long-term performance.

Any possible scope limitations are duly indicated in the report. As was the case in 2023, Sogin prepared a survey addressed to its internal and external Stakeholders, to learn their opinions on the Sustainability Report. The survey is available under the sustainability section of the company website www.sogin.it.

REPORTING PROCESS

The preparation of the document by the Sustainability Area of Sogin's Regulatory, Institutional and Communication Department follows an internal procedure, issued in November 2020, which lays out the drafting standards and deadlines, implementation

stages, roles and responsibilities of the parties involved in the process, to ensure full and accurate reporting to Stakeholders.

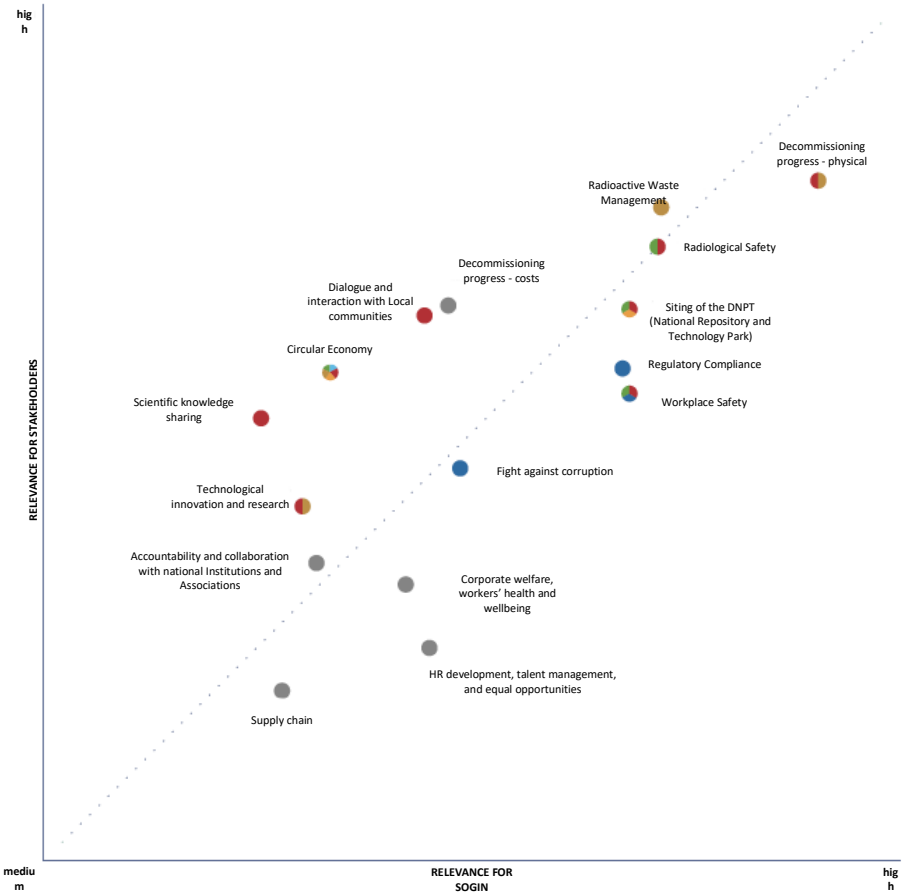
DEFINITION OF CONTENT

Sustainability reporting is based on the analysis and identification of issues that are material to both the Sogin Group and its stakeholders. A topic may be considered material if it generates a potential or actual social, economic, or environmental impact on the organisation or if it significantly affects the stakeholders' evaluation of the organisation.

MATERIALITY ANALYSIS

The most recent materiality analysis was effectuated by listening firstly to internal stakeholders, particularly company management, who completed a qualitative questionnaire and then secondly to key external stakeholders, who were also asked to complete a questionnaire. The outcomes of the materiality analysis are summarised in the following matrix, representing the topics that have a high and medium level of significance for Sogin and its Stakeholders. In 2023 no changes were made to the 2022 matrix. The analysis took into account a range of internal and external issues such as: corporate strategy documents; risk analysis; reference amendments to legislation; press reviews; trade union inspections; social media and an internal climate analysis with a new key approach, following the GRI 3 update – Material Themes 2021, which allows material themes to be prioritised, thus determining the related impact generated by the Group. As with previous years, global macro-trends and comparisons with similar organisations to Sogin operating in other countries were also considered. For additional information on these impacts reference is made to the updated GRI Standards table at the end of this document.

MATERIALITY MATRIX



Each topic in the matrix is assigned a specific place based on its significance (highly important topics in the upper right corner of the matrix, while less important topics are reported in the lower left corner). The colour of the circles indicates the 2030 Agenda's Sustainable Development Goals for each individual topic – **Sustainable Development Goals (SDGs)**. The material topics that emerged are related in the 2023 Sustainability Report along with other topics that, even though they may not have reached the level of being "highly important", are still considered significant to the relationship with the Stakeholders.
A bridging table, provided in the appendix of this document, combines the material topics identified on the basis of the analysis with the GRI reporting standards and in which, for each topic, the association with the reference standard is reported and the reporting perimeter is identified and outlined.

ALIGNMENT BETWEEN THE MATERIAL TOPICS THAT EMERGED FROM THE ANALYSIS AND THE 2030 AGENDA'S SUSTAINABLE DEVELOPMENT GOALS (SDGs)

	MATERIAL TOPICS	DESCRIPTION	SDGs
1	Decommissioning progress – physical	Progress with dismantling works of nuclear power plants to release the sites free of radiological restrictions; critical issues connected to planned decommissioning activities and their implementation times, including with regard to the availability of the National Repository.	8, 9, 12, 14
2	Radioactive Waste Management	Sogin's radioactive waste management process - characterisation and classification, collection, transportation and radioactive waste treatment - and possible critical issues/negative impacts on the current management approach.	12, 9
3	Radiological Safety	Prevention of radiological accidents, assessment of the radiological monitoring system, training and awareness raising campaigns.	3, 8
4	Siting of the DNPT (National Repository and Technology Park)	Stages of the siting process, players involved in decision-making, Sogin planned and future actions on this topic, collaboration with the Stakeholders.	3, 8, 11
5	Regulatory Compliance	Actions designed to comply with the current regulations, constant monitoring of relevant regulatory changes and their prompt introduction into the internal regulations to prevent the infringement of laws or regulations which may result in reputational damage or sanctions (risk of non-compliance with the law).	16
6	Workplace Safety	Prevention of occupational accidents, relevant training and awareness raising programmes. Specific activities to promote a culture of workplace safety.	3, 8, 16
7	Decommissioning progress – costs	Costs connected/related to the dismantling of nuclear power plants and the closing of the nuclear fuel cycle.	12
8	Listening to and dialogue with local communities	Past and future dialogue and exchange at a local level, analysis of resulting discussions, evaluation of Stakeholders' satisfaction, prevention of risks connected to Sogin's reputation.	4
9	Circular Economy	Previous and future actions implemented by Sogin to apply the circular economy in decommissioning, by minimising waste and recycling most of the materials generated by the dismantling.	3, 6, 8, 11, 12
10	Fight against corruption	Actions and strategies implemented by Sogin to monitor and prevent the risk of corruption and events of corruption.	16
11	Scientific knowledge sharing	Specific past and future actions/initiatives implemented by Sogin to spread knowledge and scientific culture in the field of nuclear decommissioning.	4
12	Technological innovation and research	Previous or planned actions and projects developed by Sogin to effectively face challenges in the decommissioning and radioactive waste management sectors. Possible partnerships with research institutes and specialised training centres operating in this sector at a national and international level.	4, 12, 9
13	Corporate welfare, workers' health and wellbeing	Initiatives offered to employees to foster the well-being of staff in the company, increase access to welfare and promote engagement in these initiatives.	8
14	Accountability and collaboration with national Institutions and Associations	Actions implemented by Sogin to develop constant relationships with national Institutions and Associations; identification of relevant partnerships for development; assessment of Stakeholder satisfaction in relation to Sogin engagement and information approaches.	8, 16
15	HR development, talent management and inclusion	Definition of designs for the development of specific training programmes for the Group's resources, assessment of individual performance, identification and allocation of planned objectives. Development actions to foster corporate social inclusion and ensure respect for diversity.	4, 8
16	Supply chain	Engagement of qualified operators, promotion of commissioned plans, green procurement development, quality assessment in the procurement process and supplier listening channels.	8, 16

2023 IN NUMBERS

UN's 2030 Agenda

Sogin contributes to **11** of the 17 goals

Suppliers

74 tenders for a total of
26 million euro

Joint liability

554 companies operating on sites
2,543 workers in total

Diversity

42% women who hold positions of responsibility up to the second level (out of 30.3% of women in the company)

Social Media

Over **12,000** Sogin LinkedIn followers, with the trend constantly increasing

Institutions

3 transparency tables
2 protocols with institutions and bodies for the security of the country

Physical progress of decommissioning

43,4%

Stakeholder

783 people participated in visits organised at our sites (school and university students, associations, journalists and institutions)

Training

29,259 hours provided

Media presence

3,578 media appearances
+45% compared to 2022

Economic Value Distributed (EVD) to stakeholders

193 million euro

Economic progress of decommissioning

104,6 million euro

International relations

5 cooperation agreements
6 applied research projects on decommissioning and radioactive waste management with the European Commission


PRIMARY
TIC-205
DEVIAZIONE A SISTEMA DRENAGGI HC-485
PURIFICAZIONE
RESET VALVOLA HC 486 V
RESET VALVOLA TIC 205 V
V 206
V 9062
POMPE DHR
V 416

GROUP PROFILE 1

SOGIN

Sogin is the company that deals with the decommissioning of Italian power plants and decommissioned nuclear plants, the closure of the nuclear fuel cycle, and the management of radioactive waste. Wholly owned by the Italian Ministry of the Economy and Finance (MEF), Sogin works according to the strategic guidelines set by the Italian Government.

With the Italian Legislative Decree no. 31/2010 Sogin was appointed the task of localising, designing, implementing and managing the National Repository, a surface infrastructure designed for the safe storage of all radioactive waste.

In 2004 Sogin acquired 60% of Nucleco, the national operator engaged in the integrated management of waste and radioactive sources, in the decommissioning of nuclear installations and in the decontamination of industrial sites.

Sogin's mission is to close the Italian nuclear power cycle. In addition to the four Italian nuclear power plants in Trino (VC), Caorso (PC), Latina and Garigliano (CE), and the FN plant in Bosco Marengo (AL), Sogin manages the dismantling of former fuel cycle research facilities such as EUREX in Saluggia (VC), OPEC and IPU in Casaccia (RM), ITREC in Rotondella (MT) and the ISPRA-1 reactor (VA).

Thanks to its twenty years of experience in this sector, the Company takes part in nuclear decommissioning and radioactive waste management in several countries, and has two offices abroad, in Moscow (Russia) and Bratislava (Slovakia).

Sogin develops partnerships and relations with international bodies and foreign public and private operators in order to foster an exchange of know-how on the decommissioning of nuclear power plants. It offers support to Italian institutions in complying with the provisions laid down in international treaties and agreements.

It also works to promote trade development by acquiring designs, studies, guidance and technical services related to dismantling facilities, radioactive waste management, safety and radiation protection.

NUCLECO

Nucleco is the Italian leading company in the sector of radiological services, radioactive waste management, decontamination and reclamation of industrial sites and nuclear power plants. The Company is specialised in the collection, treatment, conditioning and temporary storage of radioactive waste and sources resulting from nuclear medicine activities and scientific and technological research. Sogin holds 60% of Nucleco's share capital, while ENEA holds the remaining 40%.

DECOMMISSIONING

Based on innovative technical solutions, the Company carries out the decommissioning of nuclear power plants and reprocessing facilities (including those operating in the Uranium-Thorium and MOX - Mixed Oxide Fuel - cycles), while ensuring the highest safety standards in radioactive waste management.

INDUSTRY

It offers safe, environmentally friendly and effective solutions for the management of materials containing natural radionuclides, NORM (Naturally Occurring Radioactive Materials) and TENORM (Technically Enhanced Normally Occurring Radioactive Materials), produced in the petrochemical, Oil & Gas, mining and fertiliser production sectors.

BIOMEDICAL

It is specialised in the collection, treatment, conditioning and temporary storage of radioactive waste and sources resulting from nuclear medicine activities and scientific research managed by public and private entities. The Company works in partnership with the main manufacturers of radiopharmaceuticals to minimise the volume of waste resulting from diagnostic and treatment interventions.

ENVIRONMENT

It deals with the traditional and radiological power plant reclamation, by providing its clients with expertise based on cutting-edge technology.

GOVERNANCE

SHAREHOLDERS' MEETING

SOGIN

Share capital held by the Italian Ministry of the Economy and Finance, which owns 100 percent of the shares.

NUCLECO

Share capital held indirectly by the Italian Ministry of the Economy and Finance, through the parent company Sogin, which owns 60% of the shares, and directly by Enea, which owns 40% of the shares.

It appoints and removes the members of the Board of Directors and the Board of Statutory Auditors; sets the remuneration due to Board members and the Board of Statutory Auditors; appoints the independent auditor; approves the annual financial statements.

BOARD OF COMMISSIONERS

In office from 03/08/2022 to 03/08/2023
Commissioner: Fiamma SPENA
Deputy Commissioners: Angela BRACCO and Giuseppe MARESCA

Responsible for the company's ordinary and extraordinary management. Exercised the management and coordination of the subsidiary company, Nucleco.

BOARD OF DIRECTORS (BoD)

SOGIN

In office from 04/08/2023 for the financial years 2023-2025
Chairman: Carlo MASSAGLI
Deputy Chairman and CEO: Gian Luca ARTIZZU
Non-Executive Directors:
Barbara BORTOLUSSI
Paola CIANFROCCA
Jacopo VIGNATI

NUCLECO

In office for the financial years 2022-2024
Chairwoman: Nadia CHERUBINI
Deputy Chairman and CEO: Agostino RIVIECCIO
Non-Executive Directors:
Mario LAZZERI until 28 June 2023 and from 20 November 2023, Shareholders' Meeting appointment.
Fabrizio SPERANZA from 17 July 2023 co-opted by the Board of Directors until 20 November 2023.

The members are appointed by the Shareholders' Meeting in compliance with the principle of gender balance. It manages and organises the company, defining the corporate strategies. It exercises the management and coordination of the subsidiary company, Nucleco. It approves the Draft Budget and adopts the Three-year Corruption Prevention Plan. It approves and updates the Organisation, Management and Control Model.

BOARD OF STATUTORY AUDITORS

SOGIN
During the formation of the company, the Collegiate Body was not appointed.
In office from 04/08/2023 for the financial years 2023-2025
Chairman: Angelo MIGLIETTA
Standing Statutory Auditors: Vittorio PELLA, Concetta D'ALONZO
Alternate Auditors: Marco CANZANELLA, Luisa FOTI

NUCLECO
In office from 17 July 2023 for the financial years 2023-2025
Chairman: Mauro SANDRONI
Permanent Statutory Auditors: Marco AVAGLIANO, Maria Angela ROCCA.
Deputy Statutory Auditors: Antonino CIANCA, Roberto IASCHI

It supervises the company management; it monitors compliance with the rules and the By-Laws, verifying that deeds and resolutions passed by corporate bodies are correct; it monitors compliance with the principles of proper management, the adequacy of the administrative and accounting organisation and its effective functioning.

SUPERVISORY BODY

SOGIN
Remained in office from February 2021 until September 2023
Chairman: Gaetano CAPUTI
External member: Davide ALBONICO
Internal member: Pierfrancesco BALDASSARRI

At its meeting on 28 September 2023, the Board of Directors appointed the new Supervisory Body, confirming the same members.

NUCLECO
In office from 14 October 2022 and until the expiry of the term of office of the Board of Directors that appointed it
Chairwoman: Mariangela DI GIANDOMENICO
External member: Francesco CARDELLA
Internal member: Sara TRAVAGLINI

It monitors the functioning, effectiveness, compliance and updating of the Organisation, Management and Control Model. The Supervisory Body is assigned the functions of the Independent Assessment Body regarding compliance with anti-corruption and transparency regulations.

JUDGE FROM THE COURT OF AUDITORS

SOGIN
Judge Giacinto DAMMICCO Delegated Control Officer from 1 January 2023
Judge Maria Gabriella DODARO Delegated Substitute Control Officer until 31/12/2023.

The audit function of the Court of Auditors contributes to the proper implementation of the provisions of law on financial and budgetary management. It prepares the annual report, in which the Court reports to the Presidents of the two Houses of Parliament on the outcome of the audit carried out on the Company's financial management.

TAXATION

Sogin has established and continues to maintain a set of internal regulations and procedures, declaring their objectives, features and tax management approach as well as any other activity connected to data collection, measurement, management and tax risk monitoring. In line with its sustainability strategy, the Company's approach to managing its tax obligations is based on the core values of honesty and integrity when managing its tax obligations, applying the principles of fairness, transparency, honesty and integrity which in tax terms means correctly meeting its tax obligations and complying with regulatory provisions.
Within the company, the link between tax governance (namely the set of regulations related to tax governance and tax risk management) and corporate governance is inherent to managerial, administrative and accounting operations.
The tax treatment of business operations is defined through an appropriate analysis, in compliance with both legislation and the legitimate interests of the company and its stakeholders. The Company encourages prior dialogue with the tax authorities, using the tools provided for by the regulations in a framework of mutual cooperation, fairness and transparency and which also aims to properly manage any situations of uncertainty regarding the application of tax regulations.

PHYSICAL PROGRESS OF NUCLEAR DECOMMISSIONING

2023 was characterised by significant management challenges. As from August, with the establishment of the new Board of Directors, initiatives have also focused on the activities of the sites, which has led to an overall **43.4% physical progress in decommissioning**. The activities monitoring compliance with the scheduled progress of works are distributed according to a hierarchical structure and a set of coherent general and specific objectives.

RECOGNITION OF COSTS AND REGULATION

Sogin operates in accordance with the directives issued by the Italian Ministry for Ecological Transition of the time, pursuant to Article 13, paragraph 4 of the Italian Legislative Decree no. 79/1999, transposing Directive no. 96/92/EC relating to the regulations for the internal electricity market. Sogin also complies with the regulations issued by the **Italian Regulatory Authority for**

Energy, Networks and the Environment (ARERA). Until 2022, the activities related to the decommissioning of nuclear plants were financed by the A2RIM tariff component of the general costs of the electricity system. As from 1 January 2023, as foreseen under Article 1, paragraphs 20, 21 and 22 of the 2023 Italian Budget Law, nuclear liabilities will no longer be borne by electricity consumers, but rather directly by the state budget, leaving ARERA's tasks unchanged in terms of determining nuclear liabilities on the basis of economic efficiency criteria.

Full Decommissioning Programme

Sogin periodically prepares and sends ARERA a **Full Decommissioning Plan**. This document lists all the activities needed for the dismantling of nuclear plants and facilities, accompanied by a methodological note measuring the physical progress of decommissioning activities. The latter contains a detailed proposal for measuring the physical progress of any relevant activity referred to under the nuclear contract (not just implementation but also engineering, licensing and contracting activities), and represents an important step forward in monitoring the effectiveness of the contract. In 2024 the process of updating the Full Decommissioning Plan was initiated.

Regulatory period

With resolution no. 417/2020 of 27 October 2020, ARERA launched a procedure to draft the provisions for the recognition of nuclear liabilities, amending and integrating the Economic Efficiency Criteria to be applied to the new regulatory period after 2020 (third regulatory period). Furthermore, the Authority defined an appropriate duration for the third regulatory period, that provides Sogin with the possibility of reviewing the plans only after an adequate period of time. The third regulatory period for decommissioning activities has a duration of 6 years, starting from 1 January 2021 and up to 31 December 2026, and is divided into two regulatory semi-periods, each lasting three years. On 30 April 2021, Sogin submitted a Full Decommissioning Programme - with changes compared to the one submitted on 30 June 2020. The last Programme includes costs and terms deviations due to the Covid-19 pandemic and the containment measures adopted by the Government. In the same resolution ARERA also reviewed the accounting separation criteria.

With resolution no. 93/2021 of 9 March 2021, ARERA defined the news criteria for the recognition of costs incurred for decommissioning activities in the **Consolidated Nuclear Decommissioning Text (TIDECN)** relating to the third regulatory period and the activities falling within the scope of nuclear liabilities, excluding the works relating to the design of the National Repository and Technology Park.

ARERA
Autorità di Regolazione per Energia Reti e Ambiente

The new regulatory system is based on a mechanism recognising the final costs incurred for the nuclear contract. Sogin adopts this mechanism to draft the final balance sheet of the previous year and submits it to ARERA for approval by 28 February every year.

With resolution no. 348/2021 of 3 August 2021, it definitively approved the TIDECN, which establishes the criteria for recognising the costs of the decommissioning activities for the 2021-2026 regulatory period, as well as the quantitative parameters for the application of the TIDECN in the first semi-period (2021-2023). In the same resolution, ARERA also approved the budget for the items related to nuclear liabilities for decommissioning activities during the first regulatory semi-period.

ARERA recognises the final costs incurred according to effectiveness and efficiency criteria, provided that they fall within the scope of nuclear liabilities as defined in the Italian Inter-Ministerial Decree of 26 January 2000 (as amended by the Italian Inter-Ministerial Decree of 3 April 2006).

The current system divides the costs of the nuclear contract into different categories and applies different recognition methods. The cost categories are as follows:

A **Progress Costs**
All costs, external and personnel, incurred **for the progress of the decommissioning activities**

B **Structural Costs**
These are all the external and personnel costs that do not fall within the costs of progress and costs applicable to multiple years. In turn, they are divided into:

B1	B2	B3
Costs related to nuclear safety and radiation protection	Costs unrelated to nuclear safety and radiation protection	Institutional communication costs

C **Costs applicable to multiple years**
These are the external costs incurred for **investments**. They refer to assets that have entered into operation or work in progress.

D **Taxes**
Income taxes incurred for decommissioning activities

ARERA, in addition to defining Sogin's remuneration model, monitors operations in terms of the relevance of the costs incurred within the scope of "nuclear liabilities", as defined by the Italian Ministerial Decree of 26 January 2000, in a framework of efficiency and effectiveness, determining the sum of the fees to be recognised. Through specific provisions given to the Fund for Energy and Environmental Services (CSEA) it ensures that Sogin's financial needs are covered. The first regulatory semi-period ended at the end of 2023. Following discussions with ARERA, an application was made on 1 December 2023 to postpone the deadline for submitting the update documentation of the new Full Decommissioning Plan to the third quarter of 2024. ARERA has taken note of the request, also confirming the need to adopt a transitional cost recognition method for 2024, which is presently being defined. For these reasons, unlike last year, the dates for the achievement of the "*brown field*" and "*green field*" statuses are not indicated in the site sheets (see the chapter, *Closing the Italian nuclear fuel cycle*, paragraph, *Nuclear sites under decommissioning)* in this report. The new dates will be announced in the next edition, after the Full Decommissioning Plan review process that is expected to end by 2024.

AUTHORISATIONS
The main authorisation needed for dismantling a nuclear plant is the Deactivation Decree issued by the former Ministry for Ecological Transition, currently the Ministry of the Environment and Energy Safety, after consultations with the Ministry of the Interior, the Ministry of Labour and Social Policies, the Ministry of Health, the Region or the relevant Autonomous Provinces and the Italian **National Inspectorate for Nuclear Safety and Radiation Protection** (*Ispettorato Nazionale per la Sicurezza Nucleare e la Radioprotezione* - **ISIN**). This procedure, as defined under Articles 98 and 99 of the Italian Legislative Decree no. 101/2020, starts with Sogin's submission of the decommissioning application. The Italian Decree-Law no. 1/2012, amended with modifications into the Italian Law no. 27/2012, pursuant to Article 24 "*acceleration of the deactivation and dismantling operations of nuclear power plants*", under paragraph 4, states that, without prejudice to the specific procedures envisaged for the implementation of the National Repository and Technology Park as referenced under paragraph 3, the authorisation issued under Article 55 of the Italian Legislative Decree no. 230/1995 to implement the deactivation projects, and the authorisations foreseen under Article 6 of the Italian Law no. 1860 of 31 December 1962, and under Article 148, paragraph 1-bis of the Italian Legislative Decree no. 230/1995, issued from the date that the aforementioned Decree came into effect, are regarded as a statement of urgent measures of public utility and constitute alternatives to urban planning tools, replacing any administrative procedures, authorisations, concessions, licences, approvals and administrative directives, however defined, foreseen under the current regulations, thus permitting the implementation of the works.

TRANSPARENCY AND LEGALITY

CORRUPTION PREVENTION AND TRANSPARENCY

Sogin and Nucleco appointed a **Corruption Prevention and Transparency Officer**. In 2023, the Board of Directors at both Sogin and Nucleco updated and approved their **Three-Year Plan for the Prevention of Corruption and Transparency 2023-2025 (PTPCT)**.

The measures provided in the respective Plans have further strengthened the supervisory powers required to prevent corruption and improve transparency and guaranteed full accessibility to the data and information held by the two companies through the publication in the "Transparency" section of their institutional websites and through public access.

The strategic objectives of the PTPCT 2023-2025, achieved by both companies during the year, include:

- the adoption of the regulatory text on conflicts of interest, which regulates the matter in an organic, detailed way, in line with the relevant Italian Anti-Corruption Authority (ANAC) Guidelines;
- the adoption of the policy concerning the regulation of extra-institutional assignments, which regulates, in compliance with current legislation, the assumption by employees of "extra-institutional" tasks which are likely to result in a situation of a conflict of interest or in any way to a situation potentially prejudicial to the company.

Among the objectives of the PTPCTs for 2023-2025, Sogin's and Nucleco's Corruption Prevention and Transparency Officers identified the need to introduce regulations aimed at regulating the issue of staff rotation. Therefore, to that end, a specific policy will be formalised by 2024. For the three-year period 2024-2026, the respective PTPCTs provide for updating the risks pursuant to the Italian Law 190/2012. This objective falls under a review of the main business risks that will be actuated during 2024. Among the other strategic objectives in Nucleco's PTPCT 2024-2026 is mapping corporate processes and performing an assessment of the adequacy of the corporate structure for the purpose of improving measures designed to prevent corruption.

In terms of whistleblowing, both Sogin and Nucleco have IT platforms that guarantee the confidentiality of the whistleblower's identity, the content of the reports and the relative documentation.

Following the transposition into national law of the new regulation on the subject, introduced with the Italian Legislative Decree no. 24 of 10 March 2023, implementing EU Directive 2019/1937 and the relevant guidelines issued by the **Italian Anti-corruption Authority (ANAC),** ANAC resolution no. 311 of 12 July 2023, both companies updated the online platform for whistleblowing reports and revised the relative management procedure, also as concerns the coordination between the Corruption Prevention and Transparency Officer and the **Supervisory Body (SB)** in handling reports relating to breaches of the **Organisation, Management and Control Model (MOGC)** or relating to conduct carried out in the execution of their administrative responsibilities.

In line with the information requests under GRI 2-26, "mechanisms for requesting clarifications and raising concerns", no whistleblowing reports were received by Sogin or Nucleco in 2023. In terms of transparency, with regard to Sogin, supervision and monitoring continued on the mandatory obligations relating to the publication of documents, data and information in the "Transparency" section of the company's institutional website, pursuant to the Italian Legislative Decree no. 33/2013.

Thanks to the coordination between the Corruption Prevention and Transparency Officer support organisation and the data production managers, the progressive implementation of this section was ensured. The supervision and monitoring of the fulfilment of publication obligations has allowed the Supervisory Bodies of Sogin and Nucleco, in exercising the functions of an Independent Assessment Body, to promptly draw up the annual confirmation of the fulfilment of the obligations of publication, pursuant to ANAC resolution no. 203 of 17 May 2023.

In order to comply more promptly and efficiently with the transparency obligations to which Sogin is subject, in implementation of one of the strategic transparency objectives of the PTPCT 2023-2025, the company has set up a new IT platform to manage the data/documents/information to be published. This allows the organisations responsible for data processing to be autonomous in the management of the entire procedural process, ensuring the fulfilment of publication obligations in full compliance with the relevant legislation.

The other strategic transparency objectives provided for in the PTPCT 2023-2025 have been achieved or reformulated by virtue of the regulatory or organisational changes introduced, that is to say they have assumed the character of structural transparency objectives, though still identified in principle as strategic objectives as their achievement is constant and continuous. These include the "*usability of the Transparent Company section and the efficiency of the publication flow*", which are automatically supported with the new IT platform for transparency. The communication objectives with internal stakeholders are achieved through ongoing activities, also aimed at continuously strengthening synergies, including the adoption of a digital work tool, the creation of a network of contacts and training.

Sogin's transparency objectives for the three-year period, 2024-2026, include:
- the adaptation of the "*Transparent Company*" section of the institutional website to the measures introduced by the new procurement legislation with the coming into effect, from 1 January 2024, of the new Code of Public Contracts (Italian Legislative Decree no. 36 of 31 March 2023) and subsequent indications on the matter approved by the Italian Anti-Corruption Authority (ANAC) (resolutions no. 264 and no. 601, respectively of 20 June and 19 December 2023);
- the full operation of the new transparency platform and the consequent strengthening of the network of contacts/assistants for transparency;
- the implementation of transparency monitoring with first-level monitoring carried out by those responsible for processing and publishing data;
- the updating of the transparency guidelines in line with regulatory and organisational changes.

Nucleco's transparency objectives for the three-year period, 2024-2026, include:
- the adaptation of the "*Transparent Company*" section of the institutional website to the measures introduced by the new procurement legislation with the coming into effect, from 1 January 2024, of the new Code of Public Contracts (Italian Legislative Decree no. 36 of 31 March 2023);
- the updating of the tree structure of the aforementioned section in line with the regulatory and organisational changes that have been introduced.

On 19 December 2023, two requests for generalised public access to the documentation relating to the adoption of the **National Map of Suitable Areas (CNAI)** were received by Sogin. Sogin responded within thirty days of the submission of the requests, as required by the legislation.

For Nucleco, on the other hand, there are no requests for generalised public access and simple public access.
In 2023, Sogin and Nucleco provided training on preventing corruption, transparency and whistleblowing which focused on the different degrees and types of risk exposure of personnel with particular regard to first-level managers, their representatives in the field and employees operating in sectors characterised by a greater risk of corruption. In 2024 the opportunity to provide further training will be assessed, including courses on any regulatory updates on the subject. Also in the ambit of training, with particular reference to Sogin, a specific initiative was launched within the company organisations involved for transparency assistants, responsible for inputting and publishing data on the new IT platform. The preparatory activities for developing further general training on transparency were also concluded in the light of substantial regulatory, organisational changes or updates to the PTPCT.

COLLABORATIVE SUPERVISORY ACTION PROTOCOL ON ANTI-CORRUPTION AND TRANSPARENCY

AUTORITÀ NAZIONALE ANTICORRUZIONE

On 28 November 2023, ANAC and Sogin signed a collaborative supervisory action protocol on anti-corruption and transparency, aimed at offering the company further support in the development and consolidation of the corruption prevention and transparency strategy, both in the planning phase of the measures, and in the phases of implementation and monitoring.

PROTECTION OF PERSONAL DATA

As required under European Regulation no. 679 of 2016 (the General Data Protection Regulation - GDPR), Sogin appointed a Data Protection Officer (DPO) and created the Privacy Office. Ongoing GDPR compliance activities continued in 2023, such as monitoring, document updating, training and handling requests from individuals concerned, in order to protect their rights.

ORGANISATION, MANAGEMENT AND CONTROL MODEL (MOGC)

In line with Article 6 of Italian Legislative Decree no. 231/2001, Sogin has adopted an MOGC and a Code of Ethics and has appointed a SB composed of three members, two of whom are external and one internal. The Model is considered by the company to be a set of rules, organisational structures, operating procedures, policies and check points, with a preventive purpose regarding behaviour that might constitute an offence or crime under 231 or a breach thereof.
Within this model, both Sogin's Code of Ethics - in which the essential values, the reference standards, the rules of conduct and the principles to which the behaviour of those parties acting on behalf of or in the interests of the Company need to be oriented – and the PTPCT must be considered integral parts.
The MOGC is published on the company's website under the "*Governance and Transparency*" section and consists of a General Section and a Special Section.

At the end of 2023 the company initiated a review and update of the MOGC that will be approved by the Board of Directors in 2024, and whose amendments have been drafted by taking into account the doctrine and *best practices* of the sector, in particular the Confindustria's Guidelines for "*establishing Organisation, Management and Control Models*", in the updated version of June 2021.
Among the main new elements, the synergy between the MOGC and the PTPCT has been highlighted, both of which contribute to defining a system of legality and business ethics aimed at preventing the phenomena of corruption and poor administration as well as the commission of 231 offences and/or breaches of the MOGC.

The MOGC takes into account and integrates the corruption prevention policy and measures adopted by the company through the PTPCTs.
This methodology is in line with the ANAC's resolutions in effect on the subject which call for an integrated approach between the two documents and organisational and management synergies with the coordination of the 231 and 190 processes.
In addition, a specific paragraph was dedicated to the internal reporting management system which has been designed in two parts and leaves the reporting party the opportunity to choose whether to proceed with:

- an "*ordinary report*" sent only to the SB and without the protection afforded by whistleblower;
- a "*whistleblowing report*" sent to the dedicated internal channel, the management of which is entrusted to the Corruption Prevention and Transparency Officer.

This approach was shared directly with ANAC as part of the "*Collaborative Supervisory Action Protocol*", signed by Sogin and the Authority itself.
For more information on the whistleblowing report management system refer to the document "*Whistleblowing Report Management*", accessible from the sogin.it website, section "*Transparent Company - Other Content - Corruption Prevention*".

Nucleco also adopted an MOGC, consisting in:

- the "*General Section*" which includes the general principles and rules aimed at regulating the operation of administrative liability pursuant to the Italian Legislative Decree no. 231/2001;
- the "*Code of Ethics*";
- the "*Special Sections*", adopted by the company in order to reduce exposure to the specific risks of an offence being committed pursuant to the Italian Legislative Decree no. 231/2001, as a function of the company's activities.

The PTPCT, under the responsibility of the Corruption Prevention and Transparency Officer, the Multi-year Audit Plan for planning independent, third-party Internal Audits and the Annual Verification Plan by Nucleco's SB, acting as an **Internal Supervisory Body (ISB)**, form an integral part of the MOGC.
In 2024, a risk analysis on offences committed under the Italian Legislative Decree no. 231/2001 will be performed, on the basis of which a decision will be made on whether to update the MOGC.

INTERNAL CONTROL
The Internal Control System is an integral part of corporate governance and guarantees the adequacy and functionality of the processes, information systems and behaviour adopted in pursuit of the company's strategic and institutional goals.

This objective is implemented by identifying the anomalies, opportunities and risks detected as a result of the control and monitoring initiatives and by reporting the information provided to support and qualify the decisions taken by the corporate governance body and by other senior figures, each called upon, in relation to their own attributions, to act in order to ensure that the risks of compliance, effectiveness and efficiency, connected to the nature of the company and the activities carried out, are kept within reasonable limits.

The Internal Control System adopted by Sogin, as set out in the General Section of the MOGC, is arranged over three levels:

- the line controls, or level I controls, entrusted to the managers of each order and grade and to all employees and production units, in relation to the responsibilities and tasks entrusted to them and executed continuously within the business processes by those who carry out a given activity and by those who have supervisory responsibilities;
- level II controls, carried out periodically by specific company structures in charge of overseeing the development and implementation of Quality, Environment and Health and Safety Management Systems and Risk and Opportunity Management Systems, according to the international standards of reference and in compliance with internal regulations, practices and behaviour adopted in accordance with mandatory standards and to guarantee management control;
- level III (or independent) controls, carried out by the Internal Audit function.

INTERNAL AUDITING

Internal Auditing is an integral part of corporate governance. Its functions consist in performing an independent, objective investigation into the adequacy and functionality of the Internal Control and the Risk Management System implemented by the company, which it performs through *assurance*, consultancy and follow-up interventions, aimed at supporting and qualifying the decision-making processes of the administrative, control and supervisory bodies of corporate governance and other senior figures that have been assignedcontrol, supervision and/or direction and coordination powers.

Internal Audit initiatives, carried out according to the **International Professional Practices Framework (IPPF)** of the **Institute of Internal Auditors (IIA)**, are performed on the basis of the strategic management guidelines, the mandate and the audit plan submitted annually for review and approval by the Board of Directors.

In addition, as established by Article 21.2 of Sogin's regulations, "*the person in charge of the internal control function reports to the Board of Directors or to the specific committee established within it*". This provision, further detailed in the mandate, is substantiated in the periodic report to the Board of Directors which, in addition to the results of the individual Internal Audit initiatives, includes the quarterly update on the status of the implementation of the audit plan and the annual information provided to give an independent and objective assessment on the adequacy and functionality of the Internal Control and the Risk Management System implemented by the company, based on the results of a series of specific internal auditing tasks carried out over a sufficiently long period of time.

In 2023 Internal Auditing performed 8 audit tasks, mostly in relation to contingent needs of a consultancy nature. Following the renewal of the corporate governance body, the Board of Directors, at its meeting on 29 November 2023, approved the strategic management guidelines for the three-year period 2024-26, the mandate and the 2024 audit plan.
At its meeting on 20 December 2023, the Internal Auditing body provided the Board of Directors with the annual information on the adequacy and functionality of the Internal Control System and the Risk Management System, based on an independent, objective assessment made with reference to the main results from the tasks performed in the 2020-23 period.

RISK MANAGEMENT

Sogin, with the adoption of the **Guidelines for the development of the Integrated Risk and Opportunity Management Model (GI-RO),** which also define the strategic-organisational guidelines and management policies for the three-year period 2023-25, has gradually increased, during 2023, the company's ability to identify and pro-actively manage the risks and opportunities that could influence the company in its achievement of its general goals, as well as supporting and qualifying the decision-making processes of the corporate governance body and other senior figures entrusted with the management, supervision and coordination of corporate processes and/or projects.

Achieving this goal is also necessary to maintain high standards in environmental protection, safety, compliance and quality, and to consolidate the company's ability to fulfil ARERA's information needs in relation to the estimated variations in the dismantling programmes.

The Model is based on the best standards and practices at a national and international level, considering Sogin's effective organisational capacity, its particularities and those of the specific sector in which it operates, with a view to being implemented and integrated in the decision-making processes and corporate management and organisation systems.

From an operational point of view, the action of promotion is based on a support and consultancy activity aimed at, according to the weight of the risks and opportunities related to the various management areas, the relevant senior managers, in order to define specific *risk registers* and measurement criteria to assess the so-called elementary events (risk and/or opportunity). To support the *reporting phase,*the Enterprise Risk Management has dedicated *risk breakdown structures* that, through specially developed algorithms, aggregate the assessments carried out on each elementary event subject to assessment. In 2023, the *risk breakdown structures* were expanded to include assessments on the risks and opportunities of the areas of *cybersecurity*, personal data protection pursuant to the GDPR and radiation protection pursuant to the Italian Legislative Decree no. 101 of 31 July 2020 in the Enterprise Risk Management reporting system.
To ensure the containment of the subjectivity factors, these assessments are subject to integrations made on the basis of the information made available over time as outputs from the verifications made as part of the internal control system, and subsequently shared cyclically during the "*management review*".

The final results of the assessments are then compared with the materiality and tolerance thresholds defined by the Board of Directors and, where these are exceeded, a reporting and promotion activity is initiated to develop specific management plans. Finally, in December 2023, a cybersecurity risk assessment was carried out as part of the Information Security Management System.

Nucleco has also adopted a structured risk management. The mapping and associated risk mitigation strategies are constantly monitored and updated, taking into account the risks inherent in the Company's specific activities, as well as those arising from the constantly evolving reference environment. It considers not only the changes in regulations that may impact on organisational and managerial choices, but also the strategies that are needed to cope with and/or prevent risks arising from changes in technology, social-health, financial or compliance conditions.

Nucleco mainly performs activities for its shareholders, Sogin and Enea, under active contracts that constitute approximately 94% of the profit generated by the company's sectorial activity in 2023. The remainder is directed to counterparties, such as Italian and European institutions, and public and/or private operators with high credit worthiness.

The performance assessment of the company's management systems, carried out through monitoring and internal audits, has helped to ensure the maintenance of the currently held certifications.
In 2023, Nucleco continued reviewing and updating the main administrative and managerial processes governed by an organic set of procedures in addition to implementing integrated computer systems with the aims of strengthening internal control and mitigating administrative risks in relation to failure to comply with regulatory obligations. Specifically, context analyses and risk-opportunity assessments were updated and progress was made on improvement objectives and programmes.

COMPLIANCE SYSTEM

In 2023, 5 corporate compliance circulars were issued to all personnel, providing updates on the main measures in matters of corporate interest. Sogin has adopted a specific structure to manage compliance risk, evaluate and monitor the Company's compliance with sector regulations, control their effective enforcement, and check on progress and outcomes (Article 14 of the Italian Law no. 155/2017). This structure, operating in line with the principles of awareness, reputation, accountability, risk mitigation, and risk management, carries out a set of precautionary activities to ensure that the Company complies with sector regulations, protecting it from regulatory and reputational risks, strengthening the corporate reputation and ensuring competitiveness and the trust of Stakeholders. By defining several best practices, this structure can provide support to corporate functions and help them achieve corporate goals, without breaching or misinterpreting applicable regulations. This activity is based on verifying whether corporate procedures and policies are correct, and compliance with first and second-level regulations (laws and regulations). During 2023 the Compliance Area collaborated on the definition and verification of 22 different corporate documents (technical, general, environmental, administrative, human resources, procurement and quality) and on the drafting of specific legal opinions.
Furthermore, with regard to incidents involving non-compliance concerning laws and regulations, with particular reference to environmental and social regulations (e.g. Consolidated Law on the Environment - Italian Legislative Decree 152/2006, Consolidated Law on Health and Safety - Italian Legislative Decree 81/2008), the following table summarises the monetary sanctions incurred in the three-year period 2021-2023, with details for each site.

Sito	Udm	Sogin 2023	Sogin 2022	Sogin 2021
Bosco Marengo	**no.**	**0**	**0**	**0**
Caorso	**no**	**0**	**0**	**0**
Casaccia	**no**	**0**	**0**	**0**
Garigliano	**no**	**1**	**0**	**0**
	euro	**6,500**	**0**	**0**
ISPRA	**no**	**0**	**0**	**0**
Latina	**no**	**1**	**1**	**0**
	euro	**6,500**	**6,500**	**6,500**
Saluggia	**no**	**0**	**0**	**0**
Trino	**no**	**0**	**0**	**0**
Trisaia	**no**	**1**	**0**	**0**
	euro	**6,500**	**0**	**0**

The table above shows the monetary sanctions greater than or equal to EUR 5,000. This threshold is selected based on the fact that it represents the initial level of moderate risk, as established by the company's integrated risk and opportunity management guidelines.

INTEGRATED MANAGEMENT SYSTEM

The Corporate Management System is the set of procedures by which Sogin pursues the objective of creating value with a view to continuous improvement, by promoting the development of a Management System that meets the requirements set by the ISO 9001, ISO 14001/EMAS and ISO 45001 standards. The strategic organisational objectives of this system are set out in the **Integrated Management System (IMS)** Policies and the provisions that determine its organisational structure. In August 2023 the CEO, who took office following the appointment of Sogin's new Board of Directors, confirmed the IMS Policy.
The Company decided to obtain ISO 9001, ISO 14001, ISO 45001 certification and undergo EMAS registrations to comply with legal requirements recognising that the ability to contextualise, integrate and align corporate management with ISO requirements can help remove constraints and/or take advantage of opportunities that may impact effectiveness and efficiency and ensure that corporate actions comply with the achievement of institutional objectives.

To achieve this objective, the Sogin Group adopted a specific organisational structure, divided into the following tasks:

- the control and support of the development of the Corporate Management System, in terms of the macro-processes of second-level control, is assigned to the "*Administration, Resources, Systems and ICT*" Department for Sogin and to the "*HSEQ and Sustainability Management Systems*" Department for Nucleco;
- The development of the Corporate Management System is assigned to the top management, which has leadership and coordination powers across different areas of competence.

In view of the sector in which the Group operates, the Corporate Management System is developed according to the reference standards for Quality (UNI EN ISO 9001), the Environment (UNI EN ISO 14001) and Safety (ISO 45001), and the Safety Standards issued by the **International Atomic Energy Agency (IAEA)**.

SOGIN AND NUCLECO CERTIFICATIONS

CERTIFICAZIONE SISTEMA DI GESTIONE
DNV
ISO 9001 • ISO 14001
ISO 45001

IMQ CERTIFIED

Quality management systems: the standard defines the requirements for quality management in an organisation. The requirements are of a "general nature" and may be implemented by any kind of organisation.

IMQ CERTIFIED

Environmental Management Systems: the standard certifies that the organisation has an appropriate management system for monitoring the environmental impacts of its activities, and systematically seeks its improvement in a consistent and efficient way.

IMQ CERTIFIED

Management systems for occupational health and safety: this certifies that the organisation has healthy workplaces, safeguards employees from work-related accidents and diseases and commits to constantly improving its performance in this regard.

JOINT LIABILITY

In line with the best practices of the Italian contracting authorities and in compliance with current regulations, Sogin performs regular checks on all contracting, sub-contracting and related companies to verify compliance with workers' rights and the principles of social ethics and transparency, limiting the risk of "*joint and several liability of the principal*". The table below reports the number of Sogin's contracting companies, for works and services, with an indication of the number of workers involved at each site.

GRI 2-8: NUMBER OF CONTRACTORS AND WORKERS INVOLVED

Site	Companies	Workers
Bosco Marengo	40	164
Caorso	101	453
Casaccia	12	81
Garigliano	115	514
ISPRA-1	39	128
Latina	74	396
Saluggia	71	301
Sede di Roma	15	55
Trino	33	117
Trisaia	54	334
TOTALS	**554**	**2,543**

Sogin implemented a homogeneous and joint computerised system to identify all the external employees working on a given contract on a daily basis. Moreover, it carries out massive documentary checks to ensure that the companies working with Sogin comply with salary, social security and insurance obligations.
This activity also includes random checks performed at the worksite. In the event of non-compliance by employees of external companies, following an official and written request on behalf of the concerned parties, the Company - as the contracting authority - launches a replacement procedure and provides for the direct payment of the unpaid accrued amounts. At the end of 2019 the Italian Legislative Decree 124/2019 came into force and was converted into the Italian Law no. 157/2019, introducing fiscal responsibility for contracting authorities under Article 4. Therefore, Sogin verifies fiscal compliance of the contractors, sub-contractors and related parties, who meet the following three requirements:

- firms with contracts for an annual total exceeding EUR 200,000;
- workforce mainly employed at the contractor's business premises;
- employment of capital goods belonging to the contractor or anyway ascribable to the contractor.

In 2023, Nucleco renewed the certification of its **Social Accountability Management System in accordance with the SA8000 international standard for the three-year period, 2023-2026**. The management system, certified in 2017, is integrated with the other certified management systems addressing topics such as Quality, Environment and Safety at Work, thus demonstrating the company's commitment and attention to achieve the highest standards of certified quality for business processes, in accordance with the most renowned international best practices.

Nucleco published on its website its social responsibility policy through which the company, aware of the value of human and relational capital in achieving its business and sustainability objectives, confirms its commitment to the protection of workers' rights, both for its own personnel and for the employees of all the companies with which it collaborates.

SUSTAINABLE APPROACH 2

2030 AGENDA

The United Nations' SDGs are an important reference for Sogin when carrying out its strategic activities for the safety of the country. The Group contributes to the achievement of 11 of the 17 SDGs of the 2030 Agenda with completed and ongoing projects.

Details of the company's contribution to the achievement of individual goals are provided below:

Ensure healthy lives and promote well-being for everyone at all ages
Sogin gives priority to ensuring health, well-being and safety for everyone and for all ages. We promote safety as a value and practice for both internal and external stakeholders. We believe that the organisation must constantly evolve on these issues, and we therefore adopt models and policies that prioritise Quality, the Environment and Safety.

Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all
As a state-owned company, we have the responsibility to actively contribute to quality, equitable and inclusive education and to guarantee learning opportunities for all. We continually update our people's skills and are in constant dialogue with schools, universities and research centres to develop and disseminate specialist know-how related to decommissioning and radioactive waste management.

Achieve gender equality and empower (greater strength, self-esteem and awareness) all women and girls
We strive to develop an inclusive corporate culture, where diversity and gender equity are enablers of value creation. For years now, we have been promoting training, development and raising awareness on these issues with the corporate population.

Ensure availability and sustainable management of water and sanitation for everyone
We strive for sustainable water management every day, by reducing the impact of our activities. One example is the ongoing radiological and conventional monitoring of the groundwater beneath our plants and its treatment to remove any contaminants.

Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all
We guarantee the protection and respect of people's rights and a safe and inclusive working environment, by providing information and raising awareness among the corporate population. We apply the principles of Green Public Procurement to ensure the sustainable supply chain management.

Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation
We design and implement innovative technological solutions that enable sustainable decommissioning management. Examples are the creation of an application that tracks radioactive waste data, preserving their memory for future generations, and the reconstruction of virtual plant models using 3D technology, to make the reclamation and dismantling processes more sustainable.

Make cities and human settlements inclusive, safe, resilient and sustainable
Our contribution to this goal forms the basis for our presence in the territories. We have always developed relationships of collaboration and support with the communities that live there, with the common goal of creating value for the territory.

Ensure sustainable consumption and production patterns
We create sustainable production and consumption models by integrating the principles of the circular economy into our processes, minimising the waste generated and recycling a high percentage (around 89%) of the total materials generated by the dismantling of Italian nuclear power plants, also promoting the reduction of single-use plastics.

Conserve and sustainably use the oceans, seas and marine resources for sustainable development
We promote the conservation and sustainable use of water and marine resources. Examples include underwater clean-up operations to remove contaminated or hazardous material to protect the environment and pelagic species, and initiatives to raise awareness for the protection of marine ecosystems.

Protect, restore and promote sustainable use of terrestrial ecosystems
We strive to protect, restore and promote the sustainable use of the terrestrial ecosystem, for example through the forest renaturalisation of the areas surrounding our sites as is currently ongoing and planned for the future.

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels
We contribute to achieving this Goal with measures aimed at preventing corruption and with actions to identify and counter any unlawful conduct. With this in mind, we adopt and constantly update our MOGC.

PLANNING SUSTAINABILITY

Sogin, on 30 March 2023, and Nucleco, on 5 May 2023, unanimously approved the Sogin Group's first Sustainability Plan, which represents a major step forward in the process reported on a few years ago, involving all the Group's functions in a transversal and inclusive manner.

AREAS, COMMITMENTS AND OBJECTIVES

The approved Plan, based on six sustainability commitments relating to Sogin's activities, aims to contribute to improvements in several areas:

1. the **core business**, based on the measurement and valorisation of decommissioning and waste management projects, in terms of sustainability;
2. **reputation**, with the representation of Sogin as an entity that contributes to the sustainable development of the Italian economy;
3. **transparency in respect of stakeholders**, by developing activities to involve stakeholders, especially in the communities and territories where Sogin works, with particular reference to the National Repository;
4. **internal and organisational coherence**, by enhancing the contributions of all the Group's functions and systematising the actions already inherent in the company's operations and mission;
5. **contributing to the Italian economy**, for a new, more responsible, ethical and sustainable business model;
6. the United Nations' **2030 Agenda**, by contributing to the achievement of some of the sustainable development goals.

The **sustainability commitments** define the guidelines and priorities adopted by Sogin and Nucleco in their business operations, from the perspective of contributing to the sustainable transition of the Italian economy. These are defined as strategic because they develop the Group's positioning on ESG (Environmental, Social and Governance) issues.
In 2023 there were some important changes in the governance, organisational structure and company guidelines that necessarily required greater commitment to the management of change.
With this in mind, the company has continued its commitment to keeping the stakeholders informed of the results obtained and to pursuing sustainability objectives, albeit with some adjustments which were necessary in order to respond to the context of reference.

CIRCULARITY	*COMMITMENTS* **Plan, design and manage activities according to the principles of circularity and sustainability, by mitigating and assessing their overall environmental and social impact.** *OBJECTIVES* • *introduce sustainability criteria in the supply chain and supplier qualification processes;* • *mitigate direct environmental impacts;* • *measure CO2 emissions with the goal of taking action to mitigate and/or compensate for them;* • *improve the energy efficiency of the sites and ensure (where possible) a gradual transition towards the use of sustainable energy sources;* • *reduce the amount of nuclear waste produced and maximise the recovery/recycling of decommissioning waste.*
VALUE SHARED WITH THE TERRITORY	*COMMITMENTS* **Create value for the communities and territories of operation, in a shared and participatory way.** Develop an active citizenship role towards the local community of reference, extending corporate values to external stakeholders in a shared and participatory manner. *OBJECTIVES* • *promote a structured dialogue with national and international operators, including through the relevant sector associations, with the aim of promoting a sustainable supplier network;* • *mitigate the environmental impacts through the promotion of a local supply chain;supplky chain* • *identify and analyse the best international experiences with the aim of identifying the most appropriate solutions to be proposed to the areas where the National Repository and Technology Park will be located, with particular regard to initiatives of agricultural, gastronomical, naturalistic, historical and architectural enhancement with a view to employment development.*
ENHANCEMENT OF COMPETENCIES	*COMMITMENTS* **Promote the value of knowledge and research and the importance of the unique in-house, intercompany and inter-generational skills developed,** so as to contribute to creating shared value. *OBJECTIVES* • *create and enhance international partnerships to promote collaboration and research on circularity and sustainability issues;* • *increase collaboration and share innovation and research actions and programmes with Italian and non-Italian institutions and universities, including work placements, internships and other forms of personnel interchange;* • *increase contacts and relationships with Italian businesses in order to develop and implement decommissioning technologies;* • *ensure the intercompany transfer of skills, including the structured involvement of senior employees and/or former employees in training activities and supporting new resources.*
ACCOUNTABILITY	*COMMITMENTS* **Adopt the values of transparency and accountability by implementing a planning, assessment, monitoring and communication system for ESG activities.** *OBJECTIVES* • *extend the company's certifications to further industry reference standards;* • *start a reporting process that promotes the integration of environmental and social data with economic data;* • *extend the process envisaged under the Protocol B Impact Assessment, with Nucleco's involvement.* • *adapt IT tools to improve the data collection and archiving of ESG updates.*
ENGAGEMENT	*COMMITMENTS* **Recognise the importance of building relationships of trust with both internal and external stakeholders, adopting a proactive and inclusive approach.** *OBJECTIVES* • *involve internal and external stakeholders in a process of sharing, information and dissemination, through communication/information and, more specifically, engagement activities, developed ad hoc for different categories;* • *circulate and promote the Physical Progress and Achievements Report;* • *assess sustainability performance in relation to the supply chain, in order to spread a culture of sustainability along the entire supply chain;* • *engage strategic product suppliers and managers for the internal orders on issues of sustainability and environmental performance.*

CULTURA ORGANIZZATIVA	***COMMITMENTS*** **Commit to improving the organisational culture** to create an environment conducive to innovation, and implement human resource management systems based on meritocracy and gender equality. ***OBJECTIVES*** • *Sign the "Valore D" Manifesto for women's empowerment to promote a commitment on issues of gender diversity, the employment and professional development of women;* • *celebrate World Days on relevant topics, highlighting some of the high-value sustainability activities undertaken by the Group.*

The following will be adopted to help achieve the objectives:
- **STAKEHOLDER ENGAGEMENT POLICY** - to build a stakeholder engagement model from a system perspective, which can then be applied to every function/area.
- **SUPPLIER CHAIN POLICY** – to implement sustainability and circularity criteria in the qualification phase of suppliers and, subsequently, in defining specific rewarding criteria in the call for tender phase.

In 2023, the Group achieved the following objectives:
- adherence to the UN Global Compact. This commitment is reflected in the contribution to achieving the 17 Sustainable Development Goals (SDGs) laid down by the United Nations in the 2030 Agenda. Sogin has long contributed to their achievement through its daily activities for the decommissioning of Italian nuclear plants and the safe management of radioactive waste, in a constant relationship with the territories in which it operates.
- completion of the preparatory activities to extend ISO 9001, 14001 and 45001 certifications for the Ispra 1 site. Verification activities for the same site to be included in the scope of the Sogin certificate by the external certification body are planned for the second half of 2024.

All the objectives achieved relating to the commitments to enhance skills, engagement and accountability can be verified in the *People* section of the *Stakeholders* chapter.

BIA (B IMPACT ASSESSMENT) PROCESS

The B Impact Assessment (BIA) is an international measurement tool used by more than 50,000 companies worldwide, including more than 3,000 companies with B-Corp certification, which assists companies in assessing their impact in terms of sustainability, the environment, social relations and governance.

The process envisages an initial self-assessment by the company. Once the company has achieved a score of 80 it can apply for the verification and final validation stages by BLab, an independent body, in order to obtain Certified B Corporation (B Corp) status, which certifies that the company meets the highest standards of environmental, social and economic sustainability.

Sogin began this self-assessment process at the end of 2022 with the aim of measuring its impact, identifying areas for improvement and mapping the implementation of its first Sustainability Plan.
The analysis covered the five "impact areas":
1. Governance: to improve the policies and practices relating to its mission, ethics, accountability and transparency.
2. Workers: to contribute to the financial, physical, professional and social well-being of its workers.
3. Community: to contribute to the economic and social well-being of the communities where it operates.
4. Environment: to improve its environmental management.
5. Customers: to improve the value created for customers with the services rendered.

2023 saw the Sogin Group's performance stabilise at around 60 points. During the year, priority was given to increasing the involvement of the corporate population, across the board, through the gradual implementation of the actions laid out in the Sustainability Plan.

CONSCIOUS USE OF RESOURCES

For several years now, the Company has been promoting initiatives aimed at adopting sustainable lifestyles, based on the conscious use of resources, such as Differenziamoci, which has launched a recycling waste collection system at the head office and at all sites, and Plastic Reduction with the aim of reducing single-use plastic in the workplace. For years now, the Company has also subscribed to the programme introduced by Rome's municipal utility for public transport services to reduce the use of individual means of transport by providing free public transport cards to the staff at the head office.

CONSCIOUS USE OF RESOURCES - 2023 DATA			
207 public transport passes issued free-of-charge to 341 employees in the Rome offices.	Remote working has been extended to reduce travel (travel costs), reduce CO2 emissions and energy consumption in offices.	Energy Diagnoses have been performed for each of the 10 Sites according to Italian Legislative Decree no. 102/2014, allowing a faithful picture to be traced of the company's overall energy performance and the reliable and punctual identification of the most significant opportunities for improvement.	3 long-term car rental agreements were finalised, of which 1 contract refers to "clean lightweight" cars (emissions below 50 g/KM CO2).

SUSTAINABILITY AND INNOVATION

In the digital economy, one challenge faced by modern organisations is how to balance digital transformation actions with digital security and sustainability objectives. That is why the Group launched an analysis into corporate digital responsibility, defined as the set of practices and behaviours that help an organisation use data and digital technologies in an ethical and responsible manner across four dimensions:

- social, to ensure the security of the personal data processed, overcoming the digital divide and ensuring health and safety using digital technologies;
- environmental, to recycle technological products, encourage remote working and develop digital solutions to support the circular economy;
- economic, to ensure economic savings by sharing efficiency data with stakeholders;
- technological, to ensure digital protection from cyber risks and the responsible use of technology.

The Group has undertaken several projects and several actions to promote the digitalisation of processes and services in order to optimise resources, improve the quality of work and the quality of life for its employees.

GOVERNING THE DIGITAL CONTEXT

The Sogin Group uses an **Information Security Management System** built on a cyclical methodology of process analysis, based on risk, which allows the impact and repercussions to be determined on the company's business of events that cause the interruption of the business or the provision of services. In this analysis process, the recognition and verification of dependencies on supporting digital technologies is fundamental in order to understand and manage the impacts of events that can interrupt production or business services, thus contributing to sustainability and business continuity. Periodic interventions also include all the verifications on compliance and governance aspects that the digital context requires with a view to compliance and continuous improvement.

CYBERSECURITY

Cybersecurity is an essential element for digital sustainability. Quality technological infrastructure, which is reliable and resilient to growing cyber risks, promotes innovation, the efficient use of natural resources and the transformation of the company into a smarter and more sustainable community. Protecting data and digital infrastructure also contributes to business stability and public confidence. This is why Sogin represents digitalisation and cybersecurity in a holistic way, following the *zero trust*, *security by design and by default* models, aimed at ensuring that the entire technological infrastructure is protected and threats are prevented by implementing security systems and protection and control measures. In the age of artificial intelligence, many initiatives have been taken regarding the human factor in order to spread awareness about the use and the risks of digital technology through awareness-raising campaigns and the continuous training of personnel aimed at the responsible, ethical, safe and inclusive use of digital technologies

Digital Transition Plan

The Digital Transition Plan, drawn up in 2023, is based on an ambitious, forward-looking approach and is designed to create a modern, digital and sustainable work environment within the Sogin Group. To do this, the plan provides for the implementation of innovative technologies and tools to improve the organisation's efficiency and effectiveness by simplifying work processes and making the management of activities more transparent. In addition, the Plan provides for training and refresher courses for personnel to acquire the necessary skills, so that their activities can be carried out on an increasingly digital and innovative basis.

Fondazione per la sostenibilità digitale (Digital Sustainability Foundation)

In 2023 the second edition of the General Meeting of Digital Sustainability was held, promoted by the Digital Sustainability

Foundation. Sogin actively participated in working groups, contributing to the definition of a strategic agenda for digital sustainability and identifying ways to solve real problems related to goal no. 9 of the SDGs.

INNOVATION MANAGER HUB

Sogin took part in the **Innovation Manager Hub (IMH)**, a platform dedicated to Innovation Managers that promotes the exchange of reports and content between companies, universities and institutions. Specifically, the company participated in the event held on 21 November, which involved more than 100 innovation stakeholders, as well as 10 universities and institutional representatives. The end result of the event was the drafting of an analysis document applied to innovation sectors, taking advantage of the skills and perspectives provided by the community.

INNOVATIVE DECOMMISSIONING

The Sogin Group analyses and implements projects to develop innovative technological solutions for nuclear decommissioning and radioactive waste management.

Demolishing nuclear plants that were designed without considering their subsequent dismantling means that Sogin faces engineering and management challenges that require detailed studies and analysis as it often cannot rely on standard approaches or existing technologies. This means an ongoing commitment to the development and implementation of specific technologies and innovative systems and treatments for radioactive waste decontamination and management which are often prototypes.

The main projects that see the Sogin Group engaged with the aim of improving safety, minimising waste production and reducing the overall time and costs of activities are illustrated below.

- **Confined glove box cementation facility** at the Casaccia Plutonium plant. A mini-cementing facility was developed to solidify small quantities of liquid radioactive waste, which are nonetheless highly contaminated with plutonium. Radioactivity is isolated by miniaturising the classic devices and components of industrial plants and assembling them inside a glove box, thus allowing the waste to be conditioned without causing any environmental impact.
- **Mobile Cementation Facility - SiCoMoR - (Modular Waste Conditioning System)** that enables the solidification of liquid radioactive waste through cementation. This involves a prefabricated, modular and transportable facility that can be used at all decommissioning sites without the need to build new fixed treatment facilities.
- **AIGOR (Radioactive Objects Management Information Application)**, a platform used for radioactive waste management, designed for the planning and constant control of the life cycle of radioactive materials and waste. This is also interoperable with the institutional portal, **System for the Traceability of Solid Waste and Sources (STRIMS)** from ISIN.
- **Modelling and Survey 3D of nuclear structures**, a methodology developed by Nucleco, which produces a "Point Cloud" of complex nuclear structures which can be explored and PC-searched. Thanks to the virtualisation process, 3D parametric models can be developed, containing all the plant's physical and radiological information, to support all decommissioning activities, simplify the design and increase safety conditions.
- **Remote inspection systems**, mini-robots or drones equipped with advanced tools (e.g. high-resolution cameras, LIDAR system for real-time, 3D reconstruction, thermo-camera, radiological measurement systems) to carry out detailed inspections of areas of a plant that are difficult to access.

As part of the innovative projects, in 2023, Sogin developed the use of **Building Information Modeling (BIM)**, a collaborative process to optimise the planning, construction and management of buildings using software. Through BIM, all the relevant data in a construction project can be collected, combined and linked digitally. The virtual construction of the project can be viewed as a three-dimensional geometric model. BIM produces a digital representation of the physical and functional characteristics of a building or piece of infrastructure.

The use of BIM is mandatory for Contracting Authorities operating under the Public Procurement Code pursuant to the Italian Legislative Decree 36/2023.

BIM is an innovative and strategic methodology for decommissioning because it integrates construction as well as architectural, plant and infrastructural aspects. In addition to being functional to planning the construction of a project, BIM is also an essential method for the preventive control of the model, including verifying and reducing errors during the execution phase.

Its use has several advantages, including time and cost savings, early decision-making, documentary research, reducing interference and inconsistencies and the integrated construction of the project.

February 2023 saw the launching of the training plan for the project to implement the mandatory BIM methodology for Sogin, in accordance with the criteria defined at the regulatory level by classes of the work contract amount. The plan involved 170

technical Sogin personnel chosen from a survey and from applications.

The training started a process of *reskilling* and/or *upskilling* (updating and/or increasing skills) the pre-existing skills and covered the BIM roles that take into account individual skills.

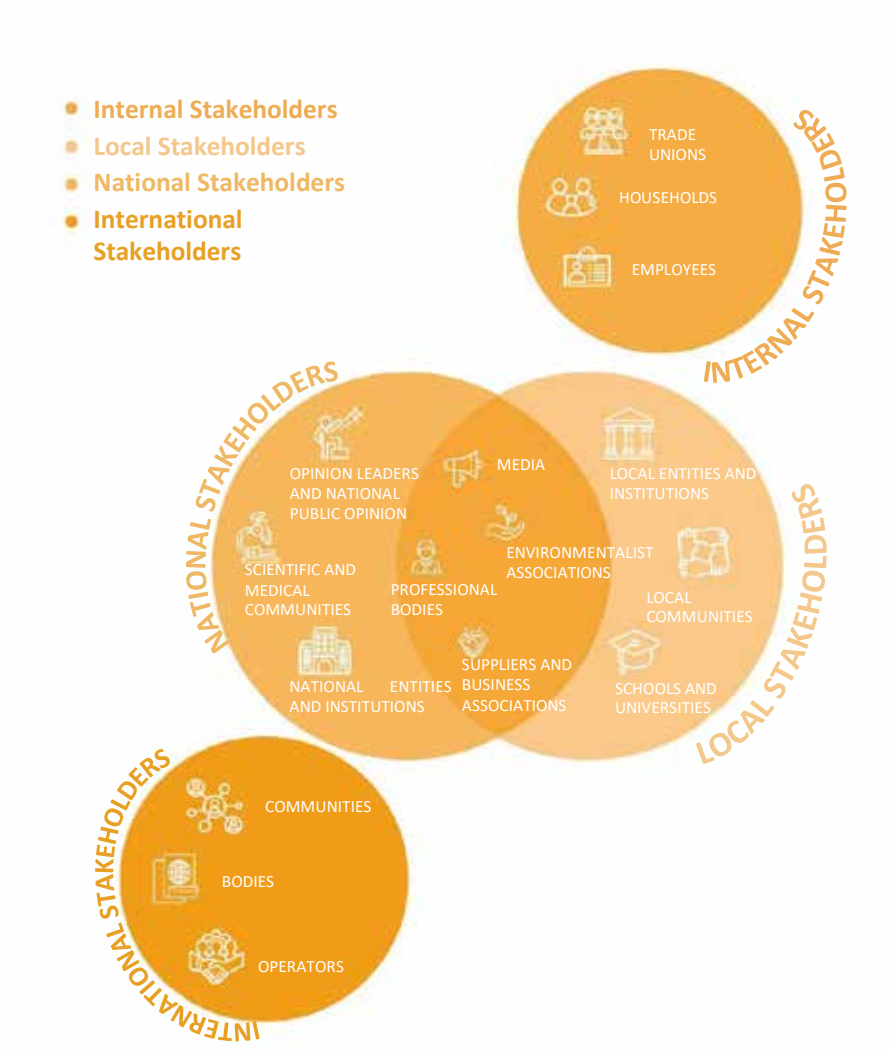
It was, therefore, a real start of the process in *change management* within the company aimed at moving, on a technological, human and organisational level, towards this new professional activity that concerns the core business of our company.

TRAINING	SOFTWARE	PROJECTS
About **150** people trained	**30** Autodesk AEC Collection Licences	**6** projects in BIM (Technical and Economic Feasibility Projects or Final Projects)
32 courses	**100** Licences on European servers related to Acdat consisting of Autodesk Construction Cloud software	
114 hours	**100** Docs licences on US servers	
4 areas (BIM Manager, CDE Manager, BIM Coordinator and Generic BIM)		

For more in-depth information on the Sogin Group's projects for technological innovation applied to decommissioning and radioactive waste management see the Development and Innovation page at www.sogin.it.

STAKEHOLDER 3

Sogin recognises as its Stakeholders all parties with whom it interacts, and which may affect or be affected by the achievement of the company's objectives from the perspective of shared value. Stakeholders are identified on the basis of the level of interest and influence that each Stakeholder has on corporate decisions and activities.
These two aspects are evaluated in terms of decision-making powers, legal or contractual obligations and connections with corporate strategies.
Relations with Stakeholders are based on ongoing dialogue, sharing objectives and transparency, with the aim of creating shared value.
The typology of the instrument used as a basis for developing relations with Stakeholders, varies according to the type of Stakeholder who needs to be listened to, informed and engaged, with the common objective of collecting the Stakeholder's expectations and needs and informing them on the objectives achieved and the activities promoted by the Company .



Continuous updating is important for Sogin, and includes participating in discussion groups on stakeholder engagement in the relevant sector.
Again in 2023 the company participated in the **Nuclear Energy Agency's (NEA) Forum on Stakeholder Confidence (FSC)**, now in its 24th edition, dedicated to stakeholder engagement in the radioactive waste management sector. Established in 2000, the FSC is a body composed of most of the NEA member countries represented by companies specialising in radioactive waste management and the localization, construction and operation of repositories, regulatory bodies, technical support organisations and scientific or research institutions.

PEOPLE

The Sogin Group places its people at the centre of its strategy, striving daily to ensure their well-being and growth through communication, training and development activities at every organisational level. Attention to people is also reflected in the search for solutions to improve the well-being of employees and to promote a healthy balance between their private and working lives.

DIVERSITY AND INCLUSION

For Sogin and Nucleco, inclusion and the valorisation of diversity are integral to the company's value system. Once again in 2023 the two companies subscribed to **Valore D** - the first Italian business association dedicated to promoting gender balance and an inclusive culture across organisations and companies - and offered their workers consolidated and varied training courses on the issues of diversity and inclusion. Valore D training programmes are divided into individual and group courses, aimed at developing professional and personal growth as well as the exchange of best practices with other businesses.

3 TRAINING OPTIONS individual and targeted at Young, Middle and Senior managers to support growth in the career path, role identity and the development of new leadership models.	**1 ANNUAL MENTORSHIP COURSE** intercompany (P.O.W.E.R. project) for 1 mentor and 1 mentee offered to 2 middle and senior managers.	**3 SHARING LABS** a one-day training course on HR Agility and Sustainability.	**10 TRAINING DAYS** proposed by the association's calendar and aimed at the entire corporate population.	**3 FOCUSED ON** online meetings to share good practices regarding work mainly in the HR community.	**E-LEARNING** on issues related to inclusion and diversity.	**VALORE D TALKS** live meetings open to the corporate population on diversity & inclusion.

During the year the Sogin Group carried out several initiatives to raise awareness among the corporate population on the issues of diversity and inclusion.

MAY, EUROPEAN DIVERSITY MONTH

The European Diversity Month celebrates the commitment of organisations to build equal and inclusive environments to benefit every individual. The initiative is part of the European Commission's efforts to fight discrimination and promote diverse and inclusive workplaces. Sogin participated with actions to raise awareness among the corporate population on the issue of managing subconscious prejudices as a *skill* to be disseminated to improve relationships and create bridges within the company, in compliance with the European Community's requirements.

TRAINING AGAINST BIAS

Delivery of a short e-learning course entitled "**Subconscious Bias**", provided by Valore D, in the context of the "*Libera(la) mente dai pregiudizi*" (Free the mind from Biases) campaign. The aim was to break down subconscious stereotypes and biases that can also have repercussions in decisions concerning the professional sphere.

GOOD BUSINESS PRACTICES IN STEM

Dissemination of the research conducted by Valore D in 2022 entitled **#ValoreD4STEM** (the acronym for Science, Technology, Engineering and Mathematics) in which Sogin participated together with 33 other companies in order to share good STEM practices within the company. The best practices collected were divided into four macro areas: initiatives aimed at encouraging girls to take up STEM subjects, STEM *upskilling* and *reskilling* initiatives, initiatives aimed at promoting the development of STEM women and maximising their *retention*, and initiatives aimed at promoting the reintegration of STEM professionals into the world of work.

INTERNATIONAL DAY FOR THE ELIMINATION OF VIOLENCE AGAINST WOMEN

On the occasion of the International Day for the Elimination of Violence against Women, a digital event was held for Sogin and Nucleco entitled, "**Online against Violence against Women and Gender Stereotypes"**, which saw the participation of the company's top managers and some operators of the "**GiuridicaMente Libera" Anti-Violence Centre**". Furthermore, on this day, the 9 decommissioning sites and the offices in Rome and Nucleco were illuminated in red.

SOGIN WINS AN HONOURABLE MENTION AT THE 2023 MINERVA PRIZE

Sogin's commitment to women's empowerment in recent years was rewarded in November 2023 with the **"Company of Excellence" Special Mention** at the annual Minerva Prize, "Women managers make the team" event in Rome promoted by Federmanager and Unindustria.

BEYOND GENERATIONS SURVEY

Sogin and Nucleco participated in the Valore D study, "*Beyond generations: experiences, relationships, work*" with the aim of **mapping the generations** present in companies in Italy, **identifying the values** and **needs of the people** and **investigating the relationships** between colleagues of different ages.

The results were presented in March 2024 at the Library of the Chamber of Italian Deputies (*Biblioteca della Camera dei Deputati*).

In addition, the first playbook on Female Empowerment in Italy was presented in Rome in June, containing over 430 good practices adopted by companies in the Valore D network, which includes Sogin, to promote gender equality, a transversal objective of the National Recovery and Resilience Plan (PNRR). The volume, produced by Valore D in collaboration with the Boston Consulting Group, is the result of a careful re-reading of the PNRR aimed at identifying which of the Plan's goals, more than others, positively affects the employment status of women and the growth of the country. The work involved almost 350 companies associated with Valore D who shared the good practices implemented to promote gender equality. The result is an analysis of the factors that positively affect the participation of women in the labour market and a manual that collects over 430 detailed sheets illustrating the individual practices.

Gender policies and organisation

Sogin monitors the situation within the organisation with regard to gender equality in order to implement the measures required by European legislation in this area as soon as possible. In May 2023 EU Directive 2023/970 was published in the Official Journal which lays down minimum requirements to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women.

Out of all the women employed at Sogin, **60%** have a STEM (Science, Technology, Engineering and Mathematics) degree, with the percentage at **71%** for Nucleco.

Following the company reorganisation that took place in autumn 2023, a fair representation of women in the first-level organisational model can be found. This followed an analysis that examined the previous organisations and studied the process flows underlying the company's structure, from which the definition of important organisational positions arose. As a result, at the end of 2023 there was an increase in the percentage of women in top-level organisational positions compared to previous years, reaching around **22%.**

In addition, at the end of the year **42%** of women hold positions of responsibility up to the second level of the organisational chart (out of a percentage of **30.35%** of women in the company), and at 4 of the 9 nuclear sites the role of Decommissioning Manager or deputy is covered by women.

With regard to the recruitment process, in 2023 the internal Protocol added a stipulation that personnel selection providers had the mandatory requirement to submit a list of candidates that equally represented the female and male gender for the same requirements and skills.

TRAINING AND DEVELOPMENT

The management of human resources aims mainly to enhance both the professional technical and managerial competencies

in the field of nuclear decommissioning and radioactive waste management and to foster individual growth and development paths.
For this reason, Sogin implements training and learning programmes according to the role, skills and potential of each resource and to corporate needs. Again in 2023 Sogin organised training courses to meet the new needs arising from organisational changes, from updates in the legal framework, from the development of new technologies and, more generally, from the evolution of the reference context.
Training courses, in addition to the topics mentioned above, focused in a transversal way on the culture of safety and on raising the awareness of specific topics.
All Radiation Protection Experts have been guaranteed training courses and conferences which are valid for continuous professional updates as required by the Italian Legislative Decree no. 101/2020. Following the approval of the new Procurement Code, an e-learning refresher training course was provided on a massive scale, followed by a synchronous webinar event. With regard to conventional safety, training on managing Work Permits with the IPOD management system has continued. The training activities were carried out in accordance with the following categories:

2023 TRAINING FIELDS

Specialised technical training:
training continued on the technical aspects of the core business held in collaboration with the Radwaste Management School.
Main areas:

- Maintaining professional qualifications;
- Maintaining the qualification of Radiation Protection Experts;
- Fit Test and Respiratory Protective Devices Test Bench;
- International geology course/conference;
- Specialist course on Italian Legislative Decree no. 231- Whistleblowing and the Supervisory Body's tasks;
- Training on the use of Radio Systems;
- HR training: Leave and Permits, Public Employee Transfer;
- Environment;
- Advanced course measuring the activity of beta/x radionuclide emitters with liquid scintillators;
- Classification of waste;
- Use of software for managing work programmes.

Regulatory Updating on:
New Procurement Code – e-learning course and subsequent in-depth webinar;
Anti-corruption and transparency;
Training on quality, emergency management, conventional, industrial and digital safety;

On-the-job training:
designed to transfer know-how to workers operating at plants.

Sogin's reward policy is based on meritocratic criteria linked to the achievement of company and individual results during the year. Measures may include salary increases, mainly of a variable type, which take the form of both individual and collective incentives (performance result bonus), targeted development measures with horizontal or vertical career paths, and specific training measures. A **Management by Objectives (MbO)** system, based on the achievement of corporate objectives linked to business results, is defined for managers and personnel holding senior organisational positions.

RADWASTE MANAGEMENT SCHOOL (RaMS)

The Radwaste Management School is Sogin's training centre that ensures high-level professional updating and promotes managerial and technological innovation. The training offered by the school relies on the experience and specialised know-how in the field of safety, and contributes to make the Group a major player in the national and international industrial panorama.

Founded in 2008, the school can be accessed by professionals coming from institutions and companies and contributes to the dissemination of a safety management model for industrial processes.

The RaMS is one of the strategic assets Sogin and Nucleco rely on to achieve their mission. Nuclear decommissioning and radioactive waste management are complex, long term activities that require high-level expertise and multidisciplinary skills.

The dissemination and development of specialist know-how are integral to the Sogin Group's strategy to guarantee maximum safety, transfer skills to future operators and satisfy the increasing - national and international - demand for specialist knowledge in this sector.

The training programme of the Radwaste Management School (RaMS) ensures the best standards of innovation, multi-disciplinarity and a specific focus on decommissioning and radioactive waste management. The programmes include training on technical and scientific matters, such as nuclear plant technology, decommissioning, radiation protection and radioactive waste management. The programmes are designed to meet the newest legal requirements and foster corporate safety culture.

To satisfy the requirements imposed, in terms of mandatory training, courses are constantly updated as foreseen under the Italian Legislative Decree no. 81/2008 (Consolidated Law on Health and Safety at the Workplace) and the Italian Legislative Decree no. 101 of 31 July 2020 on nuclear matters, implementing Directive 2013/59/Euratom laying down basic safety standards for protection against the dangers arising from exposure to ionising radiation. The RaMS is constantly committed to developing partnerships with accredited bodies, universities, scientific associations, research, and development bodies, also at international level.

It is involved in university training, through seminars and graduate and post-graduate courses.

In 2023, the RaMS continued to provide training in "remote" mode, both via e-learning and videoconferencing.

CERTIFICATIONS:

UNI EN ISO 9001/2015
(Quality Management Systems)

UNI EN ISO 14001/2015
(Environmental Management Systems)

UNI ISO 45001
(Workplace Health and Safety Management Systems)

RaMS PERFORMANCE 2023				
TRAINED STAFF	**COURSES OFFERED**	**TRAINING HOURS**	**TEACHING HOURS**	**TEACHING HOURS PROVIDED BY SOGIN AND NUCLECO'S STAFF**
818 people were involved in at least one training intervention, many of whom attended multiple courses, for a total of 2,354 individual participations	271 editions	17,585	3,266	619

TRAINING COURSES PROVIDED IN 2023 BY THE RaaMS	
HOURS DIVIDED BY TYPE AND RECIPIENTS	**HOURS**
NUCLEAR SAFETY	**4,289.5**
Hours provided to Sogin Staff	3,869
Hours provided to Nucleco Staff	224.5
Hours provided to the staff of external entities or companies	196
SAFETY IN THE WORKPLACE	**7,116.5**
Hours provided to Sogin Staff	6,981.5
Hours provided to Nucleco Staff	135
Hours provided to the staff of external entities or companies	0
TECHNICAL AND SPECIALISED TRAINING (HELD BY THE RaMS FROM 2021)	**6,179**
Hours provided to Sogin Staff	6,099
Hours provided to Nucleco Staff	80
Hours provided to the staff of external entities or companies	0
TOTAL	***17,585***

TRAINING HOURS PROVIDED IN 2023 BY THE RaMS - DIVIDED BY GENDER				
	NUCLEAR SAFETY	**SAFETY IN THE WORKPLACE**	**TECHNICAL AND SPECIALISED TRAINING**	**TOTAL**
WOMEN	**1,659.5**	**1,206.5**	**1,906**	**4,772**
Sogin	1,651.5	1,206.5	1,862	4,720
Nucleco	8	0	44	52
MEN	**2,434**	**5,910**	**4,273**	**12,617**
Sogin	2,217.5	5,775	4,237	12,229.5
Nucleco	216.5	135	36	387.5
TOTAL	***4,093.5 ****	***7,116.5***	***6,179***	***17,389 ****

* An additional 196 training hours provided to external staff are added to the total hours

TRAINING HOURS PROVIDED IN 2023 BY THE RaMS - DIVIDED BY JOB CLASSIFICATION				
	NUCLEAR SAFETY	**SAFETY IN THE WORKPLACE**	**TECHNICAL AND SPECIALISED TRAINING**	**TOTAL**
MANAGERS	**34.5**	**77**	**176**	**287.5**
Sogin	34.5	77	176	287.5
Nucleco	0	0	0	0
EXECUTIVES	**1,074.5**	**902.5**	**1,638**	**3,615**
Sogin	1,072	902.5	1,638	3,612.5
Nucleco	2.5	0	0	2.5
EMPLOYEES	**2,476**	**4,074**	**3,659**	**10,209**
Sogin	2,456	4,062	3,603	10,121
Nucleco	20	12	56	88
WORKERS	**466.5**	**1,975**	**698**	**3,139.5**

Sogin	264.5	1,852	674	2,790.5
Nucleco	202	123	24	349
FELLOWSHIP/TRAINEESHIP	**0**	**0**	**0**	**0**
Sogin	0	0	0	0
Nucleco	0	0	0	0
EMPLOYEES SECONDED BY ENEA	**42**	**88**	**8**	**138**
TOTAL	***4,093.5 ****	***7,116.5***	***6,179***	***17,389 ****

* An additional 196 training hours provided to external staff are added to the total hours

CORPORATE WELL-BEING

Agile working

In application of the agreement signed with trade unions on 19 September 2022, again in 2023 the company continued to apply the Agile Work regime to promote a work culture based on flexibility and organisation and which takes into account phases, cycles and objectives. This way of organising work is one of the initiatives to support the reconciliation of work and private life, with a view to family and environmental sustainability.

Corporate Well-Being - "In Salute" Programme

In 2023 the collaboration between EMA-ROMA and Sogin - for the blood donation campaigns that have seen more than 12,000 cc donated over the years - continued with intensity. Notably, the last campaign in December attracted the highest level of participation in terms of the number of volunteers who, in this way, had access to the many medical screening initiatives. The contributions from volunteers went to support the transfusion centre at the San Filippo Neri Hospital.

NoiSoginWelfare

The "NoiSoginWelfare" project, which has been running since 2017, was again activated in 2023. In addition to workers having the option of obtaining a tax-free Performance Result Bonus (PdR) thanks to the 100% tax wedge reduction, Sogin developed a welfare scheme linked to achieving decommissioning targets. By accessing an online platform, workers could choose the portion that would be allocated to welfare, and in this way set up a "welfare budget" that could be used in relation to their needs for specific services and goods. The budget for every employee was then increased by 16% of the amount allocated to welfare, which was covered by the Company.

In 2023 23% of Sogin employees decided to convert a portion of the B-component of their performance result bonus into welfare goods and services (26% in 2022), for a total amount equal to EUR 250,832.00 broken down as follows.

34% for a supplementary pension fund; 19% for school and kindergarten expenses; 21% for gift boxes and vouchers; 16% for reimbursement of household utilities and the remaining portion for public transportation, family assistance expenses and vouchers of various kinds.

As in previous years, in order to raise awareness and inform workers about Welfare, online training sessions were organised and a web-point service was set up to provide personalised advice.

HEALTHCARE AND WORK-RELATED ACCIDENTS

Sogin employees and dependent family members are provided insurance cover for health care through the Supplementary Healthcare Fund for Employees (FISDE) offered by the Enel Group. The same type of supplementary health care is provided for managers with ASEM (Integrated Energy and Multi-services Management Healthcare), whilst managerial executives benefit from supplementary health care with the Supplementary Healthcare Fund for Employees offered by the Enel Group (FISDE).

In the field of accident insurance, the Company has taken out accident policies reserved for staff on duty.

PENSION FUNDS

In addition to the usual pension schemes, Sogin offers its employees the option of receiving supplementary pension benefits through membership of the Employees' Pension Fund (FOPEN) and the Managers' Pension Fund (FONDENEL). Starting in 2007, as provided for by law, all employees can allocate their entire employee severance indemnity to the pension fund.

ARCA SERVICES

ARCA, the recreational association for employees in the electricity industry, promotes cultural and sporting initiatives to encourage the interaction between employees and their families. It also organises trips and holiday packages through preferential agreements with important tour operators. The same service is offered to corporate managers by ACEM (Associazione Culturale Energia e Multiservizi), which takes care of all the recreational aspects of this category.

LOANS AND AGREEMENTS

In line with the action undertaken in the electricity sector and within the limits of the available resources stated under the second level trade union bargaining agreement, Sogin grants preferential loans to employees to purchase or renovate their homes and for special personal needs. Like in the People Care project, many agreements have also been signed with commercial businesses (Food & Beverage, Healthcare & Wellness, Shopping, Facilities).

CORPORATE COMMUNITY

The Sogin Group considers it essential to create and develop its corporate community, made up of people who share values and objectives.

NoiSoginGroup is the Intranet portal for information, communication and employee involvement, which allows the integration of the Group's internal information services, overcoming the logic of separation between Sogin and Nucleco and strengthening the Group's dimension as a community.

The Environmental Legislative Note is published on the intranet on a monthly basis to promote awareness of environmental legislation in the Company's activities, and the Legislative Newsletter is the tool that provides updates on new legislation. Sogin News, the Sogin Group's quarterly magazine, conceived as a space for in-depth analysis complementary to the NoiSoginGroup portal, was developed on a Sway platform with a "less paper and more technology" approach, making it accessible to the many remote working employees.

SHARED VALUE

Informational meetings in the regions

Since the start of 2023, **783 visitors** for over a total of **32 visits** have been welcomed to decommissioning sites. Most of them were students from **schools (354)** and **universities (236).** They are followed by representatives from **associations (89)** and **institutions (49)** and **journalists (21)**.

These numbers demonstrate a growing interest, especially among the new generations, in Sogin's history and activities. To stimulate the curiosity of these guests, in addition to showing them the workplaces, Sogin organised in-depth meetings on the issues of the environment and the promotion of STEM (Science, Technology, Engineering and Mathematics) for women, as well as workshops to stimulate young people to reflect on the future of their region at the end of decommissioning activities.

SME DAY - INDUSTRIAMOCI 2023

Once again this year, the Sogin Group took part in the PMI Day - Industriamoci event, the national day dedicated to small and medium-sized enterprises promoted by Confindustria and which is now in its 14th edition. PMI Day hopes to introduce the younger generations to the entrepreneurial activities in their local area through guided tours to associated companies. In this spirit, Sogin opened the doors of the nuclear power plants in Caorso on 15 November and in Trino on 24 November.

The event was promoted in collaboration with Confindustria Piacenza, offering 35 students from Piacenza's "Faustini Frank Nicolini" middle school the unique experience of visiting the Caorso plant together with our technicians and imagining the future of the Piacenza site together. The theme of the 2023 Edition was 'Freedom', and the workshop took the name 'Free to express yourself: draw the future of your territory'. Each participant was asked to draw and then present his or her own idea of the future of the site where the Caorso power station now stands after decommissioning activities have been completed and the area is free of radiation constraints.

The event held in Trino saw 40 students from the "A. Avogadro" Scientific Studies High School in Vercelli who visited the plant to learn more about its industrial past and its ongoing decommissioning phase. The event was organised in collaboration with Confindustria Novara Vercelli Valsesia and provided an opportunity to develop STEM (Science, Technology, Engineering and Mathematics) skills on the eve of the World Day against Gender-based Violence. Specifically, a number of Sogin's "role models" demonstrated how female skills are enhanced at the company and shared their experience to encourage new generations to choose their future university path and subsequently their career without feeling the restraints of any form of stereotype.

WORLD ENVIRONMENTAL EDUCATION DAY

Climate change, environmental protection, and the history of nuclear decommissioning were some of the aspects discussed by Sogin during an environmental information and awareness day organised for 25 October at the Latina power plant.

40 students from the "E. Maiorana" Scientific Studies High School in Latina took part in the initiative, which was created as part of the World Environmental Education Day celebrations. The students visited the Pontine site and were welcomed and accompanied by Sogin's technicians and environmental experts.

During the event, the young guests had the opportunity to take a close look at the reactor building and one of the piezometers used to measure and monitor the groundwater level inside the Pontine plant. The last part of the day was dedicated to learning about the operation of the air quality monitoring station, located near the power plant, and to visiting the control room of the Cirene plant, which has never been put into operation, to learn more about its technological and safety aspects.

INSTITUTIONS

Sogin's relationship with institutions, both at the national and the local level, over the years, in addition to being naturally defined by the standards of reference, can be seen in the constant and daily commitment to create opportunities for discussion based on transparency and information.
To this end, again in 2023, meetings were organised with various institutions to discuss the most significant aspects of Sogin's activities as part of the decommissioning of Italian nuclear sites and the procedure for siting the National Repository for radioactive waste.

In 2023, **5** institutional visits were held involving political and technical representatives from institutions and local authorities in the regions hosting Sogin sites.
For details on these visits, refer to the nuclear site data sheets in the chapter, *Closing the Italian nuclear cycle*.

Regional transparency meetings

Transparency Meetings are periodic meetings convened by the Regions in whose territories nuclear plants and power plants are housed in the phase of decommissioning. Established under specific resolutions and regional laws, they represent an opportunity for dialogue between Sogin and local stakeholders (citizens, institutions and associations), to inform parties of the progress of the decommissioning activities, and to provide information about radioactive waste management and, in general, any important activity concerning the protection of health and the environment from nuclear power.
In 2023, Sogin participated in 3 Transparency Meetings: for the Basilicata Region (23 January 2023, Potenza), for the Emilia-Romagna Region (31 March 2023, Caorso) and for the Campania Region (4 April 2023, Sessa Aurunca - CE).

NATIONAL PLATFORM FOR SUSTAINABLE NUCLEAR ENERGY

In September, at the Italian Ministry of the Environment and Energy Safety (MASE), Sogin participated in the first meeting of the **National Platform for Sustainable Nuclear Energy (PNNS)**, a structured network whose objective is to create a point of national synthesis on various initiatives, experiences, critical aspects, perspectives and expectations on the advanced nuclear sector that presents innovative features and characteristics, such as sustainability and contributing to the decarbonisation of energy and production systems. The Platform is the tool designed by the MASE to connect and coordinate the various national actors who, in different capacities and at various levels, deal with nuclear energy, safety, radiation protection and radioactive waste, in all respects. The Platform allows the MASE to coordinate, with the support of RSE (the Italian Research on the Energy System) and ENEA, the Working Groups organised to handle specific issues. **Sogin, within Working Group No.5 "Waste and decommissioning"**, has the role of steering committee, with the following objectives: recognition of the national situation and the international context and proposals for action and timing.

INDEPENDENT BODIES

Sogin holds dialogues with all the independent bodies that contribute to providing accurate information on decommissioning activities in Italy.

In compliance with the provisions of the EIA Decree, through a specific decree issued by the former Italian Ministry of the Environment and the Protection of the Land and Sea, an Environmental Observatory for the Garigliano nuclear power plant was established. The Observatory is a permanent body responsible for analysing and assessing the correct performance, from an environmental point of view, of the dismantling operations carried out in the plant in order to check that they are consistent with the provisions of the EIA decree. In accordance with the Operating Regulations, Sogin provides the necessary technical and logistical support to ensure the operation of the Observatory.

Protocol for the reclamation of illegal landfills

The collaboration protocol between Sogin and the Extraordinary Commissioner for the Reclamation of Illegal Landfills was signed on 10 December 2020 and remains in effect until the Extraordinary Commissioner's mandate expires (this mandate was reconfirmed, for another three years, in March 2024). In 2023 the scheduled activities continued: the provision of technical, administrative and operational support to deal with the reclamation of illegal landfills in Italy, guaranteeing the protection of the environment, securing the safety of the territory and protecting communities. As foreseen under this Protocol, Sogin and Nucleco provide the expertise of their technicians and their instruments to support the Extraordinary Commissioner in the rehabilitation of the identified landfill sites where required.

Memorandum of Understanding between Sogin and the Carabinieri's Environmental Protection Unit

On 14 December 2022, the Sogin and the Commander of the Carabinieri **Environmental Protection and Ecological Transition Unit (CCTATE)** signed a Memorandum of Understanding aimed at cooperation in the recovery, management and securing the safety of radioactive and non-radioactive waste and orphan radioactive sources. The Protocol also provides for mutual training activities to be organised in areas of common interest and for cooperation in developing activities to analyse and potentially update procedures to manage radioactive and non-radioactive waste. The agreement is in line with the circular economy strategy that Sogin has always adopted to minimise the waste produced and maximise the volume of recovered materials.

Media, digital channels and social media coverage

TOTAL MEDIA RELEASES	PRESS ARTICLES	WEB ARTICLES	RADIO AND TELEVISION NEWS	PRESS RELEASES/NOTES	VISITING JOURNALISTS
3,578	867	2,486	225	17	21

In 202 the media presence was up +**45%** compared to 2022 (2,467). The activities with the greatest diffusion in the media during the year concerned:

Decommissioning
- Award of the tender to build the ICPF plant at the Rotondella site
- Tenders were launched to dismantle the reactor at the Garigliano power plant and to build the Magnox plant at Latina
- Start of the dismantling of the water tower and the vessel at the Garigliano power plant
- Delivery of the two casks for the dry storage of Elk River fuel to the Itrec site in Rotondella
- Return from Slovakia to the Caorso plant of the items with radioactive sludge and resin treatment residue

National Repository and Technology Park
- Sogin's international workshop in Rome on future research activities into the Technology Park
- Call for applications in the siting process for the National Repository which was formalised with the approval of the Energy Decree in the Council of Ministers
- Application of the Municipality of Trino proposed by the mayor, Daniele Pane, to host the National Repository in its territory
- Publication by the Italian Ministry of the Environment and Energy Safety of the list of 51 areas suitable for siting the National Repository

Company
- Appointment of Sogin's new Board of Directors
- Sogin's participation at Ecomondo 2023 and the presentation of its activities
- The signing of the collaborative supervisory action protocol on anti-corruption and transparency with the Italian Anti-Corruption Authority (ANAC)

Digital channels are a key tool for reaching numerous stakeholders of reference and for disseminating information concerning the company's values. Sogin publishes institutional information and content of general interest on its two official websites (sogin.it for Sogin and nucleco.it for Nucleco); further digital content is published on the official website of the National Repository for radioactive waste (depositonazionale.it). A total of 74 news items were published in 2023 (59 Sogin, 10 Nucleco, 5 National Repository), including notes/press releases. Overall in 2023, the Company published about 110 news items across its social media profiles. The Sogin profile alone recorded 250K views and an increasing involvement of Sogin employees through LinkedIn personal profiles. With around 12,230 followers at the end of 2023, the Sogin profile confirms the positive trend in terms of followers with regard to this channel.

SOCIAL COVERAGE		
YOUTUBE CHANNEL SOGIN CHANNEL	**LINKEDIN SOGIN, NUCLECO AND RaMS**	**INSTAGRAM @OPENGATE_SOGIN**
OBJECTIVES	**OBJECTIVES**	**OBJECTIVES**
Information and transparency through the dissemination of digital content on decommissioning operations, the National Repository and Technology Park design and other corporate initiatives Increasing and enhancing the brand reputation	Enhancing the skills and competencies of Sogin and Nucleco's employees in the field of decommissioning & waste management Increasing and enhancing the brand reputation and stakeholder engagement Intensifying website traffic	Giving visibility to corporate events and initiatives Creating a social space for sharing and engagement Increasing and enhancing the brand reputation Intensifying website traffic

To regulate aspects of Sogin's web presence, Sogin and Nucleco have:
- a Social Media Policy, addressed to web and social users, providing information on content and publication settings adopted by Sogin and Nucleco; it can also be used as a handbook and a tool to foster a more conscious use of these means of communication;
- two Social Network Use Guidelines, prepared for Sogin and Nucleco's employees, respectively, to provide indications on how to protect the Company's reputation and image when publishing corporate news and matters regarding the employees' personal profiles, and also to focus on personal branding.

INDUSTRY EVENTS

Sustainable Development Festival

Sogin took part in the 7th edition of the Sustainable Development Festival promoted by ASviS (Alleanza italiana per lo sviluppo

sostenibile - the Italian Alliance for Sustainable Development), held from 8 to 24 May. In all, 17 days of common reflection, as many as the Sustainable Development Goals in the United Nations' 2030 Agenda, with five main events in Naples, Bologna, Milan, Turin and Rome, each dedicated to delving deeper into a different aspect of sustainability. The company, as a defender of Goal 11 – *Make cities and human settlements inclusive, safe, resilient and sustainable* - took part in the event held in Bologna which was dedicated to the environment, speaking at the third panel dedicated to climate neutrality, investments and innovation as part of the event entitled, «Climate neutrality by 2030, a possible challenge. The nine Italian cities of the European Mission talk about their experiences». For the Sogin Group, it was also an opportunity to talk about the Italian National Repository of Radioactive Waste project and illustrate the innovative solutions adopted in radioactive waste management, including AIGOR, the IT application that allows processes related to the waste life cycle to be optimised, and the 3D Survey, the methodology for reconstructing virtual 3D models of complex plants in order to design decontamination and dismantling interventions.

IMPEL network on environmental remediation issues

In May, Sogin took part in the 2023 General Assembly of IMPEL, the international, non-profit association of the environmental authorities of the Member States of the European Union. The network is organised into various Working Groups that follow the different sectors in which environmental protection policies are developed. Specifically, Sogin took part in the *expert team, "Water and Land Remediation"*, the goal of which is to study the technologies for water and soil remediation related to *Thermal Desorption and Phytoremediation*. Techniques, such as those analysed in previous years, which could be helpful in resolving issues of interest to the Sogin sites or to the area that will be identified for the National Repository.

2023 European Researchers' Night

On 29 and 30 September, the Sogin Group took part in the 2023 European Researchers' Night organised as part of the NET - scieNcE Together project at the Città dell'Altra Economia in Rome. Over the two evenings, Sogin and Nucleco examined the world of radioactive waste management and the dismantling of nuclear plants participating in various activities, large and small.

2023 AIRP National Conference

Again in 2023, Sogin participated in the National Congress of the Italian Association of Radiation Protection (AIRP), which was held in Cagliari from 27 to 29 September 2023. The work programme, introduced by AIRP President Francesco Mancini, was divided into six different technical and scientific working sessions that included reports, talks and posters. The main aspects of radiation protection were covered, from radiation in health care to environmental radioactivity, from characterisation techniques through to monitoring and decommissioning of nuclear power plants and quality in measurements. Sogin took part in Session 1, "Emergencies and Nuclear Plants", and Session 5, "Radiation Protection".

IWeek

Sogin took part in the 4th edition of iWeek (Intelligence Week) entitled, «*Nuclear power, can it be done?*", an opportunity for dialogue between institutions, organisations and companies in the energy sector spread over two events: on 5 October in Milan and on 11 October in Rome. Sogin participated on both days with the CEO, who spoke in Milan at the round table, "*The Italian safety and decommissioning supply chain*", and the Chairman who contributed to the Rome debate.

SDG Global Compact Forum

On 17 and 18 October, Sogin participated in the 8th edition of the SDG Global Compact Forum, the world's largest strategic initiative for corporate citizenship, created to promote a sustainable global economy in its three aspects: social, environmental and governance, through the contributions made by companies to achieving the sustainable development goals of the United Nations' 2030 Agenda. The Forum was held in Palermo on the theme, "*Companies and impact: sustainability 5.0*", and it was two days full of presentations, meetings, talks, exchanges, in which the watchword was "transformation": only by being able to measure one's ability to change and transform the context in which they operate, setting increasingly challenging improvement objectives, can one measure one's impact and generate shared value. The Forum was also an opportunity to establish, in a shared and participatory way, the themes on which the activity will focus in 2024. Sogin's participation in the Global Compact, as an active member, is one of the objectives of the Sustainability Plan, approved in March 2023.

ECOMONDO 2023

From 7 to 10 November, the 26th edition of Ecomondo took place at Rimini Fiera, an event of reference in Europe for green transition and new circular and regenerative economy models. Also this year, Sogin and Nucleco presented the Group's skills and technologies for the Italian nuclear power industry to numerous visitors at the stand: from decommissioning design to waste management, from siting to radiation protection, from environmental analysis to reclamation and monitoring. The event also provided an opportunity to illustrate how the company ensures sustainability in all its various dismantling and reclamation activities. One example is the environmental reclamation of a former Air Force firing range area in Punta della Contessa (Brindisi) recently performed by the subsidiary Nucleco, in which some 300 native tree species were replanted.

Annual AIN Conference

On 5 December Sogin participated in the annual conference of the Italian Nuclear Association (AIN) entitled, *' Italian nuclear power in the international and European landscape''*, which was held in Rome. The objective of the conference was to present and develop qualified positions and opinions on the commitment of nuclear industries abroad and the basic conditions deemed necessary for taking concrete steps towards the development of nuclear projects in Italy. Sogin participated together with leading figures and representatives from the institutional, academic and industrial worlds linked to the nuclear power industry. The company took part in the panel on the skills and capabilities of Italy's nuclear power industry from a national and European perspective.

INTERNATIONAL BODIES

Due to its Italian expertise in decommissioning and radioactive waste management, Sogin interacts with world experts in the sector, participating in the most important international forums and in numerous working groups and initiatives of the main international organisations in the sector, such as: the International Atomic Energy Agency (IAEA), the Nuclear Energy Agency (NEA), the Organisation for Economic Cooperation and Development (OECD) and European Commission bodies involved or operating in the nuclear field, i.e. the Directorate-General for Energy (DGENER), the Joint Research Centre (JRC) and the EURATOM Supply Agency.
Moreover, Sogin assists the Italian Government, its institutions and other national organizations involved in the nuclear sector, by providing its expertise in international institutional meetings.

Agenzia internazionale per l'energia atomica (International Atomic Energy Agency - IAEA) delle Nazioni Unite	**Agenzia per l'Energia Nucleare (Nuclear Energy Agency - NEA), dell'Organizzazione per la Cooperazione e lo Sviluppo Economico (OCSE)**	**Organismi della Commissione Europea con competenza in campo nucleare, ovvero la Direzione Generale per l'Energia (DGENER), il Joint Research Center e la EURATOM Supply Agency**

IAEA (the International Atomic Energy Agency)

As one of the Agency's Collaborating Centres, which was renewed for another 4 years in September 2023, Sogin has provided support for the "*Nuclear Power, Fuel Cycle and Nuclear Science*" programme through:

- research and development in the fields of robotics and characterisation systems;
- sharing know-how and promoting training events;
- the implementation of innovative tools to plan, design and execute decommissioning and waste management operations.

The company participated in the 67th IAEA General Convention on Nuclear Safety, assisting the Italian representatives in the work of the Conference and in preparing the bilateral meetings, the "*Biennial Forum of the International Decommissioning Network*" and the "*International Conference on Nuclear Decommissioning: Addressing the Past and Ensuring the Future*".
From 3 to 7 July, Sogin took part in the "*Technical Meeting on Repurposing and Stakeholder Involvement*" in the role of moderator for the first session of the workshop, in which the experiences of Belgium, the United Kingdom and Sweden, relating to sustainable development projects of post-decommissioning sites and the methodologies for involving stakeholders in the decision-making process were examined. A report on the discussions held and the conclusions reached is soon to be published.
In May, the company participated in the "*International Conference on Nuclear Decommissioning*" (from 15 to 19 May) and the "*Annual Meeting of the Technical Working Group on Decommissioning and Environmental Remediation*" (from 22 to 25 May).
Lastly, from 12 to 16 June, the Group continued to participate in the "NET4D - *New and Emerging Technologies to Advance Decommissioning Projects*" project. The objective was to provide information on the uses of emerging digital technologies for managing decommissioning projects. Sogin coordinated the activities of one of the working groups focused on the acquisition, analysis and testing of digital technologies to create complex models based on the so-called "*point cloud*" methodology.
Sogin has also contributed to numerous meetings and projects on various topics: human resources in the decommissioning & radioactive waste management sectors; approaches to dismantling graphite plants; low-level waste repositories; methods for assessing environmental and radiological impacts; geological repositories for the final management of high-level waste and the management of spent fuel.

NEA (Nuclear Energy Agency)

The NEA is an international, intergovernmental organisation under the OECD. It assists its Member States in maintaining and developing, through international cooperation, the scientific, technological and regulatory bases necessary for the safe, environmentally sound and economically viable use of nuclear energy for peaceful purposes. In 2023, Sogin continued its relationship by participating in the meetings of the Steering Committee (top management body of the Agency) and the Committees on Radioprotection and Public Health, Radioactive Waste Management, Decommissioning Legacy Management, Nuclear Law. In addition, the company collaborated in important decommissioning and waste management projects, such as the "Cooperative Programme on Decommissioning" and in the six-monthly meetings of its Technical Advisor Group (TAG).

Between 23 and 27 October, Sogin participated in the 74th meeting of the Technical Advisor Groups of the NEA held in Kakegawa, Japan, presenting the state of decommissioning in Italy, with a focus on the Garigliano plant.

Other conferences and working groups in which Sogin and Nucleco took part in 2023 are listed below:

- The Advisory Group of the European Supply Agency, the (2008/114/EC, Euratom);
- The European Research Reactor Conference, the annual international conference dedicated to the latest developments in research reactor technology and operation;
- The 8th European Nuclear Industry Congress 2023;
- The International Nuclear Law Association Meeting, where Sogin gave a presentation on the Italian legislation concerning siting the repository. The Workshop, organised by EURAD, was entitled, "*Assessing the long-term evolution of engineered barrier systems of waste disposal systems*";
- NucCon 2023 - the International Conference on Non-destructive Evaluation of Concrete in Nuclear Applications.

PROJECTS WITH THE EUROPEAN COMMISSION

In 2023 activities continued under the framework of Sogin's membership in the EURATOM "*Research & Training*" Programme (Horizon 2020 and Horizon Europe framework programme) of the European Commission. The projects foster Sogin partnership with non-EU research centres and companies to investigate matters related to its core business.

PREDIS (Pre-Disposal Management of Radioactive Waste): aims to detect and implement waste management strategies and innovative technologies in the pre-disposal stage, making it possible to reduce the waste volume and optimise waste treatment procedures.

In the period in question, with regard to the studies on the treatment and conditioning processes of organic liquids, Sogin (as Task Leader) continued to coordinate the laboratory activities carried out by partners participating in the activities and all the results of the trials were collected in the final document, which is expected to be issued in the first quarter of 2024.

From 3 to 6 October 2023, the ICEM2023 (International Conference on Environmental Remediation and Radioactive Waste Management) conference took place in Stuttgart, for which Sogin had prepared a paper entitled, "*Investigation, Development And Assessment Of Innovative Direct Conditioning Solutions For Radioactive Liquid Organic Waste Within The PREDIS Project*".

From 20 to 23 November, Sogin participated in training on "*Pre-disposal Waste Management Operations, Case Study*" at the Orano reprocessing facility in La Hague.

Sogin also participated in the innovation activities for monitoring cemented products in storage, the development of the Strategic Research Agenda for pre-disposal issues and the knowledge transfer activities envisaged by the project in the field of waste treatment.

The results obtained from the PREDIS project were used by Sogin to test innovative conditioning solutions on medium-activity organic liquids stored at the Casaccia Plutonium Plant. https://predis-h2020.eu

INNO4GRAPH (INNOvative tools FOR dismantling GRAPHite moderated nuclear reactors): aims to develop innovative instruments and methodologies for dismantling European graphite-moderated reactors. Sogin is involved in several technical Work Packages and, in particular, in the development of a prototype system to assess the state of preservation of graphite blocks in the reactor at the Latina power plant.
In 2023 the activities envisaged by the project were completed:

- the analysis of the costs of graphite extraction operations and the insertion of the cost database into the 3D model of the reactors designated to the DEMPlus simulator;
- the report on the tests carried out on an innovative prototype system to assess the state of preservation of graphite blocks in the reactor at the Latina power plant.

On 19 October 2023, the final symposium of the project was held at the EdF site in Chinon (Industrial Demonstrator), with the presence of representatives from the European Commission and the IAEA.
https://www.inno4graph.eu/

MICADO (Migrant Integration Cockpits And Dashboards): designed to find new solutions for non-destructive radioactive waste characterisation using a digitisation process.
Sogin provided technical support for the definition of the system requirements and technology development, and for the construction of the final demonstration, which took place during the week of 23-27 January at the ENEA headquarters in Casaccia. During the event, the project's results were explained with presentations, videos and live activities.
https://www.micado-project.eu/

CLEANDEM (Cyber physicaL Equipment for unmAnned Nuclear DEcommissioning Measurements): has the goal of developing new technological solutions for non-destructive characterisation during Decommissioning & Dismantling operations. Sogin is involved in defining the system requirements and the possible operational usage scenarios and is the Work Package Leader dedicated to training and the final demonstration.
In 2023, Sogin contributed to defining the reference scenarios for the final demonstration (which will be carried out in the first half of 2024) by identifying the galleries 01-02-03, Building 200, at the Saluggia site, as test cases. In parallel to this, Sogin contributed to the dissemination of the project results by participating in the second webinar, organised in collaboration with AiNT, in February 2023.
https://cordis.europa.eu/project/id/945335/it

HARPERS (HARmonised PracticEs, Regulations and Standards in waste management and decommissioning): aims to identify the critical aspects and strengths of a more harmonised European regulatory framework for decommissioning and radioactive waste management in the pre-disposal phase. The project will also assess the possible benefits of developing shared treatment facilities between Member States.
In 2023, Sogin, as the leader of WP4, "*Circular Economy*", coordinated the activities of the two workshops (January and February) to collect feedback from stakeholders as part of the priority of topics to be explored in the second phase of the project. Sogin also developed the methodology to prioritise topics and finalised Deliverable 4 in June 2023, which gathers all the evidence and methodologies used to define the topics to be explored in the second phase of the project with regard to the circular economy applied to nuclear decommissioning and waste management.
From 6 to 10 November 2023, as part of the IAEA's "*International Conference on the Safety of Radioactive Waste Management, Decommissioning, Environmental Protection and Remediation: Ensuring Safety and Enabling Sustainability*", Sogin presented a poster entitled, "*HARPERS Project - Identification of priority needs and opportunities for promoting Circular Economy when managing materials and waste arising from nuclear decommissioning*".
https://www.harpers-h2020.eu/

EURAD-2: European Joint Programme on Radioactive Waste Management: The joint European programme on radioactive waste management, EURAD-2, was created as a continuation of the EURAD project launched in 2019 and which will end in June 2024. The aim of the programme is to support European Union Member States in implementing Directive 2011/70/Euratom (Radioactive Waste Directive) by acting and collaborating with their own domestic programmes, to acquire the skills necessary to the safe management of radioactive waste, including the coordination of the technical and scientific actions implemented by partners to achieve common objectives. The call for Work Packages to be submitted for inclusion in EURAD-2 was launched on the European Commission website in March 2023 (under the EURATOM programme for the period, 2023-2025). In September 2023, Sogin received a mandate from the MASE to represent Italy in the Waste Management Organisation board and the project proposal was delivered in November 2023. The EURAD-2 project will start in the second half of 2024.
https://www.ejp-eurad.eu/

COLLABORATION WITH FOREIGN OPERATORS

The main collaboration agreements signed and renewed by Sogin and international partners in 2023 are listed below:

- ✓ agreement with **SURAO**, the Czech state-owned company responsible for the National Repository for radioactive waste at Dukovany;
- ✓ agreement with **ENRESA** (*Empresa Nacional de Residuos Radiactivos SA*), the Spanish state-owned company in charge of radioactive waste management and the construction of a repository for low- and intermediate-level radioactive waste;
- ✓ agreement with **ANDRA** (*Agence nationale pour la gestion des déchets radioactifs*), the French state-owned company responsible for managing radioactive waste in France;
- ✓ agreement with **ONDRAF** (*Organisme national des déchets radioactifs et des matières fissiles enrichies*), the Belgian state-owned company in charge of waste management and the construction of the Dessel repository;
- ✓ agreement with **ARAO**, a technical safety organisation (TSO) of the Slovenian government in the field of waste management. Based on the agreement, Sogin and ARAO intend facilitating the exchange of information in the specific field of radioactive waste management.

SUPPLY CHAIN

Any sustainability journey undertaken in an organisation must include its supply chain. Furthermore, in the context of a circular economy model, which has always guided our decommissioning strategies, the procurement phase is essential as a fundamental step towards circularity and begins with rethinking the choice of materials, design and executive processes, the products to be used and, as a result, the most functional contracttools.
From the first half of 2023, Sogin decided to ask all its contracted suppliers to fill out the Synesgy questionnaire to assess their ESG (Environmental, Social, Governance) performance. Of the 495 economic operators invited by Sogin, 285 completed the questionnaire, of which 56% obtained certification. Only 5% of the certified economic operators were deemed unsatisfactory.

Further details can be found in the "suppliers" section of the site, **sogin.it.**

ANAC AWARDS SOGIN THE CONTRACTING AUTHORITY QUALIFICATION

In August, Sogin qualified as a contracting authority from the Italian Anti-Corruption Authority (ANAC), a recognition that attests to its competence and professionalism in managing, directly and independently, the entire process of acquiring services, supplies and works. The qualification for contracting authorities was introduced pursuant to Articles 62 and 63 of the Italian Legislative Decree No. 36/2023 (the new Code of Public Contracts), with the aim of increasing quality and efficiency in the management of tenders. Sogin is therefore registered in the ANAC list of contracting authorities, which dictates, under the new Procurement Code, the requirements for qualification and the criteria for obtaining points. The company has obtained the highest level of qualification, allowing the contracting authority to issue tenders without any limits for services and supplies (level SF1) and for works (level L1). In particular, the company recorded the highest performance in the three criteria considered: capacity for technical-administrative design of procedures; capacity to entrust and control the entire procedure; capacity to verify contractual execution, including testing and commissioning. Along with Sogin, the subsidiary Nucleco has also successfully completed the procedure to qualify as a contracting authority and is included in the ANAC list.

Relationships with economic operators

While performing its activities, Sogin maintains constant relationships with the economic operators representing an excellence in the national and international industrial sector for their technological skills, know-how and specialisation; this approach aims to create a decommissioning supply chain capable of seizing the opportunities resulting from the closure of the nuclear fuel cycle.

Relationships with the economic operators who take part in tender and contracting procedures for work, service and supply contracts and the qualification system, as well as the procedures resulting from the conclusion of the relevant procurement contracts or subcontracting authorisation contracts, are developed in compliance with the provisions set out by the "Code of Public Contracts" under the Italian Legislative Decree n. 50/2016, as amended and supplemented, with the guidelines of the Italian Anti-Corruption Authority (ANAC) and with the recent Italian Legislative Decree no. 36/2023.

In order to ensure the maximum participation of economic operators in the reference market, Sogin respects the principles of loyalty, good faith, professional fairness, transparency, sustainability, protection and safety of workers, respect for the environment, free competition, equal treatment and non-discrimination.
Furthermore, Sogin relies on its Supplier Register for contracting highly technical works, services and supplies from highly-qualified economic operators.

Sustainable procurement
Based on the provisions of the National Plan for Green Public Procurement, Sogin specifies minimum requirements to be included in its tender rules to promote the use of technologies with a low environmental impact and adopt more sustainable consumption and production models. The United Nations' 2030 Agenda made provisions for this when it set the goal of "*Ensuring sustainable consumption and production patterns*" (SDG 12) and the target of "*Promoting public procurement practices that are sustainable, in accordance with national policies and priorities*" (12.7). Starting from 2017 the company adopted a specific guideline to include the Minimum Environmental Criteria (*Criteri Ambientali Minimi* - CAM) in its tenders; this indication is constantly implemented and updated according to the reference regulations. Following the work of the specific working groups set up within the Procurement & Contract Division to revise and standardise the internal and external documents of the contracting authority in order to comply with the regulations, including the field of sustainability, in 2023 the revisions of the General Terms and Conditions for works, services and supply contracts, the standard contract forms and the determinations and decisions to contract were issued.
Finally, Sogin has made it one of its commitments to adopt a Procurement Sustainability Policy, with the aim of integrating ESG factors into procurement processes and undertakes all the necessary activities to implement sustainability processes in relation to the qualification and evaluation of economic operators, and to revisit procurement strategies, in regard to the general context of Italian contracting authorities.

Legislation and strategy
With regard to procurement strategies, Sogin has continued the constant monitoring of any legislation impacting on public procurement.
In the specific, following the publication in the Official Gazette no. 77 of 31 March 2023, the Italian Legislative Decree no. 36 of 31 March 2023 (and the related Annexes), containing the Code of Public Contracts in the implementation of Article 1 of Italian Law no. 78 of 21 June 2022, which delegates authority to the Government in the field of public contracts, Sogin continued the work of finalising the tender documentation (such as decisions to contract, tender specifications, etc.) in the aim of adapting it to the new regulations that came into effect on 1 July 2023.

Innovative procurement
Sogin is equipped with an E-procurement system that allows for tendering and selection procedures to be managed through a computerised system.
Following their registration, economic operators can access the qualification system and apply for the tenders online through the dedicated platform. This system verifies the documents attached to the reports for the statements regarding the possession of participation requirements and the absence of excluding factors; the system also allows for bids to be opened and assessed, accessing the bidders' classification and awarding the tender. In 2023, 515 purchase orders were issued for a total of EUR 189.5 million (in 2022, the amount was EUR 235.4 million). Following the various regulatory updates, in 2023 a revision of the Guidelines for the inclusion of Minimum Environmental Criteria in procurement documents was issued in collaboration with the environmental technical organisation in charge.

MAIN CONTRACTS IN 2023	
TRISAIA 04.08.2023	Completed the contract for the construction of the final product cementing facility (ICPF) at Sogin's ITREC site in Trisaia, for an amount of EUR 43,019,298.
ENGINEERING 20.10.2023	Completed Lot 1 of the Framework Agreement for multidisciplinary engineering services for a total amount of EUR 5,907,200.
SITE ENGINEERING 06-23.11.2023	All 5 Lots of the Framework Agreement for multidisciplinary engineering services for the Sogin Sites of Latina, Garigliano, Casaccia, Saluggia and Trisaia were completed for an amount of EUR 4,297,673.
TRINO 29.12.2023	Completed the contract for the executive design and execution of the D2 Repository demolition and reconstruction activities at the Trino power plant, for an amount of EUR 2,408,449.

Checks on economic operators

In compliance with current regulations, Sogin verifies that economic operators possess the necessary requirements and do not fall under the exclusion clauses; this process is carried out during the qualification phase and tendering procedures for registered contractors and sub-contractors, for the entire duration of the procurement contract's execution.

In application of the Legality Protocol, signed in 2011 and renewed in 2016 (currently under review for updating with current legislation), with the Prefectures of the Provinces responsible for the sites affected by decommissioning works, Sogin performs anti-mafia checks on economic operators, in addition to those checks foreseen by legislation, in accordance with the aforementioned Protocol.

The economic operators must declare that they are aware of and that they accept the provisions laid down in Sogin's MOGC, pursuant to the Italian Legislative Decree no. 231/2001, which includes the Code of Ethics and the PTPCT, containing measures to prevent and tackle predicate offences for administrative responsibility, frauds, corruption and maladministration under the Italian Law no. 190/2012. Nucleco also requires its economic operators to release a similar statement.

In conclusion, contracts have specific clauses providing for the following:

- economic operators must issue a self-certification to prove that they comply with specific social obligations (i.e., measures to protect workers and their fundamental rights, the principle of equal treatment and non-discrimination, protection from child labour, etc.);
- Sogin is entitled to verify the requirements stated by the production units or the economic operators' offices.

Evaluation of supplier performance

The vendor rating process analyses, assesses and improves supplier performance, thus providing more transparency between the contracting authority and the contractor. Sogin assesses all the contracts signed, excluding those for less than EUR 10,000, professional assignments, subscriptions, leases, utilities, sponsorships and partnerships with entities and institutions, which mainly refer to public services.

The parameters considered are in compliance with the technical specification, flexibility/timeliness, competence of personnel, adequacy of tools and instrumentation, adherence to deadlines and an overall performance assessment.

As for the works, an assessment related to safety in the workplace and environmental management was also included.

In the event that the supplier's performance trend is unsatisfactory, this may impact the qualification outcomes - in the case of a qualified operator - or the likelihood of being assigned future contracts by Sogin. Negative assessments may result in exclusion from the tendering procedures and rejection of any qualification requests. This applies to both qualified and non-qualified suppliers.

Qualification system

Sogin has adopted a Qualification System (Supplier Register) to identify the economic operators to be included during the launch of tendering procedures. The qualification rules adopted by the Company comply with the sector regulations and the provisions stated in the guidelines of the Italian Anti-Corruption Authority (ANAC). The economic operator's registration has an unlimited duration. The current "*Regulation for the establishment and management of a Qualification System for the awarding of works, services and supply contracts of Sogin S.p.A.*", issued under Articles 36 and 134 of the Italian Legislative Decree no. 50/2016 (presently under review for updating with current legislation), provides the option of accessing tenders in the Register for:

- Works categorised up to class VIII, conventionally fixed at EUR 20,658,000;
- Engineering services not exceeding EUR 2 million;
- Services and supplies not exceeding EUR 10 million.

The Qualification System is managed through a digital platform integrated in the Sogin E-procurement system (as defined in the previous sections of this report). Both systems can be accessed through the Procurement Portal, available in the corporate website. The economic operators can log in to the portal at any moment and submit a qualification application for each commodity category. The operator's application is then processed and examined by the unit concerned; finally, the qualification Board resolves on the admissibility or non-admissibility of each commodity based on the requirements defined in the qualification rules and specifications. The following is an overview of the data relating to the Qualification System for the year in question:

NUMBER OF CATEGORIES	NUMBER OF ECONOMIC OPERATORS	TENDERS LISTED IN THE REGISTER	VALUE OF THE TENDERS LISTED IN THE REGISTER
~ 180	~ 800 (~ 1,600 categories assigned)	74	EUR 26 million in 2023

Orders issued and the geographical distribution of suppliers

The performance of decommissioning and radioactive waste management operations generates value for the territory by contributing to the industrial and economic development of national and local business fabrics. The following tables show the absolute and percentage value of the orders issued by Sogin, divided by type and geographical distribution of the clients.

GRI 2-6: VALUE OF THE ORDERS ISSUED BY TYPE									
	2023	2022	2021	2023	2022	2021	2023	2022	2021
Type	**Amounts (EUR million)**			**Percentage structure of the amounts**			**Number of orders**		
Supplies	24.0	22.8	16.1	12.7%	9.7%	9.1%	98	99	119
Works	71.8	37.2	83.4	37.9%	15.8%	47.2%	94	55	66
Services	93.7	175.4	77.2	49.4%	74.5%	43.7%	323	350	393
Total	***189.5***	***235.4***	***176.7***	***100%***	***100%***	***100%***	***515***	***504***	***578***

GRI 2-6 and GRI 204-1: VALUE OF THE ORDERS ISSUED BY SOGIN BY SITE						
SITE	**2023**		**2022**		**2021**	
	EUR million	%	**EUR million**	%	**EUR million**	%
Bosco Marengo	2.0	1.1	7.9	3.4	1.8	1.0
Caorso	7.8	4.1	17.5	7.4	45.3	25.6
Casaccia	9.5	5.0	6.5	2.8	8.4	4.7
Garigliano	19.5	10.3	15.6	6.6	22.4	12.7
Latina	14.0	7.4	21.6	9.2	10.3	5.8
Saluggia	7.5	4.0	5.3	2.3	3.8	2.1
Rome - Headquarters	68.8	36.3	138.7	58.9	48.2	27.3
Trino	9.0	4.7	11.7	5.0	13.3	7.5
Trisaia	48.0	25.3	7.9	3.4	7.2	4.1
Ispra - 1	3.4	1.8	2.6	1.1	1.3	0.7
Multisite	-	0.0	0.05	0.02	14.8	8.4
Total	***189.5***	***100***	***235.4***	***100***	***176.7***	***100***

Nucleco

In 2023, Nucleco, through the implementation of the PRO-Q e-procurement platform, made its Supplier Register fully operational. This tool allows economic operators to obtain qualification and only those who have suitable characteristics for participating in the various tendering processes to be selected.

The system is integrated with the Vendor rating module, which evaluates the quality of the service provided by the economic operator and defines, as a result, its placement in the Register as well as its evolution over time. The overall assessment is, therefore, composed of the combination of two assessments. The first derives from the evaluation performed by the Procurement function with special qualitative questionnaires and data on the economic operator's conduct during the tender process. The second, made by the Contract Execution Director, is an evaluation of the operator's performance in the execution phase of the contract.

The full operation achieved by the e-procurement platform in 2023 has made it possible to increase the number of contracted economic operators and to further diversify distribution across the country. Specifically, compared to 2022, there has been an increase in operators with registered offices in Basilicata, Campania, Tuscany and Veneto. The details are:

MAIN ECONOMIC OPERATOR INCREASES 2023/2022			
Reference Region	**Number of contracts in 2023**	**Number of contracts in 2022**	**Increase**
Basilicata	7	2	+5
Campania	11	6	+5
Tuscany	4	2	+2
Veneto	4	2	+2
Total	***26***	***12***	***+14***

The following table shows the territorial distribution of all the economic operators, broken down by region, with the relative percentage share of the contract amount over the total for orders payable and signed in 2023.

2023 TERRITORIAL DISTRIBUTION OF ECONOMIC OPERATORS			
Reference Region	**Number of contracts**	**Contract amount in EUR thousands**	**Incidence on total value**
Abruzzo	2	123	1%
Basilicata	7	310	3%
Campania	11	1,316	11%
Emilia-Romagna	10	827	7%
Lazio	**33**	**4,176**	**34%**
Lombardy	**30**	**2,160**	**18%**
Piedmont	**10**	**1,973**	**16%**
Puglia	5	146	1%
Sicily	3	484	4%
Tuscany	4	512	4%
Trentino-Alto Adige	1	7	0%
Veneto	4	134	1%
Total	***120***	***12,168***	***100%***

The data shows that Nucleco, in line with the previous year and in line with the regions where Sogin, the Parent Company, has power plants and facilities, signed the main contracts with economic operators based in the Lazio (34%), Lombardy (18%) and Piedmont (16%) Regions.

VALUE CREATION AND DISTRIBUTION

Added value, understood as the economic increase generated by the Group's activities and distributed among the main stakeholder categories, allows the sustainability report to be linked to the financial statements. The GBS (*Gruppo di studio per il Bilancio Sociale*) methodology was adopted to calculate added value. The following table reports figures on the creation and distribution of economic value generated by Sogin and Nucleco in the 2021-2023 three-year period. The table is drafted in compliance with the GRI Standard requirements and is based on a reclassification of the income statement reported in the Consolidated Financial Statements at 31 December 2023. It reports:

- the generated economic value which corresponds to the measurable economic wealth, produced by Sogin and Nucleco over the year (it includes the value of production, income from participating interests, income and financial charges, changes in ongoing commissioned works and increases in fixed assets for internal work);
- the distributed economic value which is a qualitative-quantitative indicator of the Company's social impact and distribution of value to the different stakeholder categories;
- the economic value retained within the Companies which corresponds to the wealth ensuring economic sustainability, and is reinvested in innovative instruments and services to foster continuous improvement.

SOGIN AND NUCLECO VALUE GENERATION AND DISTRIBUTION				
Figures in EUR million	**2023**	**2022**	**DELTA 2023-2022**	**2021**
Economic Value Generated	**220.34**	280.05	**-21%**	233.55
of which for fuel management and reprocessing activities	5.2	83.6	-94%	22.7
Economic Value Distributed (EVD)	**194.13**	259.32	**-25%**	212.42
Operating Costs	102.03	168.18	-39%	110.94
Employee wages and benefits	89.71	89.30	+0.45%	92.92
Payments to providers of capital	1.67	-0.01	N/A	0.63
Payments to government	0.73	0.78	-6%	2.77
Value distributed to shareholders	0.00	1.26	-100%	5.15
Community investments	0.00	0.00	N/A	0.00
Economic Value Retained	**26.47**	20.73	**+28%**	21.13

The economic value distributed in 2023 was EUR 194.13 million, a decrease compared to EUR 259.32 million in 2022.

- **Operating Costs (value distributed along the supply chain):** equal to approx. EUR 102.03 million, representing the share of value distributed to the Group's suppliers. This item includes the purchase costs of raw materials, ancillary and consumables, costs for the use of services, the execution of works and the use of third-party assets;
- **Employee wages and benefits:** equal to EUR 89.71 million, it is the share of generated economic value distributed to employees, via salaries and wages, social security contributions, severance schemes and services provided to employees (meal services, tickets). 2023 continued the positive efficiency trend, initiated in previous years.
- **Payments to providers of capital:** equal to approx. EUR 1.67 million, it corresponds to the interest due from the Sogin Group to its capital providers. Interest payable and other financial charges essentially refer to the interest payable to the CESI supplier, against payment of receivables due from the Campania Region;
- **Payments to government:** equal to approx. EUR 0.73 million; it corresponds to the share of economic value allocated to the Government, by means of tax and social security levy (direct, indirect taxation and paid taxes).
- **Value distributed to shareholders:** equal to EUR 0 million, representing the economic value share distributed by the company's sole Shareholder, as dividends.

The value that Sogin and Nucleco did not distribute to their Stakeholders, was retained by the Companies as amortisation and depreciation and provisions for reserves and risk funds. It is used to ensure the sustainable growth of the two Companies.

HUMAN RESOURCES KPIs

GRI 2-7: EMPLOYEES

Workforce by gender

		Sogin 2023			Nucleco 2023			Group 2023			Group 2022	Group 2021
		P	FT	Total	P	FT	Total	P	FT	Total	Total	Total
Women	no.	251	0	**251**	43	4	**47**	294	4	**298**	298	301
Men	no.	576	0	**576**	188	16	**204**	764	16	**780**	799	842
Total	**no.**	**827**	**0**	**827**	**231**	**20**	**251**	**1,058**	**20**	**1,078**	**1,097**	**1,143**
of which:												
Full-time	no.	815	0	**815**	230	20	**250**	1,045	20	**1,065**	1,082	1,128
Part-time	no.	12	0	**12**	1	0	**1**	13	0	**13**	15	15

Workforce by place of work

		Sogin 2023			Nucleco 2023			Group 2023			Group 2022	Group 2021
		P	FT	Total	P	FT	Total	P	FT	Total	Total	Total
Caorso	no.	88	0	88	10	1	11	98	1	99	102	105
Garigliano	no.	63	0	63	23	4	27	86	4	90	84	84
Latina	no.	77	0	77	10	3	13	87	3	90	91	97
Trino	no.	55	0	55	9	2	11	64	2	66	67	76
Bosco Marengo	no.	33	0	33	6	0	6	39	0	39	39	43
Casaccia	no.	59	0	59	0	0	0	59	0	59	52	60
Saluggia	no.	45	0	45	8	0	8	53	0	53	53	56
Trisaia	no.	58	0	58	15	1	16	73	1	74	75	77
Ispra	no.	4	0	4	10	5	15	14	5	19	17	17
Rome Offices	no.	341	0	341	140	4	144	481	4	485	511	521
International offices	no.	4	0	4	0	0	0	4	0	4	6	7
Total	**no.**	**827**	**0**	**827**	**231**	**20**	**251**	**1,058**	**20**	**1,078**	**1,097**	**1,143**

Workforce by gender						
		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Men	%	69.65%	81.27%	***72.36%***	72.84%	73.67%
Women	%	30.35%	18.73%	***27.64%***	27.16%	26.33%

GRI 2-8: WORKERS WHO ARE NOT EMPLOYEES

Self-employed workers, or not employed by the organisation, working under the Group's supervision

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Staff leasing workers	no.	0	16	**16**	**6**	**6**
Collaborators	no.	7	0	**7**	**8**	**n/a**

401-1: NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER DIVIDED BY AGE, GENDER AND GEOGRAPHICAL AREA

Newly hired

New hires by gender

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Men	no.	7	18	**25**	22	39
Women	no.	5	4	**9**	8	12
Total	**no.**	**12**	**22**	**34**	**30**	**51**

New hires by age

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
<30 y	no.	0	2	**2**	9	16
30-40 y	no.	3	12	**15**	13	20
41-50 y	no.	5	8	**13**	6	9
>50 y	no.	4	0	**4**	2	6
Total	**no.**	**12**	**22**	**34**	**30**	**51**

New hires by place of work

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Caorso	no.	0	2	2	0	6
Garigliano	no.	0	4	4	4	0
Latina	no.	0	3	3	0	0
Trino	no.	0	2	2	2	6
Bosco Marengo	no.	1	0	1	1	3
Casaccia	no.	7	0	7	0	0
Saluggia	no.	0	0	0	0	4
Ispra	no.	0	5	5	4	3
Trisaia	no.	0	1	1	0	0
Rome Offices	no.	4	5	9	19	29
International Offices	no.	0	0	0	0	0
Total	**no.**	**12**	**22**	**34**	**30**	**51**

Hire rate by gender

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Men	%	0.85%	7.17%	*2.32%*	2.01%	3.41%
Women	%	0.60%	1.59%	*0.83%*	0.73%	1.05%
Total	%	**1.45%**	**8.76%**	***3.15%***	**2.73%**	**4.46%**

Hire rate by age						
		Sogin 2023	**Nucleco 2023**	**Group 2023**	**Group 2022**	**Group 2021**
<30 y	%	0.00%	0.80%	*0.19%*	0.00%	0.00%
30-40 y	%	0.36%	4.78%	*1.39%*	1.19%	1.75%
41-50 y	%	0.60%	3.19%	*1.21%*	0.55%	0.79%
>50 y	%	0.48%	0.00%	*0.37%*	0.18%	0.52%
Total	%	**1.45%**	**8.76%**	***3.15%***	**2.73%**	**4.46%**

Hire rate by place of work						
		Sogin 2023	**Nucleco 2023**	**Group 2023**	**Group 2022**	**Group 2021**
Caorso	%	0.00%	0.80%	*0.19%*	0.36%	0.52%
Garigliano	%	0.00%	1.59%	*0.37%*	0.00%	0.00%
Latina	%	0.00%	1.20%	*0.28%*	0.00%	0.00%
Trino	%	0.00%	0.80%	*0.19%*	0.18%	0.52%
Bosco Marengo	%	0.12%	0.00%	*0.09%*	0.09%	0.26%
Casaccia	%	0.85%	0.00%	*0.65%*	0.00%	0.00%
Saluggia	%	0.00%	0.00%	*0.00%*	0.00%	0.35%
ISPRA	%	0.00%	1.99%	*0.46%*	0.36%	0.26%
Trisaia	%	0.00%	0.40%	*0.09%*	0.00%	0.00%
Rome Offices	%	0.48%	1.99%	*0.83%*	1.73%	2.54%
International Offices	%	0.00%	0.00%	*0.00%*	0.00%	0.00%
Total	%	**1.45%**	**8.76%**	***3.15%***	**2.73%**	**4.46%**

Terminations

Terminated staff by gender						
		Sogin 2023	**Nucleco 2023**	**Group 2023**	**Group 2022**	**Group 2021**
Men	no.	24	20	44	65	50
Women	no.	3	6	9	11	7
Total	**no.**	**27**	**26**	**53**	**76**	**57**

Terminated staff by age						
		Sogin 2023	**Nucleco 2023**	**Group 2023**	**Group 2022**	**Group 2021**
<30 y	no.	0	3	3	12	5
30-40 y	no.	4	11	15	24	15
41-50 y	no.	2	6	8	3	8
>50 y	no.	21	6	27	37	29
Total	**no.**	**27**	**26**	**53**	**76**	**57**

Terminated staff by place of work						
		Sogin 2023	**Nucleco 2023**	**Group 2023**	**Group 2022**	**Group 2021**
Caorso	no.	5	2	7	7	11
Garigliano	no.	0	1	1	1	1
Latina	no.	3	0	3	3	3
Trino	no.	1	2	3	11	8
Bosco Marengo	no.	0	1	1	5	4
Casaccia	no.	1	0	1	1	3
Saluggia	no.	0	0	0	3	5
Ispra	no.	0	0	0	3	3

Trisaia	no.	2	0	2	3	0
Rome Offices	no.	15	19	34	38	19
International Offices	no.	0	1	1	1	0
Total	**no.**	**27**	**26**	**53**	**76**	**57**

Termination rate by gender

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Men	%	2.90%	7.97%	*4.08%*	5.93%	4.37%
Women	%	0.36%	2.39%	*0.83%*	1.00%	0.61%
Total	%	**3.26%**	**10.36%**	***4.92%***	**6.93%**	**4.99%**

Termination rate by age

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
<30 y	%	0.00%	1.20%	*0.28%*	1.09%	0.44%
30-40 y	%	0.48%	4.38%	*1.39%*	2.19%	1.31%
41-50 y	%	0.24%	2.39%	*0.74%*	0.27%	0.70%
>50 y	%	2.54%	2.39%	*2.50%*	3.37%	2.54%
Total	%	**3.26%**	**10.36%**	***4.92%***	**6.93%**	**4.99%**

Termination rate by place of work

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Caorso	%	0.60%	0.80%	*0.65%*	0.64%	0.96%
Garigliano	%	0.00%	0.40%	*0.09%*	0.09%	0.09%
Latina	%	0.36%	0.00%	*0.28%*	0.27%	0.26%
Trino	%	0.12%	0.80%	*0.28%*	1.00%	0.70%
Bosco Marengo	%	0.00%	0.40%	*0.09%*	0.46%	0.35%
Casaccia	%	0.12%	0.00%	*0.09%*	0.09%	0.26%
Saluggia	%	0.00%	0.00%	*0.00%*	0.27%	0.44%
Ispra (added)	%	0.00%	0.00%	*0.00%*	0.27%	0.26%
Trisaia	%	0.24%	0.00%	*0.19%*	0.27%	0.00%
Rome Offices	%	1.81%	7.57%	*3.15%*	3.46%	1.66%
International Offices	%	0.00%	0.40%	*0.09%*	0.09%	0.00%
Total	%	**3.26%**	**10.36%**	***4.92%***	**6.93%**	**4.99%**

GRI 401-3: PARENTAL LEAVE

Employees who took parental leave

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Men	no.	21	6	27	12	30
Women	no.	35	6	41	41	59
Total	**no.**	**56**	**12**	**68**	**53**	**89**

Employees who returned to work after parental leave

		Sogin 2023	Nucleco 2023	Group 2023	Group 2022	Group 2021
Men	no.	21	6	27	21	11
Women	no.	35	6	41	54	39
Total	**no.**	**56**	**12**	**68**	**75**	**50**

GRI 404-1: AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE

Total annual training hours provided

		Group 2023	Group 2022	Group 2021
Internal Staff	**hours**	**28,080**	**34,176**	**28,636**
of which, Sogin	*hours*	*18,746*	*17,502*	*18,115*
of which, Nucleco	*hours*	*9,334*	*16,674*	*10,521*
To other personnel	**hours**	**1,179***	**354**	**426**
of which, staff leasing workers	*hours*	*845*	*68*	*106*
of which, collaborators	*hours*	*0*	*28*	*22*
Total	**hours**	**29,259**	**34,530**	**29,062**

*of which 196 hours were provided to external employees, of which 138 hours were provided to Enea Managers.

Total annual training hours by type

		Group 2023	Group 2022	Group 2021
New hires	hours	105	578	41
Managers	hours	519	948	3,135
Specialised technicians	hours	10,525	12,718	5,914
Nuclear and traditional safety	hours	15,564	16,788	19,972
On-the-job training	hours	2,546	3,498	0
Total	**hours**	**29,259**	**34,530**	**29,062**

Average annual training hours by gender (per capita)*

		Group 2023	Group 2022	Group 2021
Men	hours	46	10	25
Women	hours	11	26	22
Total	**hours**	**26**	**18**	**24**

**the average hours of training are calculated based on the average number of employees*

Average training hours by employee category (per capita)

		Group 2023	Group 2022	Group 2021
Managers	hours	15	11	22
Executives	hours	21	20	23
Employees	hours	27	32	25
Workers	hours	28	40	26
Total	**hours**	**26**	**26**	**24**

the average hours of training are calculated based on the average number of employees

Average numbers by gender

		Group 2023	Group 2022	Group 2021
Men	no.	457.92	301.15	302.68
Women	no.	629.58	820.85	848.32
Total	**no.**	**1,087.50**	**1,122.00**	**1,151.00**

Average numbers by professional category (rounded figures)

		Group 2023	Group 2022	Group 2021
Managers	no.	21.00	21.16	26.00

Executives	no.	235.35	239.41	228.18
Employees	no.	623.44	638.27	650.95
Workers	no.	208.31	223.08	246.47
Total	**no.**	**1,087.50**	**1,122.00**	**1,151.00**

GRI 405-1: EMPLOYEES BY PROFESSIONAL CATEGORY, GENDER AND AGE AS OF 31 DECEMBER*

TOTAL WORKFORCE BY EMPLOYEE CATEGORY

		Sogin 2023			Nucleco 2023			Group 2023			Group 2022	Group 2021
		Women	Men	Total	Women	Men	Total	Women	Men	Total	Total	Total
Managers	no.	2	19	21	1	0	1	3	19	22	21	25
Executives	no.	69	141	210	5	14	19	74	155	229	242	230
Employees	no.	174	317	491	40	93	133	214	410	624	625	655
Workers	no.	6	99	105	1	97	98	7	196	203	209	239
Total	no.	**251**	**576**	**827**	**47**	**204**	**251**	**298**	**780**	**1,078**	**1,097**	**1,149**
Managers	%	0.24%	2.30%	2.54%	0.40%	0.00%	0.40%	0.28%	1.76%	2.04%	1.91%	2.18%
Executives	%	8.34%	17.05%	25.39%	1.99%	5.58%	7.57%	6.86%	14.38%	21.24%	22.06%	20.02%
Employees	%	21.04%	38.33%	59.37%	15.94%	37.05%	52.99%	19.85%	38.03%	57.88%	56.97%	57.01%
Workers	%	0.73%	11.97%	12.70%	0.40%	38.65%	39.04%	0.65%	18.18%	18.83%	19.05%	20.80%
Total	%	**30%**	**70%**	**100%**	**19%**	**81%**	**100%**	**28%**	**72%**	**100%**	**100%**	**100%**

GRI 405-1: EMPLOYEES BY PROFESSIONAL CATEGORY, GENDER AND AGE AS OF 31 DECEMBER*

	Group 2023					Group 2022					Group 2021				
	<30 y	30-40 y	41-50 years	>50 y	Total	<30 y	30-40 y	41-50 years	>50 y	Total	<30 y	30-40 y	41-50 years	>50 y	Total
Managers	0	0	3	19	22	0	0	2	19	21	0	0	23	2	25
Executives	0	13	73	143	229	0	20	66	156	242	0	85	79	165	329
Employees	10	230	232	152	624	17	273	177	158	625	28	260	178	165	631
Workers	5	88	66	44	203	8	93	60	48	209	16	68	47	33	164
Total	**15**	**331**	**374**	**358**	**1,078**	**25**	**386**	**305**	**381**	**1,097**	**44**	**413**	**327**	**365**	**1,149**
Managers	0.00%	0.00%	0.28%	1.76%	2.04%	0.00%	0.00%	0.18%	1.73%	1.91%	0	0	2.00%	0.17%	2.18%
Executives	0.00%	1.21%	6.77%	13.27%	21.24%	0.00%	1.82%	6.02%	14.22%	22.06%	0	7.40%	6.88%	14.36%	28.63%
Employees	0.93%	21.34%	21.52%	14.10%	57.88%	1.55%	24.89%	16.13%	14.40%	56.97%	2.44%	22.63%	15.49%	14.36%	54.92%
Workers	0.46%	8.16%	6.12%	4.08%	18.83%	0.73%	8.48%	5.47%	4.38%	19.05%	1.39%	5.92%	4.09%	2.87%	14.27%
Total	**1%**	**31%**	**35%**	**33%**	**100%**	**2%**	**35%**	**28%**	**35%**	**100%**	**4%**	**36%**	**28%**	**32%**	**100%**

GRI 405-1: COMPOSITION OF THE BOARD OF COMMISSIONERS BY GENDER AND AGE

COMPOSITION BY GENDER

		2023	2022	2021
Men	no.	1	n/a	n/a
Women	no.	2	n/a	n/a
Total	no.	3	n/a	n/a

COMPOSITION BY AGE

		2023	2022	2021
<30 y	no.	0	n/a	n/a
30-40 y	no.	0	n/a	n/a
41-50 y	no.	0	n/a	n/a
>50 y	no.	3	n/a	n/a
Total	no.	3	n/a	n/a

BOARD OF DIRECTORS (BoD)				
Composition of Sogin's Board of Directors by gender				
		2023	**2022**	**2021**
Men	no.	3	3	3
Women	no.	2	2	2
Total	**no.**	**5**	**5**	**5**
Composition of Sogin's Board of Directors by age				
		2023	**2022**	**2021**
<30 y	no.	0	0	0
30-40 y	no.	1	0	0
41-50 y	no.	1	3	3
>50 y	no.	3	2	2
Total	**no.**	**5**	**5**	**5**

GRI 2-21: ANNUAL TOTAL COMPENSATION RATIO*

ANNUAL TOTAL COMPENSATION RATIO				
		GROUP 2023	**GROUP 2022**	**GROUP 2021**
Annual total compensation ratio	no.	4.3	3.79	n.a.
Change in annual total compensation ratio	no.	0	0	n.a.

*Indicator reported from 2022 onwards

GRI 405-2: RATIO OF BASIC SALARY AND REMUNERATION OF WOMEN/MEN BY PROFESSIONAL CATEGORY*

		SOGIN	**NUCLECO**		**GROUP**	
		2023	**2023**	**2023**	**2022**	**2021**
Managers	%	81.31	N/A**	78.30	71.6	69.82
Executives	%	95.89	100.86	96.48	96.21	96.5
Employees	%	96.78	100.67	98.12	98.32	98.42
Workers	%	101.43	104.66	108.05	105.54	99.98

*Indicates the percentage difference between women's and men's salaries for each category.
**Cannot be calculated since the executive area of Nucleco is composed exclusively of women.

CLOSING THE ITALIAN NUCLEAR FUEL CYCLE

4

NUCLEAR DECOMMISSIONING

Decommissioning is the last stage of a nuclear plant's life cycle, after its building and operation stage. Decommissioning includes the following operations:

- safe maintenance
- removal of spent nuclear fuel
- decontamination and dismantling of the structures used during operations
- radioactive waste management and storage in temporary repositories
- radiological characterisation and release of the site

After the completion of decommissioning operations, the conditioned waste, previously stored in the site's temporary repositories, will be ready for conferment to the National Repository. At this stage the area becomes a brownfield site. With the conferment of the waste to the National Repository, the site will become a greenfield, namely a site free from radiological limitations and ready for reuse.

WASTE MANAGEMENT

During the life cycle of a nuclear plant, two main types of waste are produced from operations through to the end of decommissioning:

- non-radioactive waste, resulting from standard industrial processes, which, in turn, is divided into several categories (i.e., hazardous, special waste, etc.);
- Radioactive waste, characterised by a radiological content, is divided into categories according to radionuclide concentration and radioactivity decay time.

In a nuclear plant, materials such as copper, iron and concrete have no radiological constraints; therefore, they are isolated from the radioactive materials and sent for recovery or reused at the site.
Overall, the dismantling of the nine nuclear sites will allow the recycling of more than one million tonnes of materials, equal to an estimated 89% of all dismantled materials.

Non-radioactive waste

Non-radioactive waste is classified in accordance with a EWC (European Waste Code), managed according to standardised procedures and properly transferred to the authorised entities, prioritising its recovery or final disposal in cases where reuse is not possible. In this regard, Sogin works at an early phase of the disposal to minimise the volume of non-reusable waste and maximise the production of waste sent for recovery. The Company ensures traceability of all waste, from dismantling and demolition to the final treatment or disposal.
For further details, see the Environmental Indicators table.

Radioactive waste

Radioactive waste management is a complex activity that is carried out during the entire life cycle of a nuclear plant, from its operation to dismantling.

RADIOACTIVE WASTE MANAGEMENT OPERATIONAL ACTIVITIES
Characterisation This entails the performance of a series of analyses and tests on the waste to identify its chemical, physical and radiological features. The results of the characterisation make it possible to choose the most appropriate treatment and conditioning for each type of radioactive waste.
Treatment At this stage, the radioactive waste undergoes specific operations to alter its physical shape and/or chemical composition. The objective is to reduce the waste volume or prepare it for conditioning.
Conditioning Conditioning is designed to produce, in a definitive way, radioactive waste products that are suitable for handling, transporting, temporarily storing and delivery to the disposal plant; it can include converting waste into a solid, stable form and inserting it into an appropriate container.
Storage This consists of arranging for the waste to be placed in temporary repositories for subsequent management phases, or temporarily, to store it safely before sending it to the identified disposal solution.
Disposal This is the final stage of radioactive waste management, in which the manufactured product is sent to a final repository to be disposed of.

There are several categories of radioactive waste, corresponding to different management options, depending on the concentration and type of radionuclide.
Radioactive waste in Italy is classified according to the Italian Interministerial Decree of 7 August 2015, which divides it into five categories (short-lived waste, very low-level waste, low-level waste, intermediate-level waste, high-level waste), which define its specific disposal procedure.

Sogin is committed to ongoing applied research in the field of radioactive waste management, based on the Research, Development & Demonstration (RD&D) approach, which is based on the following principles:

- the research must aim to develop practical solutions within a short time frame, to demonstrate the feasibility of appropriate treatment processes;
- the possibility of adapting techniques used industrially on non-radioactive waste should be taken into account for the nuclear field;
- the need for RD&D to bridge the gap is common to many countries, but the capabilities for conducting these activities need to be graduated according to the size of the problem;
- exchange of experience should be encouraged between countries with more advanced programmes and countries with limited quantities of more complex waste management and less advanced nuclear programmes.

IGOR: Innovation in waste management

In 2022, **the Radioactive Objects Management Information Application (AIGOR)** became operational. It ensures the integrity of monitored data and processes and the security of information, with the ultimate goal of preserving their memory for future generations.

Setting up the system has allowed the digitalization of a series of communication procedures with the relevant authorities which were previously handled on paper and is progressively standardising the strict management procedures for radioactive materials and waste, radiogenic sources and machinery at all the sites. AIGOR is a web-based system distributed on Sogin's infrastructure and consisting of a central node that interfaces with the peripheral nodes of the sites and with STRIMS, the institutional site of ISIN as provided for by the Italian Legislative Decree no. 101/2020.
The application was designed to support the management processes for radioactive waste, disused and in-use sources, spent fuel and machinery employing radiation and keeps track of all the changes. In the preliminary stage, it makes estimates and forecasts that are useful for the whole-life planning of management needs, predicting the results obtained in terms of, for example, final volumes and radioactivity. By the end of 2023, there were more than 40,000 radioactive objects registered in the system; this figure exceeds 50,000 registrations when the traceability of the processes performed on the managed objects is considered. The performance targets envisaged when the application became operational have been met, with information going from a few tens of thousands of registrations to several tens of millions, with a reduction in management times. Further developments to the system will ensure AIGOR's integration with waste management systems, allowing for greater automation of waste handling, guaranteeing further time savings and a further minimising of the margin of error. In addition, the integration with the corporate common data area required under UNI 11337, will also make it possible to obtain detailed information on the materials and waste generated by the dismantling of the plants, in order to make more accurate estimates of the characteristics of the final products. In its final configuration, the application will be able to integrate management systems with multiple technologies developed from different generation models, making it possible to obtain an industrial 4.0 system, aimed at optimising processes and impacts, also with a view to the circular economy, placing Italy at the forefront of this sector at the European level.

Radioactive waste inventory
Below is the radioactive waste inventory, organised into waste "*pending treatments*", i.e. waste that is currently "*unconditioned*" and generally must, therefore, still be subjected to treatment and/or conditioning processes to make it suitable for sending to the National Repository, and "*final products*", i.e. waste that is currently "*conditioned*" and, therefore, potentially already suitable for sending to the National Repository.

SOGIN RADIOACTIVE WASTE INVENTORY AS OF 31/12/2023												
UNIT OF MEASUREMENT: CUBIC M (ROUNDED TO CUBIC METRES FOR SINGLE CATEGORY AND TYPE OF WASTE IN EACH SITE)												
	Short-lived radioactive waste		**Very low-level waste**		**Low-level waste**		**Intermediate-level waste**		**High-level waste**		**Total**	
	2023	**2022**	**2023**	**2022**	**2023**	**2022**	**2023**	**2022**	**2023**	**2022**	**2023**	**2022**
Caorso	**0**	**0**	**721**	**897**	**197**	**79**	**0**	**0**	**0**	**0**	**918**	**976**
Final products	0	0	212	112	64	10	0	0	0	0	**276**	**122**
Pending treatments	0	0	509	785	133	69	0	0	0	0	**642**	**854**
Garigliano	**0**	**0**	**1,330**	**1,273**	**1,181**	**1,138**	**85**	**85**	**0**	**0**	**2,596**	**2,496**
Final products	0	0	55	55	927	923	85	85	0	0	**1,067**	**1,063**
Pending treatments	0	0	1,275	1,218	254	215	0	0	0	0	**1,529**	**1,433**
Latina	**0**	**0**	**1,508**	**1,371**	**319**	**297**	**475**	**475**	**0**	**0**	**2,302**	**2,143**
Final products	0	0	1	1	11	11	29	29	0	0	**41**	**41**
Pending treatments	0	0	1,507	1,370	308	286	446	446	0	0	**2,261**	**2,102**
Trino	**0**	**0**	**1,226**	**1,130**	**367**	**336**	**38**	**45**	**0**	**0**	**1,631**	**1,511**
Final products	0	0	0	0	0	0	0	0	0	0	**0**	**0**
Pending treatments	0	0	1,226	1,130	367	336	38	45	0	0	**1,631**	**1,511**
Bosco Marengo	**0**	**0**	**223**	**218**	**372**	**371**	**1**	**1**	**0**	**0**	**596**	**590**
Final products	0	0	213	213	350	350	1	1	0	0	**564**	**564**
Pending treatments	0	0	10	5	22	21	0	0	0	0	**32**	**26**
Casaccia	**0**	**0**	**54**	**0**	**161**	**2**	**535**	**534**	**0**	**0**	**750**	**536**
Final products	0	0	0	0	0	0	0	0	0	0	**0**	**0**
Pending treatments	0	0	54	0	161	2	535	534	0	0	**750**	**536**
Saluggia	**0**	**0**	**1,523**	**1,609**	**494**	**483**	**793**	**793**	**0**	**0**	**2,810**	**2,885**
Final products	0	0	386	344	102	95	1	1	0	0	**489**	**440**
Pending treatments	0	0	1,137	1,265	392	388	792	792	0	0	**2,321**	**2,445**
Rotondella	**0**	**0**	**3,234**	**3,228**	**320**	**318**	**311**	**311**	**0**	**0**	**3,865**	**3,857**
Final products	0	0	1,075	1,067	245	245	182	182	0	0	**1,502**	**1,494**
Pending treatments	0	0	2,159	2,161	75	73	129	129	0	0	**2,363**	**2,363**
Cemerad	**78**	**29**	**222**	**182**	**234**	**413**	**11**	**1**	**0**	**0**	**545**	**625**
Final products	0	0	0	0	0	0	0	0	0	0	**0**	**0**
Pending treatments	78	29	222	182	234	413	11	1	0	0	**545**	**625**
Ispra-1	**0**	**0**	**67**	**110**	**4**	**4**	**1**	**1**	**0**	**0**	**72**	**115**
Final products	0	0	0	0	0	0	0	0	0	0	**0**	**0**
Pending treatments	0	0	67	110	4	4	1	1	0	0	**72**	**115**
Total	***78***	***29***	***10,108***	***10,018***	***3,649***	***3,441***	***2.250***	***2,246***	***0***	***0***	***16,085***	***15,734***
Final products	0	0	1,942	1,792	1,699	1,634	298	298	0	0	**3,939**	**3,724**
Pending treatments	78	29	8,166	8,226	1,950	1,807	1,952	1,948	0	0	**12,146**	**12,010**

The changes compared to the previous year (2022) are due to reclassifications for new radiological characterisations and/or the re-evaluation of certain treatment and transfer hypotheses to the National Repository, essentially attributable to the radioactive waste production and management activities carried out in 2023, including operations performed on site on certain radioactive waste streams (e.g. sorting and overpacking operations) and the sending off-site for treatment and/or conditioning of certain radioactive waste streams (e.g. supercompaction of compressible solid waste) and the return of certain waste streams subjected to off-site treatment/conditioning (e.g. incineration residue). These changes were the subject of STRIMS communications, using, essentially, the interoperability tool with AIGOR. It should also be noted that for AIGOR and STRIMS, in relation to the headquarters registered under Article 60 of the Italian Legislative Decree no. 101/2020, in addition to the data on radioactive waste reported in the table, there is also data relating to disused sources and irradiated fuel stored on the sites and that, in the ambit of the radioactive waste, some sites (e.g. Ispra-1, Casaccia, Latina and Caorso) have also reported the presence of

radioactive waste classified as being potentially exempt. Finally, with regard to the volumes reported, it should be noted that:

- for radioactive waste in casks, the volume taken as a reference is the external volume of the cask, calculated according to the external dimensions;
- for radioactive waste in tanks (e.g. liquid waste) or in special storage areas/packaging (e.g. solid waste in pits), the volume occupied by the waste alone is taken into account.

The table below shows the inventory of Nucleco's radioactive waste at 31 December 2023; it includes waste directly managed by the subsidiary company, waste resulting from the decommissioning of the Sogin site in Casaccia, and waste resulting from industrial, research, and medical and health activities. The latter, after treatment and conditioning, is assigned to ENEA according to the Integrated Service by-law, as established by CIPE resolution of 1 March 1985, aimed at centralising the management of waste resulting from medical, industrial and research activities in Italy.

INVENTORY OF RADIOACTIVE WASTE STORED IN CASACCIA AND MANAGED BY NUCLECO AS OF 31/12/2023

UNIT OF MEASUREMENT: CUBIC M

	Very short average lifespan	Very low-level waste	Low-level waste	Intermediate-level waste	High-level waste	Total
Conditioned	0	2,130	2,029	322	0	**4,481**
Non-conditioned	395	1,066	1,905	239	0	**3,605**
Transited	0	114	0	0	0	**114**
Total	***395***	***3,310***	***3,934***	***561***	***0***	***8,200***

The waste produced by Sogin and managed by Nucleco is returned to its sites of origin after treatment and conditioning. The waste produced at the Casaccia site differs in that it is stored at Nucleco storage facilities and reported in the subsidiary company's inventory.

Fuel and nuclear materials management

Italy's nuclear fuel is not only linked to the previous season of electricity production from nuclear sources at the 4 power plants of Caorso, Garigliano, Latina and Trino and to the research activity carried out at the Casaccia, Rotondella and Saluggia plants, but is also connected to the activity of the research reactors located at ENEA's Casaccia Research Centre.

Irradiated fuel from nuclear power plants

Around 1,864 tonnes of irradiated nuclear fuel (nuclear fuel used in nuclear power plants to produce electricity) derived from Italian nuclear power plants, 99% of which was sent abroad for reprocessing.
Of the total, some 913 tonnes have already been reprocessed and the resulting nuclear material disposed of. The remaining approximately 951 tonnes are included in the reprocessing contracts signed between Sogin and the French Company, ORANO, and between Sogin and the British Nuclear Decommissioning Authority (NDA). 938 tonnes from the previous total have already been shipped to reprocessing facilities, whereas the remaining 13 tonnes are still in Italy.

IRRADIATED NUCLEAR FUEL SENT ABROAD (REPROCESSING CONTRACTS IN PLACE AS OF 31.12.2023)

DESTINATION	MASS*	NUMBER OF ELEMENTS/TYPE	ORIGIN	NUMBER OF EXECUTED SHIPMENTS
UNITED KINGDOM (Sellafield - Dounreay) 1969-2005**	716.3 t***	50,893 + 19 rods/ BWR, PWR, MAGNOX	Garigliano, Trino, Latina	102
FRANCE (La Hague) 2007-2015	190.4 t	1,032 + 6 rods/ BWR	Caorso	16
	16.8 t	52 PWR cruciform fuel elements Trino 48 PWR squared fuel elements Trino 48 BWR semi-rods Garigliano	Avogadro Repository	5
	14.5 t	47 PWR fuel elements, of which: 39 UO2 elements 8 MOX elements	Trino	2
Total	**938 t**			

*Mass (in tonnes) of heavy metal before radiation.
**In 2014, the NDA finished processing the last batch of Sogin fuel at Sellafield - UK.
***The quantity indicated includes the waste fuel from the 19 Garigliano rods sent by ENEA to Dounreay (Scotland). The contract was closed in July 2017 as part of the negotiation with the NDA for the replacement and minimisation and residual return agreements.

IRRADIATED NUCLEAR FUEL MANAGED BY SOGIN STILL LOCATED IN ITALY - DATA AS OF 31.12.2023			
DESTINATION	**MASS***	**NUMBER OF ELEMENTS/TYPE**	**NO. SHIPMENTS PENDING**
FRANCE (La Hague)	13.2 t*	64 fuel elements, of which: 63 MOX BWR Garigliano 1 PWR squared fuel element Trino	3
NATIONAL REPOSITORY	0.115 t**	Bars, chunks and samples	TBD
NATIONAL REPOSITORY	1,679 t**	64 Elk River elements (enriched uranium and thorium)	TBD

*Mass (in tonnes) of heavy metal before radiation.
*** Mass of heavy metal after radiation (value according to the Euratom report)

The residual from reprocessing will return to Italy and will be stored temporarily in a suitable facility before being transferred to the long-term storage area for high-level waste (High-Level Storage Complex) of the future National Repository.

- **Residuals from France:** based on the agreements signed with ORANO, it is estimated that after the reprocessing of all the fuel foreseen under the contract, including the fuel pending shipment, 15.4 m3 of highly radioactive vitrified waste and 47.6 m3 of compacted metal residuals, net of transport and storage casksare expected to return to Italy.
- **Residuals from the UK:** based on the agreement signed by Sogin and the NDA on 17 July 2017 to replace the residuals resulting from the reprocessing of Italian fuel in the UK (as defined in the Directive of the Ministry of Economic Development of 10 August 2009), Italy will only receive the highly radioactive vitrified waste residuals with a volume ranging between 19 and 20.5 m3, net of shipment and storage casks.

Irradiated fuel from fuel cycle facilities

The management of fuel cycle facilities, appointed to Sogin in 2003, involved the management of the fuel located at the sites of the Casaccia and Rotondella plants. The current programmes provide for the conferment of the fuel to the National Repository for dry storage, after being treated and stored in shielded metal casks. Almost all this material consists of 64 Elk River fuel elements of US origin for a total weight of approx. 1.7 tonnes, as shown in the table above.

Sogin nuclear materials from reprocessing abroad

The table below reports the quantities of uranium and plutonium recovered by Sogin from foreign third-party reprocessing facilities.

NUCLEAR MATERIALS - DATA AS OF 31.12.2023				
	Allocated quantities		**Total quantity expected at the end of the allocation process to the UK and assuming completion of the transport and reprocessing in France**	
	Uranium	Fissile Plutonium	Uranium	Fissile Plutonium
	[t]	[kg]	[t]	[kg]
UK (Sellafield)	713	1,074*	713	1,074*
FRANCE (La Hague)	190.6	0**	228	163***

* Total quantities allocated to Sogin by NDA as on the date of allocation.
**The Plutonium resulting from reprocessing of nuclear fuel delivered to France at 31/12/2023 was transferred for a fee based on the agreements signed by Sogin and ORANO.
*** Quantity calculated as on 31/12/2023, with estimated decay based on Enel figures collected upon the reactor unloading. The quantity reported in the table corresponds to the estimated quantity of fissile Plutonium which was not transferred to ORANO. Figures rounded to the nearest integer.

According to the Directive of the Ministry for Productive Activities no. 5023/2006, the fissile materials resulting from reprocessing in France and the UK should be transferred on a fee payment basis.
Sogin no longer holds fissile plutonium in France, following the transfer of ownership of the fuel resulting from the reprocessing to ORANO.
This refers to irradiated fuel delivered to date under the transportation and reprocessing contract, and plutonium from the virtual reprocessing of the Sogin-owned fraction of irradiated fuel at the Creys Malville power plant in France.
Among the materials allocated to Sogin after fuel reprocessing in the UK, there are the materials allocated according to the agreements signed with the NDA in 2017 (agreement of "Replacement and Minimisation" and virtual fuel reprocessing in Dounreay) and in 2019 (non-standard virtual fuel reprocessing of Trino and Garigliano).

In February 2019 the NDA notified Sogin of the availability of the Uranium and Plutonium recovered from the reprocessing of irradiated nuclear fuel from Trino under the 1974 contract.
In December 2022 an agreement was signed for the sale on a payment basis to the NDA of all materials made available by Sogin under the reprocessing contracts. The effective execution of this agreement will take place once the EURATOM Supply Agency (ESA) has signed.

NUCLEAR SITES UNDER DECOMMISSIONING

Trino Power Plant (VC)
The "Enrico Fermi" Nuclear Power Plant in Trino is the plant that recorded the best performance benchmark in Italy. It was also the first experience in the history of the Italian nuclear industry.

ISPRA-1 Reactor (Varese)
The ISPRA-1 reactor, the latest version of the Chicago-Pile 5 designed and developed by Enrico Fermi, was the first Italian research reactor.

Saluggia EUREX Plant (Vercelli)
The EUREX plant was employed to conduct studies on the reprocessing of irradiated nuclear fuel, and separate the fissile materials suitable for reuse.

Latina Nuclear Power Plant
Back in 1964, when the Latina nuclear power plant started operating, it was the most powerful plant in Europe. With an English reactor with graphite-gas technology. GCR-Magnox, the power plant is the first generation of nuclear plants.

Bosco Marengo FN Plant (AL)
Bosco Marengo (Fabbricazioni Nucleari) Nuclear Fabrications plant produced fuel elements to supply Italian and foreign nuclear plants.

Caorso Power Plant (PC)
Caorso was the largest nuclear power plant operating in Italy. Although its short period of operation (from 1981 to 1986), this nuclear power plant produced approx. 29 billion kWh.

OPEC and IPU plants in Casaccia (RM)
OPEC-1, located in the Casaccia Research Centre, was the first plant in Italy that performed research and analysis on nuclear fuel elements after radiation.

Garigliano Power Plant (CE)
The "Garigliano" power plant in Sessa Aurunca hosted the first BWR reactor (Boiling Water Reactor) operated in Europe. Like the Trino and Latina plants, this power plant belongs to the first generation of nuclear plants.

Rotondella ITREC Plant (MT)
The ITREC plant conducted research on the reprocessing and re-manufacturing processes applied to the Uranium-Thorium cycle to verify their technical-economic feasibility compared to the Uranium-Plutonium cycle.

TRINO NUCLEAR POWER PLANT (VERCELLI)

The "Enrico Fermi" nuclear power plant in Trino was built by a consortium of companies led by Edison and was the first Italian industrial initiative in the nuclear sector. It is also the plant that recorded the best performance benchmark in Italy during its time of operation.

Operation	1965-1987
Capacity	270 Mwe
Type of Plant	PWR – Pressurised Water Reactor
Production	29 billion KWh

MAIN ACTIVITIES IN 2023

- In the context of the bigger project to dismantle the reactor building, work continued on dismantling the systems and components of the primary circuit. Specifically, the 4 loops and most of the auxiliary systems inside the container were removed, including the reactor's emergency loading and cooling system. The materials resulting from these activities (about 330 tonnes) were characterised on site and will be sent to Studsvik (Sweden) to undergo fusion treatment to reduce the volume of radioactive waste.
- With regard to the auxiliary building dismantling project, the transfer operations for the activated components from the purifier pond to the fuel pond, where they were placed in special containers called racks, were completed. This allowed the water to be drained, the bottom and walls of the pond to be cleaned and radiometric checks to be carried out. The heterogeneous cementing station will be built in the area where part of the metallic materials, that will be produced by the plant's upcoming decommissioning activities, will be treated reusing existing premises.
- With regard to the adjustment of the D2 temporary repository, the supplier's implementation project was completed. Operations are expected to start in the second half of 2024 following the authorisation for the characterisation plan integrated with the latest requests from the Italian National Inspectorate for Nuclear Safety and Radiation Protection (ISIN).
- As regards the project to partially lower the Turbine Building, the contract was

finalised and the implementation project began in December.

- As part of the project to build the Sicomor (Modular Homogeneous Waste Cementation System), the contract for the preparatory works was assigned, among which the work for the foundation slab that will house the plant's modules and the implementation project was initiated.

AUTHORISATIONS

- 1

PEOPLE

- Personnel numbers according to organisational allocation: 53 people in total, of which 13 are women. 1 manager, 9 executives, of which 2 are women, 30 employees, of which 8 are women, and 10 workers
- Diversity: 3 female managers in the roles of Plant Manager, Physical Health Manager and Radiation Protection Expert

ENVIRONMENT

- Radioactive waste at 31.12.2023: 1,631 cubic metres
- Non-radioactive waste produced in 2023: 313.91 tonnes, of which 194.62 tonnes sent for recovery
- Validation of the 3rd issue of the 3rd edition of the EMAS Environmental Statement

STAKEHOLDER

- In 2023 the Trino power plant opened its doors to over 250 people, including school and university students and representatives from local bodies and institutions
- On January 19 the Environment Commission of the Regional Council of Piedmont and the Regional Councillor for the Environment visited the Trino power plant and the Saluggia plant

In accordance with the EIA Decree, which prescribes the implementation of compensatory and environmental rebalancing measures to be agreed on with the competent territorial authorities, in June work was completed on the section of the VenTo cycleway of Sogin pertinence.

CAORSO NUCLEAR POWER PLANT (PIACENZA)

The Caorso nuclear power plant was the largest operating plant in Italy. It is the most recently built plant and also the one with the largest volume and overall quantity of materials to be dismantled.

Operation	1981-1986
Capacity	860 Mwe
Type of Plant	BWR – Boiling Water Reactor
Production	29 billion KWh

MAIN ACTIVITIES IN 2023

- As part of the project to adapt the site's three, temporary storage repositories to the new safety standards, in October, after the positive outcome of the tests, ERSBA 2 (*Edificio Rifiuti Solidi a Bassa Attività* - Low-level Solid Waste Building) was authorised to operate and loading operations began in December. This is an important achievement for the advancement of the decommissioning programme and the safe management of radioactive waste at the Piacenza plant. As for the adaptation of ERSBA 1, waste transfer operations within ERSBA 2 began in December and work is expected to start on its demolition in 2024. With regard to the third repository, called ERSMA (*Edificio Rifiuti Solidi a Media Attività* - Intermediate-level Solid Waste Building), the sites were handed over to the contractor and the first demolition activities began.
- As regards the radioactive resins and sludge treatment project, the incineration and conditioning activities at the Slovakian plant in Bohunice were completed in the first half of 2023: a total of 800 tonnes of spent ion exchange resins and 60 tonnes of radioactive sludge were treated, reducing their volume by more than 90%. With the last transportation, carried out in December 2023, all the 100 items produced by the conditioning activities returned to Caorso and were stored, as low-level waste, in the ERSBA2 repository, suitable for transfer to the future National Repository.
- In November, the work to adapt the fire-fighting system was completed, which included the demolition of the concrete septum, the construction of the new foundation slab and the installation of a tank as a new water resource.

AUTHORISATIONS

- 4

PEOPLE

- Personnel numbers according to organisational allocation: 82 people in total, of which 13 are women. 12 are executives, of which 2 are women, 43 employees, of which 9 are women, and 27 workers, of which 2 are women.
- Diversity: 5 female managers in the roles of Decommissioning Manager, QAS Manager, OH&S Manager, Facility Control Manager, Waste Treatment Facilities Manager.

ENVIRONMENT

- Radioactive waste at 31.12.2023: 918 cubic metres
- Non-radioactive waste produced in 2023: 1,393 tonnes, of which 1,335 tonnes sent for recovery
- Validation of the 3rd issue of the 3rd edition of the EMAS Environmental Statement

STAKEHOLDER

- In 2023 the Caorso power plant opened its doors to around 300 people, including school and university students, members of associations and institutions, and journalists
- On 31 March the Transparency Round Table of the Emilia-Romagna Region met to discuss the progress of the plant's dismantling activities and 20 people visited the power plant
- On 3 May, the Caorso power plant hosted a theatrical performance on occupational health and safety entitled, "White Silence. For safe work", organised on World Day for Safety and Health at Work
- On 12 July, 45 people, as part of the JRC Summer School on Nuclear Decommissioning and Waste Management, 13th edition, visited the power plant

LATINA NUCLEAR POWER PLANT

The Latina power plant was the first to be built in Italy and belongs to the first generation of nuclear facilities. When it was commissioned in 1964, it was the largest nuclear power plant in Europe.

Operation	1964-1986
Capacity	210 Mwe
Type of Plant	Graphite-gas Magnox reactor (Gas Cooler Reactor)
Production	26 billion KWh

MAIN ACTIVITIES IN 2023

- As part of the project to dismantle the screens and steam generators (boilers) in the reactor building, the executive design for dismantling the six boilers was completed. The activities were started in March 2024.
- Tests were carried out successfully at the Materials Treatment Facility, where weakly contaminated metal materials will be treated, including those produced by the demolition of the power plant's boilers and other future decommissioning activities. The Plant is expected to be operational in the first half of 2025.
- With regard to the new Active Liquid Effluent Treatment Plant (ITEA) resulting from the decontamination of components produced by decommissioning activities and the washing of operators' personal protective equipment, activities continue to install the plants and the internal components of the process lines.
- As for the mobile supercompaction plant, the construction of which was completed in 2022, the preliminary investigation for the operation of the plant was completed in December 2023. The campaign for the supercompaction and cementation of about 700 drums of radioactive waste from the plant's previous operation is expected to finish at the end of 2024.
- As part of the project to adapt the reactor building's premises to become a repository, the dismantling work of the systems and components in all the premises affected by the project was completed and the related remediation, characterisation and decontamination operations were carried out. The

project will increase the site's radioactive waste storage capacity, without having to build new plants.

- Up until 2022 approximately 8,000 cubic metres of land was processed for the purpose of recovery during the works for the construction of three buildings on the site. The land, now certified as Second Raw Materials, will be reused in environmental reclamation activities.

AUTHORISATIONS

- 5

PEOPLE

- Personnel numbers according to organisational allocation: 55 people in total, of which 7 are women. 7 are executives, 38 employees, of which 7 are women and 10 workers
- Diversity: 3 female managers in the roles of QAS Manager, Health Physics Manager, Radiochemistry Laboratory Manager

ENVIRONMENT

- Radioactive waste at 31.12.2023: 2,302 cubic metres
- Non-radioactive waste produced in 2023: approx. 4,390 tonnes, of which 2,432 tonnes sent for recovery

STAKEHOLDER

- In 2023 the Latina power plant opened its doors to around 130 people, including school and university students and members of Associations and Committees engaged in the scientific dissemination of issues related to nuclear energy technologies

On 19 January 2023, Sogin signed an operating document with the Municipality of Latina for demolition and reconstruction works on the Mascarello bridge (in Foce Verde). This follows the agreement signed between the Lazio Region, the Municipality of Latina and Sogin, which took place on 9 February 2021 and is part of the compensatory and environmental and territorial rebalancing measures required as part of the decommissioning of the Latina nuclear power plant (Article 24, paragraph 4 of Italian Decree-Law no. 1/2012 converted into Italian Law no. 27 of 2012). The initiative confirms Sogin's focus on the territory and the commitment to synergy between the Municipality and the company. The construction of the new bridge will significantly improve road access and the socio-economic life of the Pontine coastline and will facilitate logistical activities related to the decommissioning of the nearby nuclear power plant.

GARIGLIANO NUCLEAR POWER PLANT (CASERTA)

The Garigliano power plant was the first BWR (Boiling Water Reactor) type reactor to be commissioned in Europe and belongs to the first generation of nuclear plants.

Operation	1964-1978
Capacity	160 Mwe
Type of Plant	Reattore (BWR – Boiling **Water** Reactor)
Production	12,5 billion KWh

MAIN ACTIVITIES IN 2023

- Activities were completed to restore the pond system as part of the dismantling project for components in the reactor building, the most complex due to the level of radioactivity and the logistical constraints of the operations, and the pre-operation phase necessary for the start of definitive operation was initiated. This enabled the flooding and subsequent opening of the vessel. The dismantling of the internals and the vessel itself, in fact, has to take place under a water hammer, because water shields radiation. In addition, the operational project for the dismantling of the components at the lower levels of the reactor building was completed.
- With regard to the project to dismantle the thermal cycle of the turbine building, the repristination activities for the auxiliary systems (automation and control system, electrical system and fire-fighting system) were completed, allowing the dismantling activities of the turbine's thermal cycle components to be initiated.
- With regard to the retrofit project for the Ex-Compactor building, the operational project was completed in the year. Once rebuilt, the building will be used as a temporary repository for radioactive waste, avoiding the need to build additional storage facilities.
- As part of the dismantling work of the old Radwaste, the system where radioactive liquid waste was treated before the new Radwaste was operational, the remediation of the sludge contained in the three tanks, T12, T13 and T26, was completed and the contract relating to the dismantling of the same was awarded.

- With regard to the construction of the new D2 temporary repository, work continued on the foundations and started on the installation of drainage pipes in preparation for casting the slab.
- As part of the project for transportation and treatment of metallic materials at the Swedish Cyclife plant, the characterisation activities of the 380 tonnes of materials previously shipped were completed in 2023. The waste treated is expected to be returned in 2024.
- With regard to the modifications made to the water supply system, authorisation was obtained to start the operation of the new supply system, which enabled the controlled demolition of the piezometric tower.

AUTHORISATIONS

- 6

PEOPLE

- Personnel numbers according to organisational allocation: 56 people in total, of which 9 are women. 6 are executives, of which 1 is a woman, 36 employees, of which 8 are women, and 14 workers
- Diversity: 1 female manager in the role of QAS Manager

ENVIRONMENT

- Radioactive waste at 31.12.2023: 2,596
- Non-radioactive waste produced in 2023: 7,754 tonnes, of which 7,707 tonnes sent for recovery

STAKEHOLDER

- In 2023, the plant opened its doors to approximately 80 students from schools and universities in the region
- On 4 April 2023, the Transparency Round Table of the Campania Region was held

SALUGGIA EUREX PLANT (VC)

The Saluggia site, together with the Trisaia site, are the most complex in engineering terms for dismantling activities. Studies were conducted at the EUREX plant on the reprocessing of irradiated nuclear fuel, and separation of the fissile materials suitable for reuse.

Construction	1965-1969
Operation	1970-1984
Type of Plant	Nuclear fuel cycle research plants

MAIN ACTIVITIES IN 2023

- As part of the decontamination and dismantling project of the Manual Unit for Plutonium Conversion (UMCP) facility, the second of the five glove boxes was dismantled in December. During the year, the design of the third "alpha sealed" containment curtain also began, preparatory to the continuation of activities.
- With regard to radioactive waste management, about 1,400 of the 3,000 drums stored in building 2300, containing technological radioactive waste such as protective clothing, gloves and masks, were characterised during the year. The activity has the goal of reducing the volume of this waste to less than half. The treatment of the remaining drums is expected to be completed in 2024.
- With regard to liquid organic radioactive waste, the Operating Plan for the construction of the plant to extract liquids from the storage tank and immobilise HDPE (high-density polyethylene) drums using specific resins was submitted to the regulatory body for approval in 2023.
- With regard to the CEMEX (EUREX Cementation Plant) Complex, which will solidify radioactive liquid waste by cementation, Sogin started a new selection procedure in April 2023 after terminating the contract in December 2022 due to numerous defaults on the part of the contractor.

AUTHORISATIONS

- 4

PEOPLE

- Personnel numbers according to organisational allocation: 40 people in total, of which 13 are women. 5 are executives, of which 1 is a woman, 27 employees, of which 11 are women, and 8 workers, of which 1 is a woman.
- Diversity: three female managers in the functions of Plant Management, Chemistry and Radiochemistry Laboratory, Quality, the Environment and Safety Systems

ENVIRONMENT

- Radioactive waste at 31.12.2022: 2,810 cubic metres
- Non-radioactive waste produced in 2023: 5,353 tonnes, of which 5,200 tonnes sent for recovery
- Validation of the issue of the 3rd edition of the EMAS Environmental Statement

STAKEHOLDER

- On 19 January, 13 members of the Environment Commission of the Regional Council of Piedmont and the Regional Councillor for the Environment visited the Saluggia and Trino sites
- On 27 April, 10 administrators and members of the Environment Committee of the Municipality of Saluggia visited the site
- On 11 and 12 October, two journalists visited the Saluggia and Caorso sites

BOSCO MARENGO FN PLANT (AL)

The Bosco Marengo (Fabbricazioni Nucleari) plant produced fuel elements to supply Italian and foreign nuclear power plants.

Construction	1965-1969
Operation	1973-1995
Type of Plant	Fuel element manufacturing plant

The Bosco Marengo site is the first Italian nuclear plant where Sogin has completed the decommissioning activities. By December 2021 almost all the dismantling activities envisaged in Phase 1 of the Global Decommissioning Plan had been completed.

MAIN ACTIVITIES IN 2023

- In the first part of the year, the 13 piezometers envisaged by the Operational Safety pilot project (MISOP) were built. Specifically, a passive, in situ treatment system was created consisting of a reactive permeable barrier based on colloidal activated carbon co-injected with colloidal zero-valent iron, capable of eliminating the contaminant, such as chlorinated solvent plume, by chemical reduction. This innovative technology will prove itself to be of the greatest efficiency in terms of cost and the management of reclamation operations, with a progressive reduction to zero - from construction to the operating phase - of waste production and the consumption of energy resources. The results from the monitoring carried out so far on the pilot system confirm that concentrations are being lowered in the piezometers downstream of the reactive permeable barrier.
- In the second half of the year, documentation was prepared for the Application for Phase II Decommissioning of the site (an update of the Global Decommissioning Plan and a draft of the actual Application) taking into account the boundary constraints (recovery art, removal of anthropogenic materials from the Buffer Zone, etc...). During this phase, the residual activities for hotspot removal will be carried out in the BLD2 building that could not be carried out in Phase I and the

removal of anthropogenic materials from the Buffer Zone will be completed.

- As part of the removal of anthropogenic materials from the Buffer Zone, the packing, handling and radiometric measurement of the big-bags containing the excavated soil continued as required by the Control Body. Overall, about 1,800 big-bags were produced and verified, some of which presented radiometric anomalies, requiring further investigation. For this reason, the Italian National Inspectorate for Nuclear Safety and Radiation Protection (ISIN) requested the update of the Radiological Characterisation Plan for the Buffer Zone, the revision of which was submitted for approval at the end of November.

AUTHORISATIONS

- 5

PEOPLE

- Personnel numbers according to organisational allocation: 24 people in total, of which 6 are women. 1 manager, 4 executives of which 1 is a woman, 9 employees, of which 5 are women, and 10 workers.
- Diversity: 4 women in the roles of QAS Manager, Radiation Protection Expert and OH&S Manager, Asset Manager, Project Procurement

ENVIRONMENT

- Radioactive waste at 31.12.2023: 596 cubic metres
- Non-radioactive waste produced in 2023: 233 tonnes, of which 138 tonnes sent for recovery

CASACCIA PLANTS(ROME)

OPEC-1, located in the Casaccia Research Centre, was the first plant in Italy to perform research and analysis on nuclear fuel elements after radiation.

Construction	
Operation	Plutonium plant, 1968-1987 OPEC-1 plant, 1962-1987 OPEC-2 plant, -
Type of Plant	Nuclear fuel cycle research plants

MAIN ACTIVITIES IN 2023

- Inside the Plutonium Plant, as part of safety maintenance, the activities to adapt the electrical and auxiliary systems continued and the new storage system was installed inside the nuclear warehouse. The preparatory activities for dismantling the glove boxes currently stored at the Nucleco repository continued and the project for the dismantling operations for the glove boxes still inside the Plutonium Plant was completed.
- As for the construction of the Alfa Compaction Station which will treat intermediate-level radioactive waste and the New Repository, verification for the validation of the final project was completed, the Preliminary Environmental Study was prepared and submitted to the MASE and, in December, the decree for the exclusion of an EIA for the project was issued.
- In OPEC-1 the activities continued to prepare the loading cells and areas for the characterisation and management methods for the waste in the containers for the Remote manipulation of radioactive substances, namely the solid waste resulting from the activities carried out in hot cells during the operation period.
- With regard to OPEC-1 safety maintenance, asbestos remediation was carried out on the coating of the ventilation systems in the roof crawl space.
- Treatment and conditioning activities continued at Nucleco's solid radioactive waste facilities: specifically, 411 drums with a total volume of 90.4 cubic metres were treated.
- As far as the dismantling and decontamination activities of Waste A and B are concerned, a new Operating Plan was sent to ISIN, which is

awaiting authorisation.Per quanto riguarda le attività di smantellamento e decontaminazione di Waste A e B, è stato trasmesso un nuovo Piano Operativo a ISIN che è in attesa di autorizzazione.

AUTHORISATIONS

- 2

PEOPLE

- Personnel numbers according to organisational allocation: 47 people in total, of which 10 are women. 7 executives, of which 2 are women, 29 employees, of which 8 are women, and 11 workers
- Diversity: 5 female managers in the roles of Plant Manager, QAS Manager, OH&S Manager, Chemistry and Health Physics Manager, Safety Coordinator in the Execution phase

ENVIRONMENT

- Radioactive waste at 31.12.2023: 750 cubic metres
- Non-radioactive waste produced in 2023: 17 tonnes, of which 15 tonnes sent for recovery

ITREC PLANT AT TRISAIA (MATERA)

The Trisaia site, together with the Saluggia site, are the most complex in engineering terms for dismantling activities. ITREC is one of the few examples in the world of Thorium Uranium fuel reprocessing.

Construction	1960-1970
Operation	1975-1987
Type of Plant	Nuclear fuel cycle research plants

MAIN ACTIVITIES IN 2023

- As part of the SI.RI.S. project (Solid Waste Storage) project for the treatment of solid waste from plant operations and from previous decommissioning activities, work continued on the characterisation, supercompaction and encapsulation in cement mortar of very low-level waste.
- With regard to the 64 irradiated fuel elements (Elk River) stored in the plant's pond, work continued on the manufacturing of the metal casks, delivered to the site in January 2024. For the pond to be emptied, the 64 elements will need to be stored inside dual-purpose metal casks, which are suitable for both transportation and storage.
- With regard to the project to construct the Finished Product Cementation Plant (ICPF), inside which the approximately 3 cubic metres of a high-level radioactive liquid solution known as the "Finished Product", will be solidified, the public works at the repository building were completed in December and the workshop tests for the plant were completed. As for the process building, the contract for the "diverse procurement of works, services and supplies for the construction of the finished product cementation plant (ICPF)" was formalised in accordance with the procedure of conferral following an expression of interest.
- Radiation-free treatment and the removal of solid-type secondary technological materials (overalls, overshoes, etc.) continued. Using appropriate separation and treatment, it was possible to handle these materials as non-radioactive waste and to produce approximately 10% less radioactive waste per year in the plant's operations.

- The TAF (Groundwater Treatment) plant treated 11,352 cubic metres of water in 244 days of operation in 2023, producing 3,600 kg of dehydrated sludge. A total of 106 samples were analysed to monitor its efficiency.
- With regard to hill soil, 5,844 square metres of materials and land equal to 4 lots were characterised, 2 of which were transferred for treatment, conditioned and returned for a total of materials and land equal to 2,910 square metres.

AUTHORISATIONS

- 5

PEOPLE

- Personnel numbers according to organisational allocation: 55 people in total, of which 9 are women. 1 manager, 8 executives, of which 2 are women, 38 employees, of which 7 are women and 8 workers
- Diversity: 2 female managers in the roles of Project Procurement and Decommissioning Site Manager

ENVIRONMENT

- Radioactive waste at 31.12.2023: 3,865 cubic metres
- Non-radioactive waste produced in 2023: 6,805 tonnes, of which 6,780 tonnes sent for recovery.
- In May 2023 ITREC's LabIT Radiochemistry Laboratory successfully passed the inspection to maintain its Accredia UNI CEI EN ISO/IEC 17025:2018 certification for gamma spectrometry testing, confirming its technical expertise and possession of all the management and operational requirements mandatory to the standard.

STAKEHOLDER

- On 23 January the Transparency Round Table of the Basilicata Region was held in Potenza.
- In February, as part of the work-related learning project, the plant's environmental laboratory hosted a class from the "Enrico Fermi" Scientific Studies High School in Policoro for activities related to tests
- On 25 May a delegation from the site participated in the technical round table of the Basilicata Region to discuss the monitoring and progress of the plant decommissioning activities and the progress of the reclamation activities supervised by Sogin.
- In June, as part of an exchange and collaboration with entities in the region, a delegation from the site held a training session at the "Pope John Paul II" Hospital in Policoro on the operational aspects of radiation protection in the event of the presence of contaminated patients.

In 2023, discussions were initiated with the WWF - the operator of the Bosco Pantano di Policoro Natural Reserve - to comply with requirement no. 4 in support of the opinion that preparatory work for the construction of the building process of the ICPR plant is not subject to an EIA. The plan is to design, in agreement with the WWF, the interventions to remove areas of degradation and to bio-ecologically and structurally reorganise the existing vegetation for the purposes of fire prevention and to limit the number of invasive species in the areas and territories surrounding the Trisaia complex.

ISPRA-1 REACTOR (VA)

Ispra-1, the latest version of the Chicago-Pile 5 series designed and developed by Enrico Fermi, was the first Italian research reactor.

Operation	1959-1973
Capacity	5 MW
Type of Plant	Chicago-Pile 5
Production	13.500 MWd

The reactor decommissioning plan covers three phases:

1. Preliminary activities and dismantling of auxiliary systems and components;
2. Dismantling of the reactor, gamma cell and pond;
3. Final reclamation of the site.

MAIN ACTIVITIES IN 2023

- During the year approximately 10 tonnes of non-hazardous special waste (consisting of solid materials such as wood, metal, paper, etc.) and 6 tonnes of hazardous special waste (asbestos removed from the previous Joint Research Centre management) were removed from the plant.
- As of 31 December 2023 approximately 160 cubic metres of water, out of a total of 190 cubic metres, had been treated and removed as part of the pond reclamation project.
- As part of the project to upgrade buildings 21n and 21h and some areas used to manage potentially removable materials, the operational project was completed in the second half of the year and the site areas were handed over to the contractor. Work is scheduled to begin in the spring of 2024.
- The Italian Ministerial Decree authorising the adaptation of buildings 21c and 21b-g as transit areas for radioactive waste was issued in the first quarter. Subsequently, the operational documents, which were approved in June, were sent to the Control Authority with requests for integrations that the site had produced in the second half of the year.

AUTHORISATIONS

- 3

PEOPLE

- Personnel numbers according to organisational allocation: 6 people in total, of which 1 is a woman. 1 executive, 2 employees of which 1 is a woman, and 3 workers
- Diversity: a woman in the role of Decommissioning Site Manager

ENVIRONMENT

- Radioactive waste at 31.12.2023: 72 cubic metres
- Non-radioactive waste produced in 2023: 16 tonnes, of which 10 tonnes sent for recovery
- In 2023 the preparatory support activities to extend ISO 9001, 14001 and 45001 certifications to the Ispra 1 site continued. Verification activities for the same site to be included in the scope of the Sogin certificate by the external certification body are planned for the second half of 2024

NATIONAL REPOSITORY, A MAJOR PROJECT FOR THE COUNTRY

The National Repository is the infrastructure in which all radioactive waste in Italy, produced as a result of the operation and dismantling of nuclear plants as well as any waste produced by medical-hospital, industrial and research activities, will be safely stored. It is a major project for the country and will achieve the centralised, safe and efficient management of the existing radioactive waste and any waste that will be produced over the next 50 years. Once the repository become available, it will be possible to conclude the dismantling of plants and return the former nuclear sites to the communities for their reuse. With the National Repository, Italy will catch up with other European countries that have already implemented, or are currently implementing, similar repositories in their countries, and will enhance the know-how acquired so far. The Italian project envisages the construction of a Technology Park, a research centre open to international collaboration for activities in the fields of energy, waste management, and sustainable development in agreement with the territories involved.

How much and which radioactive waste management

The estimate of the total quantity of waste that will be transferred to the National Repository results from the sum of the previous waste, i.e. the existing waste stored across temporary repositories in Italy, and from the estimated quantities from the safe maintenance and dismantling of nuclear plants, as well as other activities such as scientific research and medical and industrial applications that will continue into the future. This estimate is verified and updated periodically. For 2023 the total estimated amount is approximately 98,000 cubic metres of radioactive waste to be delivered to the National Repository, divided into approximately 84,000 cubic metres of very-low and low level radioactive waste and approximately 14,000 cubic metres of intermediate and high level radioactive waste.

The siting, design, construction and operation of the **National Repository and Technology Park** are governed by the Italian Legislative Decree no. 31/2010, amended by the Italian Decree-Law 181/2023 coordinated with the Italian Conversion Law no. 11 of 2 February 2024 in terms of which, this task was assigned to Sogin. For the first time in Italy, the siting of major works is done through a procedure that, by law, is based on a process of sharing with the regions as far as concerns the integration of technical and scientific aspects and includes initiatives of information, transparency and engagement. Pursuant to the Italian Legislative Decree no. 31/2010, Sogin drafted an official proposal for the **National Map of Potentially Suitable Areas (CNAPI)**, applying the sitingcriteria defined under Italy's National Inspectorate for Nuclear Safety and the Technical Guideline no. 29 for Protection from Radiation, and the prerequisites foreseen under the IAEA Guidelines. Sogin then forwarded the CNAPI proposal to the control body, which verified and validated the correct application of the criteria and forwarded it to the relevant ministries to approve its publication, which was issued on 30 December 2020. On 5 January 2021 Sogin published the CNAPI on the website **depositonazionale.it**, as well as the preliminary design for the National Repository and Technology Park and the relevant documents required by the Decree.

The CNAPI identified 67 potentially suitable areas located across 7 Italian regions. The publication of the CNAPI, opened the first Public Consultation phase which lasted 180 days. This involved Regions, Local Authorities and all the Stakeholders who had an opportunity to share their observations and technical proposals with Sogin in relation to the CNAPI and the preliminary design. Over 300 observations and technical proposals were received and published which were the subject of in-depth analyses and discussions during the National Seminar held from 7 September to 24 November 2021 to which more than 450 parties were invited consisting of the stakeholders identified by the Italian Legislative Decree no. 31/2010 and those who had submitted observations and technical proposals in the first consultation phase. The works ended on 15 December 2021 with the publication of the final remarks, made available on seminariodepositonazionale.it and depositonazionale.it and the second Public Consultation phase opened, lasting 30 days, during which additional observations and technical proposals were submitted. In January 2022, on the basis of over 600 questions, together with the observations and technical proposals submitted during the Public Consultation process and with the further addition of the contribution of the updates to the database of reference, Sogin started the process for the preparation of the proposal for the **National Map of Suitable Areas (CNAI)** and the subsequent new suitability rankings.

The CNAI proposal was forwarded to the Italian Energy Transition Ministry (Ministry of the Environment and Energy Safety - MASE) on 15 March 2022 and sent by the latter to Italy's National Inspectorate for Nuclear Safety and Radiation Protection (ISIN), which requested amendments and supplements from Sogin. On 17 June 2022 Sogin sent the CNAI proposal (rev. 01), with the relevant supplementary documentation, to the Ministry and, after receiving ISIN's technical opinion, was requested by the MASE to carry out further integrations and in-depth studies. On 6 July 2023 Sogin forwarded the updated CNAI proposal (rev. 02) to MASE and on 13 December 2023 the MASE published the identity of suitable areas listed in the CNAI on its website. Over the next 90 days, local authorities throughout Italy who were interested in hosting the National Repository could submit their applications. The Municipality of Trino (VC) submitted an application but later revoked it.
The Italian Legislative Decree no. 181, published in the Official Gazette no. 287 on 9 December 2023, partially amended the provisions of the Italian Legislative Decree no. 31/2010 by foreseeing, under Article 11, that any territorial body, even if not included in the CNAI, could send an application to host the National Repository.
In the case of applications for areas not included in the list of suitable areas, any suitability would have to be verified by Sogin based on a review using the most recent territorial data and project developments and subsequently validated by ISIN. The same procedure was envisaged for any interested military structures who could submit their own application through the Ministry of Defence. In the absence of applications, the process of localization of a site suitable for hosting the National Repository and Technology Park therefore continues, as foreseen by the Decree, with the Strategic Environmental Assessment procedure as proposed by the CNAI, initiated by the MASE with Sogin's technical support.
At the end of the Strategic Environmental Assessment procedure, Sogin must update the CNAI proposal and its relative rank of suitability, referring it then to the MASE for ISIN's opinion. Under its own decree, the MASE, in agreement with the Italian Ministry of Infrastructure and Transport, will approve the CNAI with the relative rank of suitability and will publish it on the websites of the two Ministries as well as on those of ISIN and Sogin.

Incentive programme

The Italian Legislative Decree no. 181/2023 also introduced, under Article 11, the "*Urgent measures regarding infrastructure for decommissioning and managing radioactive waste*", which also included Sogin's assignment to prepare, within 30 days of the decree coming into effect, a programme of the interventions subject to bonus measures for the benefit of the territorial communities hosting the National Repository and Technology Park. The Programme, presented by Sogin to the MASE within the allocated time, in addition to defining a methodological framework to promote interventions aimed at the social and economic development of the territory, illustrates eventual areas of intervention. It also aims to promote expressions of interest and, more generally, through the passage of the agreement protocols as foreseen by the Italian Legislative Decree no. 31/2010, a debate to find shared solutions on the long-term sustainable development of the territories involved.

INFORMATION EVENTS ON THE PROJECT AND DEFINITION OF ITS SITING

In 2023 Sogin took part in several events held by third parties to provide information on the public consultation process and the National Repository and Technology Park project.

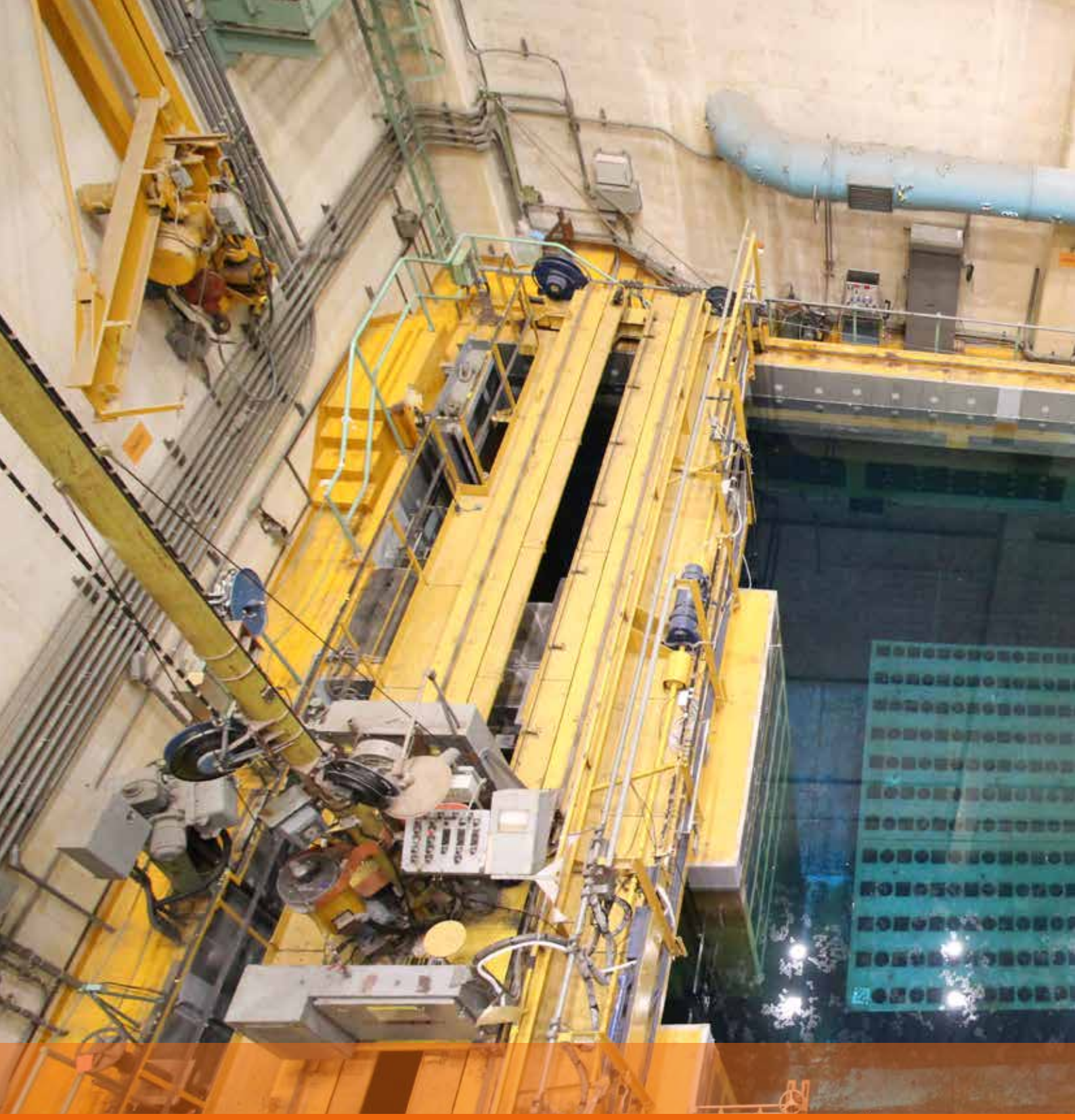
- **In January 2023** an international workshop was held in Rome entitled ***"Research plans for the Technology Park annexed to the Italian National near-surface Repository for radioactive waste"*** promoted by Sogin and dedicated to the eventual development of research activities at the future Technology Park. More than 50 experts from the major national and international scientific institutions and bodies in the sector were invited and actively participated in the discussion on the state of research in the field of radiation protection and radioactive waste management. In April, a White Paper that collated the papers presented at the workshop and that takes stock of the Technology Park project, highlighting its potential, was made public on the website of the scientific journal "Il Nuovo Cimento" of the Italian Physics Society. The White Paper was also published in paper format in June.

- **In February 2023** the 6th ***"Workshop on Modern Aspects of Nuclear Structure"***, organised by the University of Milan and the Milan section of the Italian National Institute of Nuclear Physics (INFN), was held in Bormio. The workshop covered topics relevant to the nuclear physics scientific community and related areas and provided an opportunity to develop and share the latest research activities on nuclear structural aspects and technical applications of interest. Specifically, Sogin participated in the session "*Italian National Repository: research opportunities at the Technology Park*" by presenting the National Repository project and expanding the potential research perspectives for the future Technology Park, designed as a centre of excellence for studies in the fields of environment, waste management and sustainable development.

- **In July 2023** Sogin participated in the International Symposium in Varenna (CO) organised by the Italian Physics Society in collaboration with the European Physics Society at the ***"JOINT EPS-SIF INTERNATIONAL SCHOOL ON ENERGY Course 7 - Global Challenges for ENERGY Sustainability"***, which hosted a debate on the Italian National Repository and Technology Park project.

- **In October 2023** the OECD-NEA ***"Forum on Stakeholder Confidence (FSC)"*** and the National Workshop organised with the Department of Energy were held in Cincinnati (USA). The Forum was an opportunity for Sogin to share experiences and developments in practices for managing relationships with stakeholders in the management of surface and geological disposal repositories, of radioactive waste and decommissioning and legacy management.

- **In November 2023** Sogin participated in the Workshop held in Mechelen (Belgium) on ***"Assessing the long-term evolution of engineered barrier systems of waste disposal systems"*** organised as part of the EURAD (European Joint Programme on Radioactive Waste Management) programme, created to support EU States in implementing Directive 2011/70/Euratom which establishes a Community framework to responsibly and safely manage spent nuclear fuel and radioactive waste.



ACTIVITIES IN ITALY AND ABROAD

5

Thanks to the know-how acquired, both Sogin and Nucleco operate in the Italian and international markets of decommissioning and radioactive waste management. Operating in both Europe and Asia, they offer services that cover the entire decommissioning cycle of nuclear installations: from the planning, design and implementation of operations to the management and safe handling of the radioactive waste produced.

ITALY

EXTRAORDINARY COMMISSIONER FORMER CEMERAD REPOSITORY IN STATTE, TARANTO
The radioactive and hazardous waste management and site remediation activities continued in collaboration with Nucleco.

NSPA/NATO - FORMER "PUNTA DELLA CONTESSA" SHOOTING RANGE - BRINDISI
All the activities envisaged contractually have been completed.

ALFA ACCIAI SPA, BRESCIA
Following the approval of the Operating Plan, decontamination and remediation activities on an industrial vacuum cleaner contaminated with Cs-137 were contracted with Nucleco. In performing this service, additional activities were contracted that were necessary in order to ensure that the areas had been freed of radiological contamination.

ENEL DISTRIBUTION
Nucleco contracted the asbestos reclamation activities for ceramic switches at the Gravellona Toce site (Verbano-Cusio-Ossola in the province in Piedmont).

PRIVATE CLIENT, "Condominio le Pleiadi", in Cinisello Balsamo (MI)
Performed the radiological contamination verification activities and prepared the documents for the competent Authorities.

ONET TECHNOLOGIES- GARIGLIANO POWER PLANT, CASERTA
Nucleco continued to support Onet in the removal of asbestos at the Garigliano power plant's turbine building.

MUNICIPALITY OF ACERRA - REHABILITATION OF THE CALABRICITO SITE, ACERRA (NA)
In 2023 the contract was still valid but no activities were requested regarding the reclamation of the contaminated Calabricito site.

MARKET ACTIVITIES

JOINT RESEARCH CENTRE EUROPEAN COMMISSION JRC/ISPRA- ISPRA (VA)

Nucleco continued to support JRC's laboratory staff with the measurement of radioactive and potentially radioactive samples, chemical, radiochemical and radiometric testsand on-site measurements. Nucleco also provides support at the JRC's DG HR Medical Service in Ispra. During the first half of 2023 Nucleco's activities for the JRC in Ispra regarding the supercompaction of 503 220-litre drums produced at the site were restarted. As part of the service, in order to comply with current legislation by issuing a Supplementary Agreement to the Framework Contract of 2012, the Financial Guarantees necessary for the transportation of potentially fissile radioactive material were initiated.

EUROPEAN FUNDED PROJECTS

European rescEU-CBRN-DSIM-IT project (Call for Paper issued by the Union Civil Protection Mechanism (UCPM)). Nucleco joins the project that unites first responders, national CBRN authorities and research organisations in leading private organisations to develop a plurality of CBRN mobile laboratories equipped with the most advanced detection, sampling, identification and monitoring (DSIM) systems. The Consortium Project, including ENEA and the Fire Service for Italy, began in October 2023 and will end in September 2026.

JOINT RESEARCH CENTRE EUROPEAN COMMISSION, JRC/ISPRA, ISPRA (VA)

In 2023 and under the ISPRA – PIA framework contract, Sogin carried out a series of activities aimed at supporting the dissemination, on European level, of the experiences gained in the JRC and at identifying solutions for the disposal of specific waste. Support continued in reviewing the decommissioning programmes of nuclear installations, with specialist assistance in the areas of licensing, document archiving, radioactive waste and nuclear material management.

JOINT RESEARCH CENTRE/INSTITUTE FOR TRANSURANIUM ELEMENTS (JRC/ITU), KARLSRUHE (GERMANY)

The contract signed in August 2023 provides for Nucleco's support in the radioactive waste characterisation activities using gamma spectroscopy and neutron coincidence counting.

JAVYS (JADROVÁ A VYRAĎOVACIA SPOLOČNOSŤ), BOHUNICE (SLOVAKIA)

Management and technical consultancy by Sogin continued for the dismantling of the V1 facility at the Bohunice nuclear power plant, in particular for the 2 VVER 440-230 pressurised reactors in the decommissioning phase.

GLOBAL PARTNERSHIP

The Cooperation Agreement between the Governments of the Italian Republic and the Russian Federation, ratified by Italian Law no. 106 of 31 July 2005, covered the dismantling of nuclear submarines decommissioned by the Russian Navy and the safe management of radioactive waste and spent nuclear fuel. Considering the international situation, in 2023 the series of existing contracts of the Agreement were managed and the action plan for managing its closure was launched in close coordination with the Italian Ministry of the Environment and Energy Safety (MASE) and the Italian Ministry of Foreign Affairs and International Cooperation (MAECI).


SCHOTT
DURAN

QUALITY AND THE ENVIRONMENT

6

Sogin and Nucleco carry out their activities with the greatest attention to the health of workers and the population in general and to protecting the environment by applying current national and international legislation and by considering the guidelines issued by the International Atomic Energy Agency (IAEA).

SAFETY FOR WORKERS

The Group considers the health and safety of its staff to be a priority asset for the company. Sogin and Nucleco fostered a culture of safety among their employees. Both traditional and radiological safety are included in continuous training programmes; furthermore, safety is also the focus of a health and safety improvement plan, broken down into four macro-areas which develop specific activities:

1. Creating a culture of safety

In this context, various initiatives have been implemented to disseminate and consolidate a culture of safety among the people, based on information tools, sector involvement and partnerships, ("PRINT", memorandum of understanding ratified with other electricity suppliers, such as Enel, TERNA, Edison and ACEA to define practical and legal measures to reduce electrical hazards in interchange plants and bordering areas).
Activities continued to support Occupational Health and Safety Services in using the ESS software to spread awareness among workers on the importance of reporting potential risks. In addition, a procedure was initiated to periodically monitor the events recorded by the software in order to identify any transversal improvement actions, such as accident prevention activities.
The activity to raise awareness on how to fill in Work Programmes properly at the sites continued aimed at harmonising management operations and reducing or preventing interferential risks. The review of the Work Programme drafting process is underway with changes to the software being identified and implemented in collaboration with the company ICT.
The Group continued with the implementation of the "*Misurare la sicurezza*" (Measuring safety) project, a self-assessment system, carried out by the Employer, of the health and safety status of each site.

2. Participation and sharing of best practices

In order to share procedures, behaviour, risk assessment methodologies, prevention and protection measures, meetings continued on a periodic basis between the Officers in charge of Prevention and Protection measures (RSPP), Executive Safety Coordinators and Corporate Safety Officers. During the meetings, relevant health and safety events were analysed and cross-site improvement actions were agreed on and implemented.
The coordinating doctor of the relevant/authorised doctors of each production unit continued to work on standardising health protocols and health surveillance measures. The doctors, coordinator and the employees of the Safety area held regular meetings. Updates on regulations and company activities continue to be regularly published on internal communication channels and distributed to all corporate staff. Safety walks were carried out at the sites to sensitise safety operators to transversal participation and sharing inside the site, between sites and between the sites and the Safety area. The slogan used for the meetings is "*Insieme per la Salute e Sicurezza*" (Together for Health and Safety).

3. Digitalisation

The software for health and safety management for the sites (Simpledo) has been implemented using new modules such as training, health surveillance and accidents. A centralised system to distribute Personal Protective Equipment (PPE) and accessible from a unified platform continued to operate for all Sogin employees; the purpose is to ensure that product costs, times and quality are efficient in terms of legal compliance. Software to record "near misses" has become operational. The "*Misurare la sicurezza*" (Measuring safety) software was implemented for the self-assessment of each Production Unit's health and safety status.

4. Safe and healthy workplaces

A set of indicators are measured on a periodic basis in the scope of the macro-area. More specifically, statistical indicators related to work-related accidents for Sogin and its contractors are developed on a monthly basis. During the safety walk at the sites, the implementation of the "*Misurare la sicurezza*" (Measuring safety) project began which, through specific indicators linked to the workplace, leads to the identification of improvement initiatives aimed at increasing the safety of the workplace.

WORLD DAY FOR SAFETY AND HEALTH AT WORK

On 3 May the Caorso power plant hosted a theatrical performance on occupational health and safety entitled "White Silence. For safe work". The initiative was organised on the World Day for Health and Safety at Work, which is celebrated on 28 April, to promote and disseminate a culture of safety among workers and in the workplace. The show was staged by Manicomics Teatro and tells the stories of three workers who were victims of occupational accidents. The play is written to strengthen the public's sensitivity to and awareness of such an important and delicate subject.

The initiative was attended by, amongst others, the territorial trade union representatives and the various personnel from Sogin and the subsidiary Nucleco who are engaged primarily in the protection of workers. The occasion was a time of shared reflection.

The company has always invested in training on safety issues for its staff and for its contractors. Last year more than 17,000 hours of specific training were provided.

WORK-RELATED ACCIDENTS

The following tables provide a picture of accident indices among the resources employed by Sogin, Nucleco and contractors. Accident rates are calculated by considering the total number of accidents that occurred over the reporting period, both during transfers and at work. Starting from 2018, the events which have resulted in up to 3 days of absence from work are also included among the accidents; following the issue of Circular Letter n. 42 of 12 October 2017, these events must be communicated to INAIL.
In the past, this reporting obligation was only required for the accidents involving an absence of more than 3 days from work.

GRI 403-9: WORK-RELATED INJURIES

SOGIN EMPLOYEES WORK-RELATED ACCIDENT INDICES

	2023		2022		2021	
	No.	**Rate**	**No.**	**Rate**	**No.**	**Rate**
Recordable work-related accidents for Sogin employees (including accidents during work-home transfers) Ratio between the number of recordable work-related accidents and hours worked (multiplied by 200,000)	5	0.76	1	0.15	4	00.56
Work-related accidents resulting in working days lost Ratio between the number of recordable work-related accidents resulted in working days lost and hours worked (multiplied by 200,000)	5	0.76	1	0.15	4	0.56
Work-related accidents with serious consequences Ratio between the number of serious accidents (excluding fatalities) and hours worked (multiplied by 200,000)	1 (with prognosis > 40 days)	0.15	0	-	0	-
Fatalities Ratio between the number of fatalities and the hours worked (multiplied by 200,000)	0	-	0	-	0	-
Accidents during work-home transfers (including accidents occurring on transport not arranged by Sogin)	2	0.3	1	0.15	4	n.a.
Hours worked	1,321,921		1,305,713	n.a.	1,435,079	n.a.

GRI 403-9: RECORDABLE WORK-RELATED ACCIDENTS - SOGIN EMPLOYEES - DIVIDED BY GENDER AND SITE

	2023			2022			2021		
	Total	**Women**	**Men**	**Total**	**Women**	**Men**	**Total**	**Women**	**Men**
TOTAL RECORDABLE ACCIDENTS	**5**	**1**	**4**	**1**	**0**	**1**	**4**	**1**	**3**
Caorso	0	0	0	0	0	0	1	0	1
Garigliano	0	0	0	0	0	0	0	0	0
Latina	1	0	1	0	0	0	0	0	0
Trino	1	0	1	0	0	0	1	0	1

Bosco Marengo	0	0	0	0	0	0	0	0	0
Casaccia	1	0	1	0	0	0	1	0	1
Saluggia	1	1	0	1	0	1	0	0	0
Rotondella	0	0	0	0	0	0	0	0	0
Ispra-1	0	0	0	0	0	0	0	0	0
Rome Offices	1	0	1	0	0	0	1	1	0
International offices	0	0	0	0	0	0	0	0	0

GRI 403-9: WORK-RELATED INJURIES

ACCIDENT INDICES - STAFF OF SOGIN CONTRACTORS

	2023		2022		2021	
	No.	**Rate**	**No.**	**Rate**	**No.**	**Rate**
Recordable work-related accidents of contractor firm employees (including accidents on the way to and from work) Ratio between the number of recordable work-related accidents and hours worked (multiplied by 200,000)	5	1.18	9	2.02	3	0.58
Work-related accidents resulting in working days lost Ratio between the number of recordable work-related accidents resulted in working days lost and hours worked (multiplied by 200,000)	5	1.18	9	2.02	3	0.58
Work-related accidents with serious consequences	2 (>40 days)	0.47	0	-	1	0.19
Fatalities	0	0	0	-	0	-
Accidents during work-home transfers	0	0	2	0.45	0	-
Hours worked	850,725	n.a.	893,039	n.a.	1,036,425	n.a.

GRI 403-9: WORK-RELATED INJURIES

RECORDABLE WORK-RELATED ACCIDENTS - STAFF OF SOGIN CONTRACTORS - DIVIDED BY GENDER AND SITE

	2023			2022			2021		
	Total	**Women**	**Men**	**Total**	**Women**	**Men**	**Total**	**Women**	**Men**
Total recordable accidents	**5**	**2**	**3**	**9**	**1**	**8**	**3**	**1**	**2**
Caorso	0	0	0	1	0	1	0	0	0
Garigliano	0	0	0	4	0	4	0	0	0
Latina	0	0	0	1	0	1	0	0	0
Trino	0	0	0	0	0	0	0	0	0
Bosco Marengo	0	0	0	0	0	0	0	0	0
Casaccia	0	0	0	0	0	0	1	0	1
Saluggia	1	0	1	0	0	0	0	0	0
Rotondella	4	2	2	3	1	2	2	1	1
Ispra-1	0	0	0	0	0	0	0	0	0
Rome Offices	0	0	0	0	0	0	0	0	0
International offices	0	0	0	0	0	0	0	0	0

GRI 403-9: ACCIDENT INDICES - NUCLECO'S EMPLOYEES

	2023		2022		2021	
	No.	**Rate**	**No.**	**Rate**	**No.**	**Rate**
Recordable work-related accidents of Nucleco's employees Ratio between the number of recordable work-related accidents and hours worked (multiplied by 200,000)	1	0.47	7	3.36	1	0.47

Work-related accidents resulting in working days lost Ratio between the number of recordable work-related accidents resulted in working days lost and hours worked (multiplied by 200,000)	1	0.47	7	3.36	1	0.47
Work-related accidents with serious consequences Ratio between the number of serious accidents (excluding fatalities) and hours worked (multiplied by 200,000)	0	0	0	-	0	-
Fatalities Ratio between the number of fatalities and the hours worked (multiplied by 200,000)	0	0	0	-	0	-
Accidents during work-home transfers (Including accidents occurring on transportation not arranged by Sogin)	1	n.a.	2	n.a.	0	n.a.
Hours worked	425,195	n.a.	417,200	n.a.	422,436	n.a.

RADIOLOGICAL SAFETY

The dismantling of nuclear plants and radioactive waste management operations are carried out according to specific rules and regulations aimed at guaranteeing the radiological protection of workers, people, and the environment, in line with the highest standards of nuclear safety. The potential radiological impact resulting from usual operations is constantly monitored pursuant to the Italian Legislative Decree no. 101/2020, through specific environmental and physical surveillance systems.

The following tables summarise the maximum doses of radiation exposure for the employees working at the sites in 2023. The reported doses have been defined by the Radiation Protection Expert (previously referred to as the Qualified Expert), namely the person appointed by the Employer to ensure the health surveillance of corporate staff and the radiological safety of the people and the environment. The Radiation Protection Expert works in conjunction with the company doctor, who, in turn, guarantees the workers' health care on behalf of the Employer.

The limit on the effective dose for workers exposed to radiation is 20 mSv/year and it includes dose contributions from external radiation and internal contamination. As shown in the table below, the dose absorbed by Group workers is significantly lower than the limits set in the stringent legislation of reference.

External radiation is produced via exposure to radiation sources that are external to the body while internal radiation is caused by direct contamination of the body with radiological substances, ingestion, inhalation and/or through skin absorption.

The maximum effective individual dose is the dose effectively absorbed by the exposed employee, who, over the course of a year's work, has been subjected to an exposure deriving from the sum of the contributions of external and internal radiation.

A Millisievert (mSv) equals 0.001 Sievert (Sv). The Sievert is a derived unit of the effective dose which results from the absorbed dose calculated on the type of incident radiation and the specific irradiated organ and/or body tissue and it is used to calculate the biological effects of the exposure to ionising radiation.

SOGIN MAXIMUM INDIVIDUAL EFFECTIVE DOSE - YEAR 2023

SITE	MAXIMUM EFFECTIVE INDIVIDUAL DOSE	
	mSv/year	TYPE OF EXPOSURE
Caorso	0.32	External Radiation
Garigliano	1.13	External Radiation
Latina	0.83	External Radiation
Trino	0.96	External Radiation
Bosco Marengo	0.45	External Radiation
Casaccia	0.70	External Radiation
Saluggia	0.00	External Radiation
Rotondella	0.29	External Radiation
Ispra-1	0.00	External Radiation
Nucleco Staff	1.6	External Exposure
Staff from external Nucleco firms	0.5	External Exposure

In September 2023 ACCREDIA confirmed with the NUCLECO laboratories that they had maintained their accreditation in accordance with UNI CEI EN ISO/IEC 17025:2018. This important certification attests to the technical competence, impartiality and constant functioning of the laboratories in carrying out gamma spectrometry measurements using test method UNI 11665:2017 for solid and liquid samples.

INDUSTRIAL SAFETY

Sogin manages the aspects of nuclear safety and Company Protection with the following objectives:

1. the protection of people and company assets;
2. the physical protection of installations, materials and activities;
3. the management of information, installations, technologies and materials subject to secrecy classifications;
4. the management of critical infrastructure subject to specific protection measures for reasons of public safety, public order and civil protection;
5. mandatory training for employees with security clearance, on classified information, nuclear security and cybersecurity (in collaboration with the manager of the specific organisational team), including through partnership with institutions, public bodies, universities and research institutes.

Once again in 2023 Sogin conducted "*Safety Management in the nuclear field*" training, as required under the Decree issued by the Italian Prime Minister no. 5 of 6 November 2015, as amended and supplemented.
The 8-hour training sessions covered both head office and sites and were streamed in compliance with the rules and regulations on the administrative protection of state secrets, classified and exclusive disclosure information.
In addition, courses were held for plant personnel and for personnel in charge of physical protection on aspects related to the so-called "Storage Plans" and to Physical Protection Systems, in compliance with the sector's rules and regulations.
During the year, collaboration continued with the first and second-level International CBRNe (Chemical-Biological-Radiological-Nuclear-explosives) Master Courses at the University of Tor Vergata, under the auspices of the RaMS.
In November Sogin ran a training session entitled "*Tools to combat the insider threat in the strategic infrastructures of the Country-system: the case of the nuclear industry*" as part of the Advanced Training Course and "Espionage and Interference: intelligence threats to the Italy-System - tools to analyse, prevent and tackle", organised by the School of Training in Intelligence and Strategic Analysis of the Gino Germani Institute of Social Sciences and Strategic Studies. Finally, participation continued in the CBRNE P3 Cluster (Prepare, Prevent, Protect) set up at the Istituto Affari Internazionali (IAI), the Institution for International Affairs, a network established in 2017 and to which Sogin has subscribed since its inception.

ENVIRONMENT

Sustainable development also encompasses actions that aim to ensure the quality of the environment and the rational use of natural resources. Sogin adopts a multidisciplinary approach to learn about the anthropic, naturalistic, chemical-physical, climatic, geological, scenic and economic factors of the areas in which it operates, in order to identify the potential effects of its activities. In the nuclear sector this approach is used throughout the entire life cycle of the plant, from its design and operation until its closure and decommissioning.

ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

EIA DECREES FOR SOGIN SITES		
	SITE NAME AND YEAR THE DECREE WAS OBTAINED	**2023 - DECREES OF COMPLIANCE WITH EIA DECREE PROVISIONS**
NUCLEAR POWER PLANTS	Caorso, 2008	Compliance with provision 10 (Environmental Monitoring Report) for 2022.
	Trino, 2008	Compliance with provision 9 (Environmental Monitoring Report) for 2022. Compliance with provision 1a (Timetable update).
	Garigliano, 2009	Compliance with provision 1.7 (Environmental Monitoring Report) for the second half of 2022 and for the first half of 2023. Compliance with provision 1.2.ii (Construction site interference) for the three-year period 2022- 2024.
	Latina, 2011	Compliance with provisions A)3.vi b (Second rainwater analysis) and A) 8 (Monitoring of environmental components) for 2022.
PLANTS	CEMEX in Saluggia, 2008	Compliance with provision 6 (Environmental Monitoring Report) for the first half of 2022.
	ICPF Rotondella, 2011	Compliance with provision 1 (Layer interference) Compliance with provision 3 (Public Health) Compliance with provision VO-1.7 - 1.9 (Environmental status verification report first half of 2022 and second half of 2022)
RESEARCH REACTOR	Ispra-1, 2023	

As required by environmental impact legislation, Sogin initiates procedures to assess whether a given project, to be carried out in the nuclear ambit, could have a significant negative environmental impact.
The decommissioning of nuclear power plants and the construction of some specific facilities at former ENEA nuclear sites are subject to an EIA, as provided for under the Italian Legislative Decree no. 152/2006 (Environmental Regulations).
Positive EIA decrees provide a set of specific provisions to guarantee that the assessed projects comply with environmental protection regulations and, if appropriate, define the necessary measures to avoid, prevent, reduce and compensate any significant and negative environmental impacts, if applicable.
In accordance with the timetable laid down in the EIA decree, Sogin prepares the technical documents required to verify compliance with the above-mentioned provisions. The relevant authorities (the Italian Ministry of the Environment and Energy Security - MASE, the Italian Ministry of Culture - MiC, Regions, Superior Institute for Environmental Protection and Research - ISPRA, Regional Agency for the Protection of the Environment - ARPA), on the basis of their remits and the issues raised, evaluate these documents and issue specific Decisions.
For certain specific projects that are important at state or regional level, a screening provision for EIA eligibility is required to assess whether the project could have any potentially significant and negative environmental impacts which then need to be submitted to the EIA procedure. In the event of construction or modifications to the work, Sogin undertakes to comply with any environmental conditions by submitting a request for verification of compliance where applicable.

DETERMINATION OF NOT BEING SUBJECT TO AN EIA - YEAR 2023	
SITE, PROJECT, AND YEAR THE DECREE WAS OBTAINED	
NUCLEAR POWER PLANTS	Caorso, Updating of radioactive waste management procedures and temporary on-site storage, 2013.
	Trino, Updating of radioactive waste management procedures and temporary on-site storage, 2015.
	Trino, Construction of a treatment and conditioning plant for spent ion exchange resins from the Trino Power Plant - WOT and SiCoMor plant, 2016.
	Garigliano, DT2 temporary repository: construction, operation and siting variant on the same industrial site, 2022.
PLANTS	EUREX Saluggia, Adaptation of 2300 repository and related plants, 2022.
	ICPF Rotondella, waste treatment campaign (EWC Code 16.10.02) for a duration not exceeding 120 days, using an on-site mobile installation, 2020.
	ICPF Rotondella, Preparatory work variant to the construction of the process building - Building 2000, 2023.
	ITREC plant at Trisaia - NSD1 repository, 2023
	Casaccia, IPU plant - new SCA/NDC plant, 2023

In the case of modifications, extensions or technical adjustments aimed at improving the performance or environmental performance of works of national or regional importance, where it is assumed that there are no potentially significant and negative impacts, or in the case of design variants of already authorised projects which are not substantial, for design variants linked to modifications, extensions and non-substantial technical adjustments that do not entail significant and negative environmental impacts, the Proposer may request a preliminary assessment from the relevant Authority.
Sogin submitted this type of request for their Variant on the Provisional Containment Works project for the future construction of the ICPF building - Building 2000 at the Rotondella site. The MASE stated that the project should be more appropriately assessed within the framework of a screening procedure for EIA eligibility, supplemented with an Impact Assessment.

Communication plans under EIA provisions
Compliance with certain provisions in EIA Decrees obliges Sogin to draft communication plans and submit them to local authorities for their preliminary approval.
Communication plans include several lines of action, such as the development of the RE.MO. portal. (Monitoring network), the preparation of information booklets, the organisation of site visits, press conferences, and Regional Transparency Round Tables. Through the RE.MO. portal, Sogin publicizes data on the environmental, conventional and radiological monitoring of nuclear plants, as well as information on the progress of decommissioning work.

RECLAMATION PROCEDURES
The different requirements in the EIA measures include performing monitoring campaigns for the environmental matrices, to be repeated at varying intervals on a site-by-site basis.
In accordance with the requirements of the Ministerial Decrees on environmental compatibility, Sogin constantly monitors the quality of the environmental components (atmosphere, surface water, groundwater, landscape and noise) through a set of

measurements carried out periodically on appropriately selected biological, chemical and physical indicators.
This monitoring, referred to as conventional monitoring, is carried out for the four nuclear power plants, for the ICPF plant in Rotondella and for the CEMEX Complex in Saluggia, with the following objectives:

- Check compliance with the impact predictions assumed in the EIA;
- Ensure full control of the environmental situation during the different stages of activities;
- Acquire data to document the evolution of the environmental situation in relation to the activities;
- Evaluate the evolution of the environmental situation by correlating the status prior to the works and the status while work is in progress and, in the event of abnormal situations, prepare and implement corrective measures.

The results of this monitoring are periodically collated in an environmental report and, once validated by the MASE, are made available in the RE.MO portal accessible from the sogin.it website.

RECLAMATION PROCEDURES

In the event that the results of the monitoring campaigns exceed the **Contamination Concentration Thresholds (CSCs)** for the soil and groundwater matrices, Sogin, in its capacity as plant manager, will initiate a reclamation procedure as foreseen under Title V, Section IV of the Italian Legislative Decree no. 152/2006:

Launch of the reclamation procedure through communication of potential contamination to the entities involved.	Draft and submission of the characterisation plan, accompanied by an investigation proposal, based on a preliminary conceptual model of the site (detection of contaminant source, migration pathways, exposure modalities and targets).	Approval of the characterisation plan on behalf of the Services Conference formed by the local authorities in charge of monitoring (Region, Province, ARPA, Municipality, Local Healthcare Unit - ASL).	Implementation of the investigation plan aimed at verifying the conceptual model as rebuilt, and input data acquisition for the site-specific Healthcare Risk Analysis to identify **Concentrations exceeding the Risk Threshold (CSR).**	Approval of the site-specific Healthcare Risk Analysis by the Services Conference and definition of subsequent actions.
In case Concentrations not exceeding the Risk Threshold, the following actions are implemented:				
Draft and submission of the Executive Reclamation Project (POB) or the Executive Safe Containment Project (MISOP), accompanied by a relevant monitoring plan.	Approval by the Services Conference of the Operational Remediation or Operational Safety Project.	Implementation of the actions foreseen in the Executive Reclamation Project (POB) or in the Executive Safe Containment Project (MISOP).		Implementation of the approved monitoring plan.
In the case of concentrations below the CSR:				

Implementation of a monitoring plan, as already proposed in the site-specific Healthcare Risk Analysis, to evaluate changes in the anomaly detected.

In 2023, the Company carried out reclamation procedures on the sites at Caorso, Latina, Garigliano, Trino and Rotondella. In addition to the above, also at the Bosco Marengo site, where contamination was discovered in 2016 following a quality characterisation campaign carried out autonomously by Sogin on the site's groundwater. Finally, following the characterisation of land and water (underground and surface water) to collect data for the Environmental Impact Study, a reclamation procedure was launched at the ISPRA-1 site pursuant to Article 245 of the Italian Legislative Decree no. 152/2006.

RECLAMATION PROCEDURE - CAORSO

As part of the groundwater monitoring initiated in 2012, in October 2016 the CSC was exceeded for the PCB (polychlorinated biphenyls) parameter at a single sampling point located within an impermeable baffle. A subsequent test carried out on water samples collected from external sampling points showed that the potential contamination had been contained.

- In February 2023, ARPAE carried out a sampling of the water taken from well D in order to proceed with the testing of the reclamation, the result of which showed compliance with the CSCs for the PCB parameter.
- In June 2023 Sogin sent the competent bodies a request to certify the completion of the reclamation interventions (Article 248, paragraph 2 of the Italian Legislative Decree no. 152/2006) and in July 2023 the Emilia-Romagna Regional Agency for Environmental Protection sent the technical report stating that the monitoring activity was deemed to have been completed, acknowledging that there were no reasons not to issue the certification.
- In September 2023, ARPAE sent Executive Decision no. DET-AMB-2023-4664 of 14/09/2023 on the completion of the reclamation works and the closure of the procedure.

In parallel with the procedure described above, following a technical meeting with ARPAE in March 2023, a study is being prepared by Sogin to determine site-specific background values for some analytes (As, Fe, Mn and ammoniacal nitrogen) that, over the years, have exceeded the limits of CSCs in the groundwater.

RECLAMATION PROCEDURE - GARIGLIANO

As part of the monitoring activities foreseen under the environmental compatibility decree, the concentration values of CSCs that exceeded the limit were detected over a period of time for several parameters registered in the groundwater and the Natural Background Values found in underground bodies of water as defined by the Campania Region's Executive Decision no. 320 of 31/07/2020).

- For these parameters, a procedure was initiated pursuant to Article 245 of the Italian Legislative Decree 152/2006 – February 2023 and with a supplement in May 2023.
- In response to the Campania Region's request for an update in October 2023, Sogin sent a technical report containing the results of the monitoring (November 2023).

RECLAMATION PROCEDURE - LATINA

As part of the monitoring activities foreseen under the environmental compatibility decree, in December 2013 a monitoring campaign of the groundwater present on-site was carried out by the piezometers. This showed anomalous concentrations of vinyl chloride. Consequently, the reclamation procedure was initiated.
In February 2022 the Services Conference approved Phase 1 of the operational reclamation project and added new compliance points as proposed by Sogin.
The procurement process for the implementation of pilot tests is currently underway since the first call for tenders was unsuccessful.

RECLAMATION PROCEDURE - TRINO

As part of the monitoring activities foreseen under the environmental compatibility decree, in February 2023 a procedure was initiated pursuant to Article 245 of the Italian Legislative Decree no. 152/2006 to exceed the CSCs in a single piezometer for the Trichloromethane parameter.
In May 2023 the characterisation plan which envisaged an increase in the frequency of the monitoring campaigns was submitted to the competent bodies.
On 27 June 2023 a Services Conference was held to discuss the plan itself, which was subsequently approved by a Resolution established by the Municipality of Trino no. 486 of 25/07/2023.
Given the results of the monitoring campaigns, at the end of the year an application was prepared to issue the completion certificate for the interventions envisaged in the characterisation plan pursuant to Article 248 of the Italian Legislative Decree no. 152/2006, as amended and supplemented.

RECLAMATION PROCEDURE - BOSCO MARENGO

In 2016, a qualitative characterisation campaign conducted on the site's groundwater showed the presence of some carcinogenic aliphatic and chlorinated compounds (tetrachloroethylene, dichloroethylene and trichloromethane and chromium VI) exceeding the CSCs. This event resulted in the need to launch a reclamation procedure.

- In early 2023 (January-April) the injection clusters envisaged by the project for Ensuring Operational Safety (MISOP, Messa in sicurezza Operativa) – pilot tests were carried out in the field and subsequently the procedures for entrusting the supply of the reagent to be injected were initiated.
- In June 2023, after the tests with water injection, purging and sampling that were found to be in contradiction with ARPA, the reagents (colloidal activated carbon + zero-valent iron) were injected and the subsequent monitoring activities were initiated, with a planned duration of 12 months on a monthly basis.

RECLAMATION PROCEDURE - ITREC in ROTONDELLA

During the monitoring plan required for the construction of the ICPF plant and the first *ante operam* campaign held in line with the EIA Decree, certain chemical parameters (trichloroethylene, chromium VI, iron, total hydrocarbons) exceeding the CSCs were detected in the groundwater under the ENEA site in Rotondella. Sogin notified these anomalies to the competent authorities and launched the reclamation procedure.
In January 2023 the Basilicata Region requested an update on the activities in progress, as agreed during the technical round table on 30/06/2022.
In February 2023 Sogin, with reference to the requests made during the technical round table of 30 June 2022, sent the "Characterisation plan - Area adjacent to the ENEA site in Trisaia", the report of the weekly monitoring checks of the Groundwater Treatment Plant from 01/01/2022 to 31/01/2023 and the report of the removal activities of the former Magnox pipeline in the area pertaining to Sogin.
In March 2023 ENEA and Sogin responded jointly to the Basilicata Region's January note, indicating, once more, the timetable of the activities and the parties involved.
Also in March, ENEA sent the operational reclamation project, whilst in April Sogin sent the update of the site-specific risk analysis.
The Basilicata Region convened a technical round table for 25 May 2023 in order to discuss various issues in detail.
With reference to the requests made during the technical round table of 25 May 2023, in September 2023 Sogin submitted

revision 01 of the document, NPVA02011 "*Characterisation Plan - Area adjacent to the ENEA site in Trisaia - Municipality of Rotondella (MT)*".
Immediately afterwards, Sogin also responded to the note from the Basilicata Region (Sogin prot. no. 175866 of 17/08/2023 - SIT Integrated Relational Database System) forwarding the draft document, NPVA02095, with its annexes, containing the cartographic and environmental information that Sogin had collected as part of the characterisation and monitoring of the groundwater under the Trisaia site.
On this specific issue, in September and December 2023 ad hoc technical meetings were held with the Basilicata Region to define the Territorial Information System (SIT).
In November 2023, Sogin responded to a further request made at the technical round table on 25 May 2023. In December 2023 the final version of the Technical Information System was informally sent to the Basilicata Region, pending the convening of a technical round table.

RECLAMATION PROCEDURE - ISPRA-1
During the first campaign, as part of the preliminary characterisation activities carried out on surface land, surface water and underground water to draft the environmental impact study, some chemical parameters (iron, manganese and trichloroethylene) exceeding the CSCs were detected in the groundwater under the Ispra-1 site. Sogin notified these anomalies to the competent authorities and launched the reclamation procedure.
In May 2023, a services conference was convened to discuss the characterisation plan. From the discussion with the competent bodies and with representatives from the JRC (Joint Research Centre), it was evident that the plan needed to be approved and organised into two phases: a first phase for the collection and systematisation of all the data made available and a subsequent phase for the development of the investigation plan.
The municipal decision to approve the 2-stage characterisation plan was given in August 2023. Following specific meetings with the JRC, Sogin sent the final version of the characterisation plan in December 2023.

ENVIRONMENTAL PERFORMANCE

The **Eco-Management and Audit Scheme (EMAS)** is a voluntary environmental management instrument promoted by the EU whereby private and public companies and organisations can evaluate and improve their environmental performance and draft an Environmental Declaration to share important information with the relevant stakeholders.
From 2014 Sogin has been registered with the EMAS under the Regulation (EC) 1221/2009 (as amended by EU regulations 2017/1505 and 2018/2026), thus proving its commitment to achieving high environmental performances during its operations. EMAS registration initially referred to the Caorso power plant, then the Trino power plant and the EUREX plant in Saluggia, while the verification and validation process for the Rotondella plant was successfully completed and the endorsement by Isprambiente/EMAS Committee is pending. Nucleco also obtained EMAS registration in 2019. In 2023 the updated Environmental Statement for the three-year period 2021-2023 was validated.

EMAS REGISTRATION

SITE	REGISTRATION	RENEWAL
CAORSO	2015	2023 – Validation of the 1st issue of the 4th edition of the Environmental Statement, pending a resolution by the EMAS Committee.
TRINO	2015	2023 - Validation of the 3rd issue of the 3rd edition of the Environmental Statement, with endorsement by the EMAS Committee.
SALUGGIA	2017	2023 - Validation of the 2nd issue of the 3rd edition of the Environmental Statement, with endorsement by the EMAS Committee.
ROTONDELLA	2021 - on-site validation - Registration procedure in progress	2023 - Validation of the 3rd issue of the 3rd edition of the Environmental Statement, pending endorsement by Isprambiente/the EMAS Committee.
NUCLECO	2019	2023 - Validation of the updated Environmental Statement for the three-year period 2021-2023.

ENVIRONMENTAL RADIOLOGICAL PROTECTION

Each year, Sogin carries out hundreds of samples and measurements, based on a specific radiological environmental monitoring programme for each site. This aims at ensuring a constant and permanent control of the radioactivity level in the environmental matrices (atmosphere, surface water, underground water, soil and grass, sediments, soil depositions) and in the food matrices (meat, fodder crops, fish and eggs).
Monitoring is implemented through environmental and radiological surveillance networks, installed in each nuclear power plant from the moment of their construction. Specific matrices and frequencies of sampling and measurement are defined for each site. Over the years, these networks have been checked and adapted according to the local environmental conditions and the different configuration of the plants.

The type and frequency of sampling and measurement reported in the monitoring programme are previously communicated and authorised by the ISIN, which receives an annual information report on the environmental radiological condition. At the same time, the Regional Agencies for the Protection of the Environment (ARPA) carry out a similar monitoring and surveillance activity.

Discharge formulas

Sogin carries out environmental and radiological monitoring to verify compliance with the limits and/or reference levels under the current legislation and ensures the values are in line with those of the specific discharge procedure in use at each site.
Discharge formulas define the maximum level of radioactivity that can be discharged by a specific plant over a calendar year, according to the requirements set by the Regulatory Body.
These formulas are defined by Ministerial Decommissioning Authorisation Decrees for the Trino, Caorso, Garigliano, Latina and Bosco Marengo sites, under Article 98 of the Italian Legislative Decree no. 101 of 2020, as amended and supplemented, and are in accordance with the criterion of non-significant radiological presence, that is to say an actual dose of 10μSv/year for the population.
The approval process for Decommissioning Decrees for the Casaccia, Saluggia and Rotondella sites is still in progress. Its completion will result in an update to the discharge formulas. Currently, the discharge formulas used by these sites are those defined under the operating licence. If needed, the Regulatory Body adopts new provisions in addition to the previous requirements.
The maximum quantity of liquid and gas effluents to be discharged is defined in line with a non-significant effective radiological dose on the population, in other words, the discharge procedure may be fully implemented without any significant impact on the environment and population. The discharge formula is defined according to several factors: the type of the operations carried out at the plant, the fluctuation range of natural radiations, the critical routes of exposure (how the released radioactivity can be reabsorbed by the population, such as by ingesting the fish from the river or by eating vegetables from local crops, which are part of the food chain).
Formulas are regularly updated according to the new regulatory standards on radiological protection and nuclear safety and if there are any changes in the plant's configuration.
At all Sogin sites, the annual implementation of discharge formulas fall within the order of percentage points. The impacts on the population and the environment are therefore not significant in terms of radiological protection.
Further details on the discharge formulas adopted on each site are available at sogin.it.

IMPLEMENTATION OF DISCHARGE FORMULAS IN SOGIN SITES

	2023	2022	2021
Site		**Aerial discharges - use %**	
Caorso	<0.01	0.04	0.04
Latina	0.02	<0.01	<0.01
Trino	<0.01	0.56	0.56
Garigliano	<0.01	<0.01	<0.01
ISPRA-1	<0.01	<0.01	<0.01
Bosco Marengo	0.02	0.01	0.01
Casaccia	<2.20	<2.40	<1.80
Saluggia			
Alpha	0.037	0.038	0.025
Beta-gamma	0.032	0.031	0.031
Rotondella			
Particulate	0.08	0.08	0.07
Noble Gasses	3.86	4.10	4.26
Site		**Liquid discharges - use %**	
Caorso	<0.01	0.01	<0.01
Latina	1.7	0.33	17.11
Trino	<0.01	<0.01	<0.01

Garigliano	0.01	0.07	0.33
ISPRA-1*	n.a.	n.a.	n.a.
Bosco Marengo**	0	0	0
Casaccia***	n.a.	n.a.	n.a.
Saluggia****	0	0	0.003
Rotondella	0.12	0.12	0.12

*Liquids are conferred to the Liquid Effluents Treatment Plant of the JRC-ISPRA(STEEL).
**No liquid effluents were discharged in 2023.
***No discharge formulas are provided for liquids as the same are conferred to Nucleco.
****No liquid effluents were discharged in 2023.

Radiological monitoring

The following tables report the concentration of radioactivity detected in the main environmental and food components and the Level of Investigation (LI) calculated for each radionuclide in the following selected matrices.
The sea water matrix is monitored by the surveillance networks of the plants that discharge liquid effluents into the sea (Latina and Rotondella).
The clean river water matrix is, instead, monitored by surveillance networks at plants that discharge liquid effluents into surface water courses (Caorso, Trino, Garigliano, Casaccia, Saluggia).
Due to the nature of the plant, only uranium concentrations are monitored at the Bosco Marengo site, which must be lower than the non-radiological measurement.
The outcomes of the environmental surveillance at the Casaccia and ISPRA-1 plants for 2023, will be available in July 2024, following the issuing of the ENEA and JRC-Ispra Reports, respectively.
The outcomes of the environmental surveillance are compared with the reference levels expressed in terms of activity concentration in the specific sampled matrix, and they are classified in:

- recording level: value of radionuclide concentration in a specific matrix above the minimum detectable concentration (MDC);
- investigation level: radioactivity concentration value over which further investigations should be actuated;
- intervention level: radioactivity concentration level requiring the adoption of mitigating measures.

FOOD MATRIX - MILK – SOGIN

U.m. Bq*/litre	2023		2022		2021	
	Strontium-90	Caesium-137	Strontium-90	Caesium-137	Strontium-90	Caesium-137
Level of investigation	0.36	3.90	0.36	3.90	0.36	3.90
Caorso	0.0128	<0.02	0.0106	<0.02	0.057	<0.02
Latina	<0.02	<0.0256	<0.0427	<0.0420	<0.0257	<0.0181
Trino	0.0033	<0.049	0.004	<0.047	0.0099	<0.047
Garigliano	<0.0408	<0.0848	<0.019	<0.102	<0.041	<0.104
ISPRA-1	n.a.	n.a.	<0.09	0.28	0.09	0.37
Bosco Marengo	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Casaccia	n.a.	n.a.	0.0068	0.021	0.0066	0.039
Saluggia	<0.015	<0.127	<0.011	<0.067	<0.011	<0.046
Rotondella	0.053	<0.101	<0.018	<0.102	<0.018	<0.095

*The Becquerel is the unit used to measure radioactivity and equals one nuclear disintegration per second.

ENVIRONMENTAL MATRICES - SOIL – SOGIN

U.m. Bq*/litre	2023		2022		2021	
	Total uranium*	Caesium-137	Total uranium*	Caesium-137	Total uranium	Caesium-137
Level of investigation	17,000 ppm	198	17,000 ppm	198	17,000 ppm	198
Caorso	n.a.	7.50	n.a.	4.00	n.a.	3.40
Latina	n.a.	6.24	n.a.	6.90	n.a.	n.a.
Trino	n.a.	18.7	n.a.	20.8	n.a.	17
Garigliano	n.a.	4.69	n.a.	4.79	n.a.	4.86
ISPRA-1	n.a.	n.a.	n.a.	50	n.a.	60.0
Bosco Marengo	0.53	n.a.	0.72	n.a.	0.52	n.a.
Casaccia	n.a.	n.a.	n.a.	4.56	n.a.	3.17
Saluggia	n.a.	12.5	n.a.	13.7	n.a.	18.9
Rotondella	n.a.	1.54	n.a.	2.35	n.a.	2.67

*Uranium concentrations are measured in parts per million (ppm).

ENVIRONMENTAL MATRIX - CLEAN RIVER WATER – SOGIN

U.m. Bq*/litre	2023		2022		2021	
	Caesium-137	Strontium-90	Caesium-137	Strontium-90	Caesium-137	Strontium-90
Level of investigation	1.34	0.17	1.34	0.17	1.34	0.17
Caorso	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Latina	<0.0164	<0.0112	0.0104	<0.0055	0.0703	0.0181
Trino	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Garigliano	<0.0689	n.a.	<0.0642	n.a.	<0.0786	n.a.
ISPRA-1	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Bosco Marengo	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Casaccia	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Saluggia	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Rotondella	<0.0164	<0.0341	<0.0165	<0.0358	<0.01	<0.038

ENVIRONMENTAL MATRIX - RIVER WATER – SOGIN

U.m. Bq/ litre	2023				2022				2021			
	Strontium-90	Caesium-137	Tritium	Cobalt-60	Strontium-90	Caesium-137	Tritium	Cobalt-60	Strontium-90	Caesium-137	Tritium	Cobalt-60
Level of investigation	0.17	1.34	326	0.72	0.17	1.34	326	0.72	0.17	1.34	326	0.72
Caorso*												
downstream 1	n.a.	0.00271	n.a.	<0.00745	n.a.	<0.0037	n.a.	<0.00336	n.a.	0.0002	n.a.	<0.00056
downstream 2	n.a.	0.000839	n.a.	<0.00612	n.a.	<0.00208	n.a.	<0.00188	n.a.	<0.00051	n.a.	<0.00047

Latina	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Trino												
upstream	0.00021	<0.00028	<2.41	<0.000243	0.000053	<0.00025	2.40	<0.000238	0.00029	0.0056	<2.37	<0.0007
downstream	0.000028	<0.00127	<2.41	<0.00120	0.000316	<0.00266	<2.43	<0.00356	0.00019	0.0043	<2.39	<0.0034
Garigliano												
upstream	n.a.	<0.0689	n.a.	<0.0366	n.a.	<0.0642	n.a.	<0.0380	n.a.	<0.0786	n.a.	<0.0396
downstream	n.a.	<0.0689	n.a.	<0.0366	n.a.	<0.0642	n.a.	<0.0380	n.a.	<0.0786	n.a.	<0.0396
ISPRA-1	n.a.	n.a.	n.a.	n.a.	0.193	<0.0498	<3.20	n.a.	0.185	<0.036	<3.00	n.a.
Bosco Marengo**	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Casaccia	n.a.	n.a.	n.a.	n.a.	n.a.	<0.007	n.a.	n.a.	n.a.	<0.006	n.a.	n.a.
Saluggia	n.a.	<0.008	n.a.	n.a.	n.a.	<0.002	n.a.	n.a.	n.a.	<0.002	n.a.	n.a.
Rotondella	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.

*The values correspond to the maximum annual average value between the concentration in solution and the concentration in suspension, measured in the drainage channel (valley 1) and Isola Serafini (valley 2), respectively.
** In the waters of the Rio Lovassina, determinations of Uranium, the reference radionuclide, are carried out on the site. Activity concentrations measured downstream of the discharge show no anomalies compared to the natural background variability and are of the order of 0.0001 Bq/l. Also performed, voluntarily, were gamma spectrometry measurements, which showed no presence of radionuclides not belonging to the plant vector or not attributable to the environmental background.

Like Sogin, Nucleco also performs regular monitoring of liquid and aerial discharges to comply with the discharge formula defined in the operating licence. The effective dose which may not be exceeded for an individual, calculated by summing liquid and aerial discharges, is set at lower than 10μSv/year.

NUCLECO AERIAL AND LIQUID DISCHARGES

USE %	2023	2022
Aerial discharges	<1	<1
Liquid discharges	No commitment	No commitment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GRI ENVIRONMENTAL INDICATORS

7

Performance indicators	UOM	Sogin	Nucleco	Group		
		2023	2023	2023	2022	2021
GRI 301-1: Materials user						
Renewable materials used						
Paper	ton	6.15	0.71	6.86	11.21	9.35
Other renewable material	ton	0.00	0.00	0.00	0.00	0.00
Non-renewable materials used						
Metals	ton	1,089.73	69.19	1,158.92	158.72	3,455.84
	Casks	296.00	2,576.00	2,872.00	4,360.00	730.00
Machine lubricants	l	474.48	0.00	474.48	657.50	1,428.00
Industrial Gases	m3	111,650.21	0.00	111,650.21	109,453.96	120,553.46
Cement/Concrete	m3	2,789.90	34.00	2,823.90	753.50	4,953.14
Other	ton	3,924.26	64.40	3,988.66	103.52	1,840.62
Materials used deriving from recycled material						
Paper	%	83%	0%	74%	57%	81%
Paper	ton	5.09	0.00	5.09	6.42	7.55
Other renewable material	ton	0.00	0.00	0.00	0.00	0.00
Other non-renewable material	ton	607.00	0.00	607.00	0.00	410.00
GRI 302-1: Energy consumption within the organisation						
Energy consumption						
Total energy consumption	**GJ**	**118,109.74**	**8,966.90**	**127,076.64**	**140,591.75**	**158,126.36**
Methane	GJ	15,947.79	2,260.01	18,207.80	21,139.58	21,899.29
Petrol	GJ	599.23	187.64	786.87	471.47	150.82
Diesel	GJ	21,054.06	1,327.64	22,381.70	23,965.27	27,486.77
Electricity excluding renewable sources	GJ	78,907.34	5,191.61	84,098.95	93,321.13	106,883.13
Electricity from renewable sources	GJ	31,724.75	0.00	31,724.75	30,746.46	15,024.39
Other	GJ	1,601.32	0.00	1,601.32	1,694.29	1,706.35
Water withdrawal source 303-3						
WATER WITHDRAWAL SOURCE	**ML**	12,327.13	110.00	12,437.13	**5,077.41**	**13,142.60**
Well	ML	250.52	110.00	360.52	515.50	484.82
River	ML	291.03	0.00	291.03	699.29	1,162.65
Seawater	ML	11,566.80	0.00	11,566.80	3,612.60	11,178.00
Groundwater surface water	ML	140.77	0.00	140.77	148.64	214.88
Water resources owned by third parties	**ML**	78.01	0.00	78.01	**101.38**	**102.25**
of which:						
Aqueduct	ML	33.89	0.00	33.89	27.73	32.90
Well/other owned by third parties	ML	44.12	0.00	44.12	73.65	69.36
WATER WITHDRAWAL FROM WATER-STRESSED AREA	**ML**	11,677.31	110.00	11,787.31	**4,080.79**	**11,865.31**
Well	ML	53.76	110.00	163.76	398.49	440.91
River	ML	35.39	0.00	35.39	24.12	156.62
Seawater	ML	11,566.80	0.00	11,566.80	3,612.60	11,178.00
Groundwater surface water	ML	0.00	0.00	0.00	0.00	0.00

Water resources owned by third parties	**ML**	21.37	0.00	21.37	**45.57**	**89.78**
of which:						
Aqueduct	ML	21.37	0.00	21.37	18.57	21.38
Withdrawal from well owned by third parties	ML	0.00	0.00	0.00	27.00	68.40
WATER WITHDRAWAL BY SOURCE, divided into FRESHWATER AND OTHER SOURCES	**ML**	505.60	0.00	505.60	**1,286.48**	**1,960.59**
Freshwater	ML	494.55	0.00	494.55	1,277.68	1,950.11
Other types	ML	11.05	0.00	11.05	8.80	10.48

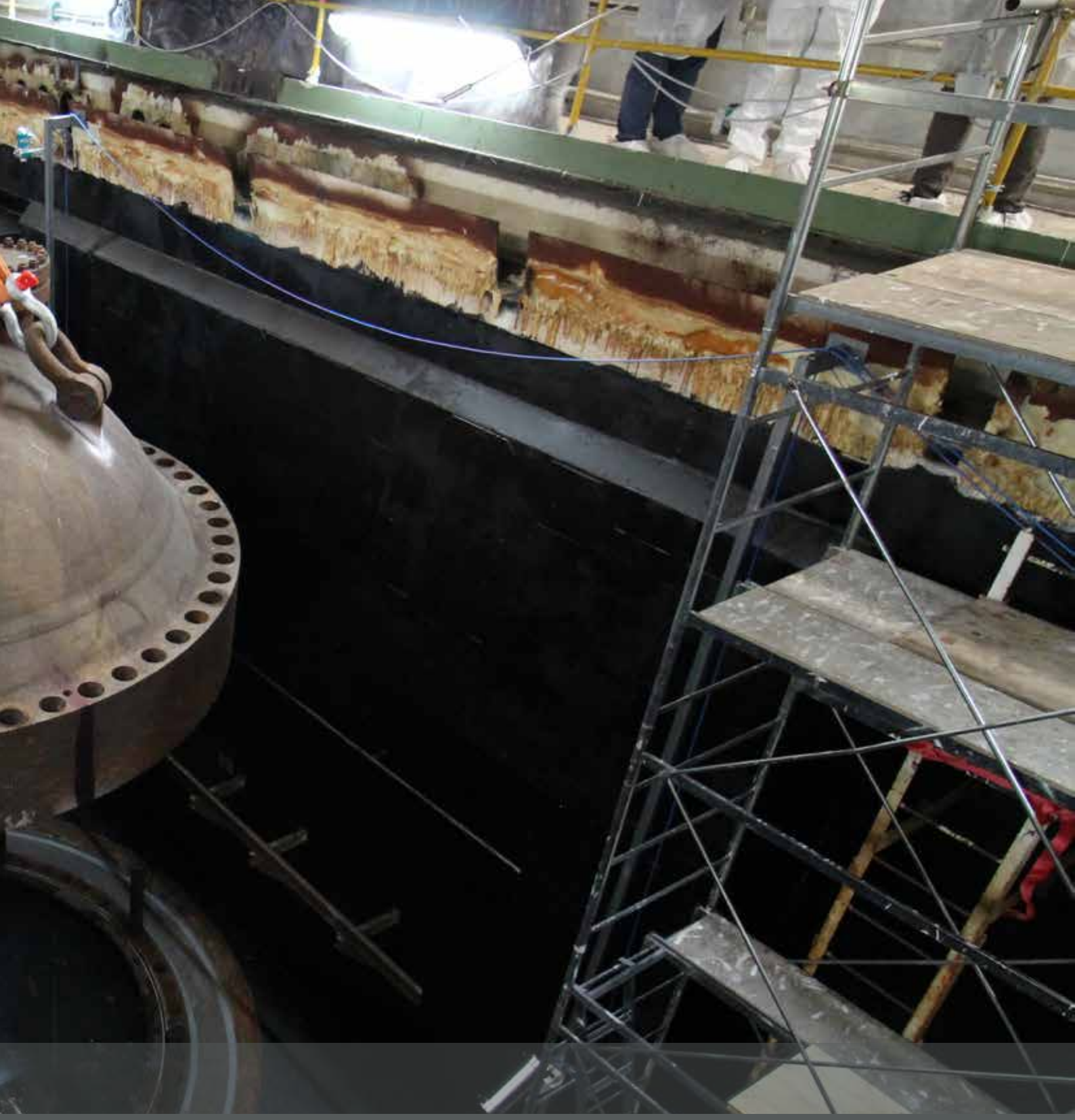
Water discharge 303-4						
TOTAL WATER DISCHARGE	**ML**	12,124.24	0.00	12,124.24	**4,633.98**	**1,503.77**
Well	ML	206.51	0.00	206.51	258.05	275.05
River	ML	291.13	0.00	291.13	699.29	1,162.65
Sea	ML	11,578.32	0.00	11,578.32	3,624.60	12.20
Surface water table	ML	0.00	0.00	0.00	0.00	0.00
Water resources owned by third parties	**ML**	48.28	0.00	48.28	**52.04**	**53.88**
of which:						
Aqueduct	ML	7.37	0.00	7.37	1.95	5.73
Withdrawal from well owned by third parties	ML	48.28	0.00	48.28	50.09	48.14
TOTAL WATER DISCHARGE DIVIDED INTO FRESHWATER AND OTHER SOURCES	**ML**	466.08	0.00	466.08	**971.20**	**1,498.01**
Freshwater	ML	454.56	0.00	454.56	935.07	1,485.81
Other types of water	ML	11.52	0.00	11.52	36.12	12.20
TOTAL DISCHARGE DIVIDED INTO WATER-STRESSED AREAS DIVIDED INTO FRESHWATER AND OTHER SOURCES	**ML**	11,584.92	0.00	11,584.92	**3,663.91**	**231.44**
Freshwater	ML	6.60	0.00	6.60	15.19	219.24
Other types of water	ML	11,578.32	0.00	11,578.32	3,648.72	12.20

Direct GHG emissions (Scope 1) 305-1						
GHG emissions (Scope 1)	**tCO2**	**2,743.58**	**239.18**	**2,982.76**	3,224.30	**3,537.33**

Indirect GHG emissions (Scope 2) 305-2						
Indirect GHG emissions (Scope 2)	**tCO2**	**8,235.94**	**386.49**	**8,622.43**	8,977.67	**9,352.27**

Waste generated 306-3						
Total waste generated	**ton**	**29,883.56**	**902.90**	**30,786.46**	**13,340.59**	**79,424.33**
Companies:	ton	16,608.11	0.00	16,608.11	8,160.63	43,480.62
Suppliers:	ton	13,275.45	0.00	13,275.45	5,179.96	35,943.72
Total waste generated: hazardous	**ton**	**85.08**	**16.87**	**101.94**	**3,302.27**	**27,668.99**
Companies:	ton	51.02	0.00	51.02	1,623.52	26,937.93
Suppliers:	ton	34.06	0.00	34.06	1,678.74	731.06
Total waste generated: non-hazardous	**ton**	**29,798.48**	**886.04**	**30,684.51**	**10,038.33**	**51,755.34**

Companies:	ton	16,557.10	0.00	16,557.10	6,537.11	16,542.69
Suppliers:	ton	13,241.38	0.00	13,241.38	3,501.22	35,212.66
Waste diverted from disposal 306-4						
Total waste recovered	**ton**	**22,644.60**	**478.96**	**23,123.56**	**7,183.63**	**10,981.60**
Total waste recovered: hazardous	**ton**	**23.46**	**14.49**	**37.94**	**38.31**	**135.62**
Companies:	ton	12.32	0.00	12.32	26.01	19.95
Suppliers:	ton	11.14	0.00	11.14	12.29	115.67
Total waste recovered: non-hazardous	**ton**	**22,621.14**	**464.48**	**23,085.62**	**7,145.33**	**10,845.97**
Companies:	ton	13,945.65	0.00	13,945.65	4,593.60	2,733.39
Suppliers:	ton	8,675.50	0.00	8,675.50	2,551.73	8,112.59
Stocks stored temporarily	**ton**	**2,218.53**	**0.00**	**2,218.53**	**1,162.08**	**378.48**
Stocks stored temporarily: hazardous waste	**ton**	**0.63**	**0.00**	**0.63**	**2.15**	**32.99**
Companies:	ton	0.63	0.00	0.63	2.15	1.05
Suppliers:	ton	0.00	0.00	0.00	0.00	31.94
Stocks stored temporarily: non-hazardous waste	**ton**	**2,217.91**	**0.00**	**2,217.91**	**1,159.93**	**345.49**
Companies:	ton	2,217.91	0.00	2,217.91	1,030.23	310.63
Suppliers:	ton	0.00	0.00	0.00	129.70	34.86
Other allocation	ton	**0.00**	**0.00**	**0.00**	0.00	0.00
Waste directed to disposal 306-5						
Total waste directed to disposal	**ton**	**5,157.51**	**423.94**	**5,581.45**	**5,311.39**	**71,776.54**
Total waste directed to disposal: hazardous	**ton**	**63.15**	**2.38**	**65.53**	**3,263.21**	**27,503.91**
Companies:	ton	40.22	0.00	40.22	1,596.76	26,920.46
Suppliers:	ton	22.92	0.00	22.92	1,666.45	583.45
Total waste directed to disposal: non-hazardous	**ton**	**5,094.36**	**421.56**	**5,515.92**	**2,048.18**	**44,272.63**
Companies:	ton	398.78	0.00	398.78	1,228.39	17,207.42
Suppliers:	ton	4,695.59	0.00	4,695.59	819.79	27,065.21



APPENDIX 8

IMPACT RECONCILIATION TABLE

Issues	Scope of impacts	Positive/Negative Impact	2030 Agenda SDGs
Accountability and collaboration with national Institutions and Associations	Direct	- Increase/Decrease in conflicting relationships with intergovernmental institutions, supervisory bodies and national and international associations resulting from shortcomings in the implementation of their requests.	
Dialogue and interaction with Local communities	Direct	- Increased/Decreased participation and reduced collaboration with the community and local communities as a result of a flawed involvement process.	
Decommissioning physical progress	Direct	- Increase/Decrease in air and water sources' pollution levels resulting from the misuse of water and energy resources and inappropriate climate risk management processes.	
Regulatory Compliance	Indirect	- Increase/Decrease in the number of environmental and social non-compliance resulting from weaknesses in the climate risk management process.	
Fight against corruption	Direct	- Increase/Decrease in the number of corruption incidents resulting from weaknesses in the employee training process.	
Circular Economy	Indirect	- Increase/Decrease in waste production and in the amount of inventories resulting from the incorrect management of raw materials throughout their life cycle and from the adoption of non-virtuous technical and technological solutions.	
Radioactive Waste Management	Direct	- Increase/Decrease in criticalities/impacts related to the waste management process as a consequence of incorrect management and/or storage of radioactive waste.	
Siting of the DNPT (National Repository and Technology Park)	Indirect	- Slowdown or halt in decommissioning activities undertaken by the Group resulting from difficulties in selecting a site for the siting of the National Repository. - Increased tax revenue and employment in the area selected for the installation of the National Repository.	
Radiological Safety	Direct	- Increase/Decrease in contamination incidents resulting from the implementation of strategies, plans and procedures in line with applicable regulatory constraints on radiological safety.	

Workplace Safety	Direct	- Increase/Decrease in the number of workplace accidents resulting from the distribution of personal protective equipment and dissemination of appropriate safety procedures.	
Supply chain	Indirect	- Regression/development of supply chain operators resulting from supplier selection, evaluation and qualification processes that take into account environmental and social sustainability criteria.	
HR development, talent management, and equal opportunities	Direct	- Increase/Decrease in the technical skills of employees and workers resulting from training activities aimed at growing and expanding their know-how with a consequent increase in productivity levels.	
Corporate welfare workers' health and wellbeing	Direct	- Increase/Decrease in turnover rate resulting from human resources management processes and the launch of initiatives focusing on people care and the retention of talent.	
Decommissioning Progress – Costs	Direct	- Increase/Decrease in costs related and associated with nuclear site dismantling and nuclear fuel cycle closure activities and possible impact on reputation.	- N/A
Scientific knowledge sharing	Indirect	- Increase/Decrease in implementing/participating in dissemination activities of specific/technical expertise on nuclear decommissioning activities.	
Technological innovation and research	Direct	- Increase/Decrease in R&D and technology-oriented investments resulting from inconsistent budget allocation processes.	

GRI CONTENT INDEX

Statement of use	**The Sogin Group has prepared the 2023 Sustainability Report in accordance with the GRI Standards for the period from 01.01.2023 to 31.12.2023.**
GRI 1 used	**GRI 1: 2021 Foundation**

GRI STANDARDS	DISCLOSURE	LOCATION	OMISSIONS		
			DISCLOSURES OMITTED	REASON	EXPLANATION
GRI 2: General disclosures 2021	2-1 Organisational details	Chapter: Group profile Paragraph: Sogin/Nucleco			
	2-2 Entities included in sustainability reporting	Introductory section Paragraph: Methodological note			
	2-3 Reporting Period, Frequency and Point of Contact	Introductory section Paragraph: Methodological note			
	2-4 Restatements of information	Introductory section Paragraph: Methodological note			
	2-5 External assurance	Final Section Paragraph: Independent Auditor's report			
	2-6 Activities, value chain and other business relationships	Chapter: Stakeholders Chapter: Closing the Italian nuclear cycle Chapter: Activities in Italy and abroad			
	2-7 Employees	Chapter: Stakeholders Paragraph: Human resources KPIs			
	2-8 Workers who are not employees	Chapter: Stakeholders Paragraph: Human resources KPIs			
	2-9 Governance structure and composition	Chapter: Group profile Paragraph: Governance			
	2-10 Nomination and selection of the highest governance body	Chapter: Group profile Paragraph: Governance			
	2-11 Chair of the highest governance body	Chapter: Group profile Paragraph: Governance			
	2-12 Role of the highest governance body in overseeing the management of impacts	Chapter: Group profile Paragraph: Our Governance			
	2-13 Delegation of responsibility for managing impacts	Chapter: Group profile Paragraph: Our Governance			
	2-14 Role of the highest governance body in sustainability reporting	Introductory section Paragraph: Methodological note			
	2-15 Conflicts of interest	Chapter: Group profile Paragraph: Transparency and legality			
	2-16 Communication of critical concerns	Chapter: Group profile Paragraph: Our Governance			
	2-17 Collective knowledge of the highest governance body	Chapter: Sustainable approach Paragraph: Planning sustainability			

	2-18 Evaluation of the performance of the highest governance body	Chapter: Stakeholders Paragraph: People			
	2-19 Remuneration policies	Chapter: Group profile Paragraph: Sogin Chapter: Stakeholders Paragraph: People			
	2-20 Process to determine remuneration	Chapter: Stakeholders Paragraph: People			
	2-21 Annual total remuneration ratio	Chapter: Stakeholders Paragraph: Human resources KPIs			
	2-22 Statement on sustainable development strategy	Chapter: Sustainable approach Paragraph: Planning sustainability			
	2-23 Policy commitments	Chapter: Sustainable approach Paragraph: planning sustainability			
	2-24 Embedding policy commitments	Chapter: Sustainable approach Paragraph: Planning sustainability			
	2-25 Processes to remediate negative impacts	Chapter: Safety and the environment Paragraph: Safety for workers Paragraph: Radiological safety Paragraph: Industrial safety Paragraph: Environmental Impact Assessment (EIA)			
	2-26 Mechanisms for seeking advice and raising concerns	Chapter: Group profile Paragraph: Transparency and legality			
	2-27 Compliance with laws and regulations	Chapter: Group profile Paragraph: Transparency and legality			
	2-28 Membership associations	Chapter: Stakeholders Paragraph: Shared value			
	2-29 Approach to stakeholder engagement	Chapter: Stakeholders Paragraph: People Paragraph: Shared value			
	2-30 Collective bargaining agreements	Chapter: Stakeholders Paragraph: People			
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Introductory section Paragraph: Methodological note			
	3-2 List of material topics	Introductory section Paragraph: Methodological note			
ACCOUNTABILITY AND COLLABORATION WITH NATIONAL INSTITUTIONS AND ASSOCIATIONS, DECOMMISSIONING PROGRESS - COSTS					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Stakeholders Paragraph: Value generation and distribution			
GRI 201: Economic performance 2016	201-1 Direct economic value generated and distributed	Chapter: Stakeholders Paragraph: Value generation and distribution			
	201-4 Financial assistance received from government	Chapter: Stakeholders Paragraph: Value generation and distribution			

GRI 203 Indirect economic impacts 2016	203-1 Infrastructure investments and services supported	Chapter: Closing the Italian nuclear fuel cycle Paragraph: National Repository and Technology Park, a major project for Italy			
	203-2 Significant indirect economic impacts	Chapter: Closing the Italian nuclear fuel cycle Paragraph: National Repository and Technology Park, a major project for Italy			
SUPPLY CHAIN					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Stakeholders Paragraph: Shared value			
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Chapter: Stakeholders Paragraph: Shared value			
GRI 308: Suppliers' environmental assessment 2016	308-1 New suppliers that were screened using environmental criteria	Chapter: Stakeholders Paragraph: Shared value			
GRI 414: Suppliers' social assessment 2016	414-1 New suppliers that were screened using social criteria	Chapter: Stakeholders Paragraph: Shared value			
FIGHT AGAINST CORRUPTION					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Group profile Paragraph: Governance Paragraph: Transparency and legality			
GRI 205: Anti-corruption 2016	205-3 Confirmed incidents of corruption and actions taken	Chapter: Group profile Paragraph: Transparency and legality	In 2023, no events involving corruption were found		
GRI 207: Taxes 2019	207-1 Approach to tax	Chapter: Group profile Paragraph: Governance			
	207-2 Tax governance, control, and risk management	Chapter: Group profile Paragraph: Governance			
	207-3 Stakeholder engagement and management of concerns related to tax	Chapter: Group profile Paragraph: Governance			
	207-4 Reporting by country	Chapter: Group profile Paragraph: Governance			
CIRCULAR ECONOMY					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Sustainable approach Paragraph: Planning sustainability Chapter: Closing the Italian nuclear cycle Paragraph: Waste Management			
GRI 301: Materials 2016	301-1 Materials used by weight or volume	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	301-2 Recycled input materials used	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			

DECOMMISSIONING PHYSICAL PROGRESS					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Safety and the environment Paragraph: Environmental Impact Assessment (EIA) Paragraph: Remediation procedures Paragraph: Environmental performance Paragraph: Environmental radiation protection			
GRI 302: Energy 2016	302-1 Energy consumption within the organisation	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
GRI 303: Water and effluents 2018	303-1 Interaction with water as a shared resource	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	303-2 Management of water discharge-related impacts	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	303-3 Water withdrawal	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	303-4 Water discharge	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
GRI 305: Emissions	305-1 Direct (Scope 1) GHG Emissions	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	305-2 Energy Indirect (Scope 2) GHG Emissions	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
RADIOACTIVE WASTE MANAGEMENT					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
GRI 306: Waste 2020	306-1 Waste generation and significant waste-related impacts	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	306-2 Management of significant waste-related impacts	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	306-3 Waste generated	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	306-4 Waste diverted from disposal	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
	306-5 Waste directed to disposal	Chapter: Safety and the environment Paragraph: GRI Environmental Indicators			
HR DEVELOPMENT, TALENT MANAGEMENT AND EQUAL OPPORTUNITIES, WELFARE, HEALTH AND WELL-BEING OF EMPLOYEES					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Stakeholders Paragraph: People			
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Chapter: Stakeholders Paragraph: Human resources KPIs			
	401-3 Parental leave	Chapter: Stakeholders Paragraph: Human resources KPIs			
GRI 404: Training and education 2016	404-1 Average hours of training per year per employee	Chapter: Stakeholders Paragraph: Human resources KPIs			

GRI 405: Diversity and equal opportunity 2016	405-1 Diversity of governance bodies and employees	Chapter: Stakeholders Paragraph: Human resources KPIs			
	405-2 Ratio of basic salary and remuneration of women to men	Chapter: Stakeholders Paragraph: Human resources KPIs			
SAFETY IN THE WORKPLACE AND RADIOLOGICAL SAFETY					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Safety and the environment Paragraph: Safety for workers			
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	Chapter: Safety and the environment Paragraph: Safety for workers			
	403-2 Hazard identification, risk assessment, and incident investigation	Chapter: Safety and the environment Paragraph: Safety for workers			
	403-3 Occupational health services	Chapter: Safety and the environment Paragraph: Safety for workers			
	403-4 Worker participation, consultation, and communication on occupational health and safety	Chapter: Safety and the environment Paragraph: Safety for workers			
	403-5 Worker training on occupational health and safety	Chapter: Safety and the environment Paragraph: Safety for workers Chapter: Stakeholders Paragraph: People			
	403-6 Promotion of worker health	Chapter: Safety and the environment Paragraph: Safety for workers			
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Chapter: Safety and the environment Paragraph: Safety for workers			
	403-9 Work-related injuries	Chapter: Safety and the environment Paragraph: Safety for workers			
DIALOGUE AND EXCHANGE WITH LOCAL COMMUNITIES					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Stakeholders Paragraph: Shared value			
GRI 413: Local communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	Chapter: Stakeholders Paragraph: Shared value			
TECHNOLOGICAL INNOVATION AND RESEARCH					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Sustainable approach Paragraph: Sustainability and innovation Paragraph: Innovation in decommissioning			
REGULATORY COMPLIANCE					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Group profile Paragraph: Transparency and legality			

SHARING OF SCIENTIFIC KNOW-HOW					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Stakeholders Paragraph: Shared value			
SITING OF THE DNPT (NATIONAL REPOSITORY AND TECHNOLOGY PARK)					
GRI 3: Material Topics 2021	3-3 Management of material topics	Chapter: Closing the Italian nuclear cycle Paragraph: National Repository and Technology Park, a major project for Italy			

Independent auditor's report on Sustainability Report 2023

SO.G.I.N. SpA

Independent Auditor's Report on Sustainability Report 2023

To the Board of Directors of SO.G.I.N. SpA

We have undertaken a limited assurance engagement on the Sustainability Report of SO.G.I.N. Group (hereinafter also the "Group") for the year ended 31 December 2023.

Responsibilities of the Directors for the Sustainability Report

The Directors of SO.G.I.N. SpA (hereinafter also the "Company") are responsible for the preparation of the Sustainability Report in accordance with the *"Global Reporting Initiative Sustainability Reporting Standards"* issued by GRI - *Global Reporting Initiative* (the "GRI Standards"), as illustrated in the "Methodological Note" section of the Sustainability Report.

The Directors are also responsible for such internal control as they determine is necessary to enable the preparation of a Sustainability Report that is free from material misstatement, whether due to fraud or error.

The Directors are also responsible for defining the sustainability performance targets of the SO.G.I.N. Group, as well as for identifying its *stakeholders* and material topics to be reported on.

Auditor's Independence and Quality Control

We are independent in accordance with the principles of ethics and independence set out in the Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

Our firm applies International Standard on Quality Management 1 (ISQM Italia 1), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

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Auditor's Responsibilities

Our responsibility is to express a limited assurance conclusion, based on the procedures we have performed, regarding the compliance of the Sustainability Report with the requirements of the GRI Standards. We conducted our work in accordance with "International Standard on Assurance Engagements ISAE 3000 (Revised) - Assurance Engagements other than Audits or Reviews of Historical Financial Information" (hereinafter also "ISAE 3000 *Revised*") issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. That standard requires that we plan and perform procedures to obtain limited assurance about whether the Sustainability Report is free from material misstatement.

Therefore, the procedures performed were less in extent than those performed in a reasonable assurance engagement conducted in accordance with ISAE 3000 *Revised* and, consequently, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report were based on our professional judgement and included inquiries, mainly of personnel of the Company responsible for the preparation of the information presented in the Sustainability Report, inspection of documents, recalculations and other procedures designed to obtain evidence considered useful.

In detail, we performed the following procedures:

1) analysis of the process of definition of the material topics reported on in the Sustainability Report, with reference to the method applied in the analysis and understanding of the Company's environment, the identification and prioritisation of the actual and potential impacts, and the internal validation of the results of the process;

2) comparison of the financial information reported in the "Value Creation and Distribution" section of the Sustainability Report with the information included in the Company's annual financial statements;

3) we obtained an understanding of the processes underlying the generation, collection and management of significant qualitative and quantitative information included in the Sustainability Report.

In detail, we held meetings and interviews with the management personnel of SO.G.I.N. SpA and we performed limited analyses of documentary evidence, to gather information about the processes and procedures for the collection, aggregation, processing and submission of non-financial information to the function responsible for the preparation of the Sustainability Report.

Moreover, for material information, considering the activities and characteristics of the Group:

- at the level of SO.G.I.N. SpA, as "parent company":

  a) with reference to the qualitative information presented in the Sustainability Report, we carried out interviews and obtained supporting documents to verify its consistency with available evidence;

b) with reference to quantitative information, we performed both analytical procedures and limited tests to verify, on a sample basis, the accuracy of data aggregation.

- for the site of Latina, which we selected based on its activities, contribution to performance indicators at a consolidated level and its location, we carried out onsite visits during which we met the persons in charge and obtained documentary evidence, on a sample basis, regarding the correct application of the procedures and calculation methods applied for the indicators.

Limited Assurance Conclusion

Based on the procedures performed, nothing has come to our attention that causes us to believe that the Sustainability Report of the SO.G.I.N. Group for the year ended 31 December 2023 is not prepared, in all material respects, in accordance with the requirements of the GRI Standards as illustrated in the "Methodological Note" section of the Sustainability Report.

Rome, 02 August 2024

PricewaterhouseCoopers SpA

Signed by

Pierpaolo Mosca
(Partner)

This report has been translated from the Italian original solely for the convenience of international readers. We have not performed any controls on the Sustainability Report 2023 translation.

2023 SUSTAINABILITY REPORT

prepared by Sogin's Regulatory, Institutional and Communication Department

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