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▶ **REPORT**

TWOTHOUSANDTWENTYTWO

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▶ **REPORT**

TWOTHOUSANDTWENTYTWO

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▶ R E P O R T

LETTER TO
STAKEHOLDERS



Gianbattista La Rocca
Chief Executive Officer

Dear Stakeholders,

We are proud to present our Sustainability Report for 2022, covering the Company's ESG (Environmental, Social and Governance) commitments and performance, in line with our declared values. The Report sets out our response to stakeholder expectations as part of our systematic engagement process.

2022 saw Italo consolidate and strengthen its commitment to combatting climate change and promoting social good as the main pillars of our strategy. The aim is to become a leader in sustainable mobility, focusing on circular, green growth even beyond the Company's area of operation.

Italo's approach to environmental issues is based around the need to use less energy in its operations and to have a lower impact on the environment. Social sustainability, on the other hand, regards work relationships, inclusion and the wellbeing of the community. These processes are backed by a corporate governance system designed to ensure that, when making business decisions, both aspects are taken into consideration, alongside human rights and value chain sustainability.

The progress made by the organization and everyone at the Company is evident from the overall improvement in approach and the results and recognition achieved in recent years.

We carried out our first ever climate change risk assessment, conducted in accordance with TCFD guidelines, and a Scope 3 GHG emissions analysis in 2022. These key steps will form the starting point for the improvements that Company intends to implement in the coming years.

Italo is proud of its contribution to the community, with our commitment rewarded with the highest ranking among Italy's transport providers in the "Diversity & Inclusion" survey published by the Financial Times.

We are convinced that commitment to sustainability is necessary to ensure a better future and fair development for the country and communities. Proof of our commitment is provided by our voluntary adoption of EU reporting requirements regarding transparency, confirming that Italo is fully aligned with the EU Taxonomy for environmentally sustainable businesses.

The Company is pleased to be able to contribute to the community and is more than ever committed to delivering on our sustainability strategy.



22 Highlights in 2022

► The Company

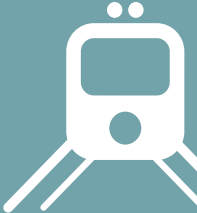
121 Millions of passengers transported from 2012

51 Cities served

59 Stations connected

51 Trains in the fleet


62.89%
Rail Sustainability Index:
compared with a sector average of 42.38%



100%
Environmentally sustainable turnover aligned to EU taxonomy

100%
Environmentally sustainable capital expenditure aligned to EU taxonomy

100%
Environmentally sustainable operating expenses aligned to EU taxonomy




► Environmental Sustainability

ISO 14001
Certification

11,92 gCO₂/pax.km
Emissions *

99%+
Of total CO₂ emissions produced by traction energy



* Compared to 127 gCO₂/pax.km for cars and 91 gCO₂/pax.km for motorcycles. Source: Ingegneria dell'Ambiente, Vol. 6, no. 1/2019.

► Social Sustainability

**ISO
45001**
Certification

1,360
Total workforce

47%
Women of the workforce

21%
Workforce aged under 30



97%
Employees hired on
permanent contracts

7% Employee turnover

20
Average hours of periodic
training per employee



NUMBER ONE

Among Italian companies (in the transport industry) in the *Financial Times* "Diversity & Inclusion" rankings

► Corporate Governance

2 Bodies focusing
on sustainability governance

0 Instances of non-compliance
with laws and regulations



Introduction

Since our foundation, the Company has had a strong commitment to respecting and safeguarding the environment: from the decision to use best in category innovative and sustainable trains, built from recyclable materials to the attention we pay to the environmental impact of our activities, identifying initiatives also designed to reduce our environmental footprint in terms of energy, waste and impact on local areas. This conduct, which is part of Italo's DNA, has led the Company to cultivate an interest in all ESG aspects, day by day strengthening our commitment to sustainable transport.

► Over the years, Italo has reached numerous milestones





SUSTAINABLE FINANCE

In 2019, the Company obtained what was the largest ever Green Loan in the global transport sector: a €1.1 billion loan marking an unprecedented turning point in green financing for the sector.

The loan, which was provided by a syndicate of Italian and international banks, was used to re-finance Italo's €900 million green investments and to further expand the eco-friendly fleet.

Italo has proven to be a mass transport operator that uses a fleet of best-in-class eco-friendly trains and a leader in environmental sustainability in the high-speed rail market. This qualifies it as a "pure player", that is a company whose revenues are generated entirely by activities that involve a low level of CO₂ emissions and that is therefore able to combat climate change.

Sustainable finance puts environmental, social and governance (ESG) concerns at the heart of the Company's decision-making and investment planning, focusing its resources on sustainable projects. Italo believes that this will have a positive impact on society and the environment without sacrificing financial returns.

To further strengthen our commitment to sustainable finance, in 2020, the Company exercised the Sustainability Linked Option, also linking the loan to concrete sustainable performance goals, measured on an annual basis. The loan agreement is classified as "green" and "sustainable". To date, the Company has consistently achieved the established sustainable performance goals.

EU TAXONOMY

Regulation (EU) 2020/852 of 18 June 2020 has defined a taxonomy of economic activities that can be considered environmentally sustainable, based on a unified system for classifying economic activities developed with the aim of helping businesses, financial stakeholders and public organizations to identify what is truly sustainable according to objective, well-defined criteria.

Art. 3 of the Regulation states that an economic activity can be defined as "environmentally sustainable" if it:

- contributes substantially to the achievement of at least one of the environmental objectives (climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, waste prevention and recycling, pollution prevention and control, the protection of healthy ecosystems);
- does no significant harm (DNSH) to any of the other five environmental objectives;
- is carried out in compliance with minimum safeguards;
- complies with technical screening criteria established by the Commission.

Whilst application of the taxonomy is not obligatory, the Company has voluntarily decided to do so by reporting on the eligibility and alignment of its activities with the EU's classification system.¹

More specifically, Italo's economic activities refer entirely to the category of delegated acts "Passenger interurban rail transport".

Italo's business, from which we generate all our revenue, is fully aligned with the EU taxonomy in that it meets all the technical screening criteria set out therein. Italo makes a substantial contribution to one of the six environmental objectives - climate change mitigation - conducting its business entirely through the use of electric trains, with no direct CO₂ emissions, without causing significant harm to any of the other environmental objectives, using rescue locomotives that satisfy the emission limits established by EU legislation, managing the waste produced using appropriate procedures and taking into account its climate risk exposure.

The Company also complies with the minimum safeguards provided for in the EU taxonomy legislation, as there have been no instances of breaches of human rights, anti-bribery, tax or antitrust legislation. These issues are also overseen within Italo's organization, which provides specific training on the Organizational, Management and Control Model pursuant to Legislative Decree 231/2001 and has launched the development of a due diligence process designed to verify respect for human rights throughout the value chain.

The taxonomy tables are shown below.

¹ An eligible activity is an activity listed in the delegated acts relating to Regulation 852/2020, regardless of whether or not it meets the technical screening criteria specified in the delegated acts themselves.

SUSTAINABILITY PLAN

In 2022, Italo revised its three-year Sustainability Plan for the period 2023-2025. The Plan has been restructured, switching from the previous architecture based on six pillars (Safety, People, Environment, Customers, Governance and Social) to one centered on the three aspects of ESG used internationally: Environmental, Social and Governance.



E.1 Climate Change

E.2 GHG Emissions and Energy Use Reduction

E.3 Water & Waste Reduction/Recycling

S.1 Health & Safety

S.2 Employees Development, Engagement & Wellbeing

S.3 Diversity & Inclusion

S.4 Community Engagement, Wellbeing & Social Projects

G.1 Corporate Governance

G.2 Cybersecurity & Data Protection

G.3 Stakeholder Mgmt

10 SDGs 2030 UN AGENDA



The Plan focuses on the key factors for the Company’s business and aims to consolidate Italo’s long-term vision and development. It sets ambitious goals based on clear actions and quantitative and qualitative targets: it consists of 10 goals and 38 actions, with the related metrics and targets to be achieved.

The materiality analysis, conducted during the year, confirmed the goals already set in the previous Plan and provided the information needed to set priorities. It highlighted the importance of the Company’s commitment to addressing climate change and its contribution to local areas and communities, as reflected in specific additional actions included in the Plan.

In addition, the Plan uses strategies and concrete initiatives to link Italo’s goals to 10 of the 17 SDGs set in the UN’s 2030 Agenda.



RAIL SUSTAINABILITY INDEX

In 2022, Italo achieved a number of notable results regarding the Rail Sustainability Index (RSI), launched by the Union Chemin de Fer (UIC)². This is a benchmarking tool for measuring the sustainability performance of rail transport using the framework provided by the United Nations’ sustainable development goals (SDGs). The RSI consists of a series of KPIs providing members with a single rating, that tracks the progress made in supporting achievement of the 7 SDGs. Italo is a member of the UIC and has participated in the project, obtaining a good score overall and in the various sub-categories. This led the Company to be invited to take part in the UIC’s Sustainability Action Week, held in Paris in the first week of March 2023, to provide a testimonial on Italo’s approach and the KPIs linked to SDG-5 (“Gender Equality”) and SDG-8 (“Full Employment & Decent Work”).

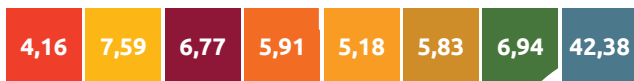
SDG



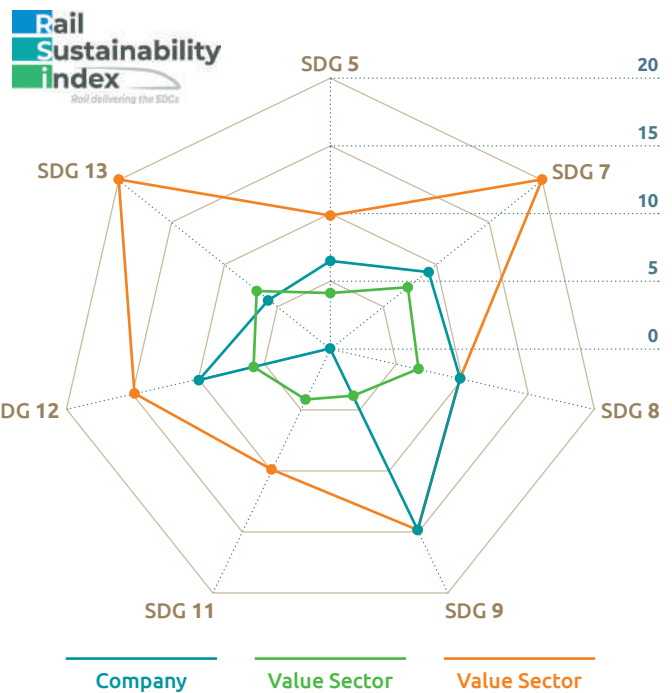
Score (%)



Sector Average (%)



- Highest Scoring KPI**
The score achieved for this series of KPIs is equal to or above the sector average.
- Key Opportunity to Improve**
The score achieved for this series of KPIs is below the sector average.



To increase the score related to SDG 13, Italo has planned several improvements to the evaluation criterion used:

- (i) Emission Targets
- (ii) Collaboration with government entities

2 <https://uic.org/sustainability/article/rail-sustainability-index-project>

About the Company

HISTORY AND MISSION

Italo is Italy's first and only private high-speed rail operator. It is a sector leader in Europe and, today, Italo and Italian deregulation represent a case study.

Italo has proven to be a unique example of private excellence in the rail transport sector. It was founded in 2006, with the first commercial service operated in 2012. After the start-up phase, in 2015 the Company successfully entered a turnaround phase, which ended in 2018 with the listing on the stock exchange and the acquisition by Global Infrastructure Partners (GIP). Italo's mission is to provide passengers safe, reliable and technologically advanced high-speed rail services, with a strategy focused on safety, hospitality, quality, market presence and sustainability.

Italo, created at a time when the development of sustainable economy models is paramount if we ensure that human activities have a negligible impact on the ecosystem, has put sustainability at the heart of everything we do. The Company, which aims to "make a difference" in the world of transport, has made respect for the person, time as a value, protection of the environment the three principles around which the idea of sustainability revolves. A goal that is pursued every day by providing a service able to meet the needs of people and the world around them in the best possible way.

Italo, with its high-quality services, is ready to meet Italy's demand for mobility. Our value-for-money offering aims to enable everyone to exercise their right to travel for work, study, business or for leisure purposes.

Italo provides comfortable and relaxing travel options, allowing passengers to avoid the stress of having to take their cars, especially over longer distances and in the most congested areas.

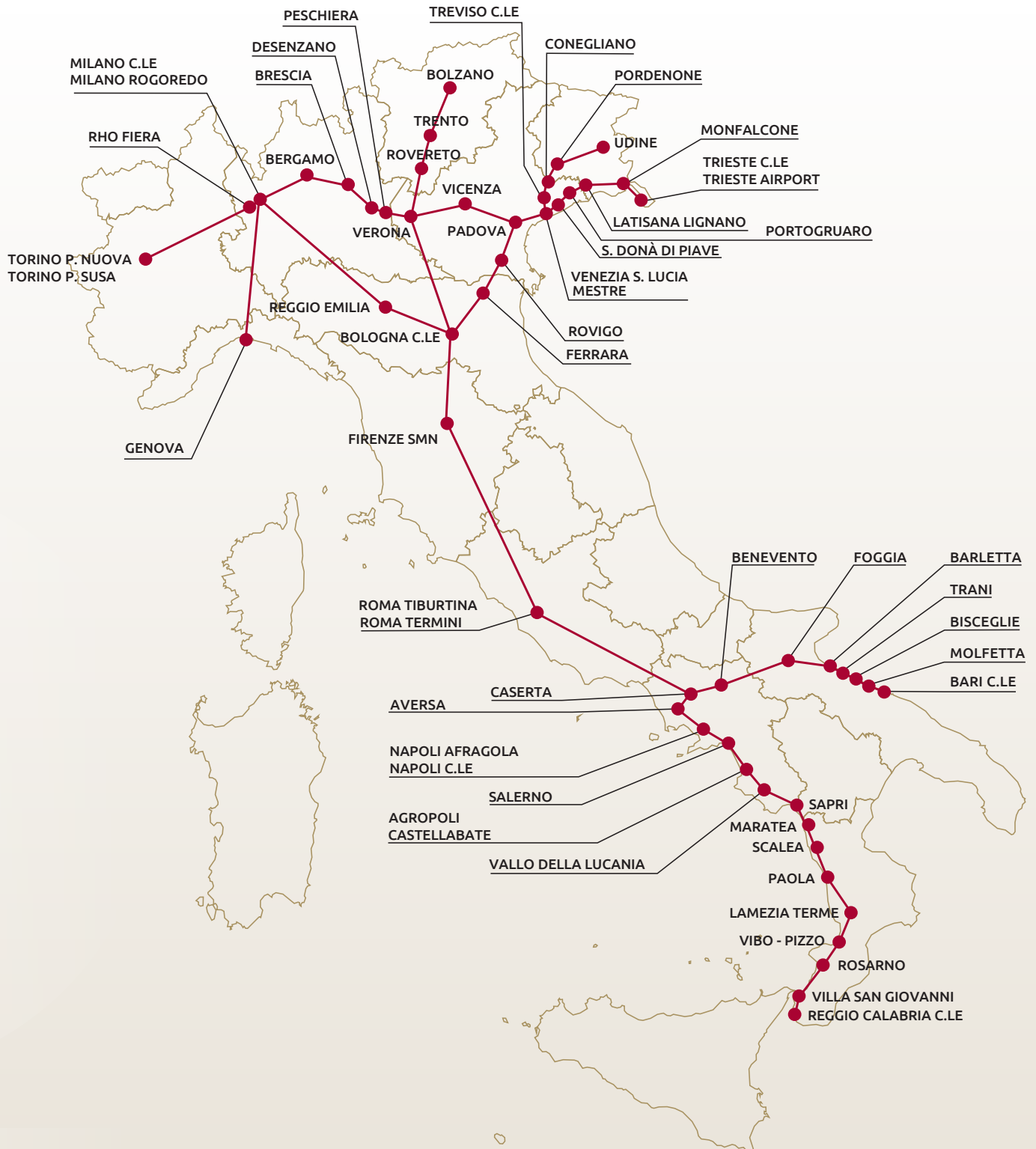
With its station and onboard staff, the Company has introduced a new approach to rail passengers. At all stages of the customer experience, from when a passenger decides to travel with Italo to when they get to their departure station, and while on the train, they can contact the Company, express their needs and obtain the right solution.

Italo's mission is not immutable but envisages an ongoing improvement in the service in order to continuously ensure that we can provide what our customers are looking for.

ITALO'S NETWORK

In 2022, Italo's network connected 51 cities and 59 stations³. Since its foundation in 2012, Italo's network has grown almost tenfold.

In 2022, travelers were for the first time offered the chance to purchase tickets for travel with other transport providers, including regional rail services, in a single transaction via Italo's sales channels. The tickets can be bought in combination with those for Italo's high-speed rail service, thus offering customers new travel options. This has enabled the Company to implement our intermodal transport plan and sell tickets for routes not included in our rail network, contributing to the development of sustainable, circular transport.



ITALO'S FLEET

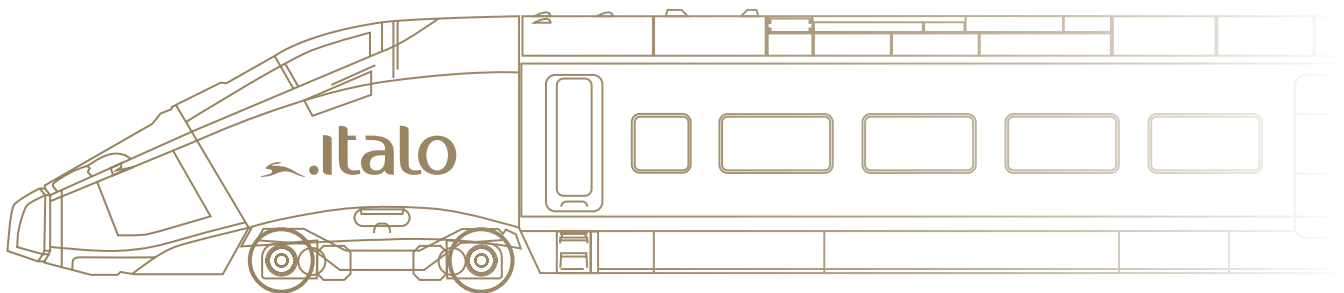
Italo's fleet consists of 25 of Alstom's AGV (Automotrice Grande Vitesse) trains that use the same traction system as the train that, on 3 April 2007, set the world rail speed record of 574.8 km an hour. The trains, built at the Savigliano (near Cuneo) and La Rochelle (France) plants, first took to the rails of the Italian railway network in April 2012.

Since its inception, Italo has invested in an advanced-conception, innovative and sustainable train, which is 98% made of such recyclable materials as aluminum, steel, copper and glass. The AGV combines technology, safety, energy savings and respect for the environment.

Since 2015, the Company has purchased also 26 EVO trains from Alstom, making a total fleet of 51 trains. Italo's EVO trains are the latest version of the "Pendolino" range, of which more than 500 trainsets are in circulation around the world. This "evolution" aims to improve the comfort for passengers. In addition, this particular train is fully compatible with the latest technical specifications for interoperability and complies with all European and Italian safety and environmental regulations.

Like those in the AGV fleet, the EVO trains are also "green", as they are manufactured with recyclable materials and are designed in accordance with eco-sustainability criteria to reduce CO₂ emissions. The distributed traction system improves efficiency and recovers energy by regenerative braking.

SHAREHOLDER STRUCTURE



72.6%

GIP III GLOBAL INVESTMENT Sàrl

11.5%

ALLIANZ Spa

of which 10% through Allianz Infrastructure Luxembourg II Sàrl

7.7%

REINVESTING SHAREHOLDERS:

Luca Cordero di Montezemolo through MCG HOLDINGS Srl
Flavio Cattaneo through PARTIND TRE Srl
Giovanni Punzo through MDP TRE Srl
Isabella Seragnoli through MAIS Spa
Alberto Bombassei through NEXT INVESTMENT Srl
Peninsula Capital through PII1 Srl

7.6%

IP INFRA INVESTORS LP

0.6%

MOLAGERS





Environmental Sustainability



Italo has always put environmental sustainability at the heart of our business model, as demonstrated by the excellent energy and emission reduction performance we have achieved over the years.

The Company has adopted an Occupational Health and Safety and Environmental Protection Management System (hereinafter the “Management System”), which has been defined, implemented and continuously improved in accordance with the voluntary international UNI ISO 14001 and UNI ISO 45001 standards regarding environmental and health and safety management. Thanks to this system, Italo strives to achieve three main corporate objectives related to the environment, health and safety:

- ensure an unspoiled environmental heritage for future generations by saving resources and preventing pollution;
- achieve and demonstrate a good level of environmental performance by keeping Italo’s operational impacts on the environment under control and consistently adhering to Company policy;
- ensure constantly improved levels of occupational health and safety protection for the Company’s employees and external workers, with a focus on the prevention of accidents and occupational diseases.

Thanks to the effectiveness of our management system, Italo did not record any cases of non-compliance with environmental laws and regulations in 2022.

Since 2014, the Ministry for Economic Development (renamed in October 2022 as the Ministry for Business and Made in Italy) in collaboration with the Ministry of the Environment (renamed in October 2022 as the Ministry for the Environment and Energy Security) has admitted Italo’s fleet to an energy efficiency incentive program that awards Energy Efficiency Certificates, also known as white certificates. The policy adopted by Italo in opting for AGV trains was also followed by the acquisition of the EVO fleet, the most sustainable product currently available on the market, which has also been admitted to the energy-saving incentive scheme.

CLIMATE CHANGE: ADAPTATION AND MITIGATION

In 2021 and early 2022, Italo carried out a comprehensive climate risk assessment to identify, prioritize and report on key risks and opportunities linked to climate change.

The climate change scenarios used in the study are based on the greenhouse gas emission (GHG) concentration pathways set out by the Intergovernmental Panel on Climate Change and additional resources.

The results of the analysis have provided Italo with a review of the main transient physical and climatic exposures and form the basis for an effective risk financing strategy to transfer these risks.

The analysis is closely aligned with the requirements of the Task Force on Climate-Related Financial Disclosures (TCFD), and breaks down into two assessments, as follows.

- **Physical climate risk assessment** of Italo's portfolio of assets (owned and not owned) based on current climate conditions and projections of the long-term impacts of climate change, according to different time horizons and climate scenarios. The analysis covered a total of 14 critical hazards, including acute risks (driven by specific events), chronic risks (long-term changes in climate patterns) and other natural disasters (eruptions and geological risks), and assessed three-time horizons (2030, 2050 and 2100) and three reference climate scenarios (+1.5°C, +2.0°C and +4.0°C). Owned assets, the lines and stations on the railway network, the management of which is in the hands of the Infrastructure Manager RFI and therefore out of Italo's direct control, assessed in this analysis, were found to be exposed to various physical climate exposures, which may increase further in the future. Among the main results, climate scenarios predict that extremely hot weather and wetter winters will become increasingly frequent, causing rail track temperatures to fluctuate beyond normal operating thresholds. This could result in a slowdown in the speed at which trains can travel - partly due to an increase in repair work - and the temporary closure of high-speed infrastructure assets beyond the Company's control as they are imposed by the Infrastructure Manager. Climate change is also likely to increase the frequency of rainfall and storms associated with flooding. These risks are likely to result in increased physical damage and service interruptions caused by rail track flooding, landslides, wind gusts and secondary hazards such as fallen trees or flying debris. Finally, as regards Italy, it is estimated that sea levels could rise by up to 1.2 meters by the end of the century, leading to further coastal erosion and increased risk of coastal flooding, including flooding of protected assets and operational disruptions.
- **Transition risks and opportunities assessment**, aimed at identifying and analyzing the transition risks and opportunities for Italo associated with a rigorous transition scenario (namely a world in which we limit the temperature increase to 1.5°C or 2°C) with a medium-term time horizon of 2030. In line with the TCFD, this transition analysis focuses on 16 transition risk factors in four main thematic areas: politics, technology, the market, reputation. Italo is considered to have a low level of residual exposure to transition risk in the medium term (2030). Italo's risk exposure is largely driven by the expected increase in commodity prices. Strengthened climate reporting requirements and investment in low-emission technology projects to improve the energy efficiency of fleets and buildings may also require additional resources. On the other hand, the transition to a low-carbon economy presents several opportunities for Italo. These include green financing options for the development of an increasingly efficient and environmentally sustainable fleet, the possibility of increased revenue from infrastructure growth that opens up new domestic markets, and a potential increase in greener domestic tourism. The sale of white certificates, thanks to the excellent environmental performance of our trains, will also provide a steady income stream.



TCFD RECOMMENDATIONS

In addition to monitoring and mitigating climate risk, Italo is aware of the importance of proper reporting to our stakeholders. Consequently, the Company carried out a gap analysis to assess and improve our current alignment with the TCFD reporting recommendations, which encompass governance, strategy, risk management and metrics and targets. In order to further improve our commitment to an effective approach and transparent disclosure of climate risk management and, based on the results of the climate risk analysis, Italo is designing and implementing a climate strategy and structuring a governance system to effectively manage climate-related risks and opportunities.

TCFD This statement has been prepared taking into account the recommendations of the Task Force on Climate-Related Financial Disclosure (TCFD).

TCFD RECONCILIATION TABLE		
Topic areas	TCFD recommendations	References
Governance	<ul style="list-style-type: none"> a. Describe the Board of Directors’ oversight of climate change-related risks and opportunities b. Describe the role of management in assessing and managing risks and opportunities related to climate change 	<p>Code of Ethics - Sustainability Report - Sustainability Governance Monitoring by setting up committees for ESG issues:</p> <ul style="list-style-type: none"> • ESG Steering Committee • ESG Team <p>Assessment of operational risks in terms of environmental impacts arising from climate change. Direct involvement of the Board of Directors through presentation of results in an annual update. Oversight of ERM by the Board of Directors from 2023.</p>
Strategy	<ul style="list-style-type: none"> a. Describe the risks and opportunities related to climate change identified in the short, medium and long term b. Describe the impact of climate change risks and opportunities on business, strategy and financial planning c. Describe the resilience of the strategy, taking into account different climate-related scenarios, including a scenario of 2°C or less 	<p>Sustainability Report - Climate change: adaptation and mitigation Monitoring and preparation of scenarios via a strategic decision-making process consisting of two assessments:</p> <ul style="list-style-type: none"> • Physical climate risk assessment • Transition risks and opportunities assessment
Risk management	<ul style="list-style-type: none"> a. Describe processes for identifying and assessing climate change risks b. Describe processes for managing climate change risks c. Describe how climate change risk identification, assessment and management processes are integrated into the overall risk management process 	<p>Sustainability Report - Climate change: adaptation and mitigation Procedure to integrate the risk management process from 2023.</p>
Metrics and targets	<ul style="list-style-type: none"> a. Reporting the metrics used to assess climate change risks and opportunities, in line with the risk management strategy and process b. Reporting Scope 1, Scope 2 and Scope 3 greenhouse gas (GHG) emissions and related risks c. Describe the targets used to manage climate change risks and opportunities, and performance against the targets 	<p>Sustainability Report - Energy and emissions Reporting via: Scope 1, Scope 2 and Scope 3.</p> <p>Sustainability Plan</p>

ENERGY AND EMISSIONS

The investment in expansion of the fleet marks a milestone in Italo’s action against climate change strategy, as the energy consumption of trains and their emissions account for more than 99% of the Company’s total emissions.

At the same time, Italo is striving to improve our energy efficiency and reduce emissions, including via further initiatives. For example, Italo has issued a new staff policy that encourages the replacement of conventional cars with electric or hybrid cars for Company business purposes. With regard to energy consumption in offices, the Company has carried out a complete overhaul of lighting at our headquarters, including the introduction of more efficient LED lamps. Programmable thermostats have also been installed for heating and cooling systems and energy-saving office equipment, such as Energy Star-certified printers and copiers with automatic stand-by.

Via the partnership with GM Ambiente & Energia, Italo also drew up a two-year environmental strategy, starting with quantification of the environmental impact of the life cycle phases of the sanitation service on board trains through LCA (life cycle assessment) analysis, and of greenhouse gas emissions via application of the Greenhouse Gas Protocol, and then set improvement targets and operational plans to achieve them.

In particular, the LCA analysis of the environmental and sanitation services on board trains enabled comparison of the environmental impact of the current service managed by GM Ambiente & Energia with the previous service.

By applying the GHG protocol to the train system, the Company’s GHG inventory was quantified and reported in accordance with Scope 3 of the ISO 14064-1 standard.

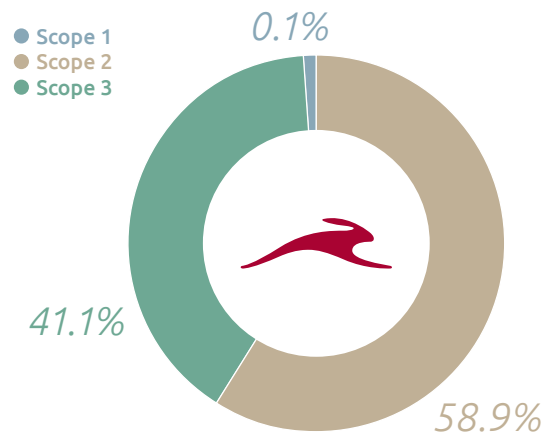
The analysis of the organization’s carbon footprint was conducted in accordance with ISO 14064-1 (categories 3 to 6) and enables reporting in the GHG inventory of all operational activities that take place at Italo’s sites and are under the Company’s control.

The study is aimed at reducing the environmental impact of CO₂ emissions. Data analysis shows that direct emissions (Scope 1 - emissions from the direct combustion of fossil fuels, such as gas used for heating) contribute less than 1% of the total.

The second category (Scope 2), namely indirect emissions related to production of the electricity consumed, accounts for more than 58% of the total impact, and is therefore the predominant category. In particular, the main contribution is due to the electricity consumed to power trains.

Finally, the remaining emissions (Scope 3), which relate to the products and services used by the organization in order to carry out its business (maintenance, cleaning and services), contribute more than 40% of the impact. 2022 value defined on a parametric basis according to train*km compared with 2021 train*km.

Emissions Contribution (%)



WASTE MANAGEMENT

To cope with environmental and administrative legislative requirements, Italo has acquired multi-level management software. This tool enables monitoring of waste production, compliance with temporary storage schedules and all the obligations related to the registration of forms and the preparation of the annual environmental statement (MUD - Single model for reporting waste produced and/or managed by economic activities). By using the tool, all types of waste produced were exclusively categorized in accordance with the European Waste Catalogue. Each waste item is then described in terms of these four aspects: waste category, waste description, EER code and collection method. The entire waste chain is managed in accordance with Legislative Decree 152/06 and subsequent amendments, thereby ensuring transparency in all the collection, storage, disposal and recovery phases. Aware of the fact that the Company manages a significant waste stream (in terms of quantity and type), Italo has defined an environmental strategy aimed at prevention of waste production and appropriate treatment, whilst encouraging recovery and circular economy protocols. Carriages are equipped with suitable waste bins, which are used by travelers as well as onboard train staff, who make sure that waste is properly sorted. The bins are appropriately marked to encourage travelers to adopt good practices. Onboard waste is stored at specific sites where recycling facilities have been installed; all the sites are equipped with a certified waste collection and recovery system and managed via a digitalized system, which enables monitoring and reporting of waste production. In particular, thanks to the aforementioned collection and recovery system, it has been possible to sort more than 50 percent of waste from board of which about 15 percent is plastic only, with an almost twofold increase in this category.

NOISE POLLUTION

Environmental legislation regarding infrastructure noise emissions imposes a number of noise exposure limits governing outdoor environments, which requires periodic updates of the processes used for assessing and measuring noise emissions from operations. Moreover, Italo implements all the necessary analyses and measures to keep our noise impact within legally established thresholds. If the Company needs to carry out special and temporary operations, Italo requests authorization from the competent local authority and ensures that an additional waiver is provided if noise limits cannot be met. In 2022, no incidents of non-compliance with applicable laws were reported.



Social Sustainability



HUMAN RESOURCES MANAGEMENT

In 2022, Italo boosted its strategy to achieve human capital balance and productivity, partly by leveraging a positive and inclusive organizational and working environment with a view to supporting and encouraging excellent business performance in the long term.

Excellent service is a key factor for success, and our staff, who are at the center of our strategy, are one of the main strengths that differentiate the Company.

2022 was a key year for engagement and communication activities. The results of the 2021 climate analysis (analysis launched every 18-24 months) guided the implementation of new initiatives to increase staff satisfaction and to bridge the gaps between the Company and our employees.

- One of the first initiatives introduced was “Experience Roundtables”, in which working groups, organized by professional category, involved staff from across all Italo’s areas of operation.
- The entire onboarding process was revamped, with the aim of simplifying the induction of incoming staff and guiding new hires from the moment they sign their contract until their full integration within the Company. In a survey administered to new employees, the new onboarding process scored an average of 4.63 points out of 5.
- The Itell Newsletter, one of the main digital channels for communicating with staff, now has revamped graphics and content with new features. The newsletter always tries to respond to staff requests, so that people can get to know each other better, and learn about the various Italo roles. It also covers the world of railways and the Italo network’s destinations and aims to close the gap between our staff and senior management. In 2022, 67% of the staff read the newsletter. Among professional categories, the newsletter was most widely read by equipment operators (66%) and train managers (65%).
- Great attention was paid to the development and maintenance of the MyItalo intranet, including implementation of a data analytics system aimed at monitoring levels of satisfaction with the content published on the platform.

Following the initiatives implemented in 2022, a new survey is scheduled to be launched in 2023.

TALENT ATTRACTION

Italo aims to rank as an active and innovative company in the market, concerned for the wellbeing of its staff and eager to grow by hiring people with specific skills who can add value to the organization.

In 2022, Italo aimed to strengthen our talent attraction strategy, via the use of various tools and new initiatives, ranging from employer branding to recruitment marketing, and from candidate experience to the definition of company benefits. In 2022, a talent acquisition approach was drawn up based on an analysis of our competitors and employment and socio-historical trends, with a view to enhancing the Company’s potential and understanding the needs of the upcoming generations.

Italo has opted for a market profile in which the Company is seen as an employer who can fully satisfy the career and personal ambitions of future employees, thanks to expansion of corporate welfare policies, remote working, training, personal growth paths, financial incentives, and medium- and long-term corporate objectives.

In 2022, Italo received a total of 25,000 applications via all recruitment channels, which led to 114 new hires. 60% of the new hires were men, and 40% were women.

A distinctive feature of Italo’s workforce is that most new hires are young people, with an average age of around 34. Approximately 21.4% of our staff are under 30.

The Company has also drawn up a recruitment plan for 2023, which envisages around 80 new hires who will help to consolidate the quality of Italo’s team and services. Moreover, 100% of Italo employees are covered by collective bargaining agreement.

In terms of personnel leaving the Company, the turnover rate has risen from 4% in 2020 to 6% in 2021 and 7% in 2022. The total number of employees leaving the Company was 99. The Italo commitment is to retaining talent through an approach based on providing fair pay, a complete benefits package and a positive working environment based on diversity, respect and career development opportunities.

Total Turnover Rate



STAFF TRAINING AND DEVELOPMENT

Human resources are a strategically important asset for Italo’s success in the high-speed rail transport sector. Overall, in 2022 Italo’s employees received an average of 74 hours per capita of training and refresher courses, which can be broken down into more than 50 hours of initial training to obtain the necessary qualifications for roles (train drivers, train managers, new qualifications required by network development), and more than 20 hours per capita dedicated to refreshment and maintenance of operational skills (so-called recurrent training) and professional skills, involving both operational and administrative staff.

A significant part of the training provided relates to occupational safety issues, with more than 11,000 hours of training (initial training and skills maintenance) provided to operational and administrative staff on regulations, fire and first aid emergency management, HACCP, and personal safety.

Italo’s training plans cover the entire workforce, including staff on temporary contracts, who received an average of around 150 hours of training per capita, marking a significant increase compared to 2020 and 2021, mainly due to the reactivation of temporary contracts and a special focus on training new temporary staff.

Rather than merely focusing on technical training, Italo involved its operational staff in specific programs designed to reinforce soft skills, including a close correlation with the findings of specific analyses carried out during the year, such as the stress from related work analysis. Based on the findings gathered, the Company organized and delivered a training plan on “emotional intelligence” themes, aimed at almost 500 employees, including onboard train attendants and train managers. This initiative was accompanied by a second “management training” project, which extended the themes of interpersonal relations and sound management to operational managers and coordinators.

The Company also highlighted “social responsibility” topics, which are increasingly central to Italo’s strategy, with the activation of a specific e-learning program on ESG topics that specifically focused on diversity and inclusion issues. The initiative saw the participation of 68% of Company staff, with over 1,000 people trained and 1,800 hours of training delivered.

In 2022, Italo’s staff also continued to focus on Legislative Decree 231/2001 (so-called 231 legislation), with new updates on tax offences and antitrust regulations, as well as basic training for new hires, with a total of almost 500 hours of training. The Company’s strong commitment to raising staff awareness of IT security issues also saw the delivery of several training sessions (totaling almost 1,000 hours), as well as courses on data protection and GDPR regulations (almost 1,300 hours).

In addition to training, great attention is still paid to internal development processes, including various opportunities for career advancement and professional diversification. Once again in 2022, Italo met some of our professional requirements by making extensive use of internal growth: 13 job rotation proposals were made, with almost 170 people included in appraisal and evaluation processes.

Finally, staff development is closely linked to appraisal processes, which are always at the center of Italo’s management and development policies. The renewal of the labor union agreement in June 2022 confirmed the close integration between the performance management system and ESG issues. The process for 2022 was completed, with the involvement of all assessable members of staff.

DIVERSITY AND INCLUSION

Italo does not accept any form of discrimination and recognizes equal dignity for all persons involved in our activities. The aspects of diversity on which the Company is most active are gender equality and wage equality. Italo's efforts led to great gender equality achievements throughout the organization in 2022, especially regarding roles traditionally held by men.

- *47% of Italo's workforce is made up of women (unchanged from 2021 and up 2 percentage points on 2020). This figure is significant within the context of the European rail sector, where women account for an average 22% of the workforce⁴.*

At Italo, 40% of managers are female, 61% of train managers are women, 10 train drivers are women, and 11% of apprentices are women. The total ratio of women's to men's pay was 76.1% in 2022.

Diversity also implies a heterogeneous workforce in terms of geographical origin and age. In this regard, as at 31 December 2022 Italo employed 73 people born outside Italy, from 36 different countries, evenly distributed across the national macro-areas within our workforce.

In addition to ensuring an increasingly inclusive working environment, Italo believes that corporate wellbeing is an important value for our people that also plays a strategic role in staff loyalty and engagement.

This commitment is reflected in Italo's inclusion in the Financial Times ranking, which identifies the European companies most committed to diversity and inclusion.

- *In the ranking of the top 850 diversity leaders, Italo was in 17th position in the Transport and Logistics category, and 1st among the 42 Italian companies.*

Based on our commitment to continuously improve the wellbeing of our people, the Company:

- issued company regulations that set out a series of measures aimed at facilitating work-life balance with regard to parental support, performing care duties within the family, caregiver support and health protection;
- in response to a need expressed by the workforce, signed an agreement with the labor unions regarding solidarity bank holidays with a view to strengthening solidarity and cohesion among staff. This allows employees to voluntarily and freely transfer any surplus holiday entitlement to colleagues who might need it;
- before the end of the simplified legal regime for remote working, signed an agreement with the labor unions to continue its application, to be regulated in terms of productivity and via ad hoc provisions for vulnerable workers, caregivers, and parents of children up to 12 years of age or with disabilities, and facilitation of the process of returning to work whilst becoming a parent.



Health and safety

SAFETY GOVERNANCE

Safety is Italo's top priority, and we are committed to putting the safety of people - both passengers and staff - first. The continuous improvement of rail traffic safety performance is achieved through the adoption of a Safety Management System (SMS), set up in compliance with the requirements of Directive (EU) 798/2016 and Legislative Decree 50/2019, and in accordance with the requirements laid down by Regulation (EU) 762/2018, taking into account all applicable national and international requirements, organized in accordance with the PDCA scheme: Plan - Do - Check - Act. Implementation and updating of the Safety Management System, enabling the Company to retain its Safety Certificate, a document necessary to be able to operate trains, is the responsibility of the Safety Management System Manager (Health and Safety Director), who has a specific qualification granted by the National Agency for Railway, Road Infrastructure and Motorway Safety (ANSFISA). The Agency also constantly supervises the Company's activities via specific checks and inspections, including onboard trains.

On the rail traffic safety front, Italo also took part as a partner in the survey conducted by the European Union Agency for Railways (ERA), which measured the perception of safety among railway operators, and shared the results of the survey and the actions introduced on the basis of its findings at European level.

In 2022, Italo was involved in two major accidents, whilst only one accident per year was recorded in each of the previous two years. In February, a person trespassing on the tracks near Vicenza was hit by an Italo train, causing serious injuries. In July, a train without passengers on board struck a buffer on exiting the Nola maintenance depot due to driver error, only causing damage, albeit significant, to the rolling stock.

Close attention was paid to the latter event and, more generally, to aspects relating to "human error". This has resulted in a specific safety project with an impact on both risk assessment and training.

ONBOARD SAFETY

Italo is the first company in the world to install HEPA (high-efficiency particulate air) filters on trains. Before introducing the HEPA filters, which are the same as those found on aircraft, the Company collaborated with experts in the rail and health sectors, such as the Polytechnic University of Milan and the IRCSS Ospedale San Raffaele research hospital. The HEPA filters turned out to be the most innovative solution for improving air circulation on board trains, including benefits such as reduced presence of particulate matter and aerosols thanks to their composition of multi-layered microfiber sheets, which form a highly effective barrier against all agents, not just the SARS-CoV-2 virus, but also any type of airborne virus or influenza.

Therefore, Italo has become best-in-class for safety conditions on trains. HEPA filters ensure continuous and complete air circulation throughout the carriages: filtered air is supplemented with air drawn in from outside, resulting in a fully regenerated flow every three minutes. Moreover, vertical airflows prevent the dispersion of any particles. This all takes place in an environment that is much larger than an aircraft cabin, with 20 per cent more space between seats and up to twice the volume of air available per passenger. This makes it easier to meet transport demand, by increasing train capacity and ensuring utmost safety for passengers and staff at all times.

As proof of our commitment to safety, and in particular our response to Covid-19 through the innovative use of HEPA filters, Italo was selected as a finalist in the UIC International Sustainable Railway Awards 2022 in the "Best Contribution to the Covid Emergency" category.



OCCUPATIONAL SAFETY

Italo has voluntarily adopted an Occupational Health and Safety and Environmental Protection Management System (the so-called Management System), which complies with the voluntary international UNI ISO 14001 and UNI ISO 45001 standards regarding the environment and occupational health and safety management.

The Company periodically assesses the presence of hazards and related risks, as well as possible impacts, in order to:

- manage and minimize the operational impact on occupational health and safety, with a view to reducing risks, including in accordance with the acceptability threshold set by current regulations, or by Italo if applicable;
- set out responsibilities and implementation procedures for the identified risk mitigation measures;
- support the strategy related to the continuous reduction of the number of accidents and occupational diseases.

In terms of responsibility, Italo has adopted a multi-employer model by identifying the managers, in accordance to Article 2(1)(B) of Legislative Decree No. 81/08, of the three production units (general management/operations management/commercial management) as employers, with the power to delegate and sub-delegate the functions conferred in compliance with the parameters of the above Decree, to persons meeting all the requirements of professionalism and experience required by law.

The role of Prevention and Protection Service Manager has also been created, with responsibilities regarding dissemination of the Management System at the Company and ensuring that staff are aware of and comply with it

The Board of Directors has also appointed the above employers as “environmental managers”, with reference to their area of competence, with the responsibility of ensuring compliance with the environmental provisions of Legislative Decree 152/2006 as amended and related regulations, and with the power to delegate the tasks assigned to them to persons within the Company organization, with appropriate requirements of professionalism and experience.

2022 recorded an increase in work-related injuries, out of proportion to the increase in the hours worked following the removal of the COVID restrictions in place during the previous two years. Although the above injuries were all minor in nature, a specific information campaign was launched during the year to boost awareness among workers of the work-related risks to which they are exposed.

There were 37 work-related injuries in 2022 (14 in 2021 and 9 in 2020), 0 serious injuries (unchanged with respect to 2021 and 2020) and 0 work-related fatalities (unchanged with respect to 2021 and 2020).

With the aim of constantly improving safety and doing so in line with the principle of sustainability, personal safety training for Italo’s women was reinstated and expanded in 2022, extending it to include employees’ families and friends. A total of approximately 700 women received training in key self-defence techniques.

Also with the aim of promoting various aspects of safety, 300 employees and their families were given training in life-saving manoeuvres and in the use of a defibrillator (basic life support defibrillation) and in providing aid to some who is choking (the Heimlich manoeuvre for babies and adults).

QUALITY ON BOARD TRAINS AND IN STATIONS

Italo has adopted a quality control system to gauge our service levels, with the involvement of customers and employees, via:

- customer satisfaction surveys;
- on-board mentoring and education programs to support train staff;
- auditing programs for internal checks;
- reporting.

In addition to an efficient customer care service, Italo has designed a specific activity to monitor the quality perceived by passengers on board trains, via a customer satisfaction survey aimed at monitoring and checking the quality provided. In 2022, this tool, which enables daily surveys, involved 248,824 passengers.

In order to plan continuous improvement actions, customer satisfaction data are analyzed monthly and are monitored by the ESG team.



In 2022, as the Covid-19 health emergency gradually diminished, regular surveys carried out from January to December registered a growing level of satisfaction (overall satisfaction up 0.7 percentage points on 2021). 2022 saw an upturn in overall satisfaction with the travel experience on board Italo's trains: 91.6% of passengers were satisfied with the quality of the service⁵.

These good results enabled Italo to reach and exceed the 91.5% satisfaction target set for 2023 ahead of schedule.

ITALOWELFARE

The ItaloWelfare corporate welfare system, which was rebranded in 2022, is based on values and KPIs identified in the United Nations Sustainable Development Plan, complies with ESG principles, and is aimed at significantly increasing value for all stakeholders.

The welfare model is consistent with the values the Company aspires to: sustainability, trust, security and inclusion, and is geared towards these social contexts:

- social sustainability;
- service equity, territoriality, proactivity, diversity, inclusion and customization;
- corporate reputation, employer branding and savings.

This includes all actions aimed at creating and strengthening the bonds of trust between the Company, employees, the family and society, such as, for example:

- the 21 scholarships awarded to the children of deserving employees, ranging from primary to high school;
- the activation of a private and post-traumatic psychological counselling service, with 90 pathways completed during the year;
- the establishment of "welfare heroes" - 25 colleagues nationwide who raise awareness and select the needs and wishes of employees and their families regarding the continuous improvement of the welfare system.

In 2022, 47% of Italo employees converted their performance bonus into spendable credit for goods and services provided by the welfare system.

Finally, sport was the driving force in 2022, with a series of initiatives put in place to promote it as an engine of sustainable growth. Several sports events, in association with fundraising campaigns to support charitable initiatives, saw 350 employees involved in solidarity marathons, football, beach volleyball and padel tournaments.

FUNDRAISING

Supporting the community means not only being a big company but also a big family.

Therefore, Italo takes care of people via activities and initiatives dedicated to the wellbeing and socio-sustainable development of the community, by supporting various third-sector associations as well as employees in difficult situations.

During the year, fundraising initiatives enabled:



- *funding, for the second year running, of the €25,000 scholarship for a young AIRC researcher engaged in a research project to fight childhood cancer;*



- *support for the Tetrabondi Association, which aims to ensure the inclusion of children with special needs, by donating two Joëlette Kids all-terrain wheelchairs to them so that families can assess the effectiveness of sport as a means of leveraging real inclusiveness;*



- *support the Telethon Foundation by hosting 'dialogues' on its trains, whose task is to make travellers aware of the importance of regularly supporting research into rare genetic diseases, and by promoting research through Italo's communication channels.*

⁵ This result refers to passengers who registered scores of 3 (neutral), 4 (satisfied) or 5 (very satisfied) for their "Overall satisfaction" with the travel experience. Considering only the high satisfaction scores (4 and 5), the percentage is 80.

The value chain

SUPPLIERS

In selecting our business partners, ethical, social and environmental issues have become increasingly important for the Company. In order to ensure adequate transparency of procurement processes and guarantee the utmost reliability of strategic supplies, Italo has defined an internal process for selecting and qualifying suppliers. The e-procurement portal that reports on the financial soundness and creditworthiness of suppliers has also been updated; this is an important element for maintaining business continuity, as well as the relevant certifications held by business partners. This information is obtained via an ad hoc survey administered to suppliers during the selection phase, which also requires the disclosure of certifications related to environmental performance, energy efficiency, quality and safety, the health and safety management system, waste management and ethics. Moreover, during the selection phase, and via special contractual clauses, suppliers are required to comply with Italo's Organisational, Management and Control Model and the Code of Ethics. The contracts also allow Italo to carry out on-site inspections to verify the stated information.

In 2022, Italo started using a specific reputational tool, including an ESG assessment of suppliers. The tool scores measure and quantify a company's risk exposure by identifying:

- the RepRisk Index (RRI), which captures and quantifies exposure to reputational risk with regard to ESG issues;
- the RepRisk Rating (RRR), which provides a metric derived from the RRI that takes into account sector- and country-specific factors aimed at facilitating analysis of benchmarking between companies.

In addition to this standardized selection procedure, Italo selects core and strategic suppliers via tendering, benchmarking and market testing procedures in order to ensure transparency and enable a more informed selection of the best candidate.

Italo has business relations with 508 partners, of which 92% are in Italy. In particular, the supply and maintenance of rolling stock and the costs for acceding the network are by far the most relevant categories of supplies, covering approximately 72% of Italo's total procurement expenditure and attributable to the most strategic assets for the operational continuity of Italo, in the high-speed railway sector as a whole.

PUNCTUALITY

Punctuality is a key factor in the quality of the transport service: Therefore, the Company takes great care with its monitoring, in order to guarantee a high-quality, punctual service.

The Company monitors three different KPIs that measure punctuality at 5 minutes and at 15 minutes:

- Italo's punctuality: measures the percentage of trains arriving at their destination with a delay of 5 to 15 minutes or less, excluding trains arriving beyond this threshold for reasons not attributable to the Company.
- B1 standard punctuality: measures the percentage of trains arriving at their destination with a delay of 5 to 15 minutes or less, excluding trains arriving beyond this threshold for external reasons (e.g., weather events, public order disturbance, etc.). This standard is established by Ministerial Decree 146/2000.
- Overall punctuality without exclusions: measures the percentage of trains arriving at their destination with a delay of 5 to 15 minutes or less without any exclusionary cause. Therefore, this parameter also includes external causes, and is representative of the delay actually perceived by passengers.

In 2022, Italo reported the following results:

KPI	2022		2021	
	On time 5'	On time 15'	On time 5'	On time 15'
Italo's punctuality	97.3%	98.4%	97.4%	98.4%
B1 standard	72.6%	87.4%	80.9%	91.5%
Actual punctuality	68.5%	84.6%	77.0%	89.2%

The 0.1 percentage-point decline in punctuality of compared with 2021 was due to several infrastructure failures that affected Italo's scheduled timetable (turnovers, arrivals/departures).

ACCESSIBILITY

Italo's ability to adapt our offering to passengers' needs and our culture of diversity also entails guaranteeing the best possible access to travel for people with disabilities and reduced mobility (PRM).

All Italo trains are built in accordance with the technical specifications for rolling stock interoperability, in compliance with the provisions of Regulation (EC) 1371/2007 and other regulations relating to persons with reduced mobility on the trans-European conventional and high-speed railway system.

Two spaces for wheelchair users are provided on board AGV and EVO trains. The spaces are located next to the toilet for people with disabilities and near the snack area, where vending machines are designed to be easily accessible. In addition to wheelchair spaces, passengers can also choose priority seating. Use of these seats is not restricted, but elderly, disabled, pregnant and injured passengers have priority. All onboard toilets and seats are also equipped with acoustic and braille signage for the visually impaired.

The control room monitors the state of the toilets suitable for passengers with reduced mobility on a daily basis. In the event of toilet facilities being unavailable, the coordinators arrange for prompt maintenance work to be carried out.

The train conductor is in charge of assisting passengers with reduced mobility during the journey. In case of need and problems (delays, transferring from one train to another, getting on and off the train), the control room will provide assistance. All passengers with disabilities or reduced mobility may book free assistance services during the time slots established by the State Railways operator, in relation to the scheduled departure time of the selected train. Passengers with reduced mobility can contact the Pronto Italo contact center to book assistance services. Within 30 minutes of the request, the back-office operator will contact the customer by phone to confirm the booking.

With regard to a total of 42,607 assistance services provided to persons with reduced mobility in 2022, Italo did not receive any complaints. The quality of service perceived by the customers who called Pronto Italo, surveyed using the CAWI (computer assisted web interviewing) technique, scored an average of 9.4 out of 10.

INTERMODALITY AND INTEGRATED MOBILITY

Italo has always taken a keen interest in integrated mobility. Since the Company's launch, we have worked with various partners to expand our complementary travel services offering by entering into agreements with public transport companies and private companies. In recent years in particular, a number of integrated solutions have been introduced that enable purchase of two different services in a single transaction, such as, for example, ferry connections to Sicily with an interchange at Villa San Giovanni. The connection service to Sicily, which is operated by the shipping company BluJet, was renewed in 2022.

In 2022, a new project was also launched to enable the integrated purchase of Italo train and Trenitalia regional train services, thus expanding the network to reach multiple destinations. It is now possible to buy high-speed train tickets together quickly and easily with tickets for Trenitalia's regional services in a single transaction. Travel planning and ticket purchasing are thus facilitated for many destinations throughout Italy.

The range of intermodal services in ItaloGo's catalogue has been enhanced.

The agreements with Direct Ferries and Travelmar enrich Italo's offering, with the possibility to add sea connections to itineraries. Direct Ferries is the world's largest online ticket retailer. It facilitates the search for and booking of ferry tickets at the best prices and collaborates with Italy's largest ferry operators. Travelmar connects the port of Salerno to the main towns along the Amalfi coast.

Autostradale's bus services connect some stations served by Italo trains to the main airports in northern Italy.

For Italo, integrated mobility does is not just about incorporating intermodality. It also provides the opportunity to offer customers a complete travel experience, by proposing other ancillary services such as booking a stay, a rental car, a parking space, a luggage storage service at the station, or a taxi, as well as tickets for many tourist and cultural activities. Travelers can find these services directly in the Italo Go section of the website and the app. Each service is operated by a selected partner, a leader in its respective field: Booking.com for stays and Hertz for car rentals are just a couple of examples. The partners offer Italo customers preferential rates, the opportunity to earn points from the Italo Più loyalty program and additional benefits.

During the pandemic and post-pandemic years, Italo has taken even greater interest in the health and safety of our passengers by offering additional guarantees. To meet these needs, the agreement with Allianz Global Assistance (AWP P&C S.A.), a leader in the insurance sector, was renewed. The agreement offers passengers travel policies that are valid in Italy and overseas, with guaranteed 24-hour medical assistance, payment or reimbursement of medical expenses including in the event of epidemics and pandemic diseases, such as Covid-19, a business policy to protect *business* trips, and a *skiing* policy to cover skiing weekends and holidays with third-party liability included, and direct payment of medical expenses in the event of an accident.

INNOVATION AND DIGITIZATION OF SERVICES

In 2022, Italo continued our technological transformation path, aimed at innovating supported systems and processes. As in previous years, this transformation process entailed a sharp focus on cybersecurity and systems resilience, with the aim of ensuring the utmost level of business continuity and data protection. The initiatives implemented in the various areas in 2022 include the following.

Improvement of customer relations

- Activation of the new Microsoft Dynamics CRM platform, with cloud native technology, which is directly integrated with the new Microsoft technology based on AI & ML paradigms.
- A knowledge base platform to automate the customer care process. Reduction of contact center waiting times.
- Continuous development of new communication campaigns and customer engagement via the Adobe marketing automation platform.
- Activation of the new loyalty program.
- New services on digital channels, to improve customer satisfaction and ensure complete autonomy in the management of services via digital channels (the purchase of lounge access, onboard pet-friendly services, seat selection and flexible *Parti Ora* travel options).

Systems and cybersecurity enhancement

- Release of the operations room tool for bulk passenger re-routing and analysis. The tool reduces handling times for critical operational issues by reducing processing times and improving customer responsiveness.
- Application of robotic process automation, an automation paradigm studied and tested in 2021. This application enables the automation of certain financial processes related to the monetization of virtual credits: the process is now handled entirely by a robot.
- Enhancement of IT system monitoring platforms with the introduction of predictive algorithms for anomaly detection, anomaly prevention and enabling reduced recovery times in the event of system blocking issues.
- Introduction of new protection system for equipment, cloud infrastructure and corporate end points via the new CrowdStrike platform.
- Activation of DMARC and a phishing alarm system
- Activation of multifactor authentication for access to corporate data within the M365 ecosystem.
- Consolidation of the cyber threat intelligence process to analyze cyber-attack scenarios and prevent associated risks.

RELATIONS WITH LOCAL COMMUNITIES

The Company strongly believes in the positive impact that rail transport offers local communities - environmentally, socially and economically - with the constant addition of new routes. Indeed, Italo is firmly convinced that high-speed rail transport will gradually replace alternative modes of transport, at least on short-haul routes, such as domestic ones, bringing large-scale benefits across the entire transport system. To this end, in 2021 Italo designed and developed an impact assessment model to assess the social and economic impact of our activities, aimed at calculating the impact our routes have on local areas in terms of:

- environmental benefits: greenhouse gases and pollutants avoided compared to other means of transport;
- local economic impact: encouragement of local GDP growth via tourism and monetary value for passengers compared with other modes of transport;
- increased rail transport safety: numbers of road accidents avoided and lives saved.

The tool enables assessment of the entire Italo network - existing and planned - in terms of environmental, economic and social impact. Once again, this reflects the Company's strong commitment to moving towards greater sustainability, as impact assessment plays an important role in integrating social and environmental issues into corporate strategy.

SOCIAL AND CULTURAL EVENTS

Travel Short Stories › Once again in 2022, Italo supported “Travel Short Stories”, the literary/photographic award for telling a short business or holiday travel story and/or sharing your own travel photographs.

AGIS (Turin Fringe Festival | Bologna Music Festival) › Italo together with AGIS - the Italian Association for the Performing Arts, supported the Turin Fringe Festival, the off-theatre and performing arts festival, and the great performers concerts at the 2022 Bologna Festival.

Fondazione Italia sociale | Civic Places › Italo has been a member of Fondazione Italia Sociale since 2019, and in 2022 the Company supported the Civic Places project, the first campaign in Italy for civic engagement venues.

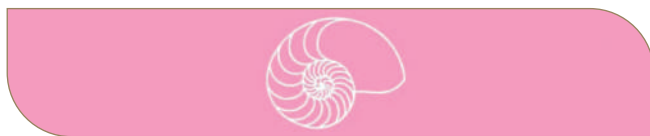
Modigliani › Italo, which continues to promote the best cultural events, supported “Modigliani Opera Vision”, a multimedia touring exhibition dedicated to the genius of the great artist.

Ferrara in Jazz 2022 › Once again for the 2021/2022 season, Italo has offered our passengers the chance to attend concerts at the Ferrara in Jazz Festival at a reduced price.

Robert Doisneau exhibition › Italo accompanied our passengers to the Robert Doisneau exhibition at Palazzo Roverella in Rovigo and offered them a special discount.

Dart 2121 › All Italo passengers were able to comfortably reach Milan and visit “2121” and “Masterpieces from private collections” at the Museo della Permanente at a reduced price.

Telefono Rosa › Italo started a training course on female self-defense led by professionals, which also involved Telefono Rosa.



Kandinsky › Italo, which continues to promote the best cultural events, is proud to have supported “Kandinsky”. L’Opera 1900/1940’: the exhibition at Palazzo Roverella, Rovigo, dedicated to one of the world’s greatest 20th century artists.

Carta Giovani › Italo has become an official partner of the National Youth Card, an initiative promoted by the Cabinet Office Department for Youth Policies and Alternative Civilian Service, which is aimed at Italian and European citizens resident in Italy aged between 18 and 35.

In&Aut Festival › Italo supported this three-day event dedicated to the theme of social inclusion and the work of autistic people, which was held at the Fabbrica del Vapore arts center in Milan from 13 to 15 May.

Museo del Risparmio (Savings Museum) › Italo, which continues to promote the best cultural events in Italy, was bound to support the “Economy Festival” in collaboration with the Savings Museum in Turin.

Brescia Foundation Museums › Italo accompanied our passengers to the “Isgrò cancella Brixia” exhibition, which, from 23 June 2022, involved Brescia’s most important cultural sites.

Lincean Academy › In 2022, Italo passengers were able to comfortably reach Rome and visit Villa Farnesina and the “La Commedia. Dalla creazione alla ricezione” initiative (including two exhibitions and a documentary) at a reduced price.



Italy in an Embrace › Italo supports the “Italy in an Embrace” project, an initiative aimed at spreading eternal values, which are the foundation of every civil community.

Empethy and ALI | Animal Law Italy › To encourage adoptions and the conscious transport of dogs and cats, Italo, in collaboration with Empethy and ALI- Animal Law Italia, offered concrete support to the volunteers involved in organising the transport of animals destined to arrive in the homes of new families, located in geographic areas different from their place of origin.

La finestra di Jacopo (Jacopo’s window) › From the idea of a child named Jacopo, the association La finestra di Jacopo was born to help less fortunate children. Italo with Trenino Thomas and Leolandia, decided to “reward” Jacopo for his resourcefulness and generosity with an official recognition and a special day entirely dedicated to him and his family.

MareVivo › Marevivo’s national “Adopt a beach” campaign restarted in 2022, with the aim of promoting the cleaning, monitoring and enhancement of dozens of beaches throughout Italy.



M’illumino di meno (I use fewer lights) › Once again in 2022, Italo participated in “M’illumino di Meno”, the initiative promoted by the radio program Caterpillar on Rai Radio2 and Rai per il Sociale, which aims to draw attention to energy saving and promote sustainable lifestyles.

RESPONSIBLE COMMUNICATION

The Company is aware that we have a significant impact on the social and environmental context in which we operate. A large community interacts with Italo, on board trains, at stations and on social media channels.

 ► **FACEBOOK**
1,208.765
Followers

 ► **TWITTER**
127,469
Followers

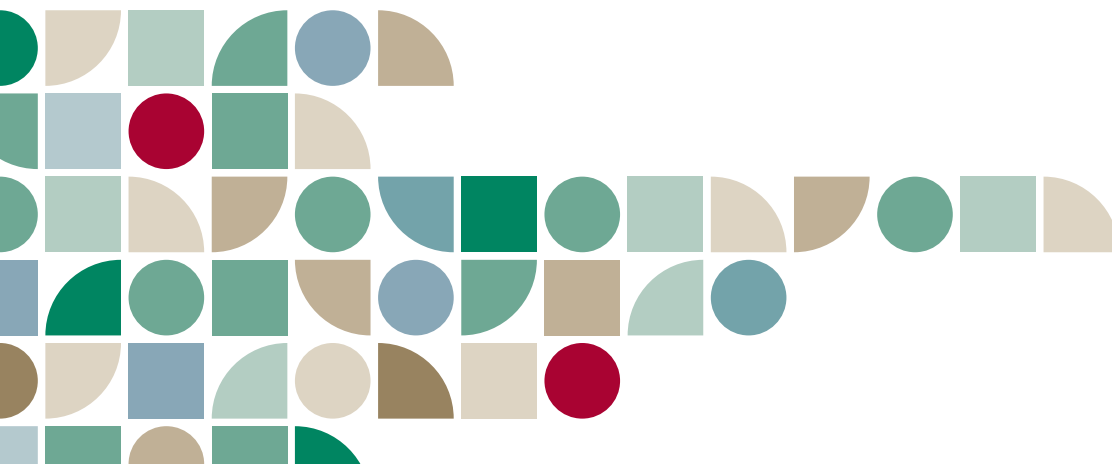
 ► **INSTAGRAM**
78,436
Followers

 ► **LINKEDIN**
86,781
Followers

 ► **YOUTUBE**
8,010
Followers

Building on this social responsibility, the Company is committed to sustainable communication. This approach has several dimensions.

- **Research and institutional relations office:** Given the complex regulatory and administrative environment governing rail operations, it is essential for the Company to carefully manage and monitor public affairs. Italo helps to strengthen a direct and effective communication channel with institutions via regular reporting to the relevant Italian and European institutions. On a technical level, Italo has always been active in promoting sector studies to support business initiatives with scientific elements, as well as promoting the benefits of rail transport and competition within the industry.
- **Institutional and product communication and events:** Press releases, conferences, interviews with senior management and corporate events are vital tools for Italo in conveying the essence of our business to customers and stakeholders in general and engaging them in our innovation and sustainability mission. Traditional and social media, on the other hand, focus more on the product: new offers, routes, services and commercial initiatives are announced promptly and clearly, so that passengers are always informed about new opportunities.
- **The magazine and social media:** The on-board magazine and the corporate website www.Italospa.it help to describe Italo's world, including its distinctive cultural features, to a wide-ranging audience of passengers and potential customers. At the same time, constant monitoring of feedback and comments provided by interactive social media communication is an excellent tool for improving communication and the overall corporate strategy.
- **Corporate social responsibility and sustainability:** Via our corporate website and social media, Italo constantly engages our stakeholders on such issues as social and cultural activism, taking care of people and, of course, environmental protection. The growing central role of sustainability within our corporate strategy means that constant communication of these aspects to stakeholders is a vital tool for properly disclosing Italo's great achievements and goals in this area, such as transparent reporting and the pioneering use of sustainable finance.





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Corporate Governance



CORPORATE GOVERNANCE

In accordance with the Articles of Association, Italo is currently managed by a Board of Directors and an Executive Committee. The Board of Directors and the Executive Committee in office in 2022 consisted of the following members.

Board of Directors

Chairman	Luca Cordero di Montezemolo
Executive Vice President	Flavio Cattaneo
Chief Executive Officer	Gianbattista La Rocca
Directors	Lucy Chadwick Ines Gandini Philip Marc Iley Christoph Holzer Michael McGhee Virasb Vahidi

Executive Committee

Chairman	Flavio Cattaneo
Members	Gianbattista La Rocca Philip Marc Iley Michael McGhee Lucy Chadwick

Directors remain in office for the period set at the time of their election, which is in any event no longer than three years, and may be re-elected. The criteria for electing members of the Board of Directors are contained in the Articles of Association⁶. The shareholders have also elected the Board of Statutory Auditors and appointed the audit firm.

⁶ Directors are elected as follows:

- (i) up to 9 Directors elected by Class A shareholders, by majority vote, during the general meeting called to elect the Board of Directors;
- (ii) one Director elected by Class B shareholders, by majority vote, during the general meeting called to elect the Board of Directors; and
- (iii) provided that the Class C Shares represent at least 8.5% of the Company's share capital, one Director elected by Class C shareholders, by majority vote, during the general meeting called to elect the Board of Directors; therefore, if the Class C shares cease to represent at least 8.5% of the Company's share capital, the right to elect this Director will be transferred to the Class A shareholders in addition to the Directors elected as per point (i). The members of the Executive Committee are appointed by the Board of Directors by majority vote of those present. In addition, the election criteria are decided on by the shareholders.

No fees are payable to Directors or members of the Executive Committee, except for the reimbursement of expenses incurred in relation to their role and D&O insurance. The remuneration of executive Directors is set by the Board of Directors pursuant to art. 2389, paragraph 3 of the Italian Civil Code.

ORGANIZATIONAL STRUCTURE⁷

The organizational structure consists of operating areas that are technically, operationally and financially independent and have specific operational processes. The head of each division has all the decision-making, management, strategic, organizational, financial and oversight powers - and the resulting responsibilities - needed to manage.



⁷ The Organisational Structure represented is the one in force as at 31/12/2022.

ESG GOVERNANCE

ESG governance is the responsibility of the following bodies:

- the ESG Steering Committee, chaired by the Chief Executive Officer, supported by the CFO in the role of Deputy Chair, and meeting on a quarterly basis to define and promote Italo’s ESG policies and decision-making mechanisms, aligning them with the Company’s strategy. The Committee oversees the processes involved in approving ESG programs and initiatives and coordinates with the heads of the departments responsible for assessing technical and economic feasibility. The ESG Steering Committee is responsible for the Sustainability Report and the Sustainability Plan.
- the ESG Team, which meets at least once a month and has the role of putting forward programs designed to strengthen the Company’s ESG culture and values, in accordance with the guidelines provided by the ESG Steering Committee. The ESG Team is responsible for:
 - initiatives relating to environmental protection, cutting emissions and energy use, and health and safety. It oversees the implementation of these initiatives and monitors environmental KPIs to ensure that they are in line with the Company’s goals;
 - proposing and overseeing social programs for employees and their families and the community, ensuring their alignment with the Company’s goals;
 - promoting awareness of ESG issues through internal communication initiatives.

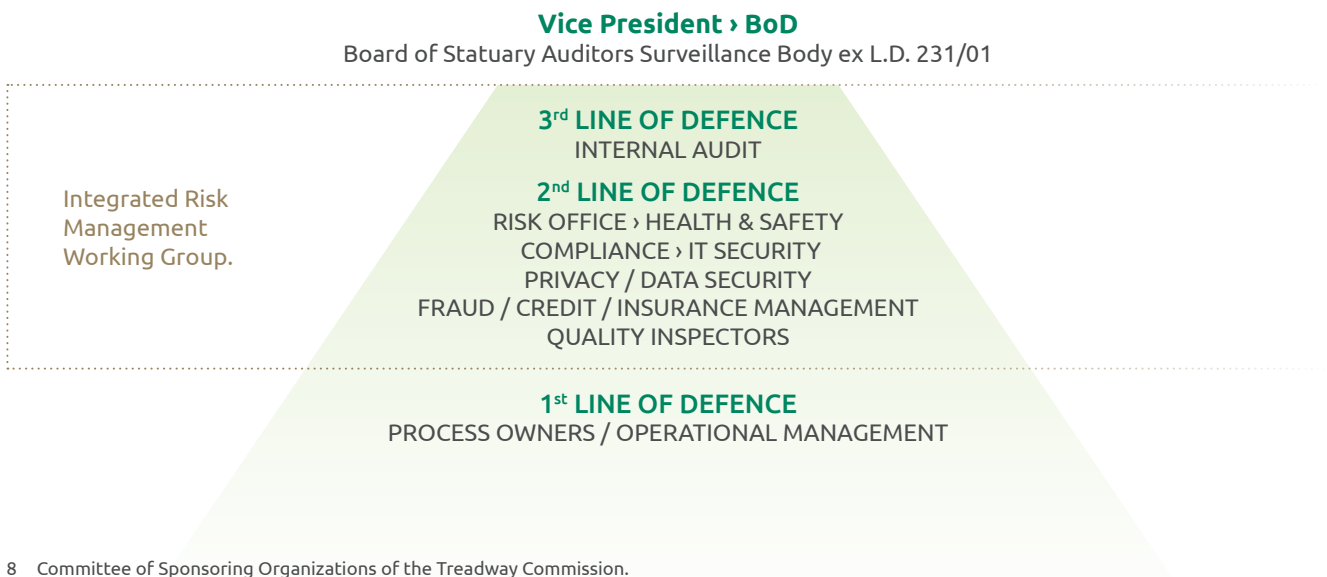
ESG Steering Committee

Chairman	Gianbattista La Rocca
Deputy Chair	Roberto Vitto
Member	Gabriele Cerratti
Member	Fabio Sgroi
Support	Ines Gandini

INTERNAL AUDIT AND RISK MANAGEMENT

Italo’s risk management and internal control system is based on the CoSo Framework⁸ (the CoSo Report - CoSo ERM) and the IIA’s Three Lines Model⁹. Its adequacy is constantly assessed and continuous improvement plans are drawn up with a view to boosting its operational efficiency and effectiveness.

On this basis, Italo has adopted an integrated approach and internal procedures designed to facilitate the information sharing and coordination within the organization. A working group with members representing the second and third lines of defense has been set up to discuss their key findings, to standardize operational plans and produce a periodic report on internal control and risk management for senior management.



8 Committee of Sponsoring Organizations of the Treadway Commission.

9 The Institute of Internal Auditors.

At the reporting date, Italo's main risks consist of:

- Strategic and business risks: the risk of failing to achieve the Company's business objectives, including market and social factors;
- Financial risks: risks that can adversely affect Italo's ability to meet its financial obligations (e.g., credit, liquidity, borrowing and interest rate risks);
- Operational risks: risks caused by flawed or failed processes, due to inadequate or malfunctioning internal procedures, malfunctioning systems and/or external events, including environmental factors;
- Compliance risks: the risk of incurring legal or administrative sanctions or reputational damage.

A project that aims to develop the Company's Internal Audit & Risk Management processes was launched in 2022, with licenses for GRC (Governance, Risk & Compliance) software purchased and initial requirements for migrating Integrated Risk Management activities to the platform met. What is a three-year project will also involve the adoption of further technologies with the aim of:

- automating periodic activities and reducing the need for manual integration of the analyses carried out by different departments;
- increasing data analysis, improving the timing and precision of monitoring/testing activities and developing continuous auditing and monitoring techniques;
- increasing the quality and accuracy of periodic reporting.

In 2022, Italo also implemented a third-party risk management process that, using a dedicated information provider, allows it to identify, analyze and assess potential reputational and compliance risks associated with the counterparties with which the Company interacts.

ETHICS AND COMBATTING CORRUPTION

Aware of the importance of the social impact of its business, Italo aims to be competitive in the marketplace via the fair and functional use of its resources, in full compliance with the law and the principles of integrity and transparency, whilst safeguarding the environment and people's physical and moral integrity, partly with a view to increasing its capacity to create value and wellbeing for the communities it serves. To ensure rigorous compliance with the law and prevent all forms of corruption, the Company has adopted:

- the Code of Ethics¹⁰, forming an integral part of the 231 Organizational, Management and Control Model, represents the set of ethical principles and values that should inspire the conduct and behavior of everyone who, in whatever capacity, acts in the interest or on behalf of the Company;
- the 231 Organizational, Management and Control Model, was revised in July 2021 to apply the latest legal requirements introduced by Legislative Decree 75/2020 regarding fraud and other unlawful activities detrimental to the EU's financial interests¹¹. The 231 Model, including the Code of Ethics, is published on the Company's website to make it available to all parties to whom it applies (e.g., shareholders, governance bodies, suppliers and customers) and on the intranet for all employees to consult;
- a Whistleblowing Policy, implemented in compliance with the requirements of Law 179/2017.

In 2022, a plan was drawn up for reviewing the 231 Model and this will be submitted for approval by the Board of Directors in 2023. The review aims to reflect the following legislative changes:

- implementation of Directive 2019/713/EU on combating fraud and counterfeiting of non-cash means of payment, which has resulted in: i) the introduction of the new offence of the "Possession and distribution of equipment, devices or computer programs for the commission of offences regarding non-cash payment instruments" (art. 493-quater of the criminal code); ii) addition of the offence of IT fraud aggravated by conduct leading to the transfer of money, monetary value or virtual currency; iii) an extended scope of application of the Directive to not only include payment instruments other than corporeal payment instruments (e.g., credit cards, checks), but also electronic money, virtual currency and mobile payments;
- amendments to Law Decree 13 of 25 February 2022 on sanctions targeting the fraudulent use of public funds that has resulted in the amendment of art. 2 of the legislation governing certain predicate offences provided for in art. 24 of the Decree covered by and punishable under the criminal code, namely: misappropriation of public funds; improper receipt of public funds; aggravated fraud with the intention of receiving public funds;
- the entry into force in March 2022 of Law 18 "Measures on offences against cultural heritage", which has reformed criminal law relating to the protection of cultural heritage included it in the criminal code.

In terms of processes relating to the prevention and mitigation of conflicts of interest among Directors, the Company applies the provisions of art. 2391 of the Italian Civil Code. The Company has also voluntarily adopted and applies a related parties procedures.

¹⁰ <https://italospa.italotreno.it/corporate-governance/codice-etico.html>

¹¹ Legislative Decree 75/2020 has transposed EU Directive 1371/2017 into Italian law, establishing minimum rules relating to the definition of criminal offences and sanctions in the area of fraud affecting the Union's financial interests.

CYBERSECURITY AND DATA PROTECTION

Italo recognizes the strategic value and importance in guaranteeing the security and confidentiality of personal data.

In line with the Company's Code of Ethics and the principles established in the relevant legislation, the ultimate aim is to protect the freedom and fundamental rights of the people to whom the personal data relates.

In terms of customer data, Italo primarily handles general, personal and contact details. In 2022, Italo managed and responded to over 270 requests from data subjects, paying constant attention to the need to enable subjects to check their personal data, in compliance with Regulation (EU) 2016/679 (the GDPR).

Several of activities were carried out within two macro-areas:

- Security and Data Privacy Governance, with the aim of defining and updating data protection management policies;
- GDPR Implementation and Awareness, with the aim of driving continuous improvement of the data protection management system.

Specifically:

- activities linked to critical analysis of the impact on data privacy of contracts with third parties, which may involve the signature of Data Protection Agreements pursuant to art. 28 of the GDPR;
- activities linked to personnel training. In 2022, training courses were devised with the aim of developing awareness of issues surrounding the processing of personal data when carrying out work tasks.

The Company's Data Protection Officer (DPO) has the key role of overseeing compliance with data processing regulations and provides advice to all internal departments with the aim of ensuring that their processes comply with data protection legislation.





Methodological Note

This document reports on the most significant activities and impacts in terms of governance, the environment, customers, human resources and society as a whole. It has been prepared “in accordance” with the GRI Standards, drawn up by the Global Reporting Initiative (GRI) and an internationally recognized framework for providing full, meaningful and comparative information.

The information contained in this Sustainability Report refers to the period from 1st January 2022 to 31 December 2022 and reflects the principles of accuracy, completeness, timeliness, comparability, balance, verifiability, clarity and the sustainability context.

The main methodological changes in this Report regard the use of the 2021 version of the GRI Standards and the updated materiality analysis, described in detail in the section on “Materiality and stakeholder engagement”.

Detailed information on the indicators reported on is provided in the “GRI Content Index”. To enable the correct comparison of data, quantitative data for the previous year has been included. Where data for the previous year has been restated or estimates have been used, this is clearly indicated in the document.

In addition, Italo has voluntarily disclosed information on the alignment of its business with the criteria established in Regulation EU 2020/852 and the Delegated Act referred to in article 8 of the Regulation, otherwise known as the “EU Taxonomy”.

The Sustainability Report has been subjected to a limited assurance engagement, carried out in accordance with the criteria in ISAE 3000 (Revised) by Deloitte & Touche SpA. At the end of their review, the audit firm prepared a specific report available in the section “Independent limited assurance report”.

The Sustainability Report is published annually.

This document is available at the public website: <https://italospa.italotreno.it/>.

Any queries regarding the Sustainability Report for 2022 can be sent to the ESG Committee at the following address: esg@ntvspa.it

Material Topics

One of the priorities in non-financial reporting is to provide transparent and continuous reporting, both as a channel for stakeholder dialogue and as a tool for monitoring performance and potential areas for improvement. Each year, Italo publishes a Sustainability Report, determining the content based on materiality analyses that identify material topics reflecting the organization’s most significant impacts on the economy, the environment, people and human rights. This year the Company has revised the method used and expended the materiality analysis to involve a greater number of stakeholder categories, as provided for in the Sustainability Plan.



Identification of the current and potential impacts resulting from Italo’s activities was based on an analysis of the Company’s operating environment (megatrends in the sector and benchmark analysis involving the main peers) and an assessment of core activities, management systems and the actions promoted with regard to ESG. The Group has identified a list of 25 positive and negative impacts, linked to a specific material topic. Each impact is assessed by the ESG Team using parameters measuring severity, scope and likelihood. Based on the results obtained, the impacts are associated with the respective material topics and then ranked from the most significant to the least significant. In addition, to obtain a shared vision of the Company’s priorities, assessment of the significance of material topics involved completion of an online survey by the six categories of stakeholder consulted for the materiality analysis of 2021 - Customers, Employees, Suppliers, Shareholders, Financial Institutions, Association and NGOs - and two new key categories: Media and Public Organizations. The outcome of the above process is detailed in the list of material topics shown below.

Ranking	List of material topics
1	Energy use, emissions and climate change
2	Quality of service
3	Health and safety of workers and passengers
4	Company ethics, combatting corruption and human rights
5	Territory and community
6	Intermodality and innovative services
7	Diversity and wellbeing at the workplace
8	Customer privacy and data protection
9	Supply chain sustainability
10	Accessibility of the service
11	Staff development and training



Annex

ORGANISATIONAL PROFILE

Table 1 - GRI 405-1.a Number and percentage of people in the organization's governance bodies by gender and age group.

Number of people	2022					
	Men		Women		Total	
	Number	Percentage	Number	Percentage	Number	Percentage
< 30 years of age	-	0%	-	0%	-	0%
30-50 years of age	2	22%	-	0%	2	22%
> 50 years of age	5	56%	2	22%	7	78%
Total	7	78%	2	22%	9	100%

Number of people	2021					
	Men		Women		Total	
	Number	Percentage	Number	Percentage	Number	Percentage
< 30 years of age	0	0%	-	0%	-	0%
30-50 years of age	2	22%	-	0%	2	22%
> 50 years of age	5	56%	2	22%	7	78%
Total	7	78%	2	22%	9	100%

Number of people	2020					
	Men		Women		Total	
	Number	Percentage	Number	Percentage	Number	Percentage
< 30 years of age	-	0%	-	0%	-	0%
30-50 years of age	3	33%	-	- %	3	33%
> 50 years of age	4	45%	2	22%	6	67%
Total	7	78%	2	22%	9	100%


ENVIRONMENT

Table 2 - GRI 302-1 Total energy consumption within the organization in GJ from 1st January to 31 December, by type¹² of consumption.

Energy consumption	Total 2022	Total 2021	Total 2020
Natural gas	1,852	1,932	2,235
Electricity	1,386,391	878,372	721,813
Diesel	248	219	263
Petrol	27	0	-
Total	1,388,518	880,523	724,311

Table 3 - GRI 305-1 and GRI 305-2 Total direct and indirect greenhouse gas emissions¹³ in tons from 1st January to 31 December.

CO ₂ footprint	Total 2022	Total 2021	Total 2020	Change 2022/2021
Scope 1	127.7	127.9	144.4	-0.1%
Scope 2 ¹⁴	100,320.8	63,556.0	52,090.9	+57.8%
Total¹⁵	100,448.5	63,687.8	52,235.3	+57.7%
Totale (gCO₂/pax.km)¹⁶	11.92	23.81	20.00	

12 The source for conversion factors in GJ is the "Table of standard national parameters 2021 - Ministry of the Environment". Specifically: natural gas = 0.034289 GJ/scm; electricity = 0.0036; diesel = 0.04285 GJ/kg, petrol = 0.04313 GJ/kg.

13 CO₂ emissions are based on the "Location-based method". However, Scope 2 CO₂ emissions have been measured using both the methods provided for in the GRI Sustainability Reporting Standards. As regards the "Market-based method", total Scope 2 emissions amount to 276,315.39 tons for 2022 and 175,552.37 tons for 2021. The source for the emission factors used in calculating location-based Scope 2 emissions is "ISPRA 2021 - Atmospheric emission factors of greenhouse gases in the national electricity industry and in the main European countries", whilst the market-based source is "AIB_Residual Mix 2020 v.1.0".

14 Location-based CO₂ emissions for 2022 have been restated due to a revision of emission factors. The source used for location-based Scope 2 CO₂ emissions is "ISPRA 2021 - Atmospheric emission factors of greenhouse gases in the national electricity industry and in the main European countries".

15 The increase in absolute emissions figures is due to the increase in train circulation.

16 The 2022 value reflects the use of an updated conversion factor certified by government (ISPRA).

Table 4 - GRI 306-3 Tons of waste produced and disposed of from 1st January to 31 December, by type and disposal method.

Disposal method	2022				
	Unit of measurement	Hazardous	Non-hazardous	Total	% of total
Recovery, including energy recovery	t	-	37.680	37.680	5%
Recycle	t	-	-	-	-
Landfill	t	-	-	-	-
Other (to be specified by the organization) exchange of waste pending one of the operations numbered R1 to R11	t	-	0.220	0.220	0%
Waste storage prior to treatment using one of the operations numbered R1 to R12 (excluding temporary storage, prior to collection, at the site at which the waste was produced)	t	0.060	410.320	410.380	51%
Physical-chemical and biological treatment not otherwise specified in this attachment resulting in compounds or mixtures discarded using one of the operations numbered D1 to D12 (by, for example, evaporation, drying, calcination, etc.)	t	60.980	295.960	356.940	44%
Preliminary storage prior to treatment using one of the operations numbered D1 to D14 (excluding temporary storage, prior to collection, at the site at which the waste was produced)	t	-	1.970	1.970	0%
Total	t	61	746.150	807.190	100%

Disposal method	2021				
	Unit of measurement	Hazardous	Non-hazardous	Total	% of total
Recovery, including energy recovery	t	-	36.025	36.030	2%
Recycle	t	-	-	-	-
Landfill	t	-	-	-	-
Other (to be specified by the organization) exchange of waste pending one of the operations numbered R1 to R11	t	-	2.020	2.020	0%
Waste storage prior to treatment using one of the operations numbered R1 to R12 (excluding temporary storage, prior to collection, at the site at which the waste was produced)	t	-	265.920	265.920	11%
Physical-chemical and biological treatment not otherwise specified in this attachment resulting in compounds or mixtures discarded using one of the operations numbered D1 to D12 (by, for example, evaporation, drying, calcination, etc.)	t	10.960	1,037.020	1,047.980	44%
Preliminary storage prior to treatment using one of the operations numbered D1 to D14 (excluding temporary storage, prior to collection, at the site at which the waste was produced)	t	3.850	1,008.303	1,012.150	43%
Total	t	14.810	2,349.228	2,364.098	100%

Disposal method	2020				Total	% of total
	Unit of measurement	Hazardous	Non-hazardous			
Recovery, including energy recovery	t	-	-	-	-	
Recycle	t	-	11	11	4%	
Landfill	t	-	236	236	96%	
Other (to be specified by the organization) exchange of waste pending one of the operations numbered R1 to R11	t	-	-	-	-	
Waste storage prior to treatment using one of the operations numbered R1 to R12 (excluding temporary storage, prior to collection, at the site at which the waste was produced)	t	-	-	-	-	
Physical-chemical and biological treatment not otherwise specified in this attachment resulting in compounds or mixtures discarded using one of the operations numbered D1 to D12 (by, for example, evaporation, drying, calcination, etc.)	t	-	-	-	-	
Preliminary storage prior to treatment using one of the operations numbered D1 to D14 (excluding temporary storage, prior to collection, at the site at which the waste was produced)	t	-	-	-	-	
Total	t	-	247	247	100%	




SOCIAL

Table 5 - GRI 2-7.a Total number of employees by gender and region.

Location	2022			2021			2020 ¹⁷		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Northern Italy	247	185	432	249	185	434	286	199	485
Central and Southern Italy and the islands	498	430	928	487	424	911	461	423	844
Total	745	615	1,360	736	609	1,345	747	622	1,369

Table 6 - GRI 2-7.b Total number of employees by type of contract, gender and region.

Location	Type of contract	2022			2021			2020 ¹⁸		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Northern Italy	Permanent	236	183	419	247	179	426	263	164	427
	Fixed-term	0	0	0	0	0	0	1	0	1
	Apprenticeship	11	2	13	2	6	8	21	33	54
Total Northern Italy		247	185	432	249	185	434	286	199	485
Central and Southern Italy and the islands	Permanent	483	422	905	470	401	871	437	368	805
	Fixed-term	10	8	18	7	4	11	2	2	4
	Apprenticeship	5	0	5	10	19	29	18	51	69
Total Central and Southern Italy and the islands		498	430	928	487	424	911	461	423	844
Total		745	615	1,360	736	609	1,345	747	622	1,369

Table 7 - GRI 2-7.c Total number of employees by full-time/part-time contract, gender and region.

Full-time / Part-time	Location	2022			2021			2020 ¹⁹		
		Men	Women	Total	Men	Women	Total	Men	Women	Total
Full time	Northern Italy	247	176	423	249	178	427	740	588	1,328
	Central and Southern Italy and the islands	495	389	884	484	389	873			
Part Time	Northern Italy	0	9	9	0	7	7	2	30	32
	Central and Southern Italy and the islands	3	41	44	3	35	38			
Total		745	615	1,360	736	609	1,345	742	618	1,360

17 Information concerning 2020 was acquired using the GRI Standards 2016 version.

18 Information concerning 2020 was acquired using the GRI Standards 2016 version.

19 Information concerning 2020 was acquired using the GRI Standards 2016 version.

Table 8 - GRI 2-8 Number of workers who are not employees by professional category and gender (headcount).

Professional category	2022			2021			2020 ²⁰		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Interns	1	1	2	2	0	2	2	0	2
Agency workers	39	96	135	35	79	114	0	4	4
Other (freelance workers, self-employed, etc.)	4	0	4	5	0	5	3	0	3
Total	44	97	141	42	79	121	5	4	9

Table 9 - GRI 401-1.a Number and rate of new hires from 1st January to 31 December by geographical area, gender and age group. The rate of new hires is the ratio between the number of new hires and the number of employees.

Number of people	2022				2021				2020				Change 2022/2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 31	30-51	> 51	Total
Northern Italy	4	8	-	12	2	4	1	7	32	9	-	41	100%	100%	-100%	71%
Men	1	2	-	3	1	3	1	5	24	8	-	32	0%	-33%	-100%	-40%
Women	3	6	-	9	1	1	-	2	8	1	-	9	200%	500%	0%	350%
Central and Southern Italy and the Islands	66	34	2	102	40	23	2	65	65	20	1	86	65%	48%	0%	57%
Men	49	15	1	65	34	16	1	51	41	15	1	57	44%	-6%	0%	27%
Women	17	19	1	37	6	7	1	14	24	5	-	29	183%	171%	0%	164%
Total	70	42	2	114	42	27	3	72	97	29	1	127	67%	56%	-33%	58%
Men	50	17	1	68	35	19	2	56	65	23	1	89	43%	-11%	-50%	21%
Women	20	25	1	46	7	8	1	16	32	6	-	38	186%	213%	0%	188%

Rate	2022				2021				2020			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Northern Italy	4%	3%	0%	3%	2%	1%	13%	2%	17%	3%	0%	9%
Men	1%	1%	0%	1%	1%	2%	20%	2%	22%	5%	0%	11%
Women	9%	4%	0%	5%	2%	1%	0%	1%	10%	1%	0%	5%
Central and Southern Italy and the Islands	35%	5%	5%	11%	18%	4%	7%	7%	27%	3%	4%	10%
Men	46%	4%	3%	13%	27%	5%	4%	10%	33%	5%	4%	12%
Women	21%	6%	13%	9%	6%	2%	33%	3%	21%	2%	0%	7%
Total	24%	4%	4%	8%	12%	3%	8%	5%	23%	3%	3%	9%
Men	28%	3%	3%	9%	18%	4%	6%	8%	28%	5%	4%	12%
Women	17%	5%	9%	7%	5%	2%	17%	3%	16%	1%	0%	6%

20 Information concerning 2020 was acquired using the GRI Standards 2016 version.

Table 10 - GRI 401-1.b Total number and rate of employee turnover from 1st January to 31 December by age group, gender and region. The turnover rate is the ratio between the number of leavers and the number of employees.

Number of people	2022				2021				2020				Change 2022/2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 31	30-51	> 51	Total
Northern Italy	9	22	-	31	13	16	-	29	13	5	1	19	-31%	38%	0%	7%
Men	7	13	-	20	7	8	-	15	7	5	1	13	0%	63%	0%	33%
Women	2	9	-	11	6	8	-	14	6	-	-	6	-67%	13%	0%	-21%
Central and Southern Italy and the islands	35	30	3	68	25	29	4	58	12	24	5	41	40%	3%	-25%	17%
Men	25	12	2	39	20	23	4	47	9	16	5	30	25%	-48%	-50%	-17%
Women	10	18	1	29	5	6	-	11	3	8	-	11	100%	200%	0%	164%
Total	44	52	3	99	38	45	4	87	25	29	6	60	16%	16%	-25%	14%
Men	32	25	2	59	27	31	4	62	16	21	6	43	19%	-19%	-50%	-5%
Women	12	27	1	40	11	14	-	25	8	8	-	17	9%	93%	0	60%

Rate	2022				2021				2020			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Northern Italy	9%	7%	0%	7%	11%	5%	0%	7%	7%	2%	17%	4%
Men	10%	8%	0%	8%	10%	5%	0%	6%	6%	3%	25%	5%
Women	6%	6%	0%	6%	12%	6%	0%	8%	8%	0%	0%	3%
Central and Southern Italy and the islands	19%	4%	7%	7%	11%	4%	14%	6%	5%	4%	19%	5%
Men	24%	3%	6%	8%	16%	7%	15%	10%	7%	5%	21%	7%
Women	13%	5%	13%	7%	5%	2%	0%	3%	3%	3%	0%	3%
Total	15%	5%	6%	7%	11%	5%	11%	6%	6%	3%	19%	4%
Men	18%	5%	5%	8%	14%	6%	13%	8%	7%	4%	21%	6%
Women	10%	6%	9%	7%	7%	3%	0%	4%	5%	2%	0%	3%

Table 11 - GRI 404-3.a Percentage of employees receiving regular performance and career development reviews from 1st January to 31 December.

Number of employees	2022		
	Men	Women	Total employees
	Percentage of employees evaluated	Percentage of employees evaluated	Percentage of employees evaluated
Administrative staff	93.8%	90.4%	92.2%
Operational staff	98.6%	88.5%	94.1%
Total	97.6%	88.9%	93.7%

Number of employees	2021		
	Men	Women	Total Employees
	Percentage of employees evaluated	Percentage of employees evaluated	Percentage of employees evaluated
Administrative staff	91.0%	86.7%	89.0%
Operational staff	97.8%	89.7%	94.2%
Total	96.3%	89.0%	93.0%

Number of employees	2020		
	Men	Women	Total Employees
	Percentage of employees evaluated	Percentage of employees evaluated	Percentage of employees evaluated
Administrative staff	98.0%	95.0%	96.0%
Operational staff	93.0%	92.0%	92.0%
Total	94.0%	92.0%	93.0%



Table 12 - GRI 401-3 Parental leave from 1st January to 31 December by gender.

Number of employees	2022			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Total number of employees having the right to parental leave	204	213	417	244	214	458	241	206	447
Total number of employees who benefitted from parental leave	110	149	259	90	112	202	78	83	161
Total number of employees who returned to work during the reporting period after taking parental leave	102	144	246	90	112	202	76	79	155
Total number of employees who returned to work after taking parental leave and who were still employed 12 months after their return to work	78	104	182	76	79	155	74	118	192

Number of employees	2022			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Total number of employees returning to work after taking parental leave	110	149	259	90	112	202	78	79	161
Rate of return to work	93%	97%	95%	100%	100%	100%	97%	95%	96%

Number of employees	2022			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Total number of employees returning to work after taking parental leave in the previous reporting period	90	112	202	76	79	155	77	122	199
Retention rate	87%	93%	90%	100%	100%	100%	96%	97%	96%

Table 13 - GRI 405-1.b Number and percentage of employees as of 31 December by category, gender and age group.

Number of employees	2022				2021				2020				Change 2022/2021			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-51	> 51	Total
Administrative staff	24	250	34	308	33	241	25	299	25	226	24	275	38%	-4%	-26%	-3%
Men	13	122	27	162	17	117	22	156	12	112	22	146	31%	-4%	-19%	-4%
Women	11	128	7	146	16	124	3	143	13	114	2	129	45%	-3%	-57%	-2%
Operational staff	267	770	15	1,052	316	718	12	1,046	401	676	8	1,085	18%	-7%	-20%	-1%
Men	163	409	11	583	181	390	9	580	220	370	6	596	11%	-5%	-18%	-1%
Women	104	361	4	469	135	328	3	466	181	306	2	489	30%	-9%	-25%	-1%
Total	291	1,020	49	1,360	349	959	37	1,345	426	902	32	1,360	20%	-6%	-24%	-1%
Men	176	531	38	745	198	507	31	736	232	482	28	742	13%	-5%	-18%	-1%
Women	115	489	11	615	151	452	6	609	194	420	4	618	31%	-8%	-45%	-1%

Table 14 - GRI 405-1.c Number and percentage of employees as of 31 December by category, gender and age group.

Percentage di Employees	2022				2021				2020			
	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total	< 30	30-50	> 50	Total
Administrative staff	2%	18%	3%	23%	2%	18%	2%	22%	2%	16%	2%	20%
Men	1%	9%	2%	12%	1%	9%	2%	12%	1%	8%	2%	11%
Women	1%	9%	1%	11%	1%	9%	0%	11%	1%	8%	0%	9%
Operational staff	20%	57%	1%	77%	23%	53%	1%	78%	30%	50%	0%	80%
Men	12%	30%	1%	43%	13%	29%	1%	43%	17%	27%	0%	44%
Women	8%	27%	0%	34%	10%	24%	0%	35%	13%	23%	0%	36%
Total	21%	75%	4%	100%	26%	71%	3%	100%	31%	66%	2%	100%
Men	13%	39%	3%	55%	15%	38%	2%	55%	17%	35%	2%	55%
Women	8%	36%	1%	45%	11%	34%	0%	45%	14%	31%	0%	45%

Table 15 - GRI 405-1.d Number and percentage of employees belonging to vulnerable groups by category and gender.

Number of employees	2022			2021			2020			Change 2022/2021		
	Men	Women	Total	Men	Women	Total	Men	Women	Total	Men	Women	Total
Administrative staff	13	10	23	11	7	18	8	8	16	18%	43%	28%
Operational staff	4	3	7	3	1	4	7	2	9	33%	200%	75%
Total	17	13	30	14	8	22	15	10	25	21%	63%	36%

Table 16 - GRI 405-1.e Number and percentage of employees belonging to vulnerable groups by category and gender.

Number of employees	2022			2021			2020		
	Men	Women	Total	Men	Women	Total	Men	Women	Total
Administrative staff	8%	7%	7%	7%	5%	6%	4%	6%	5%
Operational staff	1%	0,6%	0,7%	2%	1%	0,4%	1%	0%	1%
Total	2%	2%	2%	2%	1%	2%	2%	2%	2%

Table 17 - GRI 405-2 Ratio of women's pay to men's pay for each category of employee by significant operating office.

Average basic pay per capita	2022	2021	2020
	% Ratio of Women/Men	% Ratio of Women/Men	% Ratio of Women/Men
Northern Italy	73.9%	72.0%	80.3%
Administrative staff	56.8%	53.2%	63.7%
of which senior management	0.0%	0.0%	0.0%
of which middle management	0.0%	0.0%	0.0%
of which employees	76.6%	77.6%	94.4%
Operational staff	75.4%	73.6%	81.9%
Central and Southern Italy and the islands	77.0%	76.6%	74.5%
Administrative staff	70.7%	74.0%	68.9%
of which senior management	72.9%	75.1%	87.3%
of which middle management	93.1%	99.5%	97.3%
of which employees	84.3%	93.8%	88.3%
Operational staff	79.7%	78.2%	78.9%
Total	76.1%	75.4%	77.1%

Table 18 - GRI 404-1 Average hours of training for the organization's employees from 1st January to 31 December by gender and category of employee.

Hours of training	2022			2021			2020		
	Men	Women	Total employees	Men	Women	Total employees	Men	Women	Total employees
	Average training hours	Average training hours	Average training hours	Average training hours	Average training hours	Average training hours	Average training hours	Average training hours	Average training hours
Administrative staff	11.0	14.2	12.6	18.2	16.2	17.2	8.7	6.6	7.7
Operational staff	122.8	54.9	92.5	166.3	77.1	126.6	166.6	53.0	115.4
Total	98.5	45.2	74.4	134.9	62.8	102.3	135.6	43.3	93.6



Table 19 - 403-9.a Number of work-related injuries²¹ among the workforce recorded from 1st January to 31 December.

Number of injuries	2022	2021	2020
Number of fatalities due to work-related injuries	-	-	-
Number of work-related injuries with serious consequences (excluding fatal injuries)	-	-	-
Number of recordable work-related injuries	37	14	9

Table 20 - 403-9.b Work-related injury rate among the workforce recorded from 1st January to 31 December.

Injury rate	2022	2021	2020
Rate of fatalities due to work-related injuries	0	0	0
Rate of work-related injuries with serious consequences (excluding fatal injuries)	0	0	0
Rate of recordable work-related injuries	18.7	8.5	6.7

Table 21 - 418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data.

Number of complaints	2022	2021	2020
Complaints received from third parties and substantiated by the organization	-	-	-
Complaints from regulatory bodies	-	-	-
Total	-	-	-

Table 22 - GRI 308-1 New suppliers screened using environmental criteria; GRI 414-1 New suppliers screened using social criteria.

SUPPLIER EVALUATION			
Criteria	2022	2021	2020
Percentage of suppliers evaluated using environmental criteria	100%	N/A	N/A
Percentage of suppliers evaluated using social criteria	100%	N/A	N/A

21 The number of hours worked is 1,974,454 in 2022 and 1,638,136 in 2021.

Table 23 - GRI 204-1 Proportion of expenditure made to local suppliers.

Product / Service category	2022							
	Italy		EU		Extra-EU		Total	
	Spending (Mio €)	%	Spending (Mio €)	%	Spending (Mio €)	%	Spending (Mio €)	%
Provision and maintenance of rolling stock	109.9	23.0%	-	0.0%	-	0.0%	109.9	23.0%
Network access costs	233.6	48.8%	-	0.0%	-	0.0%	233.6	48.8%
Facility Management	17.1	3.6%	-	0.0%	-	0.0%	17.1	3.6%
Information Technology	20.0	4.2%	0.0	0.0%	6.2	1.3%	26.3	5.5%
Miscellaneous	78.7	16.5%	0.3	0.1%	12.6	2.6%	91.7	19.2%
Total	459.3	96.0%	0.3	0.1%	18.9	3.9%	478.6	100.0%

Product / Service category	2021							
	Italy		EU		Extra-EU		Total	
	Spending (Mio €)	%	Spending (Mio €)	%	Spending (Mio €)	%	Spending (Mio €)	%
Provision and maintenance of rolling stock	119.4	35.9%	-	-	-	-	119.4	35.9%
Network access costs	101.5	30,5%	-	-	-	-	101.5	30.5%
Facility Management	12.5	3.8%	-	-	-	-	12.5	3.8%
Information Technology	23.5	7.0%	2.4	0.7%	2.0	0.6%	27.9	8.4%
Miscellaneous	60.0	18.1%	0.1	0.04%	11.2	3.4%	71.4	21.5%
Total	316.9	95.3%	2.5	0.8%	13.2	4.0%	332.6	100.0%

Product / Service category	2020							
	Italy		EU		Extra-EU		Total	
	Spending (Mio €)	%	Spending (Mio €)	%	Spending (Mio €)	%	Spending (Mio €)	%
Provision and maintenance of rolling stock	121.1	42.4%	-	-	-	-	121.1	42.4%
Network access costs	75.6	26.5%	-	-	-	-	75.6	26.5%
Facility Management	8.6	3.0%	-	-	-	-	8,6	3.0%
Information Technology	20.3	7.1%	3.2	1.1%	1.9	0.7%	25.4	8.9%
Miscellaneous	46.0	16.1%	0.4	0.2%	8.3	2.9%	54.7	19.2%
Total	271.6	95.2%	3.6	1.3%	10.2	3.6%	285.4	100.0%

GRI Linkage Table

Material topics	Link to topic-specific standard	Scope of impact	Type of impact
Energy use, emissions and climate change	302-1 Energy consumption within the organization; 305-1 Direct (Scope 1) GHG emissions; 305-2 Indirect (Scope 2) GHG emissions from energy consumption; 306-1 Waste generation and significant waste-related impacts; 306-2 Management of significant waste-related impacts; 306-3 Waste generated; 306-4 Waste diverted from disposal; 306-5 Waste directed to disposal.	Italo; Suppliers	Caused by Italo SpA and directly linked to its operations
Quality of service	N/A	Italo; Suppliers; Customers	Caused by Italo SpA and directly linked to its operations
Health and safety of workers and passengers	403-1 Occupational health and safety management system; 403-2 Hazard identification, risk assessment, and incident investigation; 403-3 Occupational health services; 403-4 Worker participation, consultation, and communication on occupational health and safety; 403-5 Worker training on occupational health and safety; 403-6 Promotion of worker health; 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships; 403-8 Workers covered by an occupational health and safety management system; 403-9 Work-related injuries.	Italo; Suppliers; Customers	Caused by Italo SpA and directly linked to its operations
Company ethics, combatting corruption and human rights	205-2 Communication and training about anti-corruption policies and procedures; 205-3 Confirmed incidents of corruption and actions taken.	Italo; Suppliers; Other stakeholders	Caused by Italo SpA
Territory and community	N/A	Italo; Community	Caused by Italo SpA
Intermodality and innovative services	N/A	Italo; Customers	Caused by Italo SpA and directly linked to its operations
Diversity and wellbeing at the workplace	401-1 New employee hires and employee turnover; 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees; 401-3 Parental leave; 405-1 Diversity of governance bodies and employees; 405-2 Ratio of basic salary and remuneration of women to men.	Italo; Employees	Caused by Italo SpA
Customer privacy and data protection	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data.	Italo; Customers	Caused by Italo SpA and directly linked to its operations
Supply chain sustainability	204-1 Proportion of spending on local suppliers; 308-1 New suppliers that were screened using environmental criteria; 414-1 New suppliers that were screened using social criteria.	Italo; Suppliers	Caused by Italo SpA and directly linked to its operations
Accessibility of the service	N/A	Italo; Customers	Caused by Italo SpA and directly linked to its operations
Staff development and training	404-1 Average hours of training per year per employee; 404-3 Percentage of employees receiving regular performance and career development review.	Italo; Employees	Caused by Italo SpA

GRI Content Index

Statement of use	Italo NTV SpA has prepared a report in compliance with the GRI Standards for the period from 1st January 2022 to 31 December 2022
GRI 1 used	GRI 1 - Fundamental Principles - 2021 version

GRI Standard	Disclosure	Page	Omission		
			Requirement omitted	Reason	Explanation
GRI 2 - Informativa Generale 2021					
2-1	Organizational details	36-37			
2-2	Entities included in the organization's sustainability reporting	5			
2-3	Reporting period, frequency and contact point	42			
2-4	Restatements of information	42			
2-5	External assurance	42			
2-6	Activities, value chain and other business relationships	30-31-32			
2-7	Employees	48			
2-8	Workers who are not employees	49			
2-9	Governance structure and composition	36			
2-10	Nomination and selection of the highest governance body.	36			
2-11	Chair of the highest governance body	36			
2-12	Role of the highest governance body in overseeing the management of impacts	38-39			
2-13	Delegation of responsibility for managing impacts	39-39 42-43			
2-14	Role of the highest governance body in sustainability reporting.	38			
2-15	Conflicts of interest	39			
2-16	Communication of critical concerns	Omission	A-B	Information unavailable	Information unavailable for the 2022 annual reporting period
2-17	Collective knowledge of the highest governance body	38-39			
2-18	Evaluation of the performance of the highest governance body	Omission	A-B-C	Not pertinent	Information not pertinent for the 2022 annual reporting period
2-19	Remuneration policies	Omission	B	Confidentiality restrictions	Confidential information
2-20	Process to determine remuneration	Omission	A-B	Not pertinent	Information not pertinent for the 2022 annual reporting period
2-21	Annual total compensation ratio	Omission	A-B-C	Confidentiality restrictions	Confidential information
2-22	Statement on sustainable development strategy	14			

GRI Standard	Disclosure	Page	Omission		
			Requirement omitted	Reason	Explanation
2-23	Policy commitments	39			
2-24	Embedding policy commitments	14			
2-25	Processes to remediate negative impacts	Omission	A-B-C-D-E	Information unavailable	Information unavailable for the 2022 annual reporting period
2-26	Mechanism for seeking advice and raising concerns	39			
2-27	Compliance with laws and regulations	20			
2-28	Membership associations	29			
2-29	Approach to stakeholder engagement	34			
2-30	Collective bargaining agreements	25			
Material topics					
GRI 3 - Material topics - 2021 version					
3-1	Process to determine material topics				
3-2	List of material topics				
Topic: Company ethics, combatting corruption and human rights					
3-3	Management of material topics				
205-2	Communication and training about anti-corruption policies and procedures	39			
205-3	Confirmed incidents of corruption and actions taken	39			
Topic: Energy use, emissions and climate change					
3-3	Management of material topics				
302-1	Energy consumption within the organization	45			
305-1	Direct (Scope 1) GHG emissions	23-45			
305-2	Indirect (Scope 2) GHG emissions from energy consumption	23-45			
306-1	Waste generation and significant waste-related impacts	23			
306-2	Management of significant waste-related impacts	23			
306-3	Waste generated	46			
306-4	Waste diverted from disposal	46			
306-5	Waste directed to disposal	46			
Topic: Supply chain sustainability					
3-3	Management of material topics				
204-1	Proportion of spending on local suppliers	56			
308-1	New suppliers that were screened using environmental criteria	55			
414-1	New suppliers that were screened using social criteria	55			

GRI Standard	Disclosure	Page	Omission		
			Requirement omitted	Reason	Explanation
Topic: Diversity and wellbeing at the workplace					
3-3	Management of material topics				
401-1	New employee hires and employee turnover	49-50			
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	34			
401-3	Parental leave	52			
405-1	Diversity of governance bodies and employees	52-53			
405-2	Ratio of basic salary and remuneration of women to men	54			
Topic: Health and safety of workers and passengers					
3-3	Management of material topics				
403-1	Occupational health and safety management system	28-29			
403-2	Hazard identification, risk assessment, and incident investigation	28			
403-3	Occupational health services	28			
403-4	Worker participation, consultation, and communication on occupational health and safety	28			
403-5	Worker training on occupational health and safety	25-27			
403-6	Promotion of worker health	28			
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	27-28			
403-8	Workers covered by an occupational health and safety management system	27			
403-9	Work-related injuries	28-55			
Topic: Staff development and training					
3-3	Management of material topics				
404-1	Average hours of training per year per employee	25-54			
404-3	Percentage of employees receiving regular performance and career development review	51			
Topic: Customer privacy and data protection					
3-3	Management of material topics				
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	55			

GRI Standard	Disclosure	Page	Omission		
			Requirement omitted	Reason	Explanation
Topic: Quality of service					
3-3	Management of material topics				
Topic: Territory and community					
3-3	Management of material topics				
Topic: Intermodality and innovative services					
3-3	Management of material topics				
Topic: Accessibility of the service					
3-3	Management of material topics				



Independent limited assurance report



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INDEPENDENT AUDITOR'S REPORT ON THE SUSTAINABILITY REPORT

To the Board of Directors of
Italo Nuovo Trasporto Viaggiatori S.p.A.

We have carried out a limited assurance engagement on the Sustainability Report of Italo Nuovo Trasporto Viaggiatori S.p.A. (hereinafter "Italo") as of December 31, 2022.

Our limited assurance engagement does not extend to the information included in the paragraph "EU taxonomy" of the Sustainability Report, voluntarily disclosed, based on the European Regulation 2020/852.

Responsibility of the Directors for the Sustainability Report

The Directors of Italo are responsible for the preparation of the Sustainability Report in accordance with the "Global Reporting Initiative Sustainability Reporting Standards" established by GRI – Global Reporting Initiative ("GRI Standards"), as stated in the chapter "Methodological Note" of the Sustainability Report.

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

The Directors are also responsible for the definition of the Italo's objectives in relation to the sustainability performance, for the identification of the stakeholders and the significant aspects to report.

Auditor's Independence and quality control

We have complied with the independence and other ethical requirements of the *Code of Ethics for Professional Accountants* 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*, 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 responsibility

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

Therefore, the procedures performed in a limited assurance engagement are less than those performed in a reasonable assurance engagement in accordance with *ISAE 3000 Revised*, and, therefore, do not enable us to obtain assurance that we would become aware of all significant matters and events that might be identified in a reasonable assurance engagement.

The procedures performed on the Sustainability Report are based on our professional judgement and included inquiries, primarily with Company personnel responsible for the preparation of information included in the Sustainability Report, analysis of documents, recalculations and other procedures aimed to obtain evidence as appropriate.

Specifically, we carried out the following procedures:

- 1) analysis of the process relating to the definition of material aspects disclosed in the Sustainability Report, with reference to the methods used for the identification and prioritization of material aspects for stakeholders and to the internal validation of the process results;
- 2) comparison between the economic and financial information included in the Sustainability Report with those included in the Company's Financial Statements;
- 3) understanding of the processes underlying the origination, recording and management of qualitative and quantitative material information included in the Sustainability Report.

In particular, we carried out interviews and discussions with the management of Italo and we carried out limited documentary verifications, in order to gather information about the processes and procedures, which support the collection, aggregation, elaboration and transmittal of non-financial data and information to the department responsible for the preparation of the Sustainability Report.

In addition, for material information, taking into consideration the Company's activities and characteristics:

- with regards to qualitative information included in the Sustainability Report, we carried out interviews and gathered supporting documentation in order to verify its consistency with the available evidence;
- with regards to quantitative information, we carried out both analytical procedures and limited verifications in order to ensure, on a sample basis, the correct aggregation of data.
- we carried out remote meetings, during which we have met the management of Italo and have gathered supporting documentation on a sample basis with reference to the correct application of procedures and calculation methods used for the indicators.

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Conclusion

Based on the work performed, nothing has come to our attention that causes us to believe that the Sustainability Report of Italo Nuovo Trasporto Viaggiatori S.p.A. as of December 31, 2022, is not prepared, in all material aspects, in accordance with the GRI Standards as stated in the paragraph “Methodological Note” of the Sustainability Report.

Our conclusion on the Sustainability Report does not extend to the information included in the paragraph “EU taxonomy” based on the European Regulation 2020/852.

DELOITTE & TOUCHE S.p.A.

Signed by
Monica Palumbo
Partner

Milan, Italy
July 27, 2023

This report has been translated into the English language solely for the convenience of international readers.





ITALO SPA

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