



## POLICY ON BIODIVERSITY AND ECOSYSTEMS

### Purpose and scope of application

This Biodiversity and Ecosystems Policy (hereinafter also “Policy”) defines the principles and methods that guide and characterise the actions of the Sesa Group (hereinafter also “Group” or “Sesa”) in the protection and enhancement of biodiversity and ecosystems related to its activities, with the purpose of better understanding the specific context and identifying, assessing, managing and, where necessary, remedying any related impacts, risks, dependencies and opportunities.

Although it does not have any production sites or operate in protected or at-risk areas, the Sesa Group has decided to define a Biodiversity and Ecosystems Policy as an expression of its responsibility towards the environment and the communities in which it operates. This commitment reflects Sesa's sustainable vision, closely related to the challenges of climate change and the creation of concrete value for the communities and territories in which it operates. In particular, Sesa believes that biodiversity is key to keeping ecosystems productive and resilient. That's why conserving and managing it properly is essential to protecting life and ensuring the quality of the environment on our planet.

Sesa's commitment is based on the perspective of dual materiality and translates, on one hand, into operational models designed to mitigate and manage impacts and dependencies on the environment and biodiversity, through a proactive and, as far as possible, site-specific approach; on the other hand, in risk management strategies linked to the loss of biodiversity and ecosystem services, an increasingly important factor for the economic and social processes in which Sesa operates. From the point of view of relations with local communities and relevant stakeholders, projects to protect Natural Capital – and biodiversity in particular – are a driver of value creation that accompanies Sesa's presence in the area, translating its vision into concrete actions and initiatives.

In light of the above, Sesa adopts a systemic approach which, through the use of methodologies, various tools and best practices, and by considering – progressively and in line with the requirements of the Corporate Sustainability Reporting Directive (CSRD) – the entire value chain, targets the minimisation of its impact with a view to improving the environmental conditions of the sites where it operates.

The Policy applies with immediate effect to the holding Company Sesa S.p.A. and its subsidiaries, in line with the specific characteristics of their businesses, with reference to the principles and commitments expressed in this document.

### Regulatory Framework

This Policy is applied, together with all the regulations in force in the countries where the Company operates, to supplement all the principles set out in the Code of Ethics and Conduct (the “Code of Ethics”), in the Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001 (“231 Model”),



and in the Company policies and procedures adopted by the Company (Environmental Policy, Health and Safety Policy).

The Policy also makes reference to the following external frameworks and regulations:

- United Nations Convention on Biological Diversity (CBD);
- United Nations 2030 Agenda for Sustainable Development and Sustainable Development Goals;
- EU Biodiversity Strategy for 2030 (Nature Restoration Law);
- EU strategy on green infrastructure;
- International Finance Corporation Performance Standard 6;
- Science-Based Targets and Science Based Targets Network (SBTi and SBTN);
- Global Inventory of Biodiversity Offset Policies (GIBOP);
- Red List of Threatened Species of the International Union for Conservation of Nature (IUCN);
- The Natura 2000 network;
- Directive No. 79/409/EEC 'Birds' and Directive No. 92/43/EEC "Habitats";
- (EU) 2020/852 on Taxonomy;
- Corporate Sustainability Reporting Directive (CSRD);
- Taskforce on Nature-related Financial Disclosures (TNFD);
- A-Track Conceptual Framework (ACT-D).

## General principles, commitments and best practices

The **principles** guiding the Group's Biodiversity and Ecosystems Policy are:

- preservation of ecosystem biodiversity, particularly for activities carried out in sensitive or protected natural areas;
- monitoring and mitigating the impact of activities on biodiversity;
- promoting environmental improvement through actions aimed at protecting areas of high ecological value and spreading a culture of biodiversity;
- growth in awareness and understanding of biodiversity, its protection and conservation, encouraging best practices and communicating them internally and externally;
- collaboration with local associations and communities in actions and projects with the objective of raising awareness among stakeholders about the importance of protecting biodiversity;
- Alignment with international best practices (e.g., Kunming Montreal Global Biodiversity Framework, EU Biodiversity Strategy for 2030, EU Nature Restoration Law, UK Biodiversity Net Gain legislation) and the most challenging current and future standards and practices (e.g., TNFD, SBTN, CSRD, CS3D).

The Group's strategy and commitments to biodiversity and ecosystem conservation are developed through the following **priority lines of action**:



- compliance with biodiversity protection regulations through the construction and management of plants, activities and projects in accordance with Italian legislation and, in particular, environmental regulations (Legislative Decree No. 152/2006, which transposes Directive 85/337/EEC).
- promotion of voluntary actions:
  - o mapping and localization of the Group's sites in order to identify potential interference with protected areas in which they are located or which are in their vicinity (taking into account the type of area, the flora and fauna present with reference to the species listed in the IUCN Red List and national conservation lists);
  - o environmental analysis and assessment of the significance of the impact that the Group's activities have on the environment and biodiversity, in order to take the necessary measures to minimise them;
  - o integration of environmental aspects, including those related to biodiversity, into the Group's Integrated Management System (Quality, Environment, Safety - QSA), defining management procedures and standards for monitoring activities in order to mitigate impacts;
  - o adoption of a “hierarchy of mitigation” for impacts on biodiversity, prioritising solutions that avoid and prevent negative impacts on biodiversity;
  - o annual public reporting on actions taken to ensure biodiversity conservation in areas where the Group operates;
  - o participation in research projects or studies in collaboration with third parties;
  - o promoting training, education and awareness-raising initiatives, collaborating with associations, local communities and other stakeholders interested in biodiversity topics.

Sesa pursues the following **targets** for mitigating impacts on biodiversity and restoring ecosystems:

- Integrate biodiversity management into the Group's Environmental Management System, where this topic is relevant;
- Include biodiversity in risk analysis, management and reporting, where relevant;
- Ensuring the sustainable and tracked use of natural raw materials and water resources;
- Promote the use of renewable energy sources and reduce climate-changing emissions to mitigate climate change and reduce pollution/exploitation of natural resources;
- Leverage technological innovations to assess and mitigate impacts on biodiversity.

In order to pursue the commitments and objectives set out above, Sesa has established a Sustainability organisational structure reporting directly to the Chief Executive Officer, with the aim, among other things, of defining the environmental strategy and guiding the responsible use of natural resources and promoting a “nature positive” approach.

Finally, as evidence of Sesa's concrete commitment to environmental protection, considered a fundamental value underpinning its activities and strategies, the Group has adopted significant tools and practices, such as ISO 14001:2015 environmental management system certification (progressively, with a view to covering all Group sites) and participation, since 2022, in the CDP questionnaire on Climate Change, the leading global system for measuring, reporting, managing and sharing information on this issue.



## Stakeholder Engagement

The engagement of internal and external stakeholders is essential for the implementation of effective strategies in the management of issues related to the protection of biodiversity and the landscape and for the promotion of a transformative approach to the systemic drivers that contribute to biodiversity loss. For this reason, Sesa promotes the creation of partnerships with public organisations, scientific institutes, research centres and international non-governmental organisations (NGOs) in the area to ensure that its activities and objectives are aligned with international and national best practices. The Company is committed to promoting, both internally and towards its stakeholders and along the value chain, a culture focused on raising awareness of biodiversity protection, promoting training, research and conservation activities, awareness campaigns and any sponsorship activities.

## Management of reports and non-compliance

Sesa supports initiatives aimed at reporting to the Company any conduct by and/or against stakeholders that violates this Policy, in compliance with the principles of privacy of the reporting party, through direct reporting to [compliance@sesa.it](mailto:compliance@sesa.it) or through the Whistleblowing Platform.

## Adoption, promotion and dissemination

Sesa promotes the principles of this Policy to suppliers and partners, inviting them to align their practices with the shared guidelines. This Policy is subject to periodic review if the national and international regulations referred to as best practices, or in any case where necessary, ensuring continuous alignment with the Group's ESG strategy and Sustainability Plan.

The Policy is shared with all stakeholders, in particular with suppliers and partners, and is made available to all interested parties both at the Company's workplaces and through publication on the Company's website [www.sesa.it](http://www.sesa.it).

Empoli (FI) - April 30, 2025

Sesa S.p.A.