



Sustainability Report 2022



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LETTER TO STAKEHOLDERS

Dear Stakeholders,

We are proud to accompany you through the first edition of the Sustainability Report published by Roda S.p.A., a document talking about our current and future commitments on the social and environmental issues that characterize the sustainability path we have undertaken since long. It is in fact our wish to dialogue transparently with our stakeholders of the strategies and guarantee tools implemented to pursue recognized levels of reliability, quality and competitiveness, as well as maximum respect for the environment and for the people together with high standards of protection of workers' rights, health and safety.

Sustainability, in recent years, has become a priority in political agendas and in public debate as a central and crucial theme for the future of the Planet, thanks to the increasing awareness of the need for a common and cohesive commitment of all to achieve concrete and visible targets.

Over the years we have acted applying principles of environmental, social and governance sustainability "transmitting energy", from the first transmission line built on behalf of the Società Elettrica Bresciana to the strengthening of a role as major strategic player in the energy field.

We therefore introduce ourselves as an active actor in the achievement of concrete objectives for our market, aware of the importance of the role we play in the national context: we do want to generate positive changes and promote solutions that can bring well-being to the society in which we operate, considering being sustainable a guide for our business choices and for our daily actions.

This Report aims to present to you all our present and future commitments and our results, anchored to the pillars of sustainability we have identified and that are an image of Roda identity.

We wish you will enjoy the reading and we do hope you will feel the spirit animating us and the commitment made in this path being sure to be on the right side to undertake the challenges of our business.

Pontevico, 31st May 2023

Fermo Fiori
Chairman

ESG HIGHLIGHTS: 2022



72,7 € mln

Economic value generated

+ 5,8 € mln

Economic value generated vs year 2021

64 € mln

Economic value distributed



289

Employees

95%

Employees hired with permanent contract

16%

Increasing of personnel in 2022



80%

New suppliers subjected to ESG assessments

72

Training hours per individual

No episodes of corruption
Since the beginning



0,5 MW

Power of the photovoltaic system

99,98%

Non-hazardous waste generated

99,97%

Waste recycled



1

OUR IDENTITY CARD

1.1. WHO WE ARE

Roda history

The beginning of our company is founded on the history of an Italian family entered with tenacity and success within the **field of design, construction and maintenance of transmission lines for the transport and distribution of high and very high voltage energy.**

The history of the Roda family has its roots in the last decades of the 1800s: in 1888, in Pontevico (Brescia), Paolo Roda founded his company. At the beginnings the activity was focused on the construction market, design and construction of civil and industrial buildings, and on the field of hydraulic activities. In just over twenty years the company expanded to become a major actor in the industrial context of Brescia, to the point that the name of Paolo Roda was included in the book of Master Builders of Brescia in 1912 and his buildings are still visible in the municipalities of Brescia and Pontevico.

In 1924, with the death of its founder, the company took the name “Fratelli Roda Fu Paolo”.

Over the years we have expanded our business, implementing several activities that have allowed our entry into other sectors. In fact, since **1928** we have been operating in the **construction of transmission lines.**

Our activity has never stopped, even during the Second World War, when we had the task to restore the transmission lines damaged by war events. In the first post-war period we supported significant electrification works in the provinces of Brescia, Bergamo and Mantua, increasing what is now our core business.

In **1964** our company was included in the National Register of Builders and, therefore, our corporate structure changed, from “Limited Partnership” to “Joint-stock Company”.

In recent years we have had a strong growth of our business, acquiring several companies and expanding our activities. More in details, in **1992** we incorporated **IAB S.p.A.**, a company dealing with the wholesale and retail trade of meat. Two years later, in **1994**, we established **Consorzio Italia 2000**, promoting and consolidating our business on the international scenario. The Consortium was created to involve a group of companies in order to join their skills to meet the various requirements of customers and thus **execute transmission line projects, gas distribution plants and public works internationally.** The same year we incorporated **Fiori Fratelli S.r.l.**, a company specialized in the construction of aqueducts, sewage and roads, and **Cosmo S.p.A.**, dealing with railway constructions and underpasses.

Over the years we have continued our innovation to meet the needs of a constantly evolving market: thanks to the development of in-house innovative systems, in year **2000**, we began the campaign **to lay thousands of kilometers of optical fiber** along Italy, both aerial and buried cable deployment.

About ten years later, between **2011 and 2013**, we continued to diversify our business by acquiring **Nuova DLM Valvo S.r.l.** specialized in the **marketing, design, and production of valves** mainly used in the energy sector, in the petrochemical industry, in the extraction and storage of gas and in the marine sector. In the same period we have strengthened our presence in the real estate market, incorporating various local companies acting in the sector.

In 2015 we strengthened our core business by merging **Mazzalai S. p.A.** a company dealing with the **construction of transmission lines for energy transport and radiant systems for telecommunications**.

Since 2019 we have begun a new path towards environmental sustainability with the activities of the new related company **R. P.F. S.r.l.** in the field of the valorization of plastic waste.

Our company timeline



1888 **Year of foundation**
The company was founded to act in the engineering and construction of public and private buildings.



1928 **Expanding our business**
The company started specializing in the construction of transmission lines.



1964 **Become a Joint-Stock Company**
Changing our corporate structure.



1992 **Merging IAB S.p.A**
Engaged in the wholesale and retail trading of meat.



1994 **Establishing Consorzio Italia 2000**
To promote and strengthen our business in the international market. **Merging Fiori Fratelli and Cosmo S.p.A**



2000

Starting the deployment of fiber optic cables

For thousands of kilometres, both aerial and buried cables, along the Italian territory, exploiting the in-house developed innovative systems.



**2011-
2013**

Acquiring Nuova DLM Valvo

A mechanical company, based in the province of Cremona. In these years, we incorporated various real estate local companies.



2015

Merging Mazzalai S.p.A

A leader company in the construction of transmission lines, cableways and railways.



2019

Beginning a new path for the environmental sustainability

With the new company **R.P.F. S.r.l.** in the sector of recycling and reuse of waste.



2022

Publication of our own first **Sustainability Report**

1.2. OUR PRINCIPLES AND STRENGTHS

The key of our success is making right business networks and consolidated relationships over time: we always try to "transmit energy", outlining trends to shape a better future.

Our principles

The principles guiding our organization's goal to be a leader company both in Italy and Europe in the energy market are:

- **INTEGRITY:** we are committed in doing business with total transparency to grant respect of ethics, honesty and professionalism.
- **GROWTH:** we believe that continuous development of innovative solutions is the key to guide our business to evolve and engage a sustainable transformation.
- **TENACY:** we face all market challenges by putting on site or skills to create a solid and reliable scenario.

Our strenghts

- **WE OWN OUR FACILITIES**

We can simultaneously deploy several work teams so as to aggressively achieve challenging production and lead time targets, thanks to a wide range of vehicles and equipment, including special machinery, as well as the very high complement of operational personnel duly trained.

- **INTERNATIONAL PRESENCE**

As leader company of Consorzio Italia 2000 we are present in the international market and we have executed huge transmission line projects in Mozambique, Eritrea , Austria, Republic of El Salvador, Greece, France, Nigeria, Norway, Montenegro, Belgium and Switzerland¹.

- **TECHNICAL SKILLS**

The high know-how of our technical employees is the key of the activities in the company. Our technical office performs preliminary, final and executive engineering activities.

- **DIVERSIFICATION**

We have always been distinguished by the diversified nature of our *business*. In fact, we believe that optimizing the synergy between the various operating structures allows us to maintain our stability in the market.

- **SOLIDITY AND RELIABILITY**

Our organization is mainly structured with internal resources allowing us to perform at the highest levels of reliability and financial soundness, both towards our clients and our suppliers.

- **INNOVATION**

We are open mind to the introduction of innovative solutions, supported by the capability to develop them at the design and construction stages, also by means of experimental validation by integrating tests and test programs. In the past, we participated in the development of SKY WRAP, a technique for running optical fiber on existing overhead conductors, and we are currently an exclusive partner for this technology.

1.3. OUR BUSINESS MODEL

1.3.1. OUR COMPANY CONTEXT

During the last years we have witnessed several major events changing the context in which we operate. The COVID-19 pandemic and the outbreak of the conflict in Ukraine have caused **social, economic and energy crises** affecting several countries and have entered into a context in which **the effects of global warming will characterize the coming decades.**

¹ More information about our international presence are available on the website of Consorzio Italia 2000: <https://www.ci2000.it/>

Being conscious of these events and **aiming for sustainable development are essential to face the challenges** of the future. This is the target for which Europe has developed several instruments in recent years to enable countries and companies to take part in this change. Among these, the **Green Deal** contains the most ambitious commitments: a plan of strategic initiatives that aims to start and achieve a green transition, thanks to investments in sustainable technologies such as renewable energy, low-emission mobility and energy efficiency of buildings. In 2021 the European Union has made available an investment fund, the **Next Generation EU** that, among other goals, aims to support the Member States to take part in the path of this change and achieve the targets of the Green Deal.

In order to access the available funds, Italy has developed the **National Recovery and Resilience Plan**, a programme that aims to promote economic recovery and sustainability, dividing the funds into **six missions**, including the **Green Revolution and Ecological Transition and Infrastructure for sustainable mobility**.

This plan represents an important opportunity for the Engineering and Construction sector, having in this way the opportunity to promote, design and implement more sustainable infrastructures that support the Country in a growth that can meet the global challenges and be a key actor of the country's ecological transition.

The construction of civil plants and buildings has a deep impact on environment: for this reason it is important to carry out projects that set clear and decisive objectives to limit it, aiming to an inclusion of the structure in the territory that contains CO₂ emissions and pollutants and that puts at the centre the needs of the communities that will have to use it.

The challenges to be faced by the companies are significant and require a huge commitment, but it is essential to move together with the other players in the value chain to create a joint movement aiming to take part in sustainable development. Roda S.p.A. is committed to take part in this transformation by putting in place concrete actions improving the impact that our business has on the environment, people and economy.

1.3.2. OUR ACTIVITIES

Thanks to the experience acquired over a hundred years of business, **Roda S.p.A.** has become a major player, both in Italy and in Europe, in the design, maintenance and construction of civil engineering works, and particularly of **overhead and underground transmission lines for the high /very high voltage energy transport**.

We are duly agreed by TERNA Rete Italia S.p.A. for the activities related to the transmission lines up to the voltage of 380 kV. We also work for municipal companies and for private clients, such as

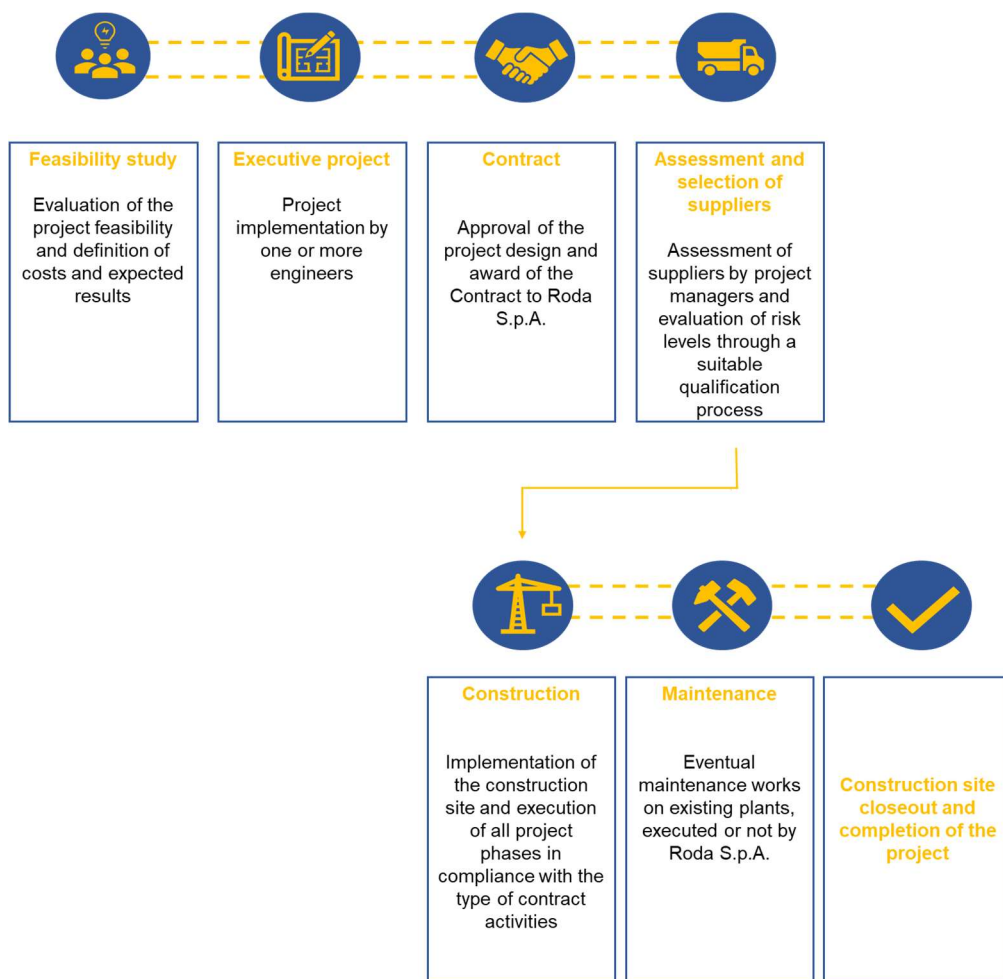
Edison, Enel, Prysmian Group, Nexans, Iren and CESI, **being present in the strict field of companies operating in high voltage plants in Italy and abroad.**

Over the years we have implemented the business related to **the civil buildings for sale on our own initiative**, an activity that we carry out together with the subsidiaries P.S. Immobiliare S.r.l. and C.B.T. S.r.l.

In the last thirty years our company has experienced many changes, such as the increase in social capital and the merger by incorporation of some companies, thus being able to expand the type of work carried out both in the public and private sectors.

As a company acting in the construction sector, each project involves different phases, which require materials and involve different types of suppliers.

The below graphical representation gives an overview of the macro-phases of a construction project. In Roda S.p.A. we deal with all these activities, for individual phases or from the beginning to the end of the process. Contracts can in fact include all phases, from the design to the completion of the project; others, however, include only the feasibility study of the project or concern only the construction or maintenance phase.



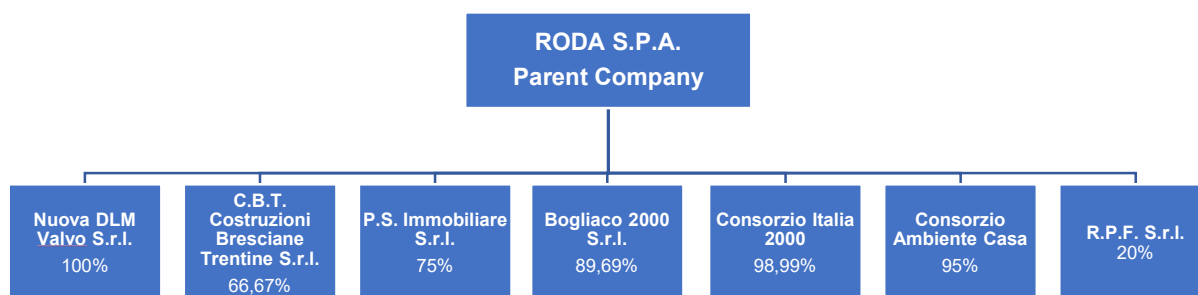
1.3.3. THE COMPANY STRUCTURE

Roda S.p.A. is the **Parent company** and its activity is equal to 68% of the Group's turnover.

Roda S.p.A. is controlling the companies below:

- **CI2000 S.r.l. (Consorzio Italia 2000)**
- **Nuova D.L.M. Valvo S.r.l.**
- **Consorzio Ambiente Casa**
- **Bogliaco 2000 S.r.l.**
- **C.B.T. Costruzioni Bresciane Trentine S.r.l.**
- **P.S. Immobiliare S.r.l.**
- **R.P.F. S.r.l**

The Group structure



This Sustainability Report describes and states the sustainability path undertaken by the Parent Company Roda S.p.A.

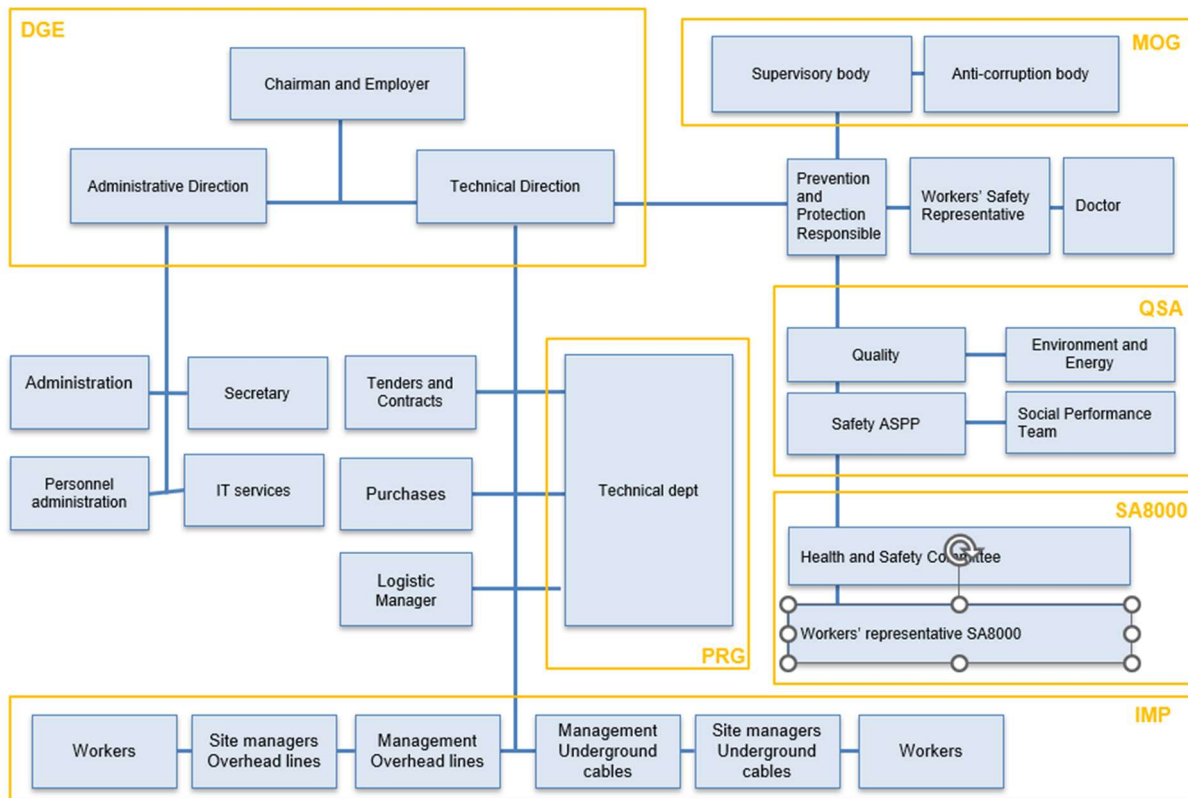
In the coming years, the Roda Group is committed to extend the current path of the reporting to the other Group companies.



**FOCUS:
RODA's BRANDS**

Various brands are part of Roda S.p.A. that, over the years, have allowed us to enter in different markets.

- **IAB – INDUSTRIA ALIMENTARE BRESCIANA:** the core business is the meat processing and trading, serving the whole national customers.
- **CONSORZIO ITALIA 2000:** consortium established in 1994. This company has the mission to identify and get public tenders abroad on behalf of the consortium members for the design and construction of transmission lines, gas plants and water plants.
- **MARINA DI BOGLIACO:** private tourist port with boat storage and maintenance facilities on Garda Lake
- **NUOVA DLM Valvo:** design and construction of top entry and side entry ball valves and butterfly valves.



1.3.4. OUR ORGANIZATIONAL MODEL

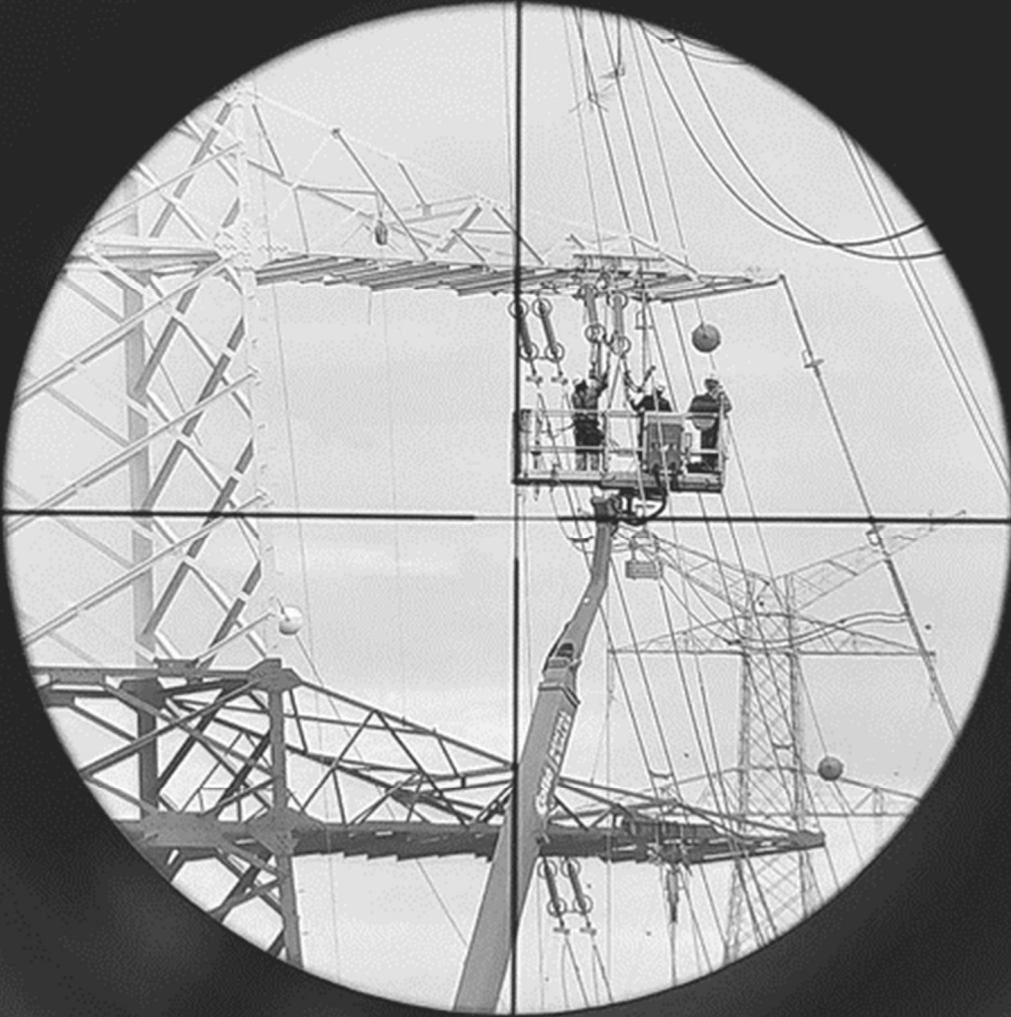
The organizational structure of Roda S.p.A. is composed by the **General Management and four operational functions**:

- **The Technical and Design Department**, dealing with the technical activities of the feasibility and design;
- **QSA Department**, which is divided and deals respectively with the three areas, as well as energy issues and the activities of the Social Performance Team;
- **Administrative Department**, which is divided into the Administration and Finance, Human Resources and Tenders, Purchasing and Warehouses areas, which are closely interconnected with the Technical Area;
- **Operational Department**, managing the construction sites.

Each department has internally all the professional actors necessary for the performance of their own responsibility.

2

OUR PATH TO SUSTAINABILITY



2.1. OUR TRENDS SHAPING A BETTER FUTURE

As a company that designs and builds power transmission lines, as well as huge projects, we have a tangible relationship with the local communities and the territory in which we operate and it is therefore essential for us to take care and cultivate this relationship, in order to respect the environment that surrounds us and the people who live in the territories in which we do our business.

The skills we have developed over the years represent the basis on which we outline a **sustainability path** that transforms our business, continuing, year after year, to integrate the respect for the environment, resources and the community within our business model, with the aim of driving economic growth and **sustainable development along two parallel lines**, so as to create value in the medium-long term for all those involved in our activities, whose work is essential for the success of the company. Every day we take part in the sustainable change taking place, **drawing a trace of this path thanks to the activities we carry out daily**.

To define the sustainability path to be undertaken, the involvement of Top Management is essential to draw the lines for a sustainable future for us and our stakeholders. This involvement, together with an understanding of the context in which the organization operates, has allowed us to define our material themes, from an environmental, social and governance point of view.

Thanks to the identification of these themes, we have defined the **pillars** that outline our **strategic choices** in terms of sustainability, as well as the contents of our first **Sustainability Report**, laying the basis for “Growing with integrity” as a starting point for costructuring a better future.

Our trends for shaping a better future



Growing with integrity: we believe essential to act responsibly according to the highest standards of integrity and ethics, generating value and responding to the interests of our value chain.

Cultivating sustainable relationship: we want to be an active actor in developing sustainable paths with our stakeholders, as well as having a central role in defining sustainable criteria along our supply chain.

Responsible innovation: it is essential for us to operate according to the highest quality and safety standards of our services and to satisfy the challenges of sustainable development.

Conservation of natural capital: it represents our commitment to protect the planet as we believe that through our activity we can actively contribute to safeguarding the natural resources, to control polluting emissions, and to mitigate climate change by acting to reduce our greenhouse gas emissions.

Valorisation of human capital: this is a priority as contribution to create a fair working environment, open to collaboration and staff growth, as well as ensuring the safety and security of our people.

2.1.1. CONSTANT DIALOGUE WITH OUR STAKEHOLDERS

We are aware of the importance of **listening to stakeholders** for the performance of company activities, as the knowledge of our impacts on the territory, as well as the full understanding of the needs, interests and expectations of those who contribute to the realization of our activities are the key **to create a long term sustainable value**.

The involvement of all interested parties must have as target the continuous improvement of processes and be reflected on all company activities, starting from the settlement of qualification criteria towards the clients, through the assessment of all suppliers and through the continuous testing on site.

Listening to our stakeholders becomes an important priority for investigating their needs and expectations. Through a dialogue with stakeholders, the identification of the causes of any anomaly and the definition of the most appropriate corrective actions ensures the achievement of the goals settled.

Therefore, we have identified and mapped the main stakeholders and the most suitable ways for engaging each typology. This activity is the starting point for a structured **engagement process**, which will start in 2023. Constant communication is in fact a key tool for the involvement of interested parties, both during management in normal conditions and during anomalies or emergency situations.

Our stakeholders



STAKEHOLDER	STAKEHOLDER ENGAGEMENT
Employees	<ul style="list-style-type: none"> • Meetings dedicated to specific issues at all levels of the organization • Internal communications via corporate means of communication • Training activities • Sharing of internal audit findings
Suppliers	<ul style="list-style-type: none"> • Meetings dedicated to performance assessment • Special communication • Exchange and involvement during the supplier's assessment • Active involvement of subcontractors on site • Dedicated meetings for performance evaluation

Local communities	<ul style="list-style-type: none"> • Local initiatives
Clients and Business Partners	<ul style="list-style-type: none"> • Direct communication channels • Co-design programs
Financial community	<ul style="list-style-type: none"> • Listening and support channels • Institutional website
Authorities	<ul style="list-style-type: none"> • Institutional round tables • Update on legislative issues • Active participation in trade associations

2.2. MATERIALITY ANALYSIS

The sustainability path of Roda S.p.A started a process of **analysis to define material issues**, allowing us to identify the **material themes**, that is, the environmental, social and governance issues most relevant to the activities of our company.

The material themes have been identified in accordance with the latest update of the GRI Universal Standards 2021, requiring the identification of the issues on the basis of the impacts, positive and negative, current or potential, generated by the company on the economy, environment, people and human rights, as a result of its activities or commercial relations.

This process comprises various phases:

1. **Understanding the context:** we have identified the main socio-economical sources stated by international organizations with regard to sustainability in the sector in which our company operates; we also carried out a *benchmark* analysis on 15 companies in the sector between competitors and customers. These assessment activities have allowed us to identify the trends concerning our company, in relation to our activities and business

relationships, the sustainability context in which we operate and the expectations of our stakeholders.

2. **Identification of the positive and negative impacts:** we have identified the positive and negative impacts, separated in real and potential, generated by the company and its business relationship on the economy, environment, people, including impacts on human rights, through a desk assessment of public documentation on the main impacts of the sector in which we operate.
3. **Assessment of the significance levels:** we have involved the Top Management, through a workshop, to classify them in order of magnitude².
4. **Prioritisation of the most significant impacts and settlement of the list of material themes:** we have analysed the results of the workshop classifying them in order of magnitude and we have obtained a list of **material themes** for our organization.

We have identified **16** materials themes: each one of them has been traced back to our sustainability pillars in order to undertake a path aiming to continuously integrate these issues into the business strategy.

Growing with integrity

Business ethics

Ensuring business development through ethical, transparent and sustainable management of business activities that can counteract and prevent incidents of active and passive corruption and disseminate responsible behaviour models.

Cyber security and data protection

Strengthening cybersecurity measures to ensure privacy and protection of sensitive data held by the Company.

Cultivating sustainable relationships

Stakeholder relationships

Maintaining consistent, robust and transparency-based relationships with stakeholders. Cultivate stable and lasting relationships, thanks to a continuous dialogue and opportunities for meeting to understand the specific demands, expectations and needs of each category.

² “Magnitude” means the probability of occurrence of the impacts by their severity at the time they occur.

Sustainable value chain

Promoting the dissemination of responsible procurement practices based on criteria that ensure compliance with socio-environmental sustainability requirements as well as respect for human rights.

Protection of local communities

Supporting the local communities and authorities with initiatives contributing the development of the community and, consequently, an improvement of the local economy.

Responsible innovation

Sustainable design and innovation

Researching solutions aimed to sustainable design considering the impact on the territory of the business lines.

Quality and Safety of products and services

Guarantee of safe and quality products and services along the entire value chain, from the design phase to the implementation.

Conservation of the natural capital

Reduction of climate impacts

Supporting policies and actions to combat climate change, promoting energy efficiency and the use of renewable energy.

Promotion of the circular economy

Promoting circular waste management through practices such as re-use, recycling and separate collection in order to minimize the use of resources.

Biodiversity conservation

Minimizing the environmental impact, along the entire value chain, in favour of biodiversity and the protection of the territories in which the Company operates.

Responsible use of water resource

Efficiently and consciously managing the water resource in order to reduce the consumption of civil and industrial water, especially in areas subject to water stress.

Valorisation of human capital

Respect for human rights and of Employees

Developing policies to protect human rights along the entire value chain (wage equity, fight against forced labour and child labour, respect for freedom of association, collective labour agreements, etc.)

Promotion of diversity and inclusion	Adopting programmes and projects to ensure the promotion of inclusion and non-discrimination in the company, while promoting equal opportunities.
Well-being of people	Ensuring conditions at work that respect the health and physical well-being of workers. Promote quality of life initiatives aimed to improve the quality of life of employees and their families.
Valorisation and empowerment of employees	Promoting training and skills development activities in order to consolidate and transfer skills, ensuring a continuous process of valorisation and growth of human capital.
Safety of employees	Developing policies and safeguards aimed to minimize the risk of accidents and occupational diseases, through the spread of a culture of prevention in all business contexts.

2.3. THE TARGETS OF OUR PATH

The decision to undertake a sustainability path, identify the material themes for our company and publish our first Sustainability Report, has prompted us to take a further step: to set targets that can trace the commitments to be realized for the coming years.

In fact, for each pillar, we have identified **targets that will draw the lines of the coming years.**

Growing with integrity	Cultivating sustainable relationships	Conservation of the natural capital	Valorisation of human capital
<p>Ethical management of the business:</p> <ul style="list-style-type: none"> Assessment of the company's ESG risks Structured approach of the ERM system that includes all risks related to the company Definition of the company's sustainability governance 	<p>Responsible Supply chain:</p> <ul style="list-style-type: none"> Creating a Supplier Code of Conduct that defines the guidelines for: labour and human rights, health and safety, environmental protection, ethics and legislative compliance of the entire supply chain Implementation of programs to optimize transport loads, reducing the environmental impact of suppliers' fleet 	<p>Tackling climate change:</p> <ul style="list-style-type: none"> Continuation of the program for optimizing and monitoring vehicle movements Start an eco-driving training program Progressive replacement of company fleet cars with hybrid or electric one 	<p>Well-being of people:</p> <ul style="list-style-type: none"> Carrying out an employee climate survey Implementation of a structured welfare system Launch of employee engagement initiatives Structuring of aggregation activities to involve the families of the employees

<p>Cybersecurity and data protection:</p> <ul style="list-style-type: none"> • Implementation of a cybersecurity training program • Promote a digitization plan of company's processes to guarantee the traceability of data and information <p>Communication and marketing:</p> <ul style="list-style-type: none"> • Having a sustainability landing page on the business' website that outlines our commitment 	<p>Community protection:</p> <ul style="list-style-type: none"> • Implementation of a systemic plan to support and finance local initiatives • Enter into agreements with associations of the shipbuilding sector 	<p>Protection of biodiversity:</p> <ul style="list-style-type: none"> • Promote initiatives to protect biodiversity, such as planting • Implement projects to protect endangered species <p>Environmental initiatives:</p> <ul style="list-style-type: none"> • Promote environmental initiatives actively involving our employees 	<p>Employee enhancement and empowerment:</p> <ul style="list-style-type: none"> • Implementation of a structured training plan • Improvement of the mapping information needs • Plan sustainability courses • Create a structured performance evaluation system and an initial self evaluation <p>Employees' Health and Safety:</p> <ul style="list-style-type: none"> • Improvement of focused HSE training activities • Recognition of a Safety Award for the best HSE performing construction site <p>Promoting diversity and inclusion:</p> <ul style="list-style-type: none"> • Run a D&I specific survey among employees • Collaboration with local universities for employment of female graduates in STEM
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3

GROWING WITH INTEGRITY

MATERIAL THEMES

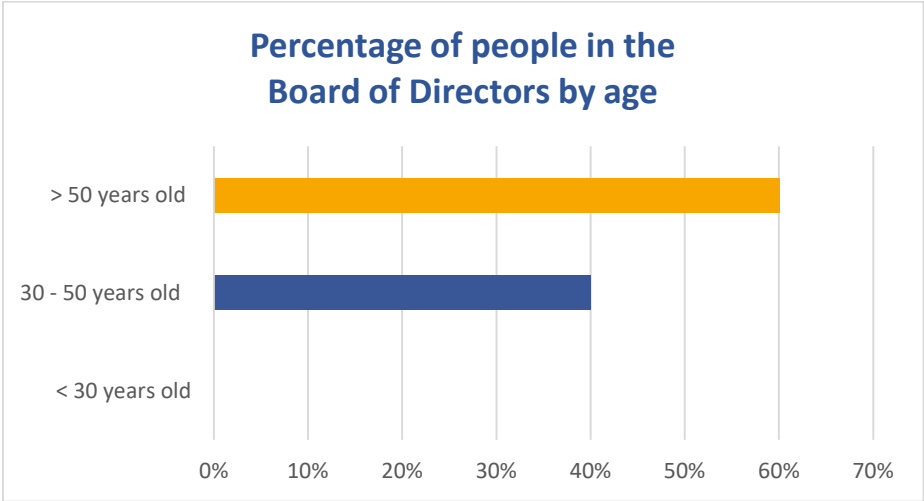
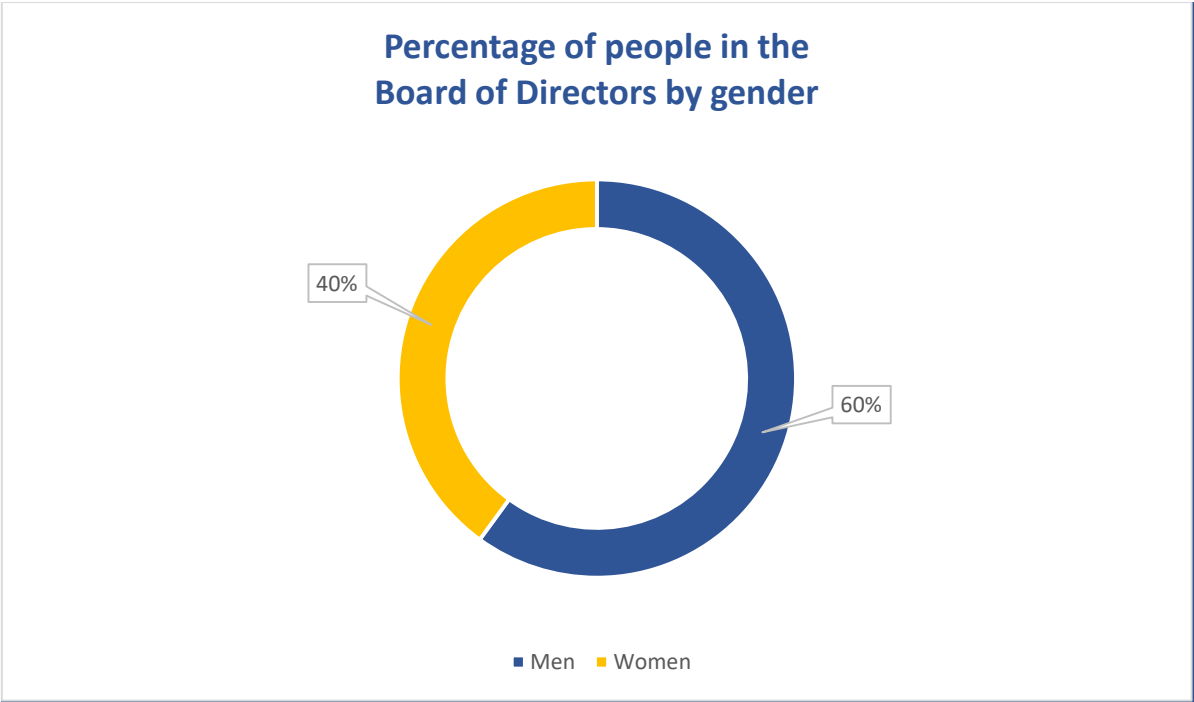
- Business ethics
- Cyber security and data protection

To manage a business in a responsible and sustainable way, it is necessary to rely on a solid structure considering the expectations and interests of the actors who co-represent the entire value chain. Ethics and integrity are **the guidelines that trace our work** and determine the decisions made by our governance bodies in the conduct of business and respect for the confidentiality of the information we manage.

3.1. BUSINESS ETHICS

The **model of Governance** adopted by our company involves the presence of several bodies that manage the company's activities: **a Board of Directors, a Board of Statutory Auditors and a Shareholders ' Meeting.**

The Board of Directors is the body with widest powers of ordinary and extraordinary administration of the Company, except for those that by law are reserved solely for the Shareholders' Meeting; These powers are divided among the members through power of attorney's. It is constituted of **5 members** appointed by the Shareholders' Meeting and they perform their office for **three exercises**; three members of the Board of Directors are men and two are women. Two men are in the 30-50 age bracket, while the other one is over 50. Both women are over 50. All members are provided with the proper tools to ensure their independence. The President is appointed among these members.



The Board of Statutory Auditors oversees compliance with the law, the By-laws and the standards of good management in the performance of company activities and verifies the adequacy of the Company’s organisational structure, internal control, administrative and accounting systems. It is constituted of **five members**, two men and three women.

The Shareholders’ Meeting represents the universality of the members. The decisions and measures taken in accordance with the law and the Articles of Association concern all members, even if absent or dissenting. The Shareholders’ Meeting, when convened in an extraordinary way, has the power to modify the Articles of Association, the removal of offices, their replacement, and has also powers of liquidator.

The company also has a **Supervisory and Control Body** that aims to verify, update and control the functioning, effectiveness and compliance with the **Organization, Management and Control Model**.

This Committee is constituted of two external members and of at least one internal member, with no operative powers. Appointments are made directly by the Board of Directors. The members of the Body elect the President - who coordinates its work - and define its functioning. In addition, the Chairman and a member outside the Body, appointed by the Management, are responsible for preventing corruption.

To adequately carry out its task of verifying the correct and effective functioning of the organizational model and to take any corrective actions, the Supervisory Body must be constantly informed about the work within the company. Reports on the correct management of the company's activities in terms of health, safety and environment, relations with the Public Administration, finances and budget must be submitted by the department or area managers in writing at least annually. The Supervisory Body also conducts audits and carries out inspections for the same purposes as above and, with a full independence of its activity, has been provided with an autonomous spending power, for the exercise of its tasks.

In addition, our daily work and relationship with our stakeholders is guided by our values and is based on the responsibility that we put in place thanks to the additional **tools** that we list here below.

By-laws

The By-laws, according to the legislation in force, supply the provisions relating to corporate governance, aimed to ensure the correct and orderly conduct of management activities.

Organisational and Management model

To prevent the risk of committing crimes provided for by Legislative Decree no. 231/2001, we have adopted an **Organisational and Management Model**, which sets all relationships and activities pursued by the organization according to a model of fairness and lawfulness and protocols specifically identified to eliminate, or at least reduce, this risk. The model represents the result of a mapping work of the families of crimes considered relevant with respect to the activities performed by the company and the areas most exposed to such offenses. The model is subject to updates over time and its current version, the fifth revision, dates back to December 2022.

This Model requires that each stakeholder reports to the Supervisory Body any fact or circumstance, even if only potentially at risk of committing a crime or that in any case constitutes a violation of the provisions of the Model, through the whistleblowing mechanisms. This type of reporting can be sent in a closed envelope addressed only to the attention of the Chairman of the Supervisory Body, or through communication channels suitable to guarantee the confidentiality of the whistleblower, including the section that the company has made available on its website.

Code of Ethics

The Board of Directors has adopted the Code of Business Ethics, whose last revision dates back to 2019 and a general revision has been planned in the medium term. This document represents the **reference standard of the principles and rules of conduct** that each recipient must adopt, at all levels of responsibility, in their work and in the performance of all activities regarding the achievement of the economic and development objectives that we have defined.

This Code is addressed to all those who work with Roda S.p.A., the Group companies towards whom the company undertakes to act in compliance with its principles. Our Code of Business Ethics is accessible in our website.

Within the Code of Business Ethics, we recognize as a priority the respect of the following principles and values:

1. Honesty, fairness and transparency of conduct at all levels of the organisation;
2. Protection of competition and transparency in business action;
3. Transparency, completeness and accuracy of economic, financial and technical information;
4. Confidentiality of information;
5. Equal opportunities and respect for people;
6. Health and safety at work;
7. Preservation of the environmental;
8. Relationships with Public Administration;
9. Absence of conflicts of interest;
10. Embargo;
11. Safeguarding business continuity and preserving company assets.

The compliance to the Code of Business Ethics is guaranteed through the company's operational and management process, duly controlled by applying a risk management system, an information system that records all controls and ensures the punctuality of information necessary to manage contingencies and any corrective actions, conformity to legislation and regulations in force.

During the initial phase, all levels of the organisation are involved in training activities on the Code of Business Ethics, applying different methods depending on the role and responsibility. Awareness activities are carried out for suppliers and other operators that collaborate with the Company.

System of proxies and powers of attorney

The appointment of specific proxies to directors and special powers of attorney to top management members, establishes the powers to represent or commit the company in front of administration, financial, personnel and commercial management, accident prevention, safety at work, environmental protection, fire prevention and waste management.

These appointments have been duly certified and made public by depositing them to the Chamber of Commerce. The updating of the system of proxies and powers of attorney takes place at the moment of revision or modification of the organizational structure.

Integrated Management System

The **Integrated Management System** combines all aspects of the organisation's operations: company policy, organization charts, process flow diagram, procedures, operating instructions, forms and job descriptions through which the organization defines its activities, responsibilities and correct methods of carrying out these activities.

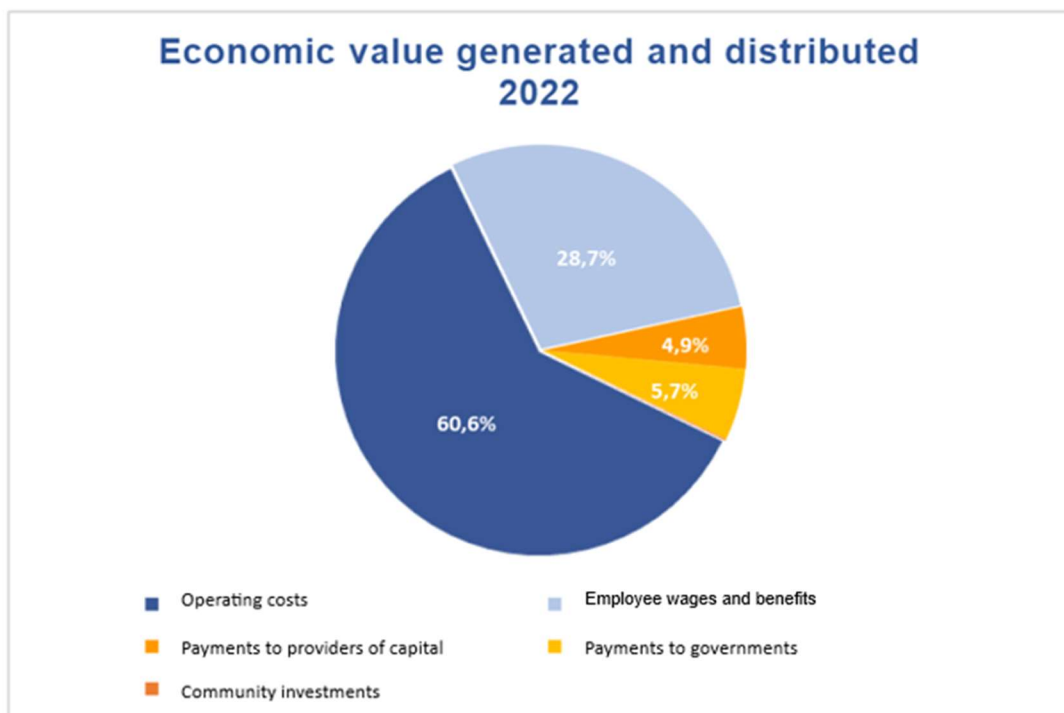
In 2019 we obtained the **UNI ISO 37001:2016** certification attesting the conformity of our Management System to the Anti-Bribery Management System standards. This certification witnesses our constant engagement **to prevent bribery and our commitments to comply with integrity, transparency and conformity in our activities.**

Thanks to the measures we adopt to ensure an ethical management of our business, we can state that **we have not reported any confirmed corruption episodes for both 2021 and 2022.**

3.1.1. DISTRIBUTE VALUE FOR A SUSTAINABLE FUTURE

We believe in the importance of a business creating value for all our stakeholders to operate ethically and to contribute to the sustainable development of society. This is the reason we are committed to distribute the value we generate with the actors that allow us to successfully carry out our activities.

In 2022 the economic value generated amounts to Euro 72.738.728, the 9% more than in 2021. This value has been retained for 12%, while for 88%, equal to Euro 64.007.126, has been distributed. More in details, the 60% has been paid to suppliers for operating activities, the 29% represents wages and benefits for employees, the 5% has been distributed among capital suppliers, the 6% has been paid to the Public Administration and, finally, the 0.1% has been invested in the community.



3.2. CYBERSECURITY AND DATA PROTECTION

Within the ethical conduct of our activities, it is essential to take care both of the privacy of all our stakeholders, in order to ensure compliance with regulations, and of the protection from cyber-attacks, implementing the necessary operational tools.

Our company ensures the confidentiality of the information in hands, except for communications required by law, compliance with the legislation on personal data and refrains from seeking confidential data through illegal means.

We undertake to manage all information obtained from employees, that are not in the public domain and contains personal data, in accordance with mandatory regulations.

We adopt specific protocols aimed to ensure the confidentiality of the data and information we handle and we are committed to ensure that all interested parties, who may have access to such information, take the necessary precautions.

All parties who interact with us are required to avoid using confidential information for purposes not related to the exercise of their professional activities, not to disseminate or use internal information and not to manipulate or disseminate false information. We also strive to ensure that all interested parties who may have access to such information take the necessary precautions.

All our employees are forbidden to disclose, copying, reproducing or transferring in any way or form to persons outside the Company confidential information, data and knowledge. This information must precisely be used in the measure and with the means strictly necessary for the performance of the own functions in such a way to avoid to compromise in any way the nature of confidentiality or cause damage.

Furthermore, following the coming into force of EU Regulation 2016/679, in reply to the obligations provided by the articles 13 and 14, we have provided a **Privacy Policy**, in relation to data of natural persons acting on behalf of a company, and its employees, if any, who come into contact with our company, by a contract stipulated between this latter and Roda S.p.A.

Thanks to the attention given to the adopted data protection protocols, **no complaints related to the violation of privacy were detected in customers in the years 2022 and 2021.**



**FOCUS:
CYBERSECURITY**

The scenarios have evolved in recent years, revealing a constant increase in risks related to new technologies and cyber attacks, and have given a deeper importance to the issues related to cyber security. For this reason, we are walking the path to obtain **the certification of our data management system** according to **ISO/IEC 27001**, which besides protecting the privacy of operational actors within our organization, will also meet the highest standards of cyber security for our customers and other interested parties.

4 CULTIVATING SUSTAINABLE RELATIONSHIP

MATERIAL THEMES

- Responsible supply chain
- Protection of the community



The sustainability path cannot be walked alone: we believe it is essential to involve our stakeholders to understand all together how **to draw the lines** for our impact on the environment and people along the entire value chain.

It is therefore essential to interact with our suppliers and involve them in this process, defining sustainable criteria through which we evaluate them. In addition, it is necessary to establish a solid relationship with the local communities where we operate, to understand their needs and support them.

4.1. RESPONSIBLE SUPPLY CHAIN

We are aware of the importance of strategic management of our supply chain to select **reliable, ethically responsible and stable partners**. The choice of our suppliers, in fact, plays a fundamental role in business and sustainable decisions.

For this purpose, Roda has adopted a procedure for selecting suppliers (and certain customer categories) and, consequently, a list, constantly updated, of companies entitled to work with our Company.

The **assessment phase** is carried out by the project managers. We require that our suppliers have valid documents, including:

- **Certification of registration to chamber of commerce**
- **Tax and wage compliance certificate**
- **Third liability policies**
- **Anti-mafia certificate**

Besides this documentation, we require, if available and applicable in the supplier's business, with the **Risk Assessment Document** and certifications obtained in accordance with **ISO standards**. Additional documentation is then required as per specific services and products.

Also, at the issuance of a purchase order, we require new suppliers to become aware of our **Code of Business Ethics** and to sign the "**Declaration of Responsibility**" taking liability for their work and formally adopt the principles of the Company Policy, including the Code of Business Ethics and the Model of Organization, Management and Control.

During the assessment phase, besides the documentary evaluation, we carry out an on-site audit and, with external collaborations, we carry out additional second-party audit activities.

In 2022, the **80%** of new suppliers were **assessed according to environmental and social criteria**, 9% more than the new suppliers assessed in 2021. In the future, we wish to extend this assessment to all suppliers.

The **evaluation assessment** takes place both for habitual suppliers we already collaborate with and for new suppliers. In addition, we act by running a system of classification of our suppliers according to the **high, medium and low risk** categories in relation to our activities.

- **HIGH RISK:** this category includes suppliers who provide labour in the construction sites (subcontracts, subleases, installation services, transport of materials and waste). For those suppliers with a high risk profile, the supplier's assessment is repeated annually and the expiry of the supplied documents is continuously monitored;
- **MEDIUM RISK:** it includes product categories related to suppliers who deal with on site activities but do not lend labour;
- **LOW RISK:** it includes all suppliers excluded from the above categories and exclusively related to the procurement and supply of materials and services for the administrative headquarters.

4.2. PROTECTION OF COMMUNITIES

Our company cannot fail to establish a solid and trusting bond with the local community. For this reason, we are committed to support our country and its citizens through philanthropic actions in health, academic and sports fields.

During the COVID-19 pandemic, which deeply hit the province of Brescia, we tried to relieve the widespread lack of masks, buying them externally and devolving them to the Red Cross for their distribution in the territory. Also, we assigned a significant sum of money to "**Fondazione Comunità Bresciana**" for further intensive therapies and we promoted a campaign fund to support the community and those who have been most affected by the emergency.

In the academic field, every year, our company supports a partial scholarship awarded to the participants of the I. S. E. O. Summer School in Economics, organized by the I. S. E. O. Institute (Institute of Studies in Economics and Employment). Each edition sees the participation of several Nobel Prize winners in Economics, along with some of the best known international economists. The aim of the Summer School is to bring together a large number of graduates (including master's or doctoral students, researchers and young professionals)

from the most important international universities to improve their knowledge in economic fields.

In addition, Roda S.p.A. regularly supports and sponsors local sports initiatives.

In order to consolidate our presence to **support and protect in a more systemic way the local community**, which we consider one of our main stakeholders, we are committed, for the coming years, to develop a **plan of local financial and promotable initiatives**, entering in *partnerships* with local realities and universities; in addition, we will carry out an analysis among the associations acting in the shipbuilding sector and engaged in the creation of *network* related to sustainable construction sites to sign an agreement with the one nearer to our activities and targets.

5 RESPONSIBLE INNOVATION

MATERIAL THEMES

- Sustainable design and innovation
- Quality and safety of products and services

Drawing the lines for a better and more sustainable future also means operating with **a focus on continuous improvement**. This principle, which pushes us to impose voluntary standards and increasingly demanding objectives, is based on the concept of “**Responsible Innovation**” that allows us to protect the environment and guarantee the highest quality of offered services.

5.1. SUSTAINABLE DESIGN AND INNOVATION

Innovation is one of our **strengths**; through innovation, in fact, we keep a constant focus on the requirements of our customers, providing answers that meet their expectations. It includes all the types of services we offer: from execution of huge projects, to design and building constructions.

The innovation of the services offered by our company begins with the **design**. Our Engineering Office, in which qualified and reliable resources work together, can develop the various design activities, starting from the **feasibility study to the executive project** and, if part of the contract scope, to the construction. In addition, we carry out any verifications, thanks to the help of tests and test programmes.

Our team is often supported by experts, from the engineering of well-known plant companies and specialized manufacturers, for technical activities for the development of innovative solutions.

In these cases, it is essential to carry out the executive design through loading tests on structures or components in order to validate their sizing and to make their implementation more efficient. These activities are usually carried out with the **support of well-known national laboratories** and the required tests can be performed in those facilities owned by our company, able to test elements of considerable size.

The use of unique technologies also applies to **building construction**. In fact, we apply a system that allows us to avoid temporary concrete works and consequent abandonment of part of the same in the soil. This approach results in **responsible management of materials and reduction of the impact of building construction on built-up land**. In addition, to carry out public building works, we use state-of-the-art systems that allow us to use **renewable energy sources** and achieve significant **energy savings**.

5.2 QUALITY AND SAFETY OF PRODUCTS AND SERVICES

Through **continuous innovation** we can **guarantee our clients the highest quality and safety of our products and services**.

Thanks to this approach, our **Integrated Management System** has been certified according to the **UNI EN ISO 9001:2015 standards** since 2016, in relation to the areas of design, construction, installation and maintenance of plants for the transport and distribution of electrical energy. These standards specify the requirements of a **quality management system** aiming to comply with the applicable mandatory requirements and increasing customer satisfaction through the supply of products or services.

It is in this context that the primary importance of **quality and safety of our services** emerges. Satisfying our customers and guaranteeing the quality of the services provided in the construction of the works are, together with strict compliance with legislative and voluntary compliance requirements, **fundamental requirements in identifying any business objective**. Thanks to the monitoring and analysis of the satisfaction of all parties involved in our company's activities, we are able to offer **highly qualified and competitive services** and to play a leading role in the construction of transmission lines complying with rules, laws and regulations and contribute, at the same time, to environmental well-being and the pursuit of **sustainable development in the territories in which we operate**.

6 PROTECTION OF NATURAL CAPITAL

MATERIAL THEMES

- Reduction of climate impacts
- Promotion of the circular economy
- Protection of biodiversity
- Responsible water management

Tracing a path of sustainable development cannot disregard the safety-guard and the protection of natural capital. We are aware that, now more than ever, the **environment** can no longer be understood as a mere passive receiving element, but a **resource to value and protect**. For this reason, our company works to **combat climate change** and **responsible use natural resources**.

The respect for the environment is a principle that we always keep in mind in the conduct of our activities and in our company choices. We consider it as essential to comply with this principle in all our activities, especially in those situations when, also through external suppliers, we interact with ecosystems.

International standards provide us with the structure to implement changes that enable us to improve our products and processes. Our **Environmental Management System** conforms to **UNI EN ISO 14001:2015**, supporting our constant commitment to the **protection of the environment and natural resources**. These standards certify the adequacy of our environmental management system to manage the environmental impacts of our activities and to seek continuous, consistent, effective and sustainable improvement.

Also, we periodically carry out **internal environmental audits**, along with those related to safety in order to follow an integrated management of risks and impacts related to our business activity.

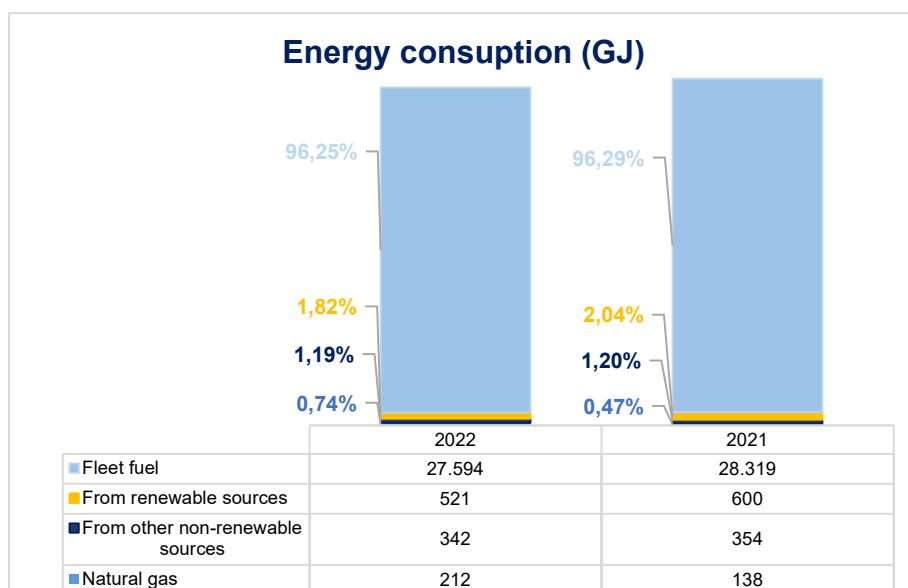
6.1. REDUCTION OF CLIMATE IMPACTS

To contribute to the fight against climate change and ensure maximum attention to the protection of the environment, we are committed to **reduce our greenhouse gas emissions**, improving certain aspects of our business activities that can directly or indirectly affect the production. These actions mainly concern the **management of our energy consumption**.

In 2020 we obtained the certification in accordance with **UNI EN ISO 50001:2018** for energy management. This certification recognizes the commitment of our organization in achieving an **efficient management of energy resources**, promoting a conscious use with no waste. Our Company Policy provides the implementation of a management system that ensures compliance and quality of our work with the relevant industry regulations, protecting the environment also through the promotion of a systematic and constant reduction in energy consumption.

Having no manufacturing activities, our company plays a small role in the reduction of energy consumption to support the fight against change; for these reasons, we limit our greenhouse gas emissions, making sure that a part of our energy be produced by **renewable energy sources**. In addition, all the energy necessary for our headquarters is produced by a

photovoltaic system of about 0.5 MW installed on the entire roof and canopies. A part of the produced energy is sold to the national distribution network.



Although we cannot significantly act on the efficiency of energy consumption, in 2022 we managed to **reduce them by 3%**, passing to a total of 28.669³ GJ consumed. This action has been possible thanks to the **reduction in fuel consumption necessary to feed the company's car fleet.**

Between 2021 and 2022 the CO₂ emissions associated with our activities remained almost unchanged, with a **decrease of 3%**.

Direct and indirect co2e emissions (t. Co2e)	2022	2021
Direct emissions (Scope 1)	1.953	2.022
From non-renewable sources (natural gas, diesel)	11	7
From company fleet (gasoline and diesel)	1.942	2.015
Indirect emissions (Scope 2) – location based	38	35

Most of our emissions are attributable to direct emissions **Scope 1** from fossil fuel consumption, with special relevance to **those attributable to car fleet.** Due to the need to continuously transport materials and equipment from our warehouses to the construction sites, **the consumption related to the company fleet** constitutes, in fact, **96%** of our total energy

³ In 2022, the data on the percentage of distribution between renewable and non-renewable sources relating to the share of energy withdrawn from the national distribution grid was estimated by calculating the average delta of the same between the years 2019-2020 and 2020-2021.

consumption. To reduce this impact, we have undertaken a **programme of optimisation and monitoring of vehicle movements**. It is our wish to launch a programme of *eco-driving* courses for our employees in order to optimise fuel consumption, while reducing polluting emissions having a direct impact on people's health. In the near future, it is our wish to, **step by step, renew our car fleet with hybrid or electric vehicles**.

Indirect emissions **Scope 2** are attributable to the consumption of electricity taken from the grid. According to the **location-based** approach that considers the distribution network by applying average emission factors of the country in which energy is purchased, these emissions amount to **2% of the total**.

6.2. PROMOTION OF CIRCULAR ECONOMY

The main environmental impacts related to the construction activities concern the **production of waste and the generation of noise pollution**.

The waste produced by us mainly comes from the construction and maintenance of overhead and underground transmission lines, while a smaller part is generated in the administrative headquarters, in the warehouse and in the mechanical workshop dedicated to the maintenance of vehicles and equipment.

To carry out a careful and responsible management of waste and promote its circularity, **we manage dedicated forms and loading/unloading registers**, which keep track of the quantities of waste produced divided by area. We are duly registered in the **Italian Register of Environmental Operators**, which regulates the management of transport on our own account. Our construction sites are duly equipped with **temporary waste areas**, on which the relevant CER codes (European Waste Code) are duly marked. In addition, if temporary storage is not available at the construction sites, we use **suitable containers**, provided by the recoverers, which are then removed at the same time as the waste is collected. For the management of **ground and excavation rocks**, we make use of **specific storage areas** where these are deposited within fences identified by signs and treated according to a **specific management plan**.

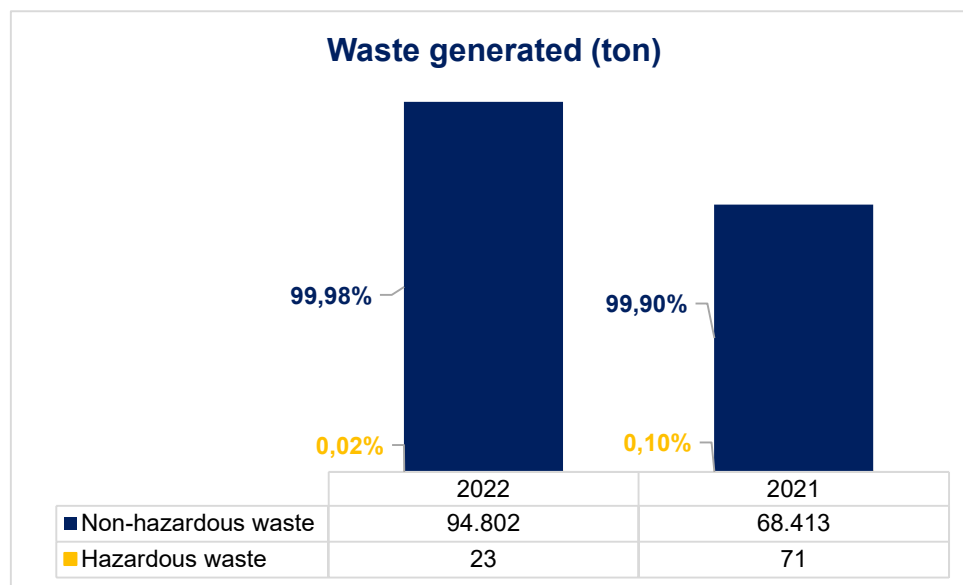
All **carriers and recoverers** collaborating with us are subject to a **specific assessment process by our purchase office**, aiming to verify they are duly registered in the Italian Register of Environmental Operators, have the necessary disposal permits and registration in the Provincial *White List*.

The only **hazardous substances** we use are **diesel fuel**, to supply vehicles and winches, **concrete and lube oils**; the **production of hazardous waste is therefore minimal** and concerns, besides the exhausted oils, car batteries, usually replaced during the maintenance of company vehicles, and printer toners. Within the construction sites, if the project includes

the dismantling of existing lines equipped with fluid filled cables, the hazardous waste consists in said cables.

Within our Organization there are more than **50 Employees**, duly trained with the **Minimum Environmental Criteria**, having the task to fill in the **copies of the Forms of Disposal of the Waste** produced on construction sites and **transmit them to the competent office** for further registration on a dedicated file; this allows the constant monitoring of the quantity of waste produced

During **2022**, we produced a total of about **94,825 tonnes of waste**, a slight increase if compared to 2021. This variation is attributable solely to the increase in the typology related to the production of earth and rocks for excavation, directly related to the purpose of the work on the construction sites carried out in 2022. Of these, only **0.02%** is composed of hazardous waste, down sharply from **0.10%** in **2021**.



Again in **2022**, **99,97% of the waste produced has been subject to recycled actions**, on the rise if compared with **95.06%** in **2021**. This result confirms our commitment to an economy focused on a **waste management approach to the circular economy and reduction of material waste**.



**FOCUS:
MANAGEMENT OF NOISE POLLUTION**

In order to **responsibly manage the noise pollution** produced by our activities, we carry out **significant assessments of the noise impacts** in the construction sites and we comply with **the acoustic zoning analysis** for the areas affected by our projects, in order to respect the **values day and night emission limits** to be respected during construction site activities. Furthermore, our machinery and equipment satisfy the **safety requirements established by the applicable legislation on noise emissions.**

6.3. PROTECTION OF BIODIVERSITY

We respect the animal and plant species present in the areas where our construction sites are located, protecting the biodiversity of the territories.

To **protect the natural resources and ecosystems** of the areas where we operate, it is forbidden to discharge liquids into the ground or into the subsoil in the construction site areas. In this context, the only risk of soil contamination to which we may be subject is related to the loss of hydraulic oils, lubricants or fuel from company vehicles or spills of dangerous substances. To prevent this risk, there is an **environmental kit** present in the construction sites containing all the tools necessary to promptly intervene in the event of leaks and/or spills. Furthermore, it is also forbidden to clean the vehicles at the construction sites, except for those carried out on the wheels before being placed on the public roads to avoid soiling. If the

rainwater comes into contact with waste, we envisage the obligation to intercept and dispose them as waste.

6.4. RESPONSIBLE WATER MANAGEMENT

We constantly and systematically monitor our water consumption by receiving the bills sent to us by the service provider.

The water consumption of our company is made **exclusively for civil and hygienic-sanitary use within our offices**. Our main activity is therefore carried out without the need to use water resources and without foreseeing the risk of water contamination. However, at our construction sites it is envisaged that, for excavation works which require the pumping of groundwater, a **preventive analysis of the works to be carried out** be realized in order to establish the management method for the discharges which will result from the operations carried out with groundwater, such **as waste water or waste**.

7 SUPPORT OF HUMAN CAPITAL

MATERIAL THEMES

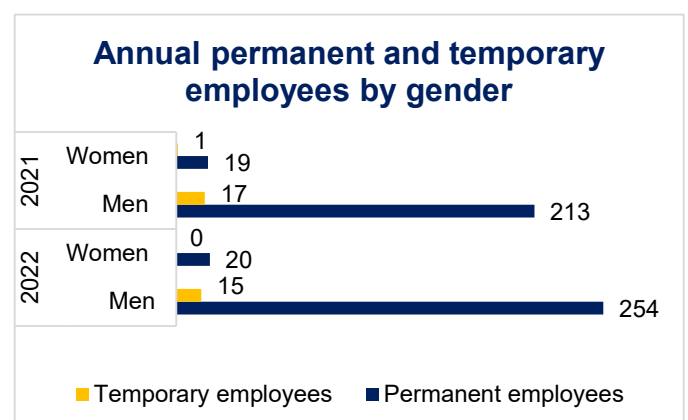
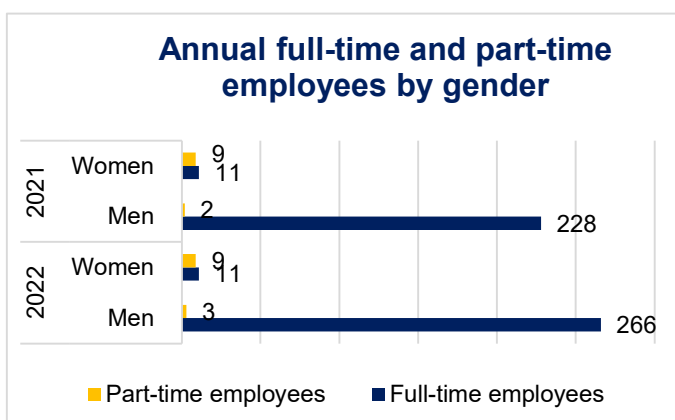
- Respect for human rights and employees
- Promotion of diversity and inclusion
- Well-being of people
- Valorisation and empowerment of employees
- Health and safety of employees

Drawing the lines for a sustainable future also means **supporting human capital**, through the **promotion of safe workplaces, respect for the human rights of workers, the promotion of well-being, diversity and inclusion and the enhancement and the development of our employees' talents**. Supporting the human resources who contribute every day to build the future of our company is a fundamental choice for us. A choice that takes the form of initiatives and investments that we make on daily basis to create healthy and comfortable work environments and to encourage professional growth paths consistent with **the expectations of our employees**.

7.1. WHO ARE OUR PEOPLE

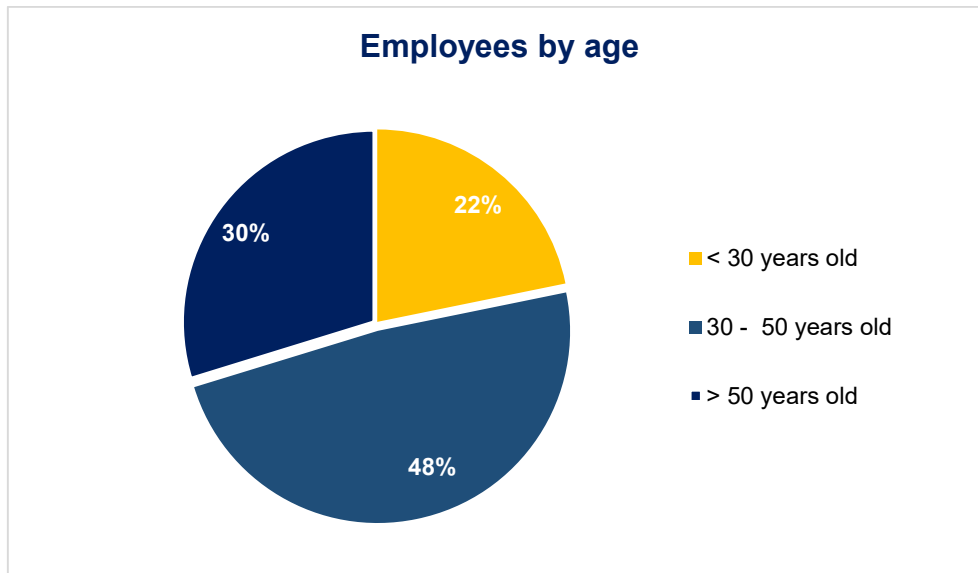
Our resources are a key element in getting the success and sustainability of our activities over time; for this reason, we are committed to **establish solid and lasting relationships with our employees**, capable of satisfying their expectations and their personal and professional needs.

During 2021, our company counted on a corporate population made up of 250 employees, in 2022 we recorded a **16% growth** in the human resources present in the company, reaching **289 employees**. As per contractual framework, the majority of employees are hired on permanent contracts (approximately 93% of total employees as at December 31, 2021 and **95% as at December 31, 2022**), reconfirming our commitment to invest in our resources for the long term and ensure stability in working relationships. Staff hired on fixed-term contracts are 100% men. Finally, employees hired with full-time contracts are equal to 96% of the total workforce, while women with part-time contracts are equal to 3% of the total employees and 45% of the total female population present in the company.



Due to the nature of the market in which we operate, which mainly involves the performance of construction activities, the breakdown by gender of employees is **93% for men** and **7% for women**.

We strongly believe in the potential of young resources; therefore, **more than 50% of our employees belong to an age group under the age of 50**.



7.2. RESPECT OF HUMAN RIGHTS AND PROMOTION OF DIVERSITY AND INCLUSION

Respect for workers' human rights is one of the **foundational principles of our business**. Therefore, we apply and observe this principle both personally, establishing virtuous relationships with all the people we collaborate with - from suppliers, employees, the community and to all stakeholders - and externally, requesting our suppliers to respect the human rights of their workers, as required by our **Code of Ethics**.

Particularly, we are committed to ensure respect for the physical, moral and cultural integrity of people, promoting the value of human resources, in order to improve and increase the wealth and competitiveness of knowledge and skills held by our employees. We undertake not to use and oppose child, forced and compulsory labour and any form of corporal punishment or physical or mental abuse, to guarantee the right for our workers to join, form, participate or organize trade unions voluntarily. We also comply with national and local laws and agreements applicable to working hours, time off and holidays. We remunerate our employees in compliance with the National Collective Labour Agreements and possibly integrate the wages according to internal supplementary agreements.

We prevent discrimination based on age, gender, sexual orientation, state of health, nationality, social class, political opinions, membership of trade union organizations and religious beliefs. In fact, we are very careful to the needs of our employees and we work every day to prevent any form of discrimination and to respect and value the diversity present in the company. As proof of our constant commitment to guarantee the respect for human and workers' rights, during 2022 and 2021 **there were no episodes of discrimination**.

In 2017 we obtained the **SA 8000:2014 certification**. This standard certifies our commitment to promote and respect human and workers' rights, empowering and protecting all personnel under the control and influence of our organisation. Furthermore, in accordance with the requirements of this legislation, we carry out a periodic **Social Performance Review**.

Respect for human rights in our company also passes through the promotion of diversity and inclusion among our employees. Developing an inclusive corporate culture that respects the diversity of others is essential to grow and implement a work environment where **people feel appreciation and valorisation**. For example, on our construction sites there is a high percentage of foreign workers who mainly speak Spanish. Therefore, we have a foreign department dealing with all necessary written translation and training activities in the languages spoken by our workers.

Also, we do not tolerate requests or threats aimed to induce people to act against the law, against our Code of Ethics or against established rules and we expect our employees to interact with the utmost respect for their colleagues, suppliers' collaborators and staff. We also make use of a supply chain that respects the above principles and is willing to accept external audits.

7.3. WELL-BEING, VALORISATION AND EMPOWERMENT OF EMPLOYEES

We pay the utmost attention to our people, making them available with an **attentive workplace to everyone's needs**, where physical and mental well-being is granted and where everyone can **grow professionally** through a developed system of valorisation and empowerment of knowledge and skills.

7.3.1. OUR WELFARE PROGRAMS

Our corporate welfare program complies with the National Collective Labour Agreements (CCNL). In accordance with them, all our employees have the right to **health care, insurance coverage in the event of invalidity and disability, parental leave and contributions established by law**.

Furthermore, we have entered into an agreement with a group company for the purchase of products and services at discounted prices to our employees.

We also pay close attention to welfare issues relating to health protection: we provide operational support to our workers through facilitated returns home, in the event of difficulties related to their health conditions during any travel.

Aware of the need to maintain a constant dialogue with our resources, to better meet the needs of our employees, we intend to carry out a climate survey among them and activate new initiatives for the involvement of all personnel, to draw up a plan of welfare structured ad hoc on the needs of our people.

7.3.2. TRAINING AND DEVELOPMENT OF PEOPLE

The **training and development of employees** are two **fundamental pillars** of personnel management in our company, as they allow us to contribute to personal growth and the development of the resources present in the company.

Employees' training begins on their first working day, through the provision of specific ad-hoc courses on topics specifically linked to the type of function performed.

Subsequently, the identification of dedicated training needs can arise from internal reports, from specific requests made by customers, or in the face of any gaps that have emerged regarding practices, knowledge or working methods.

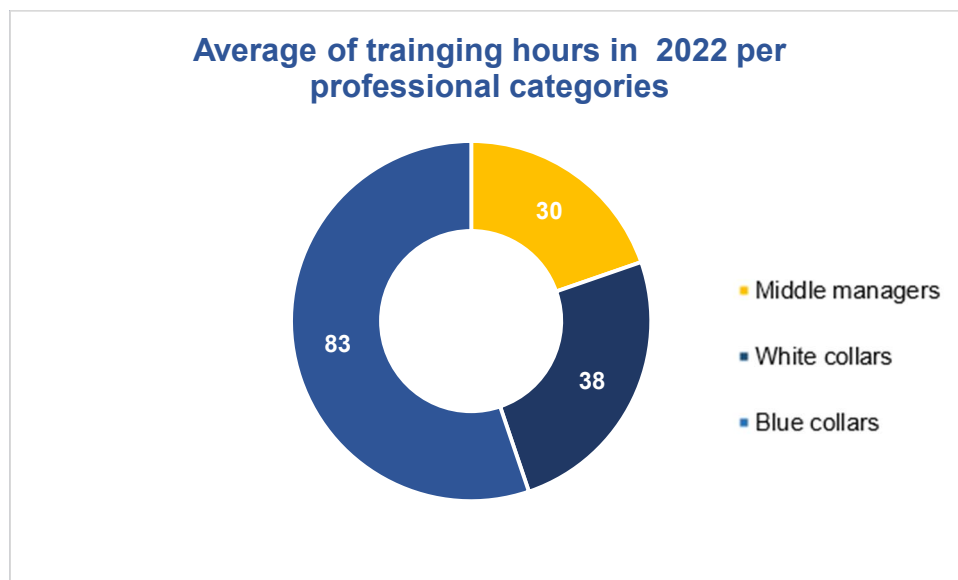
The Quality, Safety and Environment (QSE) function therefore collects the training needs and assesses topics, training supports and paths suitable for the personnel to be trained. Basically, **training needs** concern areas such as:

- **Operational conditions and environmental aspects** relating to procedures, instructions and forms;
- **Special working conditions** that may occur during the year or at construction site progress;
- **Special emergency situations.**

All the training activities carried out and those planned are reported in a **special program approved by the General Management**. The training can be carried out by internal personnel or by external teachers and can be provided at the headquarters, on the construction sites or at third parties. In the case of courses held by external teachers, each employee is provided with a **certificate of attendance**, while, in the case of courses held by internal staff, employees are required to take a learning **verification test**. Finally, in the case of field training, each participant receives **feedback** from the employee who assisted him in the training, at the end of the training period.

During the annual management review, we evaluate the **effectiveness of the training** carried out and the future training needs also on the basis of the internal audits carried out or those of third parties.

In 2021, **the total hours of training** provided exceeded **6.300**, while the average hours per **employee** were around **25**; middle managers and construction site workers were the categories most affected by the courses provided, with an average of **27 and 28 hours of training per year per person respectively**. In 2022, these figures had a strong growth following the training provided to increase workers' awareness of workplace safety issues: the total hours of training tripled, rising to a total of **more than 20.900**, while those per each employee passed to an average of over **72 hours**. In 2022, the most trained categories were office workers - with an average of around **38 hours/each** - and construction site workers - with an average of around **83 hours/each**.



Like training, **employee empowerment** plays a primary role within our company. This begins, as with training, when the employee joins the company. In fact, for **new recruited personnel**, a specific period of **support by a tutor** is envisaged - generally a Function or Area Manager - during which the new resource is followed in the performance of operational functions and in the illustration of theoretical concepts supporting in carrying out the new activities.

On annual basis, the **General Management**, supported by the corporate functions, carries out an assessment of the status of personnel skills. In particular, on a special management software, for each **administrative employee and for site managers**, there is a form where the level of classification, the area of activity, the main functions are reported - with indication of the level of competence, the possible alternative tasks to be entrusted to the employee and the courses taken or in progress during the year.

The joint analysis of all this data allows the software to create the skills **matrix for each employee**, which indicates the skills acquired or enhanced by the employee during the year. This tool therefore makes possible to carry out a punctual **assessment of the professional empowerment of employees** to identify the achievement of **fundamental requirements** in order to proceed with the career advancement of the resources. For construction site workers, on the other hand, the annual assessment is carried out on the **feedback** obtained through constant dialogue with construction site managers.

To further improve our performance evaluation system, we intend to integrate what is already present with a "**self-evaluation**" carried out by employees when they join the company in order to make them more aware of their personal development and to be able to carry out an even more punctual assessment.

7.4. HEALTH AND SAFETY OF EMPLOYEES

To fully protect the health and safety of all operators, our company adopts a specific **structure of roles**. In particular, the Employer and the Head of the Prevention and Protection Service are placed at the top of the **Occupational Health and Safety Management System** and there are three Site Technical Directors, who are responsible for managing the works on the plants and to coordinate the site managers, according to their areas of competence. In total, between team leaders and site managers, we have more than 50 employees in charge of ensuring that each procedure is carried out according to the highest safety standards. Furthermore, we have formalized a real policy for health and safety in the workplace, included in the **Company Safety Management System**.

Since 2012, our Occupational Health and Safety Management System has been certified according to **the BS OHSAS 18001:2007** standards and since 2020 according to the **UNI ISO 45001:2018** standards. These standards settle the minimum standards of good practice for the protection of the **health and safety of workers** throughout the world. It establishes a framework for reducing workplace risks and improving workers' health and well-being. In 2021 there were **5 accidents at work**, while in 2022 there were **9 accidents**.

Our procedure provides that, if an accident occurs, it must be **reported to the safety office or directly to the Employer**, thus also responding to the procedures established by the contracting entity. The same procedure provides that the on site safety officer and the person in charge of the procedure are duly informed in the same time. Subsequently, within five days the accident form is drawn up, sent to the department of National Institute for Insurance against Accidents at Work by the Human Resources Office.

The accident file states all the information related to the event occurred and any improvement actions to be taken to prevent the event from recurring in the future. Accidents are also recorded in a dedicated register, which is kept and supervised by the Human Resources Office. In fact, in order to prevent the occurrence of accident events, we analyse the causes of those occurred and consequently adopt the most appropriate **corrective actions** necessary to avoid the repetition of the causes that led to their occurrence, thus granting the maximum employee's safety.

Moreover, to improve communication on site and minimize the risk of accidents, since **February 2022**, a morning star is held, before the start of daily activities, by the Site Manager, which involves all the personnel in charge, including all the other companies present on site, with the aim of defining the scheduled activities and highlighting the safety measures to be adopted. The meeting is formalized in special minutes, sent every morning to the central office.

This process is linked to a **risk assessment** that we regularly carry out to identify in advance the areas being most exposed to risks and define the proper actions to implement in order to reduce them to a minimum level. All hazardous possible events detected, the functions and the related processes used to determine and subsequently manage them are reported in the **Risk Assessment Document** (DVR) drawn up in accordance with the Legislative Decree 81/08 and periodically reviewed and updated.

Furthermore, to monitor that the maximum safety standards in the workplace are constantly applied, we periodically carry out **unannounced internal audits** at the construction sites, in collaboration with a consulting company operating in the engineering field. Additionally, there are audits **carried out by our main Customer**, aimed to verify that all measures dealing with health and safety are implemented on our construction sites.

We also have the support of an **Occupational Doctor** in charge of carrying out visits to personnel in compliance with the **Health Protocol**, established by the company health and safety managers, to verify that the employees are suitable for the activities they have to perform. The **Occupational Doctor** also carries out periodic visits, planned by the Head of the Prevention and Protection Service, during which employees **are made aware** of the importance of the correct use of personal protective equipment and the risks associated with their function.

No cases of occupational disease occurred during 2021 and 2022.

Last but not least, to protect the mental and physical health of our employees, we frequently carry out **assessments related to work stress**, in relation to the type of job performed by most of our company's employees. The issues we consider to implement a risk assessment include: load handling, vibrations, noise, chemical risk assessment.



FOCUS: TRAINING ON OCCUPATIONAL HEALTH AND SAFETY

We deeply believe in the importance of training all our employees. For this reason, we provide specific training both in terms of **emergency management** issues and in terms of occupational health and safety issues also when there is not a compulsory training required by the legislation in force but required by our customers, such as *training* courses on management systems.

Particularly, a **basic safety module** is provided to our employees during the hiring phase, lasting between 8 and 16 hours. In addition, emergency management training covers specific issues, such as **first aid and fire-fighting procedures**.

Being the risk of electrocution one of the main risks for our employees, we make use of third parties to provide additional **5 hours courses having as topic the earth systems use and installation on transmission lines by means of portable devices**, in order to protect our workers and allow them to work in total safety.

In addition, our main Client requires that all the personnel employed on the construction sites and the HSE technical managers be endowed with specific professional skills, which can be obtained through dedicated training courses, depending on the relevant profiles, with a variable duration of 24 and 32 hours.



APPENDIX



2.4. GRI INDICATOR TABLES

GRI 201-1 Direct economic value generated and distributed		
Economic Value (euros)	2022	2021
Direct economic value generated	72.738.728	66.910.822
Operating costs	38.806.085	33.871.687
Employee wages and benefits	18.390.722	15.909.258
Payments to providers of capital	3.113.428	1.057.791
Payments to government	3.623.603	5.629.966
Community investments	73.288	109.717
Economic value distributed	64.007.126	56.578.419
Economic value retained	8.731.602	10.332.403

GRI 308-1: New suppliers that were screened using environmental criteria		
GRI 414-1: New suppliers that were screened using social criteria		
Suppliers	2022	2021
New suppliers that were screened through environmental criteria (n)	324	281
Total new suppliers (n)	403	382
New suppliers that were screened through environmental criteria (%)	80	74
New suppliers that were screened through social criteria (n)	324	281
Total suppliers (n)	403	382
New suppliers that were screened through social criteria (%)	80	74

GRI 302-1 Energy consumption within the organization		
Energy consumption (GJ)	2022	2021
Direct energy consumed	28.149	28.934
From non-renewable sources	212	138
Natural gas	212	137
For company fleet	27.594	28.319
<i>Gazoline</i>	288	261
<i>Diesel</i>	27.306	28.058
Self-generated solar energy	1.714	1.661
<i>electricity consumption</i>	343	477
<i>Transferred to the network</i>	1.371	1.184
Indirect energy consumption	520	477
From non-renewable sources,	342	354
From renewable sources	178	123
Total energy consumption	28.669	29.411

305-1: Direct (Scope 1) GHG emissions, 305-2: Indirect (Scope 2) GHG emissions		
GHG emissions (tCO _{2e})	2022	2021
Direct emissions (Scope 1)	1.953	2.022
From non-renewable sources (natural gas, diesel)	11	7
From company fleet (gasoline and diesel)	1.942	2.015
Indirect emissions (Scope 2) – market based	43	45
Indirect emissions (Scope 2) – location based	38	35

GRI 306-3: WASTE GENERATED		
Waste generated (t)	2022	2021
Hazardous waste	23	71
Waste generated from construction and dismantling activities	10	34
Lubrication waste	5	7
Waste packaging, absorbents, wiping clothes, filter materials and protective clothing not otherwise specified	1	2
Waste produced from physical and mechanical surface treatment of metals and plastics	0,32	-
Other waste	7	29
Non-hazardous waste	94.802	68.413
Waste generated from construction and dismantling activities	94.268	64.721
Drilling muds and other drilling wastes	281	-
Waste packaging	181	195
Municipal waste including separately collected fractions	22	37
Waste produced by waste treatment facilities	2	-
Printing inks	0,047	0,050
Other waste	48	3.459
Total waste	94.825	68.484

GRI 306-4: Waste diverted from disposal		
Waste diverted from proposal from third parties (t)	2022	2021
Hazardous waste	21	45
Other recycle operations	21	45
Non-hazardous waste	94.774	65.057
Other recycle operations	94.774	65.057
Total waste	94.795	65.102

GRI 306-5: Waste directed to disposal		
Waste directed to disposal by third parties (t)	2022	2021
Hazardous waste	2	26
Other disposal operations	2	26
Non-hazardous waste	28	3.356
Other disposal operations	28	3.356
Total waste	30⁴	3.382

⁴ In 2021, the execution of a specific project for a client caused an increase in the production of hazardous waste; the 2022 figure is therefore in line with the normal production of hazardous waste by Roda S.p.A.

GRI 2-7 Employees						
By type of employment (n)	2022			2021		
	Men	Women	Total	Men	Women	Total
Total	269	20	289	230	20	250
Full-time employees	266	11	277	228	11	239
Part-time employees	3	9	12	2	9	11

GRI 2-7 Employees						
By type of contract (n)	2022			2021		
	Men	Women	Total	Men	Women	Total
Total	269	20	289	230	20	250
Permanent employees	254	20	274	213	19	232
Temporary employees	15	0	15	17	1	18
Non-guaranteed hours employees (on call)	0	0	0	0	0	0

GRI 405-1: Diversity of governance bodies and employees								
By employee category and age	2022				2021			
	Men	Women	Total	%	Men	Women	Total	%
Top Managers	0	0	0		0	0	0	
< 30 years old	0	0	0	0%	0	0	0	0%
30 - 50 years old	0	0	0	0%	0	0	0	0%
> 50 years old	0	0	0	0%	0	0	0	0%
Middle Managers	12	0	12		6	0	6	
< 30 years old	0	0	0	0%	0	0	0	0%
30 – 50 years old	10	0	10	3%	4	0	4	2%
> 50 years old	2	0	2	1%	2		2	1%
White collars	35	17	52		36	17	53	
< 30 years old	11	4	15	5%	11	6	17	7%
30 - 50 years old	19	9	28	10%	19	8	27	11%
> 50 years old	5	4	9	3%	6	3	9	4%
Of which other (e.g. minorities or vulnerable categories)	1	0	1	0%	1	0	1	0%
Blue collars	222	3	225		188	3	191	
< 30	48	0	48	17%	40	0	40	16%
tra 30 e 50	101	1	102	35%	90	1	91	36%
> 50	73	2	75	26%	58	2	60	24%
Of which other (e.g. minorities or vulnerable categories)	2	0	2	1%	1	0	1	0%
Total (n.)	269	20	289		230	20	250	
%	93%	7%			92%	8%		

GRI 405-1: Diversity of governance bodies and employees								
Individuals within the organization's governance bodies	2022				2021			
	Men	Women	Total	%	Men	Women	Total	%
<30 years old	0	0	0	0%	0	0	0	0%
30 – 50 years old	2	0	2	40%	2	0	2	40%
> 50 years old	1	2	3	60%	1	2	3	60%
Total	3	2	5		3	2	5	
%	60%	40%			60%	40%		

GRI 404-1: Average hours of training per year per employee						
Annual average hours of training per employee (h/n)	2022			2021		
	Men	Women	Total	Men	Women	Total
Total	77	6	72	27	3	25
Middle Managers	30	0	30	28	0	0
White collars	53	7	38	21	4	16
Blue collars	84	0	83	28	0	28

GRI 403-9: Work-related injuries						
Work-related injuries (n)	2022			2021		
	Men	Women	Total	Men	Women	Total
Total	9	0	9	5	0	5
During work	9	0	9	5	0	5
Number of hours worked (h)	442.718	25.871	468.589	442.932	23.676	466.608
Rate of recordable work-related injuries⁵	20,3	0	19,21	11,29	0	10,72

⁵ The calculation of the "Recordable Work Injury Rate" is based on 1,000,000 hours worked, according to the following formula: (Total Recordable Work Injuries / Hours Worked) * 1,000,000.

METHODOLOGICAL NOTE

This document represents the first Sustainability Report issued by Roda S.p.A. with the objective to ensure the communication to all our stakeholders, both internal and external, of the performances of the Company regarding sustainability in the last years and identification of the future objectives undertaken. This Report has been published on May 31, 2023 and it has been prepared in collaboration with KPMG Advisory S.p.A.

The information and data of this Report refer to the Parent Company Roda S.p.A. only. The perimeter of the data does not include the subsidiaries and associated companies, and the brand IAB – Industria Alimentare Bresciana.

This Sustainability Report has been prepared adopting the “*with reference to*” option of the Standards published by the Global Reporting Initiative (GRI). Up to date, the GRI Standards are the most widely used for non-financial reporting. The reporting is in line with the principles of balance, comparability, accuracy, timeliness, clarity and reliability.

The reported GRI standards are stated in the below GRI Content Index containing the reference to the paragraph in which they are illustrated.

The information and data of this Report reflect the Materiality Matrix of the GRI Standards. The reported issues are in fact the ones considered more significant for the activities performed by Roda S.p.A. (for more information see the section “Materiality Analysis”).

The reported data and information are referred to the period 1 January - 31 December 2022, unless otherwise stated.

Where possible, comparative data referring to the previous year have been reported to present the performance trend of Roda over a longer time horizon. To provide an accurate representation of the performance, priority has been given to the inclusion of directly detectable and measurable qualitative and quantitative indicators, using estimates only in limited circumstances.

During the referred period, the Company has not experienced significant changes in its structure, ownership or supply chain.

To ask for more information about objectives, indicators and results or to submit requests on this Report please contact: esg@roda.it.

GRI CONTENT INDEX

Statement of use	Roda S.p.A. has reported the information stated in this GRI content index for the period 01/01/2022 – 31/12/2022 with <i>reference to the</i> GRI Standards.
GRI 1 used	GRI 1: GRI Foundation 2021

Standard GRI	Disclosure	Reference paragraph
2-1	Organizational details	1.2., 1.3.2., 1.3.3., Contacts
2-2	Entities included in the organisation's sustainability reporting	Methodological note
2-3	Reporting period, frequency and contact point	Methodological note
2-4	Restatements of information	Not applicable as this is the first Sustainability Report of Roda S.p.A.
2-5	External assurance	No external revision of the Sustainability Report
2-6	Activities, value chain and other business relationships	1.3.2., 1.3.3., 4.1.
2-7	Employees	7.1., 8.
2-8	Workers who are not employees	7.1.
2-9	Governance structure and composition	3.1.
2-22	Statement on sustainable development strategy	Letter to the stakeholders
2-26	Mechanisms for seeking advice and raising concerns	3.1.
2-27	Compliance with laws and regulations	In 2022 the company has received a non-pecuniary penalty.
2-29	Approach to stakeholder engagement	2.1.1.
3-1	Process to determine material topics	2.2.
3-2	List of material topics	2.2.
3-3	Management of material topics	2.1.1., 3.1., 3.2., 4.1., 4.2., 5.1., 5.2., 6.1., 6.2., 6.3., 6.4., 7.2., 7.3.1., 7.3.2., 7.4.

Standard GRI	Disclosure	Reference paragraph
201-1	Direct economic value generated and distributed	3.1.1., 8.
205-3	Verified corruption incidents and actions taken	In 2022 no corruption incident was reported
302-1	Energy consumption within the organisation suddivisa tra fonti rinnovabili e non rinnovabili	6.1., 8.
305-1	Direct (Scope 1) GHG emissions	6.1., 8.
305-2	Energy indirect (Scope 2) GHG emissions	6.1., 8.
306-1	Waste generation and significant waste-related impacts	6.2.
306-2	Management of the significant waste-related impacts	6.2.
306-3	Waste generated	6.2., 8.
306-4	Waste diverted from disposal	6.2., 8.
306-5	Waste destined for disposal	6.2., 8.
308-1	New suppliers evaluated using environmental criteria	4.1., 8.
401-2	Benefits provided to fulltime employees that are not provided to temporary or part-time employees	7.3.1.
403-1	Occupational health and safety management system	7.4.
403-2	Hazard identification, risk assessment and incident investigation	7.4.
403-4	Worker participation, consultation and communication on occupational health and safety	7.4.
403-5	Worker training on occupational health and safety	7.4.
403-7	Prevention and mitigation of occupational health and safety impacts directly linked	7.4.

Standard GRI	Disclosure	Reference paragraph
	by business relationships	
403-9	Work-related injuries	7.4., 8.
403-10	Occupational illnesses	7.4.
404-1	Average hours of training per year per employee	7.3.2., 8.
405-1	Diversity of governance bodies and employees	3.1., 7.1., 8.
406-1	Discrimination and corrective action taken	In 2022, no episode of discrimination was reported
414-1	New suppliers that were screened using social criteria	4.1., 8.
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	In 2022 no complaint was reported

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