

SUSTAINABILITY REPORT

ALPHA TRADING | REPORT SUSTAINABILITY 2023



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SUSTAINABILITY
REPORT



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LETTER TO STAKEHOLDERS

We have decided to prepare this first Sustainability Report to disclose to all parties directly or indirectly involved and/or impacted by our operations the principles underlying the management of our company, along with the results and projects we intend to implement in the coming years.

Furthermore, the tangible impact of human activity on the environment has made clear the need for companies to make a greater commitment to sustainability initiatives. Therefore, **Alpha Trading has decided to embark on a process of reporting its activities that have an environmental, social and sustainability impact**, with the strategic goal of making the benefits to our Stakeholders transparent.

Alpha Trading S.p.A. specializes in buying and selling petroleum products, primarily focusing on the international trade of marine fuels and diesel. Established in 1985, we operate in the market of fuel sales to ships in various ports worldwide, the biofuels market, low-impact heating products, and distilled and modified bitumen.

Questo primo Bilancio volontario di Sostenibilità ha l'obiettivo di misurare, presentare e comunicare agli Stakeholder le performance di Alpha Trading in ambito **ESG** (Environmental, Social e Governance), nella consapevolezza che nel prossimo decennio sarà cruciale il raggiungimento dei target fissati dall'UE in tale ambito e ciò riflette la nostra cultura aziendale.

This inaugural voluntary Sustainability Report aims to measure, present, and communicate Alpha Trading's performance in Environmental, Social, and Governance (ESG) areas to stakeholders. We recognize that achieving EU targets in these areas over the next decade is crucial and this reflects our corporate ethos.

Our challenge is to manage and develop our activities continuously to foster positive change for the benefit of all. Therefore, we must prioritize sustainability and financial stability in our daily decision-making. Sustainability at Alpha Trading is integral to our governance, with management personally overseeing strategic decisions, sustainability guidelines, and environmental and social goals. Our current organization and actions will enable Alpha Trading to set new and ambitious goals in these areas as well.

Through this document, we aim to strengthen our relationship with stakeholders based on cohesion, trust, and mutual commitment, as these values are essential for achieving a more virtuous path forward.

We hope you find this report informative.



REPORT DRAFTING PROCESS

Alpha Trading S.p.A.'s **Sustainability Report as of 31 December 2023, marks our first voluntary Sustainability Report**, providing economic, social, and environmental information. This report gives an overview of the initiatives undertaken and results achieved during the reporting period from 1 January 2023 to 31 December 2023.

The contents of this report adhere to selected "GRI Sustainability Reporting Standards", preparing the information with reference to the GRI Standards. The contents of this report were selected on the basis of the results of a materiality assessment conducted in 2023, which helped define our sustainability goals and future trajectories.

In line with the GRI Standards, we have prioritized Stakeholder inclusivity and completeness in defining content, first of all assessing our sustainability context. We have also emphasized balance, clarity, accuracy, timeliness, comparability, and reliability to ensure the quality of the information and its appropriate presentation.

The stakeholder engagement and materiality assessment process is discussed in more detail in section 3.3 "Materiality Assessment".


We issue our report every financial year. Where possible, we have included comparisons with data

from 1 January 2022 to 31 December 2022, to facilitate data comparability over time. Furthermore, to ensure accurate representation of performance and data reliability, we have minimized the use of estimates; any estimates used are disclosed appropriately.


Any limitations regarding the data in this Sustainability Report are clearly indicated.

The appendix contains the "Global Reporting Initiative Content Index", listing the GRI indicators associated with each material topic.

This report was reviewed and approved by the Chairperson and Chief Executive Officers on 19/04/2024.



FOR INFORMATION
ABOUT THE
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petrini@alphatrading.it
WITH "SUSTAINABILITY
REPORT" IN THE
SUBJECT LINE.





ALPHA TRADING

- 1.1** History of the Company
- 1.2** Mission, Vision and Company Values
- 1.3** Highlights 2023

1.1

STORIA DELL'AZIENDA



1985

Alpha Trading S.p.A. is a distributor of petroleum products, established in 1985, operating both in Italy and internationally. Its registered office is in Milan, and it has commercial and administrative offices in Genoa, as well as two production and storage sites in Carbonara Scrivia (AL) and Solbiate Olona (VA). The company initially focused on marine bunkering and trading in petroleum products (fuel oils and bitumen). In Italy and the Mediterranean region, and began a path of diversification and internationalization in the 1990s.

1993

In 1993, with the acquisition of the **Carbonara Scrivia depot**, the company became a **physical supplier of petroleum products**, integrating blending and storage activities into its business.

2003

In 2003 it expanded its operations again, building and commissioning its modified **bitumen production plant in Carbonara Scrivia**.

2004

In 2004, the company embarked on its **sustainability** journey aimed at reducing environmental impact, and **entered the biodiesel market**. This led to the establishment of **Oil.b S.r.l.**, a biodiesel production and marketing company, owner of a production plant in Solbiate Olona.

2004-2010

The company's move into the biofuels sector sparked a **period of substantial growth**, driven by ongoing expansion in its target markets. Since 2004, Alpha Trading has significantly increased its global presence, venturing into Turkey, Greece, Europe at large, and more recently, expanding operations into **Asia, the Middle East, Africa, and South America**. Today, the company supplies numerous international clients in the maritime sector, including cruise ships, container ships, bulk carriers, ferries, and oil tankers.

2013

2013 marked a pivotal moment in Alpha Trading's history with the transfer of ownership from the Brancaccio family to the company's long-standing managers, **Adriano Parodi and Stefano Marchiol**, who currently hold 80% ownership through **Holding Armada S.r.l.** Alongside this ownership change, Alpha Trading redefined its identity, positioning itself in the Oil and Gas sector as a company operating in three distinct markets:

1. Bunkering
2. Biofuels
3. Domestic Market

2015

In 2015, due to competitiveness issues with Italian biofuel production facilities, the Solbiate **Olona production plant was permanently decommissioned and dismantled**. Since then, the company has continued its activities in the biofuels market as a trader and producer through third-party facilities, also leveraging the storage facilities at Solbiate Olona.

2017

In 2017, **Oil.B S.r.l. was merged by absorption into Alpha Trading S.p.A.**, creating the biofuels division.



2018

In October 2018 Alpha Trading expanded its operations to include **physical supply services in Capodistria, Monfalcone, and Trieste**, where it has extensive product storage capacity, blending flexibility, and a chemical laboratory at the Trieste port depot, ensuring the highest quality and service standards.



2020

Through this depot, in addition to its depots in **Savona** (marketing biodiesel) and **Genoa** (marketing biodiesel and bunker products), Alpha Trading began offering new, low-sulphur products in compliance with international standards introduced in 2020.

2022

Starting in 2022, Alpha Trading has built its global presence by establishing **representative offices in Denmark, UK, Greece, Turkey, India, and Singapore**.



2023

In 2023, continuing its sustainability efforts in biofuels, the company began **testing an alternative and more environmentally-friendly fuel** for the bunkering market. This **biofuel**, derived from a blend of current fossil fuels and sustainable components, targets the maritime shipping sector. Today, with over 3,400,000 tonnes of petroleum products sold, Alpha Trading ranks among the top ten bunker trading companies worldwide.

1.2

MISSION, VISION AND COMPANY VALUES

Alpha Trading is committed to **consolidating** and **developing** its trading **operations**, through its competitive offer, comprehensive services, and investments in research and innovation aimed at reducing environmental impacts.

VISION

Market high-quality petroleum products through **personalized service** for our clients, building a company that prioritizes people and innovation, including in the energy transition.

Guided by our **mission**, over the years, the company has established privileged relationships and preferential contractual relations with key global suppliers, strengthening its **strategic presence** in major ports all over the world.

Today, through partnerships with key clients and suppliers, Alpha Trading offers **ongoing** competitive offerings in the major Italian and global ports, ensuring **high quality standards** for its products and services and contributing to **industry innovation** with solutions for the **energy transition**.

Additionally, over time, Alpha Trading has diversified its offerings to include **financial and credit services**. As a result, leveraging its structure and credit capacity, the company can now provide substantial lines of credit, personalized payment terms, and financial instruments for managing price risk, addressing the economic and financial requirements of its clients.

OUR PRIORITY IS TO
PROVIDE CUSTOMERS
WITH **HIGH-QUALITY
PRODUCTS** AND
RELIABLE SERVICES.



1.2

MISSION, VISION AND COMPANY VALUES



Customer orientation

Alpha Trading is committed to promptly meeting all customer needs, whether economic, financial, commercial or operational.



Respect for the environment

Alpha Trading si impegna a ridurre l'impatto generato sull'ambiente dalle proprie attività promuovendo l'innovazione di prodotto;



Protection and development of people

The company provides a decent and safe workplace that fosters employee skill development.



Product quality

Alpha Trading invests in constant research to achieve the highest quality for its products and services.



Vital and independent entrepreneurship

Alpha Trading turns market opportunities into value for its stakeholders.

1.3

HIGHLIGHTS 2023

To date, Alpha Trading has consolidated its position in the market, becoming one of the **top ten global bunker trading companies** and a major bunker supplier in the **Mediterranean Sea**.

Furthermore, leveraging its wide range of marketed products, the company has consolidated its position in northern Italy, particularly in Piedmont, Liguria, Valle d'Aosta, and Lombardy.



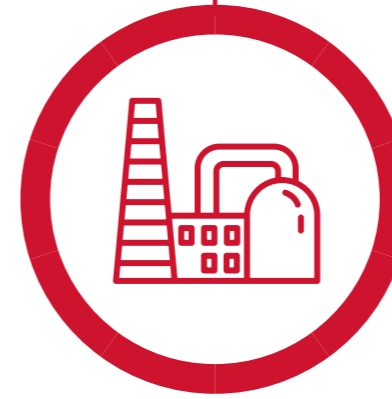
68 employees
in all



49% of employees
are women



97% of employees
are on a permanent contract



**2 owned depots/
production sites**

(Carbonara Scrivia, Solbiate Olona)

**3 rented
depots**

(Savona, Trieste, Genova)



**99% economic
value distributed**

agli stakeholder



**1 experimental
biofuel project**

per mercato bunkeraggio



**0 cases
of corruption**



**100% employees covered by the
national labour agreement (CCNL)**

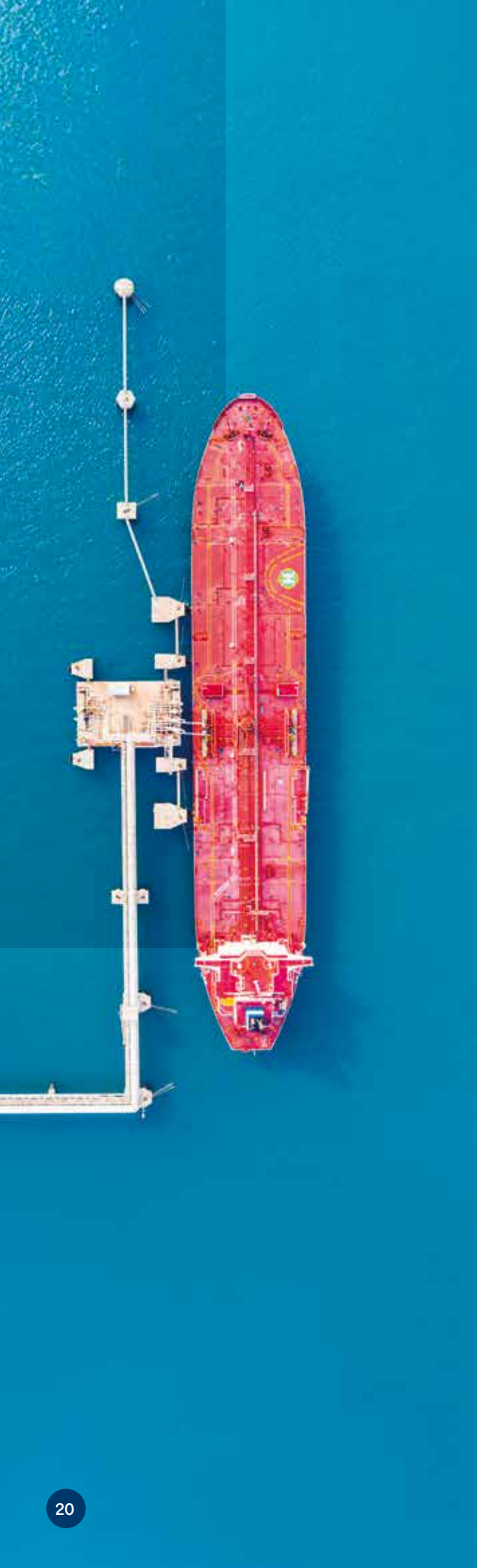
BUSINESS MODEL AND ORGANIZATIONAL STRUCTURE

2.1 Bunker Division

2.2 Biofuels Division

2.3 Domestic Market Division





Over the years, Alpha Trading has consolidated its **competitive position** in its operational divisions by developing a deep understanding of its geographic markets. This, combined with longstanding business relationships and the substantial financial capacity at the Company's disposal, allows it to offer its customers highly competitive prices and services, setting it apart from its competitors.

ORGANIZATIONAL STRUCTURE

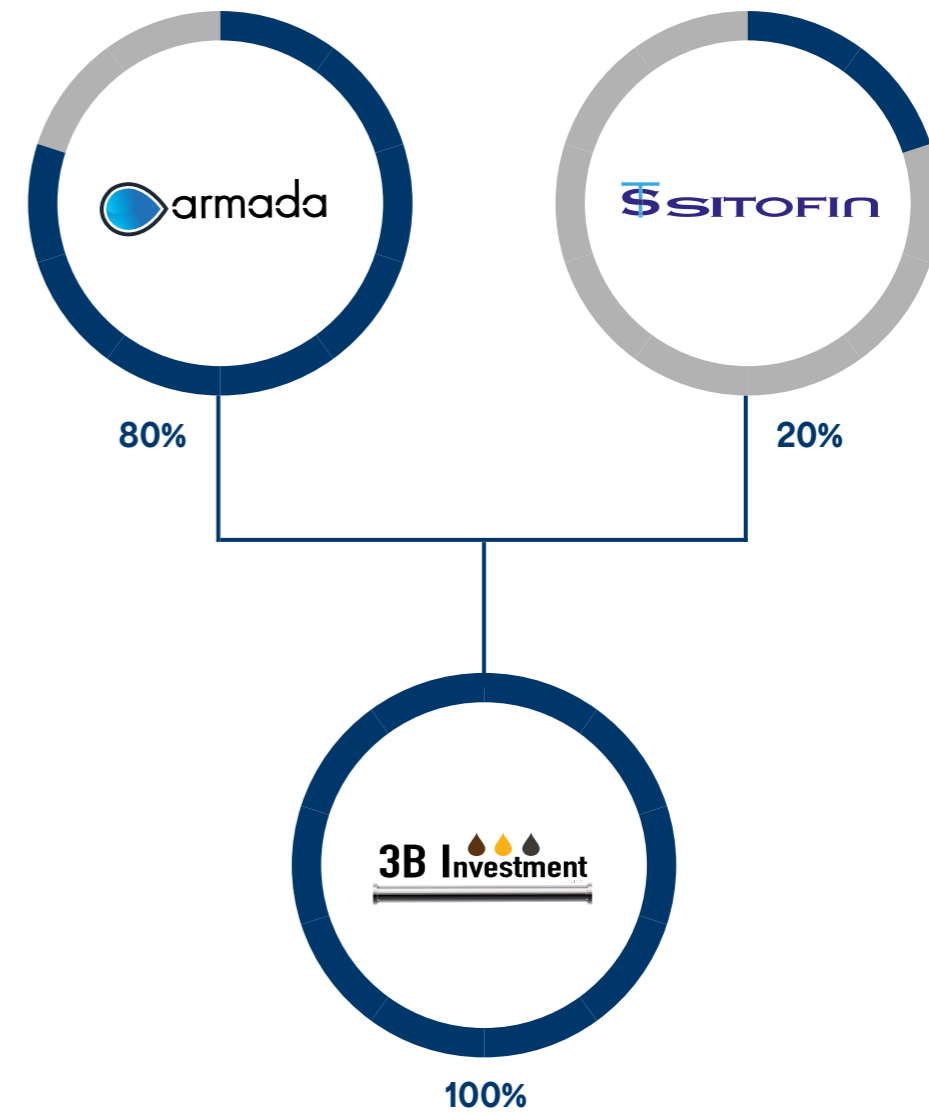
The Company is owned by 3B Investment S.p.A., a holding company established in 2013 whose name reflects Alpha Trading's three sectors of operation: **Bitumen, Bunkering, and Biodiesel**.

3B Investment S.p.A., which holds the entire share capital of Alpha Trading, is in turn owned by:

- **Armada**, holding 80% and jointly controlled by Adriano Parodi and Stefano Marchiol, longstanding managers at Alpha Trading;
- **Sitofin**, holding the remaining 20% and headed by Claudio Bombardieri, Chairman of the Board of Directors of Alpha Trading.



ALPHA TRADING S.p.A.



2.1

BUNKER DIVISION

In the marine bunkering sector, Alpha Trading primarily engages in international marine fuel and diesel trading.¹

In this division, Alpha Trading operates in two main ways:

- **Pure Trading:** the company receives orders and provides the product to customers without engaging in processing or storage activities.
- **Sales with Storage:** Alpha Trading acts as a physical supplier, managing the storage phases of the product in its own facilities. Currently, the company operates as a physical supplier in Capodistria, Monfalcone, Trieste, and Genoa, where it has extensive energy product storage capabilities.

Alpha Trading primarily sources from oil companies and independent suppliers to supply ships and vessels.

With a sales volume of approximately 3,400,000 tonnes of fuel, Alpha Trading ranks **among the top ten pure bunker trading** companies globally and is one of the largest physical bunker suppliers in the Mediterranean Sea.

¹Marine diesel is an essential fuel used in the marine industry to power ships and boats.

BIOFUELS IN THE BUNKER

With the adoption of the FuelEU **Maritime Regulation**², effective from 2025, the maritime shipping sector will undergo new and stringent rules aimed at gradually reducing greenhouse gas emissions from transport fuels used in maritime shipping. To achieve climate neutrality by 2050, the regulation encourages the use of non-biological renewable fuels, with high decarbonisation potential and excludes fossil fuels from the regulation's certification process.

In order to prepare for market demand, with a view to compliance with regulatory obligations, Alpha Trading decided to invest in the alternative marine fuel segment. In 2023, the company began experimenting with a biofuel blend obtained by mixing the current fossil product with other sustainable components. Today, Alpha Trading has developed a quality system for managing biofuels intended for the maritime shipping sector, from product selection and blending to fuel supply. The system, certified by RINA on 4 April 2023 is designed to ensure that the quality and type of bio-component in the blend actually reduce greenhouse gas emissions.

² The "FuelEU Maritime" regulation (Regulation (EU) 2023/1805 of the European Parliament and of the Council) promotes the adoption and use of renewable and low-carbon fuels in maritime transport to achieve shipping decarbonisation. It is part of the legislative measures of the "Fit for 55" package aiming at a 55% reduction of greenhouse gas emissions in the European Union by 2030.

In response to anticipated future market demands, **Alpha Trading has been developing a new type of biofuel for its bunker division since 2023**, reaffirming its position as a leader in promoting the energy transition.

2.2

BIOFUELS DIVISION

Alpha Trading's biofuels division began operations in 2004, driven by the company's commitment to developing **low-emission renewable energy**.

Aiming to contribute to a **low-carbon future**, the division focuses on marketing **biofuels primarily made from waste materials**, known as "premiati" or bonus fuels. Currently, the main product marketed by the company in this division is biodiesel, a fuel derived from renewable sources such as vegetable oils and animal fats. The company sources biodiesel from European producers to supply the Italian market, mainly serving large oil companies.

The biofuels division has gradually strengthened its market position thanks to the strategic decisions of management, the professionalism of its staff, and its expertise in products derived from second-generation raw materials, particularly waste and by-products.

Today, thanks to the **Solbiate Olona depot**, Alpha Trading has a storage capacity of **14,000** cubic metres over an area of about 6,500 square metres within the Bakelite S.p.A. complex in Solbiate Olona. At this depot, various types of biodiesel are stored and blended before being delivered to major refineries and depots in Northern Italy. The company also has significant storage capacity at the **Port of Savona**.



SUSTAINABILITY OF BIODIESEL

As a biodiesel trader, Alpha Trading is required by current regulations to ensure compliance with the sustainability criteria set out in the **Renewable Energy Directive**³. According to these criteria, biofuels must:

- achieve a 35% reduction in greenhouse gas emissions;
- not be produced from raw materials obtained from land with high biodiversity value, such as primary forests, protected nature areas, and highly biodiverse grasslands;
- not be produced from raw materials obtained from land with high carbon stock, such as wetlands, forested areas, and peatlands;
- be produced from agricultural raw materials cultivated in the EU according to the minimum requirements for good agricultural and environmental conditions defined by the Common Agricultural Policy (CAP)⁴.

To ensure compliance with these criteria, Alpha Trading commits to periodically renewing sustainability certifications issued by RINA:

- **certification confirming adherence to the National Certification System "Sistema Nazionale di Certificazione" (SNC)**, established by the Decree of 14 November 2019 "Establishment of the National Certification System for the Sustainability of Biofuels and Bioliquids";
- Certification confirming adherence to the international voluntary scheme **ISCC EU**⁵, recognized by the European Commission to demonstrate compliance with the legal requirements of the Directive (EU) 2018/2001 (RED II).



³ Directive (EU) 2018/2001 of the European Parliament and of the Council (RED II) on the promotion of the use of energy from renewable sources recasting Directive 2009/28/EC of the European Parliament and of the Council (RED I), establishes the necessary and specific requirements for biofuel and bioliquid producers to ensure the sustainability thereof.

⁴ The Common Agricultural Policy (CAP) represents a close partnership between society and agriculture to ensure a stable supply of food at affordable prices, protect farmers' incomes, safeguard the environment, and maintain the vitality of rural areas.

⁵ ISCC (International Sustainability & Carbon Certification) is a leading global certification system that supports companies in acting responsibly to ensure sustainability throughout the supply chain, allowing them to demonstrate their commitment to replacing fossil fuels.

2.3

DOMESTIC MARKET DIVISION

For over thirty years, Alpha Trading's domestic market division has operated both as a **distributor of fuels, petrol, and bitumen sourced from Italian refineries** in northern and central Italy, and as a **supplier of special fuels and modified bitumen produced in-house.**

While trading has been a hallmark of the company since its founding, **Alpha Trading became a producer in 2003 with the establishment and start-up of its plant in Carbonara Scrivia**, near Tortona. Here, they blend low-sulphur fuel oils and produce modified bitumen and bituminous emulsions. The plant is equipped with a denaturing facility that allows the commercialization of bunker diesel, fishing vessel diesel, agricultural diesel, and HVO6.

Additionally, the plant features a state-of-the-art **chemical analysis laboratory** dedicated to quality control of all products supplied by the company and the development of new products for the market, particularly bitumen and bituminous emulsions. This enables the company to ensure high and consistent quality standards for its customers.

Today, with a wide range of fuel oils, diesel, distilled and modified bitumen, and bituminous emulsions, the company has **consolidated its presence in northern Italy**, particularly in Piedmont, Liguria, Valle d'Aosta, and Lombardy

⁶HVO is a synthetic fuel produced from sustainable raw materials, delivering excellent performance due to its high cetane number. HVO stands for Hydrotreated Vegetable Oil, a hydrogenated fuel made from sustainable raw materials (e.g., used cooking oils, animal fat residues, vegetable oil).



The laboratory is equipped with a Silverson laboratory mixer, a Leica fluorescence microscope, and a Thermo Haake rotational viscometer.



APPLICATION OF BITUMEN PRODUCED IN-HOUSE



Construction and maintenance of motorways



Airport runways



Roads and town squares



Sports tracks



OUR PATH TO SUSTAINABILITY

- 3.1** Our Approach to Sustainability
- 3.2** Our Stakeholders
- 3.3** Materiality Assessment

3.1

OUR APPROACH TO SUSTAINABILITY

Recognizing the significant environmental impact of its operations, Alpha Trading embarked on a **Sustainability Journey** several years ago. This initiative has involved the introduction of products designed to align with the transition towards sustainable energy.

In 2023, to further our **commitment to environmental and social responsibility**, the company voluntarily prepared and published its inaugural **Sustainability Report**.

The primary aim of this report, through the identification of material topics, is to **provide insights into the economic, social and environmental performance** achieved and to establish goals for the future, **integrating sustainability into our overall corporate strategy**.



3.2

OUR STAKEHOLDERS

Fostering meaningful **relationships** with our **stakeholders** is a **top priority for Alpha Trading**. The company is dedicated to maintaining **continuous, transparent and two-way communication**, both internally and externally.

Understanding the pivotal role that stakeholders play in shaping Alpha Trading's prestigious reputation, the company endeavours to **grasp their expectations, needs and concerns**, needs, and concerns. This enables us to swiftly implement necessary actions for **continuous improvement** and to ensure stakeholder satisfaction.

Effective engagement with stakeholders, based on collaboration and trust, is also crucial for efficiently implementing **sustainability strategies and development plans**.

Consequently, in 2023, Alpha Trading conducted a comprehensive **benchmarking exercise** across its three divisions to identify key stakeholders. This exercise aimed to ensure that the company could accurately understand and address the needs of these stakeholders.

The outcomes of this analysis were thoroughly reviewed by top management, leading to **adjustments and enhancements to align the identified stakeholder categories with the actual stakeholders with whom Alpha Trading interacts**.

This comprehensive analysis serves as a foundation for future endeavours, ensuring **that the interests of stakeholders are increasingly** integrated into Alpha Trading's strategic direction.

The identified stakeholder categories are presented in the **Stakeholder Mapping**, which provides a concise overview of the entities that significantly impact Alpha Trading's operations or are influenced by them.

The identification of stakeholder categories is essential for conducting materiality assessment, as mandated by the adopted reporting standards⁷.

This assessment aims to identify economically, environmentally, and socially relevant aspects for both Alpha Trading and its stakeholders - known as "material topics" - forming the basis for non-financial reporting documents.

⁷ For further details on the reporting standards adopted, please refer to the Report Drafting Process



3.2

OUR STAKEHOLDERS



STAKEHOLDERS MAPPING



CLIENTS



UNIVERSITIES,
RESEARCH AND
INNOVATION CENTRES



INDUSTRY
ASSOCIATIONS



SUPPLIERS AND
BUSINESS PARTNERS



AUTHORITIES,
PUBLIC INSTITUTIONS



LOCAL
COMMUNITIES



EMPLOYEES



SHAREHOLDERS
AND FINANCIAL
COMMUNITY

3.3

MATERIALITY ASSESSMENT

This Report has been prepared based on a **materiality assessment** carried out in accordance with the methodology provided by the most recent version of the **Global Reporting Initiative Global Reporting standards** (GRI Standards 2021).

The materiality assessment process is essential for developing a transparent, clear, and effective sustainability report that considers the entire value chain of the company.

Conducted on the basis of **materiality**, the assessment helped to identify Alpha Trading's most significant impacts on the **economy, environment and people**, including impacts on their human rights. These aspects provide **crucial input for identifying financial risks and opportunities** related to the Company's impacts and they help guide the corporate strategy on the topics that are relevant to the business and its stakeholders.

The starting point for determining the material topics was a **benchmark assessment** of leading companies in Alpha Trading's market to identify best practices in ESG.

The assessment was conducted separately for each of Alpha Trading's three business areas: Biodiesel, Domestic Market and Bunkering.



The Company's main competitors were identified for each area and, where present, sustainability or non-financial reporting was examined.

The process led to the identification of potential material topics for Alpha Trading, which were then examined to determine the most significant **actual and potential, positive and negative impacts**.

To evaluate the significance of these topics and their impacts, top management participated in a **dedicated workshop** where they were asked to rate the impacts associated with each material topic.

Each impact was rated on a scale from 1 (not very significant) to 5 (very significant). This helped determine the materiality threshold and the In this way, the company effectively determined the materiality threshold and the consequent **positioning in terms of relevance**.

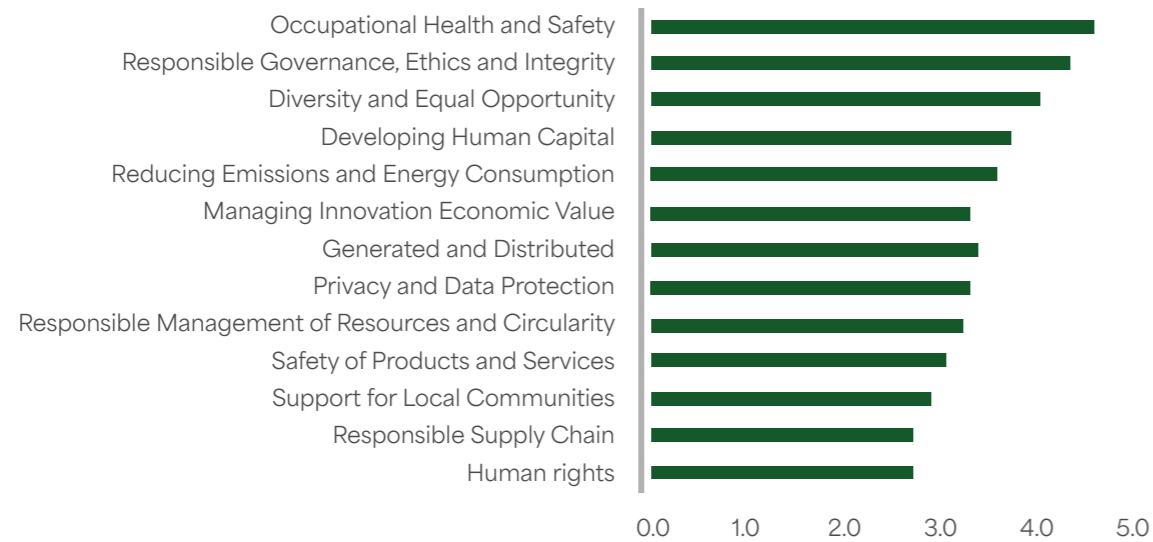
THE COMPANY'S **MAIN COMPETITORS** WERE IDENTIFIED FOR EACH AREA AND, WHERE PRESENT, **SUSTAINABILITY OR NON-FINANCIAL REPORTING** WAS EXAMINED.

3.3

MATERIALITY ASSESSMENT

The prioritized material topics identified through this assessment are provided in the table below:

PRIORITIZING MATERIAL TOPICS



For future assessments, Alpha Trading is committed to expanding **stakeholder engagement** to ensure their interests are well-represented in the impact evaluation process.



IMPACTS GENERATED

According to the GRI Standards, impacts are the effects an organisation has, or could have, on the economy, environment, and people as a result of its activities and business relationships.

The connection of each material topic to specific GRI Standards and associated impacts were identified and classified **as actual or potential, and negative or positive**, also on the basis of their contribution to sustainable development.

Through its Sustainability Report, Alpha Trading highlights its actions to mitigate potential negative impacts and enhance positive outcomes.



IMPACTS 2023

Macro-area	Material Topic	Impact	Description of Impact	Nature of Impact	Actual / Potential
Environmental Responsibility	Reducing emissions and energy consumption	Emissions and Energy Consumption	Contribution to climate change caused by increased emissions into the atmosphere and increased consumption of energy from renewable and non-renewable sources by Alpha Trading, resulting in negative impacts on the environment.	Negative	Actual
	Responsible management of resources and circularity	Contamination of soil and groundwater	Release of pollutants into waterways, contaminating soil and groundwater	Negative	Potential
		Waste management	Environmental pollution caused by the generation of hazardous and non-hazardous waste and its inadequate disposal.	Negative	Potential
Social responsibility	Diversity and equal opportunity	Creation of an inclusive workplace environment	Respect for diversity and promotion of an inclusive workplace environment through company activities and initiatives to counteract discrimination	Positive	Actual
		Incidents of discrimination	Potential incidents of discrimination and/or abuse within the Company	Negative	Potential
	Human rights	Violation of human rights	Potential violation of human rights along the value chain (e.g. freedom of association and right to collective bargaining, child labour, forced and mandatory labour) with impacts on human dignity and community development	Negative	Potential
	Occupational Health and Safety	Promotion of health of workers	Positive impacts on employee health through the promotion of programmes, training activities and services for occupational health	Positive	Actual
		Injuries and occupational diseases	Injuries, occupational diseases or other accidents in the workplace, with negative impacts on the health of direct employees or contractors caused by the operations of Alpha Trading or due to unhealthy or unsafe production processes and lack of attention to health and safety systems and/or procedures	Negative	Potential

IMPACTS 2023

Macro-area	Material Topic	Impact	Description of Impact	Nature of Impact	Actual / Potential
Social responsibility	Support for local communities	Relations with the local area	Alpha Trading's support for the local community through donations to associations and healthcare institutions and involvement in projects, initiatives and sporting events organized locally as sponsors	Positive	Actual
	Development of human capital	Training and professional growth of employees	Improving workers' skills through training and professional development activities, general and technical programmes, also linked to personalized growth and assessment targets	Positive	Actual
Sustainable Governance and Business	Responsible governance, ethics and business integrity	Ethics, anti-corruption and business ethics	Spreading ethics and fairness by communicating and training employees, business partners and other stakeholders in anti-corruption regulations and procedures and, in general, in good conduct in business competition.	Positive	Actual
		Incidents of corruption	Incidents of corruption, anti-competitive behaviour antitrust and monopoly practices with negative impacts	Negative	Potential
		Non-compliance with laws or regulations	on the economy and/ or markets Non-compliance with laws, regulations, internal and external standards in the area of sustainability with related negative social/environmental/ economic consequences and	Negative	Potential
		Privacy and Data protection	Cybersecurity, privacy of data and protection of information	damage to reputation Violations of customer security and privacy and loss of customer data	Negative
	Economic value generated and distributed	Economic value generated and distributed	Company's ability to create and distribute economic value to shareholders/stakeholders	Positive	Actual

IMPACTS 2023

Macro-area	Material Topic	Impact	Description of Impact	Nature of Impact	Actual / Potential
Products and Services	Safety of products and services offered	Non-compliance with product safety requirements	Damage to the environment due to non-compliance with product safety requirements	Negative	Actual / Potential
	Managing innovation	Innovation	Company's contribution to the development of innovative products and technologies that enable greater sustainability for the industry	Positive	Potential
Supply chain	Responsible supply chain	Failure to select suppliers according to ESG criteria	Negative impacts due to failure to select, evaluate and monitor suppliers according to ESG criteria	Negative	Actual
		Procurement from local suppliers	Promoting procurement from local suppliers, generating benefits both in terms of developing the local economy and reducing environmental impact	Positive	Actual/ Potential





OUR GOVERNANCE

- 4.1** Our Governance Structure
- 4.2** Business Integrity and Ethics
- 4.3** Creating Value
- 4.4** Privacy and Data Protection
- 4.5** Sustainable Supply Chain

4.1

OUR GOVERNANCE STRUCTURE

The governance structure of Alpha Trading is based on a traditional system, consisting of:

- Board of Directors;
- Board of Statutory Auditors;
- Oversight Committee.

BOARD OF DIRECTORS

The governing body of Alpha Trading meets in the form of a Board of Directors and is appointed for a period of three financial years.

Within the Board of Directors, the Chair of the Board of Directors and the Managing Directors are appointed.

The Board of Directors is responsible for the strategic management of Alpha Trading.

It is vested with full powers for the day-to-day and extraordinary management of the Company. It is also the Company's legal representative vis-à-vis third parties.

The following table shows the details of the Board of Directors in office for the 2022-2024 three-year period, until approval of the financial statements for the year ending on 31 December 2024.

Members	Position	Age Bracket
Claudio Bombardieri	Chair of the Board of Directors	>50
Adriano Parodi	CEO	>50
Stefano Marchiol	CEO	>50
Silvio Stagni	Director	>50
Michela Bagnasco	Director	>50
Giampaolo Gargiulo	Director	>50
Carlo Jannone	Director	>50

For data on the diversity of the Board of Directors, see Annexes - Disclosure Table 7



4.1

OUR GOVERNANCE

BOARD OF STATUTORY AUDITORS

The **Board of Statutory Auditors** is the auditing **body** that monitors adherence to the law and the **articles of association**, ensuring **compliance with the principles of sound governance**.

In the meeting of the Board of Directors held on 24 March 2022, the **new Board of Statutory Auditors of Alpha Trading** was appointed, as detailed in the table.

Members	Position	Age Bracket
Paolo Carlo Faccio	Chair	<50
Maurizio Conca	Acting Auditor	>50
Elio Giacomo Castaldini	Acting Auditor	>50
Alessandro Lualdi	Alternate Auditor	>50
Ferrando Davide	Alternate Auditor	<50

For data on the diversity of the Board of Statutory Auditors, see Annexes - Disclosure Table 8

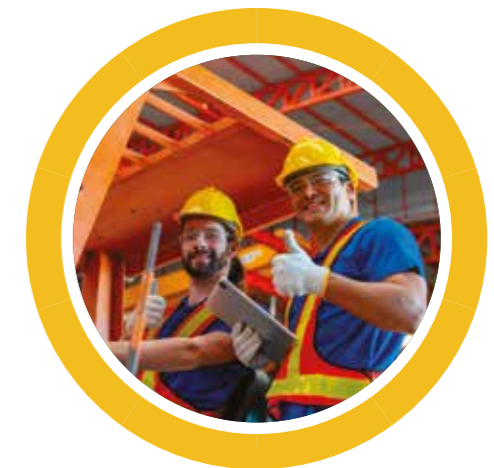
OVERSIGHT COMMITTEE

In compliance with the provisions of Italian Legislative Decree No. 231/2001, by resolution of the Board of Directors on 31 March 2016, Alpha Trading **appointed an Oversight Committee to oversee the operation of and compliance with the Compliance Management Model and to ensure that it is kept up-to-date**.

The Oversight Committee consists of a Chair and two other members, one of whom is external.

The three members of the Oversight Committee have autonomous powers of initiative and control and are responsible for overseeing the operation of and compliance with the **Compliance Management Model**.

Members	Position	Age Bracket
Fiorenzo Celasco	Chair	>50
Fabrizio Fagnola	Independent Member	>50
Stefania Vennari	Internal Member	<50



4.2

BUSINESS ETHICS AND INTEGRITY

Alpha Trading is dedicated to responsible business practices, adhering **strictly to anti-corruption and fair competition regulations**

Alpha Trading is dedicated to **responsible business practices**, adhering strictly to anti-corruption and fair competition regulations.

In 2016, to **uphold our values of ethics, responsibility and integrity**, we implemented a **Compliance Management Model**. This model sets out the principles and rules guiding Alpha Trading's interactions with public and private entities.

In keeping with Legislative Decree 231/2001, the primary goal of this Model is to ensure that everyone acting on behalf of the company **follows the principles of fairness, loyalty and transparency**.

Updated on 14 September 2023, the Compliance Management Model includes a general part explaining principles of conduct, the objectives pursued by the Company in adopting the Model, the functions and powers of the Oversight Committee, and corporate control procedures. It also contains special sections for different types of relevant offences, identifying activities at risk of such offences.

CODE OF ETHICS

As part of this Model, Alpha Trading has adopted a **Code of Ethics**. This code outlines the principles guiding the company's **strategic decisions** and its **duties and responsibilities** towards stakeholders.

These principles include **integrity, honesty, impartiality, responsibility** towards the community and **environmental protection**.

The Code of Ethics is updated to reflect economic, **financial** and **commercial developments**, in Alpha Trading's activities, as well as any changes in its organisational and management structure.

The company promotes awareness of the Code of Ethics, which, along with the Compliance Management Model, is available on our website (www.alphatrading.it/en) under the Corporate Governance section.

To ensure compliance, Alpha Trading encourages all employees to familiarize themselves with the code.



4.2

BUSINESS ETHICS AND INTEGRITY

In 2023, Alpha Trading reported no cases of non-compliance with laws and regulations, nor were there any instances of corruption or bribery. Additionally, there were no ongoing or concluded legal actions related to breaches of anti-competitive behaviour, antitrust, or monopoly practices.

GENERAL PRINCIPLES OF ALPHA TRADING

INTEGRITY, HONESTY AND IMPARTIALITY



VALUE OF HUMAN RESOURCES



FAIRNESS IN THE EXERCISE OF AUTHORITY



PRINCIPLE OF FAIRNESS



QUALITY OF SERVICES AND PRODUCTS



DILIGENCE AND ACCURACY IN EXECUTING TASKS AND CONTRACTS



PERSONAL INTEGRITY



TRANSPARENCY AND COMPLETENESS OF INFORMATION



CONFIDENTIALITY



FAIR COMPETITION



RESPONSIBILITY TO THE COMMUNITY



ENVIRONMENTAL PROTECTION

4.2

BUSINESS ETHICS AND INTEGRITY

In 2023, the **Company** received no reports of violations of the **Compliance Management Model** or the **Code of Ethics**.

REPORTING VIOLATIONS WHISTLEBLOWING SYSTEM

The **whistleblowing system** is another tool adopted by Alpha Trading to ensure **proper application of the Model 231**, and compliance with the **Code of Ethics**.

This system allows anyone to **report suspected violations anonymously** to the Oversight Committee via the dedicated channel under the **"Whistleblowing"** section of the corporate website.

By guaranteeing the anonymity of the reporter, the company **ensures** that its employees are **protected** against any retaliatory acts, thus encouraging the reporting of potential violations.



4.3

CREATING VALUE

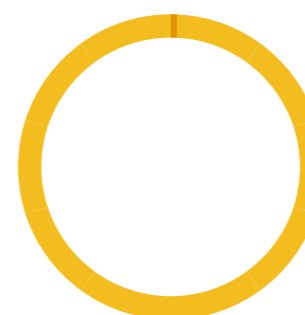
To ensure it meets its corporate growth targets, **Alpha Trading focuses on building capital and reinvesting profits** in order to **grow its processes and services**, with the **ultimate goal of generating long-term value**.

The Company recognizes the importance of **balancing the distribution of the value generated** by its operations across the categories of **stakeholders** that directly or indirectly contributed to its creation.

Therefore, to check that this actually happens, the Company measures the **economic value generated and distributed by reclassifying its income statement**, in order to communicate its **economic stability and transparency**.

Annexes - Disclosure Table 1

DISTRIBUTION OF THE VALUE DIRECTLY GENERATED AND DISTRIBUTED IN 2023



1% ECONOMIC VALUE RETAINED
99% ECONOMIC VALUE DISTRIBUTED

In 2023, the value generated **decreased by about 31% year-on-year**, mainly due to the fall in market prices that occurred during 2023. Of this, the percentage of value distributed to stakeholders remained virtually unchanged at around 99%, as did the value retained, consisting of the remaining 1%. Pursuant to the law, on the basis of a motivated proposal by the Board of Statutory Auditors, the General Meeting appointed a registered auditing firm to carry out the statutory auditing. Specifically, for the period 2024 - 2026, the auditing firm Deloitte & Touche S.p.A. was appointed.



4.4

PRIVACY AND DATA PROTECTION

The Company is committed to ensuring high standards of security for the processing of Personal Data, not only by acting in line with the **European Union Regulation on data protection GDPR 2016/679** but also by adopting procedures and establishing measures aimed at preventing information leaks that could potentially harm business interests. Moreover, this principle aligns with the Confidentiality Principle outlined in the Code of Ethics.

Various security measures have been implemented in recent years, culminating in a **two-tier cybersecurity system**:

- 1. Perimeter security**, i.e. an AI-based system that monitors activities on the network perimeter and proactively defends it, thus preventing unauthorized access or the possibility of being infected by viruses, while simultaneously preventing data leaks from company servers. This system provides an additional layer of data security by regulating the flow of incoming data, significantly reducing the risk of targeted attacks by hackers.
- 2. Sentinel One**, Antivirus System, an AI-based platform that protects all company computers and servers from virus attacks. The use of Artificial Intelligence allows the recognition of abnormal and potentially malicious behaviour, leading to the immediate expulsion of the infected computer from the company network to prevent the infection of other devices.

Access to corporate software is secured by the Multi Factor Authenticator (**MFA**), used by both employees and suppliers.

This consists of a USB key equipped with a button that, when connected to the device, generates a random password that changes every 30 seconds.

For communication security, Alpha Trading ensures the safety of data traveling between different company locations through Multiprotocol Label Switching (**MPLS**) technology, an **encrypted network** that **prevents data readability** by any third parties intercepting the communications.

Lastly, the company uses two software solutions to control the flow of incoming data via email:

- 1. Libra ESVA**, an antispam system that performs an initial screening of incoming emails, filtering potentially dangerous content (viruses, phishing attacks, etc.);
- 2. Antigena Mail**, sa proactive monitoring software that analyses the emails filtered by the first software to check for cybersecurity threats.

To monitor the effectiveness of the safeguards in place, at least twice a year the company carries out Vulnerability Assessment and Penetration (**VAP**) testing, which are real **attack simulations on the systems**. **Reports** containing the main findings and recommendations for improvements are produced after each test, with a **continuous improvement perspective**.

4.5

SUSTAINABLE SUPPLY CHAIN

The **quality** of the products and services offered by Alpha Trading is a **key element of the company's strategy**, essential for ensuring the competitiveness of the Company in the dynamic market in which it operates. In this context, **supplier selection** represents a critical success factor, fundamental for ensuring the **reliability of the offering**.

For this reason, the **Company adopts a supply chain management strategy** that includes processes for selecting, qualifying, and evaluating suppliers to ensure their alignment not only with quality standards but also with Alpha Trading's principles.

Respect for company values is an equally important criterion for the **Company**, which **commits to working exclusively with suppliers** that declare **alignment with the principles expressed in its Code of Ethics**.

For data on spending on suppliers, see Annexes - Disclosure Table 2.

Lastly, **supplier selection** also considers another parameter: **origin**.

Alpha Trading gives preference to Italian and European suppliers to ensure **faster procurement times** and to **meet the preferential origin requirement** of raw materials requested by many clients.

Once selected, Alpha Trading aims to **establish long-term relationships** with its suppliers, **based on trust and collaboration**, to create a supply chain that shares its work ethic and maintains a consistent quality level.



SOCIAL RESPONSIBILITY

5.1 Our People

5.1.1 Development and Wellbeing of Human Resources

5.1.2 Health and Safety

5.2 Relations with Customers

5.3 Support for Local Communities





SOCIAL RESPONSIBILITY

Alpha Trading places great importance on **safeguarding Human Rights**, through ethical corporate management.

The Company is dedicated to fostering a culture of social responsibility, strongly **opposing** any form of **forced** or **child labour**, and adopting a **zero-tolerance policy** to ensure fair and dignified working conditions.

Additionally, the Company is committed to **supporting the local community through donations, participating in events and creating job opportunities** for young people, thereby having a positive impact.

5.1

OUR PEOPLE

Employees are Alpha Trading's most valuable asset and the heart of the company's strategy, thanks to their daily contributions to enhancing the value of products and processes.

That's why the Company is particularly attentive to its people, going beyond merely complying with laws and regulations to place a special focus on the well-being of all its employees.

The Company is dedicated to creating a welcoming work environment built on mutual trust, valuing diversity, and encouraging employees to express their individuality within their roles.

Alpha Trading understands that its competitiveness is closely tied to appreciating its human capital, making it a priority to foster an inclusive and diverse workplace. This includes promoting skill sharing through interaction and teamwork.

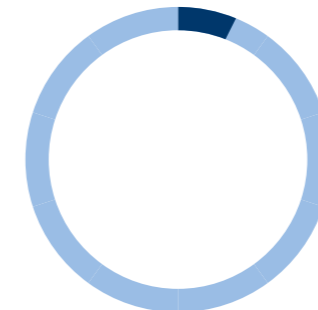


As of 31 December 2023, the workforce consisted of **68 workers, of which 66 were hired on permanent contracts** and two on temporary contracts.

Temporary contracts are mainly used for young hires, such as recent graduates, who historically **transition to permanent positions**.

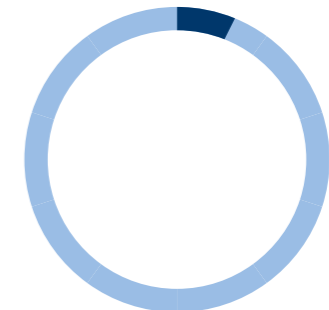
The Company also offers **part-time work** options. Like in 2022, at the end of 2023, three employees were on part-time contracts.

EMPLOYEE NUMBERS BY CONTRACT TYPE 2022



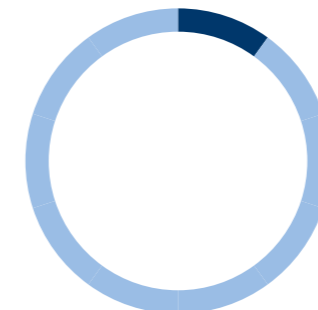
65 PERMANENT CONTRACTS
3 TEMPORARY CONTRACTS

EMPLOYEE NUMBERS BY FULL-TIME/PART-TIME CONTRACTS 2022



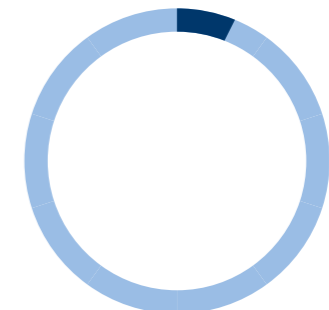
64 FULL-TIME
3 PART-TIME

EMPLOYEE NUMBERS BY CONTRACT TYPE 2023



65 PERMANENT CONTRACTS
3 TEMPORARY CONTRACTS

EMPLOYEE NUMBERS BY FULL-TIME/PART-TIME CONTRACTS 2023



65 FULL TIME
3 PART-TIME

For data on employees by gender and by type of contract, see Annexes - Disclosure Tables 3 and 4

5.1

OUR PEOPLE

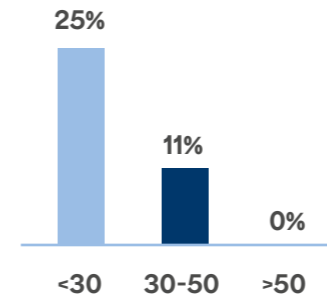


Alpha Trading follows the National Collective Bargaining Agreement (CCNL) for the **Tertiary, Trade and Services** sector for all its employees. The CCNL outlines regulatory requirements for classification, contract levels, working hours, sick leave, work permits, holidays, and disciplinary actions.

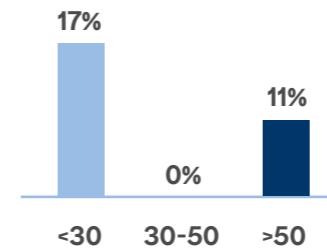
Over the past two years, the turnover rate for outgoing employees has been lower than for incoming employees. (See Annexes - Disclosure Tables 10 and 11)

In 2023, five new employees were hired: one under 30, three between 30 and 50, and one over 50.

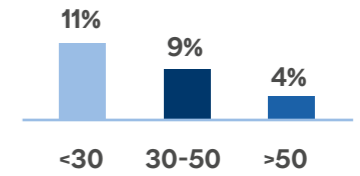
INCOMING EMPLOYEE
TURNOVER RATE 2022



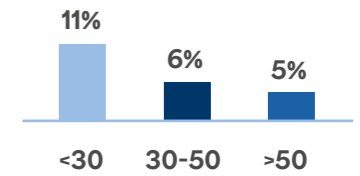
OUTGOING EMPLOYEE
TURNOVER RATE 2022



INCOMING EMPLOYEE
TURNOVER RATE 2023



OUTGOING EMPLOYEE
TURNOVER RATE 2023



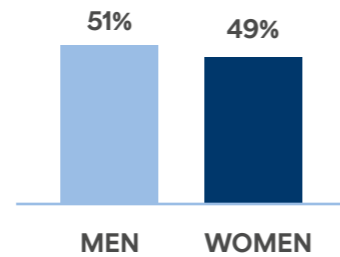
5.1

OUR PEOPLE

Alpha Trading has always prioritized **gender equality** in its human resources management

The consistent distribution of male and female employees between 2022 and 2023 demonstrates the Company's commitment to offering **equal opportunities** in all aspects of employment to qualified individuals, **without any discrimination**

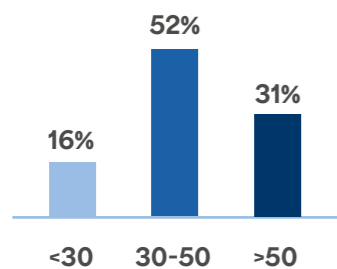
TOTAL NUMBER OF EMPLOYEES BY GENDER 2023



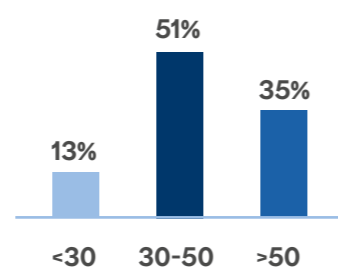
The Company also **ensures diversity across generational groups**.

Between 2022 and 2023, the majority of employees were in the 30 to 50 age group, making up 51% of the total workforce.

TOTAL NUMBER OF EMPLOYEES BY AGE BRACKET 2022



TOTAL NUMBER OF EMPLOYEES BY AGE BRACKET 2023



For data on employee diversity by professional category and gender, and by professional category and age bracket, see Annexes - Disclosure Tables 5 and 6

In support of equal opportunities, Alpha Trading employs **five individuals from protected categories**, including one manager, two office workers, and one manual worker.

WAGE EQUITY

Compensation is a crucial factor in attracting and retaining talent. Therefore, in recent years, Alpha Trading has focused on ensuring **competitive, fair, and equal pay for its employees**.

To ensure pay equity, Alpha Trading monitored the ratio between the highest-paid individual's salary and the median annual salary of all employees in 2023. This ratio was 10.66 in 2023, compared to 10.23 in 2022. The median salary of employees remained nearly unchanged from the previous year, while the highest-paid individual's compensation increased by about 4%.

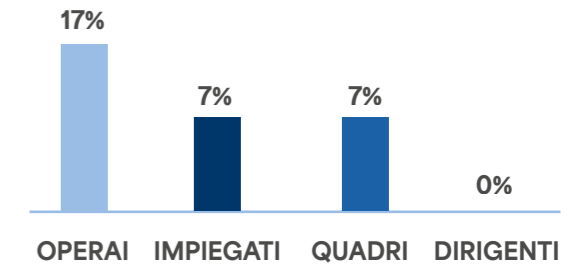
As a result, the ratio of the percentage increase in the highest-paid individual's salary to the median percentage increase for all employees is close to zero.

Additionally, the Company tracked the percentage trend between the **basic salary** of women and men. This ratio remained unchanged for senior executives but increased for office workers and junior executives. In particular, there was a significant 12% increase for junior executives from 2022 to 2023, closing the gender gap in base salary.

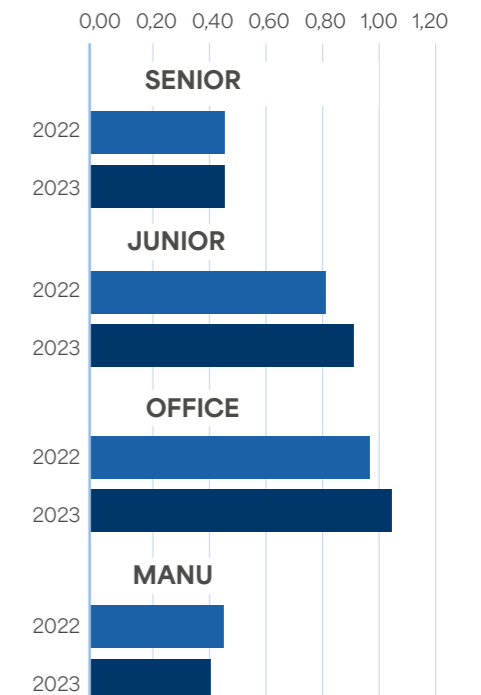
This improvement is also reflected in **total compensation**, especially for junior executives and office workers, which includes bonuses, performance-based rewards, overtime, and MBO (Management by Objectives).

To the side is a graph showing the ratio of basic salary and remuneration of women to men. For data on the ratio of basic salary and remuneration of women to men, see Annexes - Disclosure Table 9

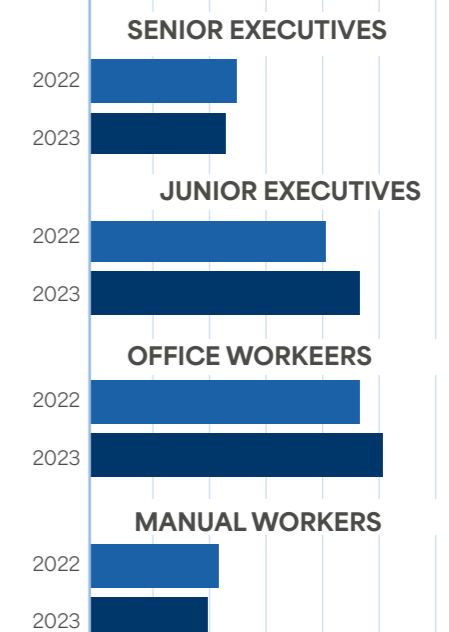
CATEGORIE PROTETTE PER INQUADRAMENTO 2023



RATIO OF BASIC SALARY WOMEN-MEN



RATIO OF REMUNERATION WOMEN-MEN



5.1.1

DEVELOPMENT AND WELLBEING OF HUMAN RESOURCES

At **Alpha Trading**, the focus on employees starts from the recruitment, selection, and onboarding phases.

Employees are personally identified and interviewed by the Company through rigorous selection processes aimed at testing the skills of applicants. If successful, the Company initiates onboarding procedures, which include pairing the new hire with more experienced employees to facilitate the transfer of necessary skills for their roles.

During the onboarding process, the Company immediately shares the **Code of Ethics** to align the employee with the principles and values that define **Alpha Trading**. Additionally, the Company ensures that all new hires receive proper training through both formal training programs and on-the-job training processes.

In human resource management, the topic of welfare is of primary importance to Alpha Trading, which is committed to protecting employees' work-life balance and **promoting their health through various initiatives**.

The healthcare plan for all staff includes a health insurance policy for surgical and major procedures, covering their families as well, and an annual **comprehensive check-up** service with a choice between two affiliated facilities offering discounts for family members.

In addition to the mandatory policy mentioned above, the Company provides **supplementary services for junior and senior executives** and a group life insurance policy for senior executives.

Regarding training, starting from 2024, thanks to training initiatives funded by the Liguria Region, **the Company will launch several courses**, encouraging employees to develop new skills in the workplace. Specifically, the **Excel** and **English language** courses will begin in March 2024.

In line with employee development, the Company organizes meetings between employees and function managers to evaluate **professional growth** and, consequently, the most suitable **career path** for each employee.

In addition to the **mandatory policy** mentioned above, the Company provides supplementary services for junior executives and a **group policy** for senior executives.



In 2023, a total of **962 training hours** were provided, with over 53% allocated to office workers. In terms of average training hours per professional category, **junior executives received the highest number of average hours, totalling 19.7 in 2023** (a 10% increase compared to 2022). This increase is primarily attributable to the female employees in this category, whose training hours more than doubled from the previous year. Additionally, **training hours for women increased by 37%**, a significant testament to the investments made in employee development.

For data on average training hours by professional category and gender, see Annexes - Disclosure Table 12

5.1.2

HEALTH AND SAFETY

Ensuring the health and safety of Workers is a fundamental aspect of Alpha Trading's social responsibility. The company is dedicated to **maintaining** and constantly **improving** these standards by implementing all necessary **preventive measures**.

Alpha Trading believes it is crucial to foster a **strong safety culture** that engages all employees and collaborators. This is achieved through effective internal and external communication, raising awareness about **key risks** and promoting **training programmes** that educate individuals on responsible conduct in the workplace.

The company's health and safety management system begins with the **assessment of all potential risks** to workers, as detailed in the Risk Assessment Document (**DVR**).

This assessment is essential for determining the **preventive measures** and **personal safety equipment (PPE)** that workers must use while performing their tasks.



As required by Legislative Decree 81/2008, the Company has identified **key personnel** to support employees:

- the **Occupational Health & Safety Officer (RSPP)**;
- the **Medical Officer**, who conducts **preventive medical exams**, assesses workers' fitness for specific tasks, and performs regular check-ups to monitor their health and ensure they remain fit for their roles.

In addition to these mandatory measures, the company voluntarily implements further safety initiatives.

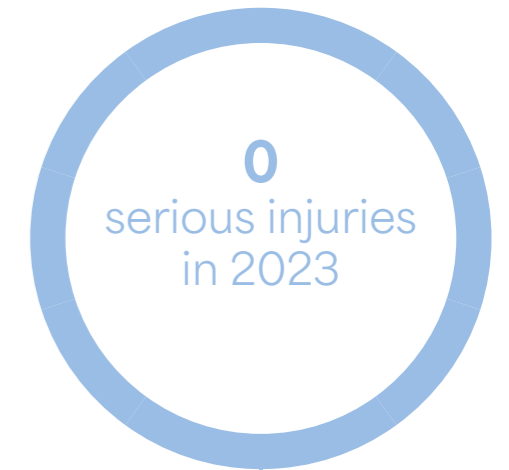
For instance, Alpha Trading regularly updates the exposure register, which tracks workers potentially at risk of carcinogen exposure. These individuals are closely monitored to ensure they are not exposed to harmful agents.

Furthermore, the company extends health and safety training to external collaborators (drivers and maintenance staff), requiring them to complete specialized courses on the internal platform every three months.

In 2023, there were no serious injuries. The only reportable injury involved a worker slipping on ice at the Solbiate Olona depot. (See Annexes - Disclosure Table 13)

The company reported the incident to INAIL (the Italian Institute for Industrial Accident Insurance) and took steps to prevent similar occurrences by installing a grated panel to raise the walking surface, thereby preventing ice formation.

In addition, in order to **protect the safety of employees, first aid and fire-fighting emergency teams** were identified to **respond promptly** when necessary.



5.2

CUSTOMER RELATIONS

Customer satisfaction is **at the heart** of Alpha Trading's strategy, helping the company maintain its competitive edge in the energy products market.

By consistently meeting and often exceeding customer expectations, Alpha Trading has built long-lasting commercial relationships based on trust.

The company fosters **customer loyalty** through the continuous delivery of high-quality products and services. This loyalty is a **result of the professionalism and reliability** of Alpha Trading's team, who are dedicated to **improving the company's offerings**.

Committed to its core values, Alpha Trading ensures the highest quality for its customers through two key measures: **UNI ISO 9001 certification and Quality Policy**⁸.

These measures are concrete evidence of Alpha Trading's dedication to innovation and **continuous improvement**.

To build profitable commercial relationships, Alpha Trading **effectively responds to any criticism and reports**.

The company investigates customer complaints to understand their causes and frequency, aiming to prevent future issues. By listening to customer feedback, Alpha Trading tailors its services to meet their needs, ensuring **maximum satisfaction**.

⁸ The UNI ISO 9001 certification and Alpha Trading's Quality Policy can be viewed on the company's website <https://www.alphatrading.it/en>

ISO 9001 CERTIFICATION

Alpha Trading **monitors and ensures quality** through its Quality Management System (UNI EN ISO 9001:2015), which covers the main office in Genoa, the production and storage sites in Carbonara Scrivia and Solbiate Olona, and the Trieste depot.

The company adopted this system in 2009 and renewed it in 2022 to achieve maximum customer satisfaction, enhance product value, and **improve business performance** through **maximum transparency**, constant regulatory review, and regular audits.

5.3

SUPPORT FOR THE LOCAL COMMUNITY

Alpha Trading considers **generating value for local communities essential**.

The company actively contributes to the local economy, addressing community needs and investing in projects that create **positive impacts**.

This involvement includes participating in solidarity events and initiatives, often **collaborating with local sports clubs as a sponsor**.

Additionally, Alpha Trading supports major healthcare institutions in Genoa through donations to Gaslini Hospital and San Martino Hospital.



Alpha Trading is a member of several regional, national, and international industry **associations**, including:



Assocostieri, the national association for companies in the **energy logistics sector** (maritime bunkering, etc.);



European Biodiesel Board (EBB), an international association for companies in the **biodiesel** sector;



Assarmatori, an international association representing **Italian, EU, and third-country shipowners** operating in Italy's regular **maritime services**;



SITEB (Strade Italiane e Bitumi), An Italian association bringing together key operators in the road and waterproofing membrane sectors, including **bitumen producers and marketers**;



Confindustria the main organization representing Italian manufacturing and service companies, aiming to protect and represent the market and businesses.

5.3

SUPPORT FOR THE LOCAL COMMUNITY

In 2014, Alpha Trading, **along with four other biodiesel production companies, co-founded Assobiodiesel**⁹.

This association **represents** and protects **the interests of biodiesel production, marketing and logistics companies**, and their by-products, at governmental and administrative levels, both nationally and internationally.

Alpha Trading actively **supports universities and research centres**. Over the years, the company has collaborated with the University of Genoa to create professional opportunities, promoting the hiring of new graduates through internship contracts.

Since 2016, Alpha Trading has been working with the **University of Pisa** on a **research project** for **plastic waste** recovery aimed at producing energy carriers within a circular economy framework ("Plastics Project").

This project, which led to a patent in 2023 following successful laboratory tests, may result in a demonstration plant in the coming years.

⁹ <http://www.assobiodiesel.org/it/en>



ASSOBIODIESEL





ENVIRONMENTAL **RESPONSIBILITY**

- 6.1** Managing Environmental Impacts
 - 6.1.1** Circular Economy and Managing Resources
 - 6.1.2** Energy Transition and Reducing Emissions

6.1

MANAGING ENVIRONMENTAL IMPACTS

Alpha Trading is aware of the negative impacts that its business inherently has on the **ecosystem**.

Therefore, **sustainability and environmental responsibility** are **two fundamental pillars** in the company's daily operations.

Over the years, the company has demonstrated **its commitment to reducing environmental impacts** through a proactive approach that goes beyond mere compliance with regulatory obligations. It aims to **integrate environmental needs into strategic business decisions**.

The introduction of the **biodiesel** business line in 2004 marked Alpha Trading's first step towards **environmental**

responsibility. The company has distinguished itself by employing advanced technologies, utilizing **less polluting energy sources** wherever possible, and designing products with low environmental impact.

In its **impact reduction** strategy, Alpha Trading considers it essential to promote **activities that disseminate good practices** and provide **environmental training for personnel**, crucial for achieving **sustainability** objectives over time.



6.1

MANAGING ENVIRONMENTAL IMPACTS

Lastly, Alpha Trading contributes to the **fight against climate change** by supporting innovation in its industry through **participation in research and development projects**.

In this context, the ongoing collaboration since 2016 with the **University of Pisa** involves the company in a research project. Based on the circular economy model, it aims to **reuse plastic waste** to obtain energy carriers (**Plastics Project**).



6.1.1

CIRCULAR ECONOMY AND MANAGING RESOURCES

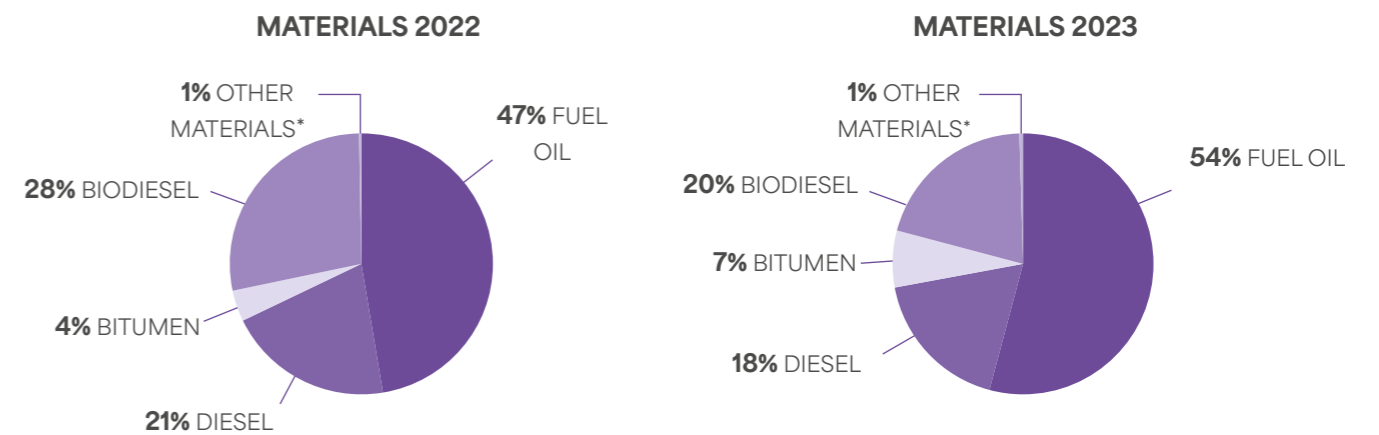
MATERIALS USED

As per the GRI 301-1 guidelines, Alpha Trading has conducted a comprehensive mapping of materials for each of its three operational sectors:

- **Raw materials**, natural resources used for transformation into products or services, such as raw materials, minerals, and timber;
- **Process-related materials**, materials necessary in the production process but not part of the final product, such as lubricants for industrial machinery;
- **Semi-finished products or components**, including various types of materials and components, other than raw materials, that are part of the final product.

Packaging materials are not included in the mapping as they are not applicable to the company's products. Below is a graphic representation of the main types of materials used.

Alpha Trading's production activities require a **wide range of materials**, diversified by their intended use and the division in which they are employed. (See Annexes - Disclosure Tables 16)



*Polymer for bitumen, fuel oil, denaturant, chemicals for bitumen, chemicals for emulsions, heating oil

6.1.1

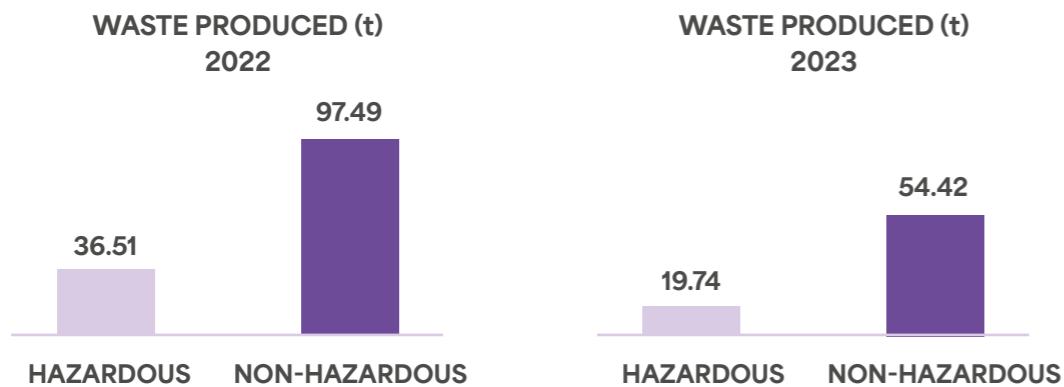
CIRCULAR ECONOMY AND MANAGING RESOURCES

Alpha Trading is committed to **reducing its environmental footprint** through the **responsible and efficient management** of materials used in production, waste generated, and water resources.

WASTE MANAGEMENT

In compliance with current regulations, the company handles waste characterization, storage, and disposal through authorized operators, whether via landfill disposal or recovery of production scrap.

To ensure efficient waste disposal, Alpha Trading correctly segregates waste into general and special categories.



In 2023, there was a significant 45% reduction in waste generated compared to 2022. This decrease is mainly due to the extraordinary disposal of two old bitumen tanks, replaced with new ones. During this operation, the usual quantity of “Bituminous mixtures containing coal tar” waste was supplemented by the residue from the decommissioned tanks, increasing the total weight of this waste by over 70%. For data on WASTE, see Annexes - Disclosure Tables 18, 19 and 20

To enhance **resource management efficiency**, several initiatives have been adopted in recent years, including:

Increasing production efficiency to minimize waste



Optimizing waste transportation logistics to reduce CO₂ emissions



Increasing the percentage of waste sent for recovery



Selecting suppliers who use sustainable packaging, reducing waste during disposal.



Choosing remediation service providers who use technologies that improve water consumption efficiency, reducing waste produced during activities

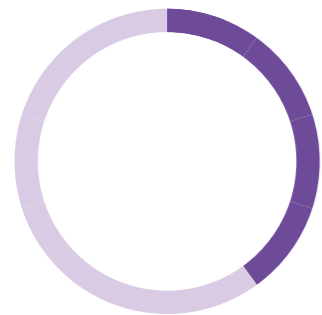


Reducing waste volume, such as using a plastic compactor acquired in 2019 to optimize transportation and reduce CO₂ emissions

6.1.1

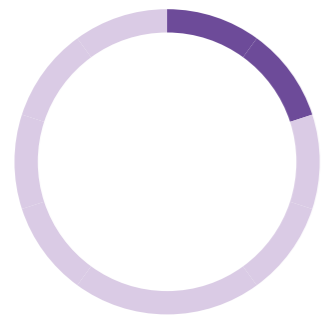
CIRCULAR ECONOMY AND MANAGING RESOURCES

PERCENTAGE OF WASTE SENT FOR RECOVERY 2022



42.7% RECOVERY
57.3% DISPOSAL

PERCENTAGE OF WASTE SENT FOR RECOVERY 2023

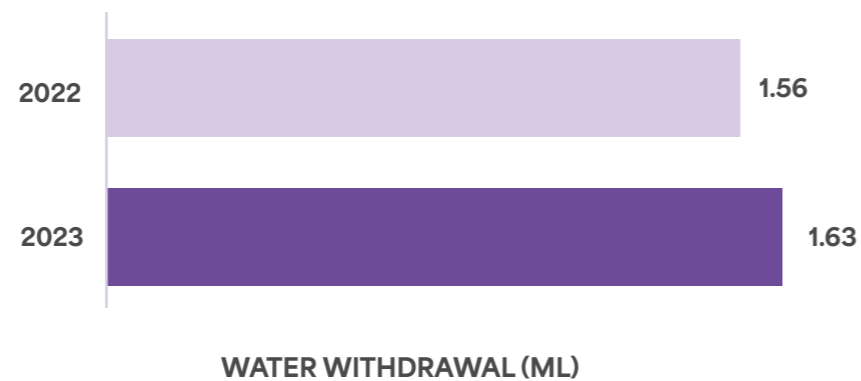


18% RECOVERY
82% DISPOSAL

For the future, the company aims to reduce the amount of waste generated from the production cycle through a waste recovery project starting in 2024.

WATER MANAGEMENT

Water consumption is primarily generated by the Solbiate Olona and Carbonara Scrivia plants, where water is used both as a raw material for bitumen emulsions and as a process-related material for product washing.



For data on water withdrawal see Annexes - Disclosure Table 17

At the Solbiate Olona plant, where only storage activities are conducted, wastewater is treated in the chemical and physical treatment system of Bakelite S.p.A., the site owner.

At the Carbonara Scrivia plant, the minimal industrial wastewater generated, known as yard water, is from washing activities and is collected in containment tanks designed to capture oily substances.



6.1.2

ENERGY TRANSITION AND REDUCING EMISSIONS

Alpha Trading is committed to **combating climate change** by promoting initiatives and designing **innovative solutions** aimed at reducing **energy consumption and emissions**.

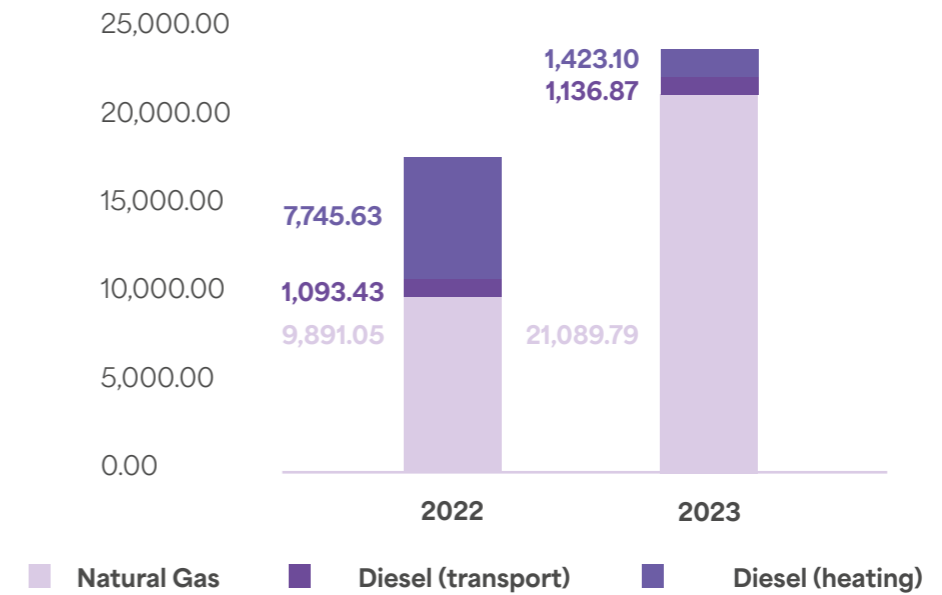


ENERGY CONSUMPTION

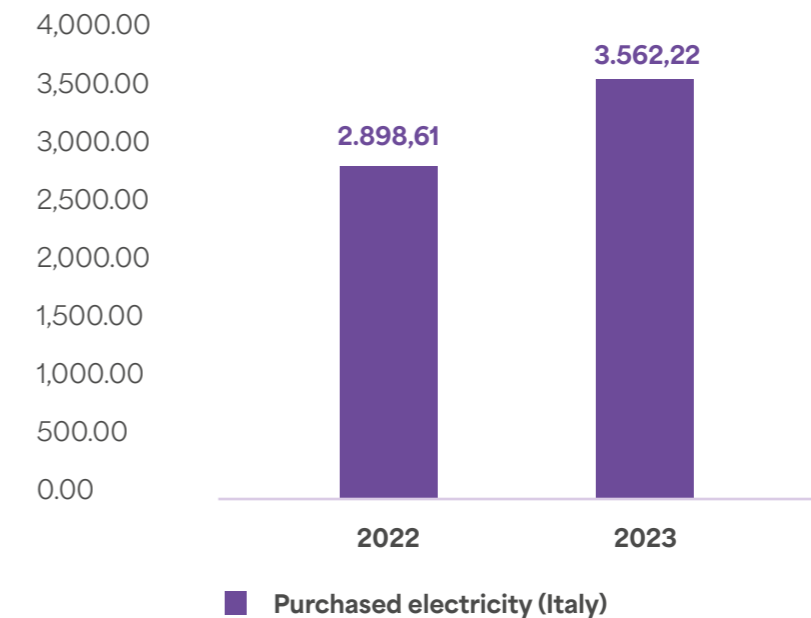
Due to the nature of its activities, Alpha Trading’s energy consumption is primarily attributed to **three sources**:

- 1. electricity**, mainly consumed at the Carbonara site for the production of modified bitumen and emulsion, as well as for the movement and storage of fuel oils and diesel. This also includes electricity used at the Genoa headquarters and the Solbiate Olona storage site.
- 2. methane**, used primarily in the Carbonara thermal plant for heating bitumen and operating the afterburner, a BAT (Best Available Technique) necessary to achieve high standards in reducing pollutant and odour emissions;
- 3. diesel**, used in the Carbonara thermal plant for heating fuel oils.

FUEL CONSUMPTION (GJ)



ELECTRICITY (GJ)



For data on energy consumption see Annexes - Disclosure Table 14

6.1.2

ENERGY TRANSITION AND REDUCING EMISSIONS

Aware of its environmental impact, Alpha Trading aims **to reduce its energy consumption**, while maintaining high standards of quality for its products and services. The company's initiatives focus particularly on electricity consumption, with continuous **modernization** of its management systems over recent years.

The company optimizes consumption through efficient management of heat-requiring utilities, using automatic temperature control systems. Additionally, by modifying tank construction standards with in-house solutions based on two decades of experience, Alpha Trading has **optimized thermal exchange**, thereby reducing heat consumption relative to the amount of product to be heated.

The reduction in electricity consumption has also been facilitated by the introduction of **automatic control systems** that regulate the operation of machines based on production process needs, even in the absence of human intervention. Using inverters is now a standard practice that Alpha Trading applies to almost all installations.

Alpha Trading's responsible approach to the environment is also reflected in its selection of production inputs. **The company selects only the highest efficiency motors available on the market for its machines.**

Lastly, Alpha Trading is committed to fostering a company culture that respects the environment, encouraging employees to adopt **responsible conduct, aimed at minimizing energy waste.**

ATMOSPHERIC EMISSIONS

Regarding emissions, the storage of products is not subject to emission limits according to current regulations. Therefore, at the Solbiate Olona plant, where only biodiesel storage activities occur, there is no fume capture system. The same applies to the areas designated for storing fuel oils and diesel at the Carbonara Scrivia plant.

In these cases, the company **monitors potential pollutant emissions and takes action if necessary. No harmful emissions have been detected** in recent years.

Most greenhouse gas emissions are generated by bitumen production, processing, and storage, which occur in a dedicated area at the Carbonara plant.

This area has a **fume capture system** that treats emissions **using the best available technologies for bitumen processing plants.**

The fumes are initially washed with a water scrubber to remove some pollutants and then pass through a pocket filter that retains the oily fraction. Lastly, the fumes enter an afterburner system, powered by methane gas. The afterburner, through a thermal oxidation process of air streams containing organic pollutants, emits only CO₂.



6.1.2

ENERGY TRANSITION AND REDUCING EMISSIONS

The company generates two main types of emissions: **Scope 1** and **Scope 2**.

Scope 1 emissions originate from sources owned or controlled by the organization and, for Alpha Trading, are primarily generated by the thermal combustor used by the afterburner and the two thermal plants, all located at the Carbonara Scrivia site.

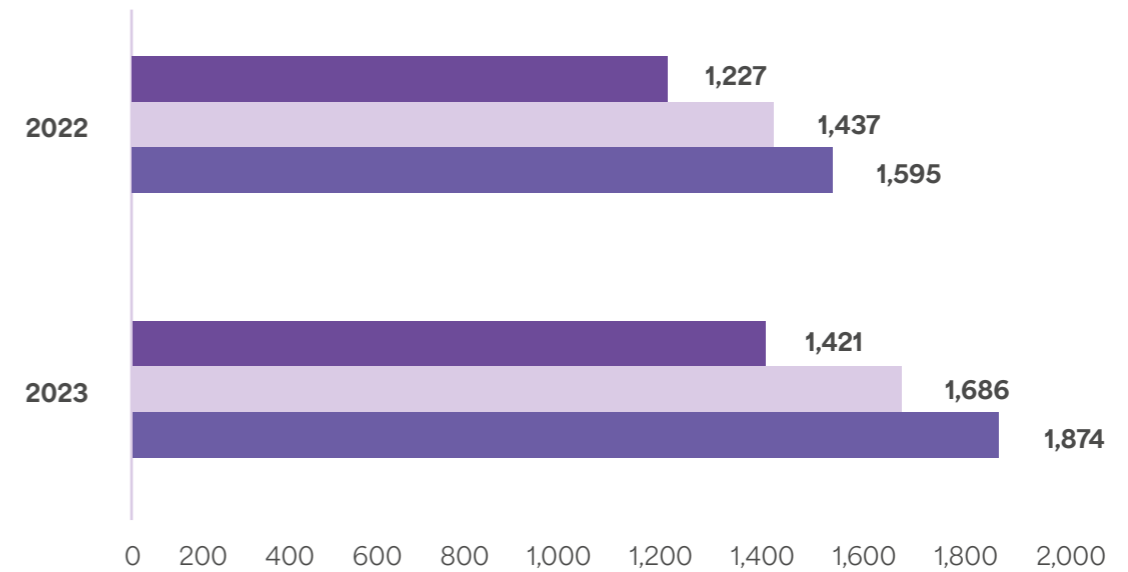
The afterburner and the bitumen facility's thermal plant are powered by methane, currently **the fossil fuel with the lowest CO₂ emissions**.

The mineral oil facility's thermal plant is powered by 10PPM diesel, the lowest sulphur content diesel available on the market.

Scope 2 emissions are indirect emissions from the production of electricity, heat, or steam imported and consumed by the organization.



CO₂ EMISSIONS (TONNE CO₂)



■ Scope I emissions ■ Scope I and Scope II (Location-Based) ■ Scope I and Scope II (Market-Based)

Two distinct approaches are used for calculating Scope 2 emissions:

- The **Location-Based** approach uses average emission factors related to energy generation for well-defined geographic boundaries, including local, subnational, or national boundaries;
- The **Market-Based** approach considers the total electricity purchased, including that from renewable sources via Guarantee of Origin certificates.



For data on direct emissions (Scope 1) and indirect emissions (Scope 2), see Annexes - Disclosure Table 15



OUR NEXT **STEPS**

7.1 Responsibility to Future Generations

7.1

RESPONSIBILITY TO FUTURE GENERATIONS

Alpha Trading aims to improve its impact on the territory and individuals by promoting a **development model based on responsibility and sustainability.**

In pursuing its purpose, the Company aligns its strategic choices with the commitment to achieve the **Sustainable Development Goals (SDGs)** defined by the United Nations in 2015.

The Sustainable Development Goals are 17 goals approved in September 2015 by the governments of the 193 member countries of the United Nations General Assembly during the signing of the action plan for peace and prosperity for people and the planet, known as the 2030 Agenda for **Sustainable Development**, of which they are the core.

The SDGs are based on the integration of the three dimensions of sustainable development: environmental, social, and economic. They recognize the close link between human well-being and the health of natural systems and, because of this, identify the common challenges that all countries, whether advanced or developing, are called to address for a sustainable future.

The **17 goals** therefore aim to address various areas of development, from fighting hunger to eliminating inequalities, from protecting natural resources to urban development, from agriculture to consumption models, each outlined in a program of action that includes 169 targets.

The SDGs that Alpha Trading contributes to

Following a careful analysis of its activities and future goals, Alpha Trading has identified three priority Sustainable Development Goals on which it intends to focus its efforts in the coming years to amplify its positive impact:

- Goal 5 - Gender Equality**
- Goal 8 - Decent Work and Economic Growth**
- Goal 13 - Climate Action**

SUSTAINABLE DEVELOPMENT GOALS



TOWARDS A SUSTAINABLE FUTURE

Alpha Trading is committed to actively contributing to the **creation of a better world for future generations by promoting equitable, sustainable, and inclusive development.** For this reason, the Company has decided to integrate attention to ESG (Environmental, Social, and Governance) issues into its growth strategy to ensure the dissemination of a culture of sustainability among all its collaborators.



7.1

RESPONSIBILITY TO FUTURE GENERATIONS



In particular, Alpha Trading helps **combat climate change through the production and trade of low environmental impact solutions for the Oil and Gas sector**. In this context, the role of energy transition accelerator taken on by the Company in 2004 fits in, with the introduction of **the business line dedicated to biofuel trading**, and confirmed recently in 2023, when Alpha Trading began experimenting with a new type of biofuel for the bunker division. In both cases, the Company's strategic decisions were guided by market trends and the intention to actively contribute to reducing greenhouse gas emissions associated with the products it manufactures and markets.

Additionally, **in the coming years**, the Company plans to equip itself with a **system for managing the environmental impacts resulting from its activities according to the requirements of the ISO 14001 certification**, the international standard for organizations that want to proactively manage their environmental impact, commit to pollution prevention, comply with regulations, and pursue continuous improvement.



At the same time, Alpha Trading continues its commitment to **creating a fair and dignified work environment**. In this context, the commitment to gender equality is a key element to ensure the maximum well-being of employees. The Company, in fact, has worked for years to eliminate any unjustifiable gender discrimination regarding opportunities for growth within the company, remuneration, and welfare, breaking down barriers and ensuring equality. For 2024, the **Company aims to enhance the good practices adopted over the years by obtaining the Gender Certification (UNI/PdR 125:2022)**.

Introduced by the National Recovery and Resilience Plan (PNRR) and governed by the Equal Pay Act (Law No. 162 of 2021), the UNI/PdR 125:2022 certification system represents a fundamental tool not only for ensuring the monitoring of the adjustment process to European standards of gender equality but also for rewarding companies that implement policies and adopt concrete measures to reduce the gender gap.

By obtaining Gender Certification, Alpha Trading intends to formalize its contribution to improving social and territorial cohesion, as well as economic growth, both made possible by the greater inclusion of women in the labour market.

Lastly, in order to ensure a safe working environment for its collaborators, in the coming years, Alpha Trading intends to adopt an **information security management system by obtaining ISO 27001 certification**. The objective is to equip itself with all the necessary tools to protect information assets, including personal data, in light of the increase in cyberattacks.



In particular, the certification has three main objectives:

- **reduce the gender pay gap;**
- **increase professional growth opportunities for women;**
- **protect maternity.**





CONCLUSIONS

Annexes - Disclosure Tables
GRI Correlation Table - Materiality GRI
Content Index

ANNEXES DISCLOSURE TABLES

ECONOMIC VALUE GENERATED AND DISTRIBUTED

Table 1 | GRI 201-1 Direct economic value generated and distributed (in thousands of EURO)

ECONOMIC VALUE	2022	2023
Economic value generated	2,415,116	1,663,097
Economic value distributed	2,405,284	1,656,091
Operating costs	2,346,929	1,630,301
Employee remuneration	7,412	6,486
Remuneration to lenders	3,812	6,498
Dividends	15,000	8,000
Remuneration to the public administration	31,932	4,669
Donations and gifts	200	137
Economic profit retained	9,832	7,006

SUSTAINABLE SUPPLY CHAIN

Table 2 | GRI 204-1 Proportion of spending on local suppliers (in thousands of EURO)

SPENDING ON SUPPLIERS	2022	2023	% OF LOCAL / NON-LOCAL SPENDING
Local	607,803	474,535	29.3%
No local	1,748,045	1,142,461	70.7%
Total spending on suppliers	2,335,847	1,616,996	100.0%

DIVERSITY AND EQUAL OPPORTUNITY

Table 3 | GRI 2-7 Employees

TYPE OF CONTRACT	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Temporary	1	2	3	1	1	2
Permanent	34	30	64	34	32	66
Total	35	32	67	35	33	68

Table 4 | GRI 2-7 Employees

FULL-TIME / PART-TIME	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Full-time	35	29	64	35	30	65
Part-time	0	3	3	0	3	3
Total	35	32	67	35	33	68

Table 5 | GRI 405-1: Diversity of governance bodies and employees

PROFESSIONAL CATEGORY	2022			2023		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
Senior Executives	5	1	6	5	1	6
Junior Executives	8	7	15	8	7	15
Office workers	18	22	40	18	23	41
Manual workers	4	2	6	4	2	6
Total	35	32	67	35	33	68

Table 6 | GRI 405-1: Diversity of governance bodies and employees

PROFESSIONAL CATEGORY	2022				2023			
	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL
Senior Executives	0	1	5	6	0	1	5	6
Junior Executives	0	11	4	15	0	11	4	15
Office workers	9	22	9	40	7	23	11	41
Manual workers	2	1	3	6	2	0	4	6
Total	11	35	21	67	9	35	24	68

Table 7 | GRI 405-1: Diversity of governance bodies (Board of Directors)

GENDER	2022				2023			
	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL
Men	0	0	6	6	0	0	6	6
Women	0	0	1	1	0	0	1	1
Total	0	0	7	7	0	0	7	7

Table 8 | GRI 405-1: Diversity of governance bodies (Board of Statutory Auditors)

GENDER	2022				2023			
	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	TOTAL
Men	0	2	3	5	0	2	3	5
Women	0	0	0	0	0	0	0	0
Total	0	2	3	5	0	2	3	5

Tabelle 9 | GRI 405-2: Ratio of basic salary and remuneration of women to men

PROFESSIONAL CATEGORY	BASIC SALARY		TOTAL REMUNERATION	
	2022	2023	2022	2023
Senior Executives	0.5	0.5	0.6	0.5
Junior Executives	0.8	0.9	0.9	0.9
Office workers	1.0	1.1	0.9	1.1
Manual workers	0.5	0.4	0.5	0.4

DEVELOPMENT OF HUMAN CAPITAL

Tabella 10 | GRI 401-1: Nuovi assunti e turnover del personale

NUMBER OF HIRES	2022			2023		
	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD	<30 YEARS OLD	30-50 YEARS OLD	>50 YEARS OLD
Men	2	0	0	1	2	0
Women	1	4	0	0	1	1
Total	3	4	0	1	3	1
Incoming employee turnover rate (%)	27.3%	11.4%	0.0%	11.1%	8.6%	4.2%

Table 11 | GRI 401-1: New employee hires and employee turnover

NUMBER TERMINATIONS	2022			2023		
	<30 ANNI	30-50 ANNI	>50 ANNI	<30 ANNI	30-50 ANNI	>50 ANNI
Men	1	0	2	1	1	1
Women	2	0	0	0	1	0
Total	3	0	2	1	2	1
OUTGOING TURNOVER RATE (%)	27.3%	0.0%	9.5%	11.1%	5.7%	4.2%

Table 12 | GRI 404-1: Average hours of training per year per employee

AVERAGE HOURS	2022			2023		
	(1 January - 31 December)			(1 January - 31 December)		
	MEN	WOMEN	TOTAL	MEN	WOMEN	TOTAL
TOTAL						
Senior Executives	12.0	10.0	11.7	15.2	10.0	14.3
Junior Executives	23.3	11.6	17.8	10.8	29.9	19.7
Office workers	17.9	12.1	14.7	13.4	11.6	12.4
Manual workers	10.0	10.0	10.0	10.0	17.0	12.3
Total	17.4	11.8	14.7	12.7	15.7	14.1

OCCUPATIONAL HEALTH AND SAFETY

Table 13 | GRI 403-9 (2018): Work-related injuries

INJURY RATES EMPLOYEES	unit of measurement	2022	2023
Total no. of work-related injuries¹	n.	1	1
<i>of which:</i>			
Fatalities	n.	0	0
High-consequence work-related injuries ²	n.	0	0
Other injuries ³	n.	1	1
Number of hours worked by employees	n.	114,579	107,046
<i>Injury rates GRI⁴</i>			
Ratio total injuries to hours worked	%	1.7	1.9
Ratio fatalities to hours worked	%	0	0
Ratio high-consequence injuries to hours worked	%	0	0
Ratio other injuries to hours worked	%	1.7	1.9

REDUCING EMISSIONS AND ENERGY CONSUMPTION

Table 14 | GRI 302-1 Energy consumption within the organization

ENERGY	unit of measurement	2022	2023
Natural Gas	GJ	9,891.0	21,089.8
Diesel (for heating or production processes)	GJ	7,745.6	1,423.1
Diesel (for vehicles owned by the company or operated under long-term hire/leasing arrangements)	GJ	1,093.4	1,136.9
Electricity purchase - ITALY	GJ	2,898.6	3,562.2
Total energy consumption	GJ	21,628.7	27,212.0

¹Work-related injuries refer to all injuries that may result in death, days of absence, work restrictions, reassignment to other duties, medical treatments beyond first aid, or loss of consciousness. These include all injuries caused by risks and hazards workers are exposed to in the workplace, such as death, amputations, lacerations, fractures, hernias, burns, loss of consciousness, and paralysis.

²High-consequence work-related injuries refer to injuries that have resulted in at least 6 months of consequences, excluding deaths.

³Other work-related injuries refer to injuries that have resulted in less than six months of consequences.

⁴Injury rates are calculated based on 100,000 hours worked, using the following formulas:

- Rate of total work-related injuries ÷ hours worked: (total work-related injuries ÷ hours worked) x 200,000;

- Rate of fatalities ÷ hours worked: (total fatalities ÷ hours worked) x 200,000;

- Rate of high-consequence injuries ÷ hours worked: (total high-consequence injuries ÷ hours worked) x 200,000;

- Rate of other injuries ÷ hours worked: (total injuries ÷ hours worked) x 200,000.

Table 15 | GRI 305-1: Energy Direct (Scope 1) GHG Emissions / GRI 305-2: Energy Indirect

(Scope 1) GHG Emissions

EMISSIONS (ton CO2eq)	unit of measurement	2022	2023
Total direct emissions (Scope 1) ⁵	tCO2eq	1,227	1,421
Total indirect emissions (Scope 2) Location-based ⁶	tCO2eq	209	265
Total indirect emissions (Scope 2) Market-based ⁷	tCO2eq	368	452
Total Scope 1 + Scope 2 (Location-Based) emissions	tCO2eq	1,437	1,686
Total Scope 1 + Scope 2 (Market-Based) emissions	tCO2eq	1,595	1,874

RESPONSIBLE MANAGEMENT OF RESOURCES AND CIRCULARITY

Table 16 | GRI 301-1: Materials used by weight or volume

TYPE OF MATERIAL	unit of measurement	2022		2023	
		Non-renewable	Renewable	Non-renewable	Renewable
Polymer for bitumen	t	296.6	0.0	347.6	0.0
Fuel oil	t	151,170.9	0.0	162,155.2	0.0
Diesel	t	65,317.4	0.0	53,712.9	0.0
Denaturant	t	22.4	0.0	10.2	0.0
Bitumen	t	12,311.3	0.0	21,072.7	0.0
Chemicals for bitumen	t	57.3	0.0	398.0	0.0
Chemicals for emulsions	t	10.7	0.0	21.9	0.0
Biodiesel	t	89,418.8	0.0	61,126.5	0.0
Diesel (heating)	t	507.1	0.0	596.8	0.0
Total	t	319,112.5	0.0	299,441.8	0.0

Table 17 | GRI 303-3 Water withdrawals

SOURCE OF WITHDRAWAL	unit of measurement	2022 (1 January - 31 December)		2023 (1 January - 31 December)	
		All areas	Water stress areas	All areas	Water stress areas
Surface water (total)	MI	1.6	0	1.6	0
Groundwater (total)	MI	1.0	0	0.2	0
Total water withdrawals	MI	2.6	0	1.8	0

⁵ For the calculation of Scope 1 emissions for the fiscal years 2021/2022 and 2022/2023, the emission factors published by the Ministry of the Environment – Table of national standard parameters for monitoring and reporting greenhouse gases – were used.

⁶ For the calculation of Scope 2 location-based emissions, the emission factors published by ISPRA – Emission factors for greenhouse gases in the national electricity sector and in major European countries – were used.

⁷ For the calculation of Scope 2 market-based emissions, the emission factors published by the Association of Issuing Bodies (AIB) – European Residual Mixes (2022 and 2023) – were used.

Table 18 | GRI 306-3 Waste generated

WASTE GENERATED	unit of measurement	2022 (1 January - 31 December)			2023 (1 January - 31 December)		
		HAZARDOUS	NON HAZARDOUS	TOTAL	HAZARDOUS	NON HAZARDOUS	TOTAL
Hardened bitumen	t	0.0	11.5	11.5	0.0	4.2	4.2
Used toner cartridges and lead batteries	t	0.0	0.0	0.0	0.0	0.0	0.0
Oily water produced from oil/water separators	t	0.0	0.0	0.0	0.0	1.0	1.0
Non-hazardous packaging (paper and cardboard, plastic, wood, metal, glass, mixed materials)	t	0.0	13.0	13.0	0.0	20.6	20.6
Packaging containing residues of hazardous substances	t	0.2	0.0	0.2	1.1	0.0	1.1
Sanitary napkins, filtering materials	t	4.7	0.0	4.7	1.4	0.0	1.4
Obsolete equipment (simple, containing chlorofluorocarbons, containing hazardous components)	t	0.0	0.0	0.0	0.1	0.5	0.6
Organic and inorganic waste containing hazardous substances	t	0.0	0.0	0.0	2.3	0.0	2.3
Waste containing oil	t	0.0	1.2	1.2	0.0	2.8	2.8
Aqueous liquid waste (including aqueous liquid waste containing hazardous substances)	t	29.3	0.0	29.3	10.7	2.0	12.8
Aqueous concentrates containing hazardous substances (SODA)	t	1.8	0.0	1.8	3.7	0.0	3.7
Materials (cement, iron, steel, aluminium)	t	0.0	1.0	1.0	0.0	4.4	4.4
Plastic, paper for recycling	t	0.0	6.0	6.0	0.0	0.0	0.0
Glass-Plastic-Wood with hazardous substances	t	0.0	0.0	0.0	0.1	0.0	0.1
Bituminous mixtures containing coal tar	t	0.0	64.7	64.7	0.0	16.8	16.8
Soils and rocks different from those mentioned in item 170503	t	0.0	0.0	0.0	0.0	2.1	2.1
Other insulating materials containing or consisting of hazardous substances	t	0.6	0.0	0.6	0.3	0.0	0.3
Total	t	37.0	97.0	134.0	20.0	54.0	74.0

Table 19 | GRI 306-4 Waste diverted from disposal

HAZARDOUS - NON-HAZARDOUS WASTE AND RECOVERY	unit of measurement	2022 (1 January - 31 December) OFFSITE	2023 (1 January - 31 December) OFFSITE
Rifiuti pericolosi	t	0.2	1.2
By means of other recovery operations	t	0.2	1.2
Non-hazardous waste	t	23.9	30.5
By means of other recovery operations	t	23.9	30.5
Total waste for recovery	t	24.1	31.6

Table 20 | GRI 306-5 Waste directed to disposal

HAZARDOUS - NON-HAZARDOUS WASTE AND RECOVERY	unit of measurement	2022 (1 January - 31 December) OFFSITE	2023 (1 January - 31 December) OFFSITE
Hazardous waste	t	36.3	18.6
By means of other disposal operations	t	36.3	18.6
Non-hazardous waste	t	73.6	24.0
By means of other disposal operations	t	73.6	24.0
Total waste directed to disposal	t	109.9	42.5

CORRELATION TABLE GRI STANDARDS - MATERIAL TOPICS

ESG	MATERIAL TOPIC	SCOPE		RECONCILIATION GRI TOPIC
		WHERE THE IMPACT OCCURS	TYPE OF IMPACT	
Environmental Responsibility	Reducing emissions and energy consumption	Company	Caused by the Company	GRI 3: Material Topics (2021) GRI 305: Emissions GRI 302: Energy
	Responsible management of resources and circularity	Company, Suppliers and business partners	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021) GRI 301: Materials GRI 303: Water and effluents GRI 306: Waste
Social responsibility	Occupational health and safety	Company	Caused by the Company	GRI 3: Material Topics (2021) GRI 403: Occupational health and safety
	Diversity and equal opportunity	Company	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021) GRI 405: Diversity and equal opportunities GRI 406: Non- discrimination
	Development of human capital	Company	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021) GRI 401: Employment GRI 404: Training and education
	Support for local communities	Company, local communities	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021)
	Human rights	Company, Suppliers and business partners	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021)
Products and services	Sicurezza dei prodotti e servizi offerti	Company, Customers	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021)
	Gestione dell'innovazione	Company	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021)

AMBITO ESG	TEMATICA MATERIALE	PERIMETRO		RICONCILIAZIONE TOPIC GRI
		DOVE AVVIENE L'IMPATTO	TIPOLOGIA D'IMPATTO	
Governance	Responsible governance, ethics and business integrity	Company, Suppliers, Government, regulatory institutions and entities	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021) GRI 205: Anti-corruption GRI 206: Anti-competitive behaviour
	Economic value generated and distributed	Company	Caused by the Company	GRI 3: Material Topics (2021) GRI 201: Economic performance
	Data protection	Company	Caused by the Company	GRI 418: Privacy of consumers
Supply chain	Responsible supply chain	Company, Suppliers and business partners	Caused by the Company and directly connected through a business relationship	GRI 3: Material Topics (2021) GRI 204: Procurement practices

GRI CONTENT INDEX

GRI 2: GENERAL DISCLOSURES (2022)

GRI	PAGE/NOTES
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Statement of use Alpha Trading has reported the information included in this GRI content index for the period 1 January 2023 to 31 December 2023 with reference to the GRI Standards.

GRI 1 used GRI 1 - Foundation - 2021

THE ORGANIZATION AND ITS REPORTING PRACTICES

GRI 2-1	Organizational details	4-5
GRI 2-2	Entities included in the organization's sustainability reporting	6-7
GRI 2-3	Reporting period, frequency and contact point	6-7
GRI 2-4	Restatements of information	6-7
GRI 2-5	External assurance	The 2023 Sustainability Report has not been externally assured

ACTIVITY AND WORKERS

GRI 2-6	Activities, value chain and other business relationships	22-27
GRI 2-7	Employees	66-67; 107

GOVERNANCE

GRI 2-9	Governance structure and composition	46-47
GRI 2-10	Nomination and selection of the highest governance body	46-47
GRI 2-21	Annual total compensation ratio	71

STRATEGIES, POLICIES AND PRACTICES

GRI 2-22	Statement on sustainable development strategy	4-5
GRI 2-27	Compliance with laws and regulations	53
GRI 2-28	Membership associations	79

STAKEHOLDER ENGAGEMENT

GRI 2-29	Approach to stakeholder engagement	34-35; 38
GRI 2-30	Collective bargaining agreements	68

SPECIFIC STANDARD DISCLOSURE

GRI 3 - MATERIAL TOPICS 2021 VERSION

Material Topic: Ethics, integrity and transparency

GRI 3: Material Topics (2021)

GRI 3-3 Management of material topics 38-42; 113-114

GRI 205: Anti-corruption (2016)

GRI 205-3 Confirmed incidents of corruption and actions taken In 2023 no incidents of corruption occurred

GRI 206: Unfair competition practices

GRI 206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices In 2023, there were no incidents of anti-competitive behaviour

GRI INDICATOR		PAGE/NOTES
Material Topic: Direct and indirect economic impacts		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 201: Economic performance		
GRI 201-1	Direct economic value generated and distributed	56-57
Material Topic: Responsible management of the supply chain		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 204: Procurement practices		
GRI 204-1	Proportion of spending on local suppliers	106
Material Topic: Privacy and cybersecurity		
GRI 3: Material Topics (2021)		
GRI 3-3	Gestione dei temi materiali	38-42; 113-114
GRI 418: Privacy of consumers		
GRI 418-1	Substantiated reports regarding breaches of privacy or loss of their data	In 2023 non si customers' no substantiated reports regarding breaches of customers' privacy or loss of their data were recorded
Material Topic: Management of water resources		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 303: Water and effluents		
GRI 303-1	Interactions with water as a shared resource	90-91
GRI 303-3	Water withdrawals	90
Material Topic: Circular Economy and Waste Management		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 301: Materials		
GRI 301-1	Materials used by weight or volume	87; 110
GRI 306: Waste		
GRI 306-3	Waste generated	88-89
GRI 306-4	Waste diverted from disposal	88-89; 112
GRI 306-5	Waste directed to disposal	88-89; 112
Material Topic: Energy Efficiency		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 302: Energy		
GRI 302-1	Energy consumption within the organization	93

GRI INDICATOR		PAGE/NOTES
Material Topic: Action to combat Climate Change		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 305: Emissions		
GRI 305-1	Direct (Scope 1) GHG emissions	97
GRI 305-2	Energy indirect (Scope 2) GHG emissions	97
Material Topic: Managing Environmental Impacts		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
Material Topic: Development of human capital		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 401: Employment		
GRI 401-1	New employee hires and employee turnover	69
404: Training and education		
GRI 404-1	Average hours of training per year per employee	72
Material Topic: Diversity, inclusion and non-discrimination in the workplace		
GRI 3: : Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 405: Diversity and equal opportunity		
GRI 405-1	Diversity of governance bodies and employees	48; 70-71
GRI 405-2	Ratio of basic salary and remuneration of women to men	71
GRI 406: Non-discrimination		
GRI 406-1	Confirmed incidents of discrimination and corrective actions taken	In 2023 no cases of discrimination occurred
GRI 401: Employment		
GRI 401-2	Benefits provided to full-time employees that are not provided to temporary or parttime employee	73
Material Topic: Customer relations		
GRI 3: Material Topics (2021)		
GRI 3-3	Management of material topics	38-42; 113-114
GRI 416: Customer health and safety		
GRI 416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	In 2023 no incidents of non-compliance concerning the health and safety impacts of products and services occurred

GRI INDICATOR		PAGE/NOTES
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Material Topic: Occupational health and safety

GRI 3: Material Topics (2021)

GRI 3-3	Management of material topics	38-42; 113-114
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GRI 403: Occupational health and safety (2018)

GRI 403-1	Occupational health and safety management system	74-75
GRI 403-2	Hazard identification, risk assessment, and incident investigation	74-75
GRI 403-3	Occupational health services	74-75
GRI 403-4	Worker participation, consultation, and communication on occupational health and safety	74-75
GRI 403-5	Worker training on occupational health and safety	74-75
GRI 403-6	Promotion of worker health	74-75
GRI 403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	74-75
GRI 403-9	Work-related injuries	74-75
GRI 403-10	Work-related ill health	74-75

Material Topic: Culture of sustainability

GRI 3: Material Topics (2021)

GRI 3-3	Management of material topics	38-42; 113-114
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Material Topic: Involvement, support and development of the local community

GRI 3: Material Topics (2022)

GRI 3-3	Management of material topics	38-42; 113-114
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Material Topic: Protection of human capital

GRI 3: Material Topics (2022)

GRI 3-3	Management of material topics	38-42; 113-114
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Material Topic: Product sustainability

GRI 3: Material Topics (2021)

GRI 3-3	Management of material topics	38-42; 113-114
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Material Topic: Research and innovation

GRI 3: Material Topics (2021)

GRI 3-3	Management of material topics	38-42; 113-114
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Material Topic: Support for local communities

GRI 3: Material Topics (2021)

GRI 3-3	Management of material topics	38-42; 113-114
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