

Occupational health and safety

[GRI 2-23, 3-3, 403-1, 403-2, 403-3, 403-4, 403-5, 403-7, 403-8, 403-9, 403-10]

The Group considers the dedication of human, professional, organisational, technological and economic resources to occupational health and safety as an investment, as it believes it to be fundamentally important to protect workers and includes among its objectives not only compliance with the provisions laid down by the law, but also measures taken with a view to continuously improving working conditions. A stringent conception of safety entails total engagement on the behalf of employees who, according to the activity performed and the respective skills and responsibilities, are required to play an active role in prevention. As such, particular attention is given to providing training and information to employees and conducting continuous monitoring, including the analysis of individual injuries, near-misses, and planned supervisory surveys.

Occupational health and safety



Risks

- Failure to meet the targets set out in the Business Plan and consequent negative impacts (operational, economic and reputational)
- Injuries and occupational illnesses of employees and third-party workers
- Epidemic events affecting workers' health
- Civil and/or criminal liability of persons covered by Legislative Decree 81/08
- Loss of ISO 45001 certification and the subsequent loss of the INAIL award
- Non-compliance with health and safety standards
- Negative operational, economic and reputational impact related to the failure to protect the health and safety of workers



Opportunities

- Technological innovations that make operations safer
- Spreading of the culture of prevention



Management methods

- Planning and monitoring of business plan objectives and targets (economic/financial and ESG)
- Code of Ethics
- Sustainability Policy
- Organisational Model 231 and information flows to the Supervisory Bodies
- MbO and LTI system with ESG objectives
- Prevention and protection service
- Specific personnel training
- ERM system integrated with ESG topics
- Integrated Certified Management System (risk assessment, containment measures and third-party audits)
- Guidelines for Risk Assessment and drafting of Risk Assessment Documents
- Procedures: Management of occupational health and safety controls; PPE management; Injury management, near-misses, company accidents; Management of tender safety obligations; Protection of the health and safety of pregnant workers, women who have recently given birth and who are breastfeeding; Whistleblowing
- Health monitoring plans
- Emergency management planning
- "Near miss" analysis and subsequent actions
- Insurance plans

The main companies of Iren Group have certified systems according to the UNI ISO 45001 international standard to guarantee the systematic control of the aspects relating to the safety and health of workers, which cover 100% of the personnel employed in the certified companies (equal to 97% of the overall Group personnel, i.e. 10,719 employees). Health and safety requirements are managed by the Group with the support of the GAMMA application, certified to manage the requirements of UNI ISO 45001.

In connection with the management of Covid-19, the Group General protocol of measures to combat and contain the spread of the virus in the workplace was maintained until November 2023.

SAFETY MANAGEMENT

The Group's safety management system is supervised by a single Safety Service within the Parent Company, which guarantees the standardisation of risk assessment methods, the identification of organisational, procedural and technical measures, and the training needs of personnel in the field. Specific codified and systematic audit procedures allow for the monitoring and the continuous improvement of this system to be pursued.

Responsibility for occupational health and safety lies with the hierarchical line Employers, Executives, Supervisors, on the basis of the specific company organisation as well as of the delegations conferred, and is reflected in the company organisation charts and safety organisation charts, published on the company intranet. Workers, according to their activity and their respective competencies and responsibilities, are involved and called upon to play an active role in prevention. In order to prevent or mitigate potential negative impacts, actions are envisaged, including the prevention and protection measures set out in the risk assessment documents prepared pursuant to Legislative Decree 81/2008; the actions can essentially be classified as information and training, health surveillance, use of Personal Protective Equipment (PPE) and application of safe work instructions. Monitoring and control activities contribute as preventive actions, including:

- checks by the Supervisors on employees and by the Works Management in the case of third-party activities;
- establishment of specific corporate committees on the subject of health and safety management;
- audits (e.g. in the area of Certified Management Systems, Internal Audit and Procurement Audit);
- supervisory inspections of the Prevention and Protection Service (PPS) planned annually;
- visits by Occupational Health Physicians to workplaces;
- discussions with Workers' Health and Safety Representatives (HSR);
- management of reports received (e.g. of near misses);
- simulation of emergency situations.

Operational control activities are regulated by a specific Group procedure. In the case of actual negative impacts, such as in the case of injuries and real emergency situations, a systematic analysis is planned, with the aim of defining causes and treatment. In proactive terms, in the case of potential and actual negative impacts, if critical issues are detected, corrective actions are defined to ensure improvement action. To monitor the effectiveness of actions, data on the following indicators relating to the Security process are usually analysed:

- rates of frequency, severity, injury incidence;
- number of company accidents;
- number of near-misses;
- number of PPS inspections planned/performed;
- number of Occupational Health Physician inspections planned/performed;
- number of medical examinations planned/performed.

for which the following Group targets are also defined:

Indicator	Target
Severity rate	< previous year
Frequency rate	< previous year
Number of annual PPS inspections performed/planned	>90%
Number of annual Occupational Health Physician inspections performed/planned	>90%
Number of annual emergency simulations performed/planned	>90%
Number of annual medical examinations performed/planned	100 %

There are also general welfare and prevention initiatives and programmes, both at the level of the national collective labour agreements applied and through the company welfare system (» SEE PAGE 307).

Specific improvement objectives concern the progressive computerisation of the management of the Security System (through the GAMMA application, which guarantees the uniformity of the approach and the related monitoring), the unification of the management of transversal issues (also through the issue of Group procedures on the subject of PPE, health surveillance, emergencies, injuries), the containment of the injury incidence rate and the progressive integration of the companies which, following acquisitions, become part of the Group.

Each Group Company organises at least one annual meeting on corporate security (art. 35 of Legislative Decree 81/2008), and, as a rule, one or two other meetings per year for discussion and updating attended by the Workers' Health and Safety Representatives (HSR). Surveys and specific meetings are also carried out at the request of the HSRs and/or workers. The HSRs are also invited to take part in the visits to the workplace with the Occupational Health Physician (art. 25 of Legislative Decree 81/2008) and are involved in audits of certified systems.

The **reporting and management of injuries and near-misses** takes place through hierarchical channels and subject to supervision by the Prevention and Protection Service according to specific procedures regulating the process, which may be computerised and are accessible to all workers. A detailed analysis of the event is carried out, aimed at identifying the causes of unwanted events, and the necessary actions and skills to prevent them. A specific app (Safety App) on the Company smartphones provided to all employees enables near-misses to be reported, promoting employee participation and facilitating the introduction of any corrective actions.

The Safety System documentation (procedures,

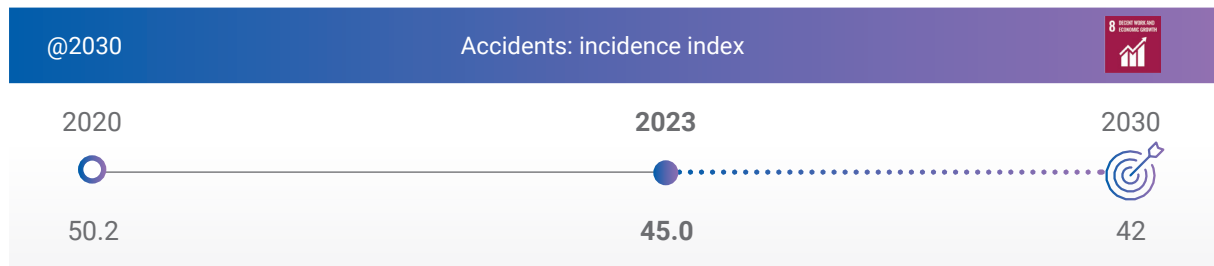
emergency plans, operating instructions, guidelines for safe working, etc.) establishes the cases and situations where workers are required to distance themselves from potentially hazardous or unexpected situations, and/or to avoid certain activities requiring specific training for which they are not qualified. In this regard, the Group companies adopted procedures to regulate particular situations and risks (works in confined spaces or in case of suspected pollution, sites in the outdoors in the case of weather alerts or employees operating alone, etc.).

The **risk identification and assessment process** is regulated by procedures and by software that guarantees a standardised approach. For each working activity, the risks and the appropriate prevention and protection measures, personal protective equipment (PPE) necessary to conduct said activities, proper conduct and any organisational measures or other requirements are identified and evaluated. Furthermore, workplaces are analysed to identify and evaluate the risks present, taking instrumental measurements where necessary. The assignment to each employee, directly or through groups (safety certifications) of the results of the assessments conducted on working activities and workplaces completes the risk profile of each worker, identifying the consequent general protection measures that include, for example, the provision of necessary PPE, the need or otherwise for health checks, and the results of these, where applicable. These structured evaluation process is conducted and coordinated by the Prevention and Protection Service (PPS) of each Company, with the indispensable involvement of the operating units. The PPS also carries out periodic controls to check the correct implementation of the provisions.

For Group companies with ISO 45001 certification, periodic audits are also planned by certified external independent auditors to verify the correct management of occupational health and safety. The results of these audits are brought to the attention of the Management to enable the relative action to be taken.

In the Group Industrial Relations Protocol, there are specific points regulating the election of Workers' Safety Representatives, in compliance with Legislative Decree 81/2008, as well as the establishment of a special Bilateral Environment and Safety Committee; over the years, specific agreements have been signed regulating particular contents (e.g. travel, working hours, etc.).

Attention to the injury phenomenon is also demonstrated by the provision, in the Business Plan and in the MbO system, of specific objectives, assigned to the managers of the operating structures most exposed to these risks.



MAIN INDICATORS OF SAFETY

Injuries and frequency rate ⁽¹⁾ other indices	u.m.	2023
Total number of injuries	no.	488
of which high-consequence injuries – non-fatal ⁽²⁾	no.	5
of which high-consequence injuries – fatal	no.	0
Frequency rate	no.	18,218,511
Indice di frequenza		
(total number of injuries/hours worked x 1,000,000)		26.79
(total number of injuries/hours worked x 200,000)		5.36
Days away from work due to injury	no.	14,983
Severity rate (days away from work due to injuries/hours worked x 1,000)		0.82
Average injury duration (days away from work due to injuries/total no. injuries)	days	30.70

⁽¹⁾ Commuting injuries and those not recognised by INAIL are excluded.

⁽²⁾ Injuries lasting longer than 6 months.

Near-misses ⁽¹⁾ by region and gender (no.)	2023
Piedmont	357
Emilia-Romagna	33
Liguria	21
Tuscany	43
Other areas	14
TOTAL	468
Women	96
Men	372
TOTAL	468

⁽¹⁾ Near-misses pursuant to standard ISO 45001:2018.

In 2023, there was a significant reduction in the injury frequency (-8%) and injury incidence (-5%) rates, compared to the previous year, despite the fact that the perimeter increased as a result of the acquisition of companies with a significant operational footprint. The severity rate and average duration remained almost constant.

The “Iren people: the numbers” section shows the breakdown of the work-related injury rates for the last three years.

INJURIES BY GEOGRAPHICAL AREA (NO.)



252
Piedmont



61
Emilia-Romagna



49
Liguria



96
Tuscany

30
Other areas

INJURIES BY TYPE ⁽¹⁾ (NO.)



Professional injuries



Incidental injuries



Road injuries

⁽¹⁾ The internal classification distinguishes between:

- professional injuries: occurring as a result of activities closely related to the work task;
- road injuries : occurring during work-related travel in company vehicles;
- incidental injuries: occurring as a result of activities not strictly related to the work task.

HEALTH CHECKS

The health surveillance of Iren Group employees, according to the tasks assigned, is organised centrally by the Safety Services function which avails itself of a specialised external company for the planning and execution of diagnostic tests.

Pursuant to current law, the medical examinations are carried out (over 9,000 in 2023) by external Occupational Health Physicians, appointed by the Employers of each Group company. A specific Group procedure defines the shared approach, including the standardisation of health protocols. The correct planning and monitoring of health checks for all workers is guaranteed by the GAMMA app, where data is uploaded which includes workers’ risk profiles according to the possible professional exposure level indicated in the risk assessment documents, the obligatory nature of the health checks, the date of any assessments, the fit-to-work certificate and any provisions/limitations. To respect personal privacy, information contained on the GAMMA app is made available to employees, executives, senior executives, medical professionals and the PPS only when relevant. Newly acquired companies are gradually being integrated into management.

As far as **occupational illnesses** are concerned, the risk assessment document (DVR), which is constantly updated, objectively establishes the presence of a potential occupational risk. This probability is minimal both upstream and downstream of the control chain implemented by the Group. Upstream, the results of the risk assessment documents of Group companies are drawn up in collaboration with the RSPP and the Occupational Health Physicians and meetings are called to discuss the outcome of the various surveys of working environments, during which, where necessary, any critical situations may be reported by the competent parties within their area of expertise, providing indications or suggestions aimed at improving working conditions. Downstream, the Occupational Health Physicians identify the residual risks and draw up a health check protocol shared at Group level, which aims to protect the mental and physical health of workers and to identify any potentially or effectively hypersensitive persons, correlating the working risk with specific diagnostic checks and enable the correct identification of any personal limitations or provisions. The Occupational Health Physician is however required by law to report any suspected occupational ill-health to the competent bodies. In 2023, there were 7 cases of occupational illness recognised as such by INAIL that did not result in death during the period of employment. The main, numerically speaking, types of occupational illness are herniated discs and pleural plaques.

Following the 2022 edition of Call4Ideas ([SEE PAGE 346](#)), experimentation is underway, in collaboration with the Department of Public Health and Paediatric Sciences of the University of Turin, on the use of industrial exoskeletons to balance physical exertion in waste collection and bin handling and logistics activities, in order to reduce possible injury/health issues.

Group companies periodically carry out **work-related stress risk assessments; the assessments**, most of which were updated in 2022 and carried out using the methodology proposed by the Joint Committee "Rubes Triva", generally showed a low level of associated risk.

HEALTH AND SAFETY TRAINING

Iren Group has always been committed to developing and promoting a solid safety culture, with the aim of constantly involving and raising the awareness of all employees through training actions with a proactive approach, aimed at improving behaviour and empowerment.

In 2023, 92,032 hours of health and safety training were provided, involving 6,348 people in at least one initiative. Workers accounted for 67% of the total number of hours. The initiatives implemented through face-to-face meetings, live webinars or distance learning were:

- **basic training and updates** for executives, managers and workers, emergency and first aid officers, on specific risks (confined environments, electrical environment, asbestos, isolated work, biological risk from legionella), on the use of category three personal protective equipment (work at height, respiratory system, confined environments);
- **qualification and refresher courses for safety officers** (RSPP/ASPP, HSR, site safety coordinators, fire prevention officers, executives and staff responsible for asbestos removal, disposal and remediation);
- **training and refresher courses on the use of equipment** (fork lifts, earth-moving machinery, lifting platforms, cranes on trucks, tractors, etc.);
- **equipment training** (cranes, portable ladders, trolleys for the transport of goods and people and/or lifts/cable cars, waste collection machinery and compactors, environmental health equipment, manholes);
- **specific internal procedures** (production of advanced works plans covering electricity risk, management of work permits, emergency management, etc.).

In 2023, particular attention was paid to raising awareness, preventing and reducing risks related to road safety, e.g. the training intervention aimed at operational employees of the hydroelectric nucleus, carried out on the track at the Susa Motor Sports Centre, with the objective of having them acquire behavioural techniques and correct reaction skills while driving company vehicles on mountain routes, through the illustration of the main critical situations that can arise while driving and the performance of a specific practical module on the track and off-road (66 employees involved for a total of 564 hours of training).

Particularly appreciated was the annual update initiative addressed to the Group's RSPP and ASPP, which represented an aggregating and involving moment, thanks to the use of virtual reality through which risk situations were simulated in the workplace, aimed at increasing awareness and prevention of risky behaviours (36 employees involved for a total of 288 hours of training).

The year also saw the launch of the five-yearly refresher training initiative on safety, aimed at Iren Group workers, developed in cooperation with the RSPP, who also provided their contribution with the production of video-interventions on the Group's safety philosophy and the various items into which it is organised. The main focus was on the use of active methodologies (gamification, role-playing games, serious games, etc.), aimed at creating immersive and interactive experiences, realised through practical exercises, simulations of real and/or potentially dangerous situations. In the second half of the year, the first 7 editions were held, with cross-functional and inter-company participation to encourage interaction and discussion among participants (124 employees involved for a total of 759 training hours). The initiative will continue in 2024 to reach over 1,000 employees.

The Training Portal is integrated with the GAMMA app for safety management, in order to allow for training needs to be constantly updated in relation to the risks to employees and the security responsibilities assigned to them, as well as to monitor the expiry dates of the relative updates. It is essential to measure the effectiveness of safety training, assessed through the administration of learning tests and/or evaluations of practical training exercises, where required by legislation.

