7.2 Environmental Information

Disclosure pursuant to Article 8 of regulations (EU) 2020/852 (Taxonomy Regulations)

Established by EU Regulation 2020/852 and with the aim of promoting investments with environmental and social objectives, the Taxonomy is a unified and formalised system for classifying sustainable economic activities in Europe. As a "Financial Undertaking", in the light of the provisions of the aforementioned Regulation (hereinafter also referred to as the "Taxonomy Regulation") and further related legislation, the ATM Group shall report for the financial year 2024 the portion of its turnover, capital expenditure and operating expenditure associated with economic activities considered environmentally sustainable in accordance with Articles 3 and 9 of the Taxonomy Regulation.

In particular, the Taxonomy now defines six environmental objectives:

- Climate change mitigation,
- Adaptation to climate change,
- Sustainable use and protection of water and marine resources,
- Transition to a circular economy,
- Pollution prevention and control,
- Protection and restoration of biodiversity and ecosystems.

With the publication in 2023 of the Delegated Acts of the EU Taxonomy, new activities were introduced concerning both the first two targets, already valid for 2022 reporting, and the remaining four environmental targets defined by Art. 9 of the Taxonomy Regulation.

The ATM Group then reviewed the list of economic activities included in the reference documentation. This process of analysis was carried out by comparing the activities carried out by the Group with those defined in the technical reference documentation, consistent with the list of NACE and ATECO codes to which they belong. Based on the developed interpretation and in continuity with last year's reporting, the activities that characterise the Group's operations are mainly attributable to the economic activities of "Urban and suburban passenger transport by road" and "Operational management of personal mobility devices" belonging to the first two climate change mitigation and adaptation objectives and identified in the respective codes 6.3 and 6.4 as per the reference regulations.

As a first step of analysis, the reference legislation requires the reporting of a series of information regarding the economic activities considered eligible[18] or ineligible[19] for the European Taxonomy (hereinafter also referred to as "Eligible" and "Ineligible" Activities). The notion of "*Eligibility*" refers to all activities included in the Delegated Acts on the objectives of the Taxonomy and only indicates that a given activity could potentially lead to a substantial contribution to one of the six environmental objectives of the Taxonomy, without also expounding on the concept of its sustainability. The regulations also specify that eligibility must be assessed and reported for activities belonging to all six environmental objectives.

The second *step* of analysis refers instead, within the framework of the "Eligible Activities", to the identification of activities aligned[20] or not aligned with the European Taxonomy (hereinafter also "Aligned" and "Not Aligned" Activities. In particular, the notion of alignment implies that an activity meets all the requirements specifically listed for it in the Taxonomy. Only when an activity fulfils the technical screening criteria, the Do Not Significant Harm criteria and compliance with the minimum safeguard criteria can it be defined as "Aligned".

Eligible Activities

In light of these previous interpretations, and as described in more detail below, the Group has calculated the proportion of turnover, capital expenditure and operating expenditure related to economic activities currently considered eligible for Taxonomy with reference to the Climate Change Mitigation and Adaptation objectives, reserving the right to conduct more in-depth analyses for the additional four environmental objectives during the future reporting year. In particular, the following percentage values were found[21]:

[18] Economic activity described in the delegated acts adopted pursuant to Articles 10(3), 11(3), 12(2), 13(2), 14(2) and 15(2) of Regulation (EU) 2020/852, irrespective of whether such economic activity meets any or all of the technical screening criteria set out in those delegated acts.

[19] Economic activity not described in the delegated acts adopted pursuant to Articles 10(3), 11(3), 12(2), 13(2), 14(2) and 15(2) of Regulation (EU) 2020/852.

[20] Economic activities meeting all the requirements of Art. 3 of Reg. EU 2020/852.

[21] The analysis and calculation of the KPIs were carried out in the light of the Group's interpretation of the information defined in Annex I of the "Delegated Regulation (EU) 2021/2178 of the European Commission of 6 July 2021 supplementing Article 8 of Regulation (EU) 2020/852) and the document "Draft Commission notice on the interpretation of certain legal provisions of the Disclosures Delegated Act under Article 8 of the EU Taxonomy Regulation on the reporting of eligible economic activities and assets" of 2 February 2022. For the calculation of the KPIs, potential double counting in the allocation of Turnover, CapEx and OpEx to the numerator was avoided through the use of financial information as accounted for in the Consolidated Financial Statements as at 31 December 2024, subsequently linked to the economic activities referred to in the Climate Delegated Act.

KPIs	2024	
	Eligible	Non Eligible
Revenue	88.84%	11.16%
CapEx	98.85%	1.15%
OpEx	97.48%	2.52%

Turnover Calculation Methodology

Consolidated net sales in accordance with IAS 1.82(a) were considered in the denominator.

With regard to the numerator, based on the interpretation of the Taxonomy Regulation, revenues from Parking Spaces, Car Parks and removals, advertising and space rental, vending machines in action at underground stations, management of Area B-C, SCTT [Sistema Integrato di Controllo del Traffico e del Territorio (Integrated Traffic and Territorial Control System)], sale of materials, contributions from the National Collective Agreement, deductions for employee services (e.g., day-care centres) and EU contributions for training courses were excluded. The financial data included in this KPI reflect what is reported in the Consolidated Financial Statements in relation to the composition of revenues and other operating income.

CapEx Calculation Methodology

In the denominator, additions to tangible and intangible fixed assets for the year 2024 were considered, before depreciation, amortisation and any revaluations, including those resulting from restatements and reductions in value, excluding changes in fair value. The denominator includes, in particular, all investments in Tangible and Intangible Fixed Assets and Rights of Use.

For the calculation of the numerator, increases in fixed assets were considered permissible in line with the adopted interpretation of the Taxonomy Regulation and further normative references. In fact, increases in fixed assets related to the purchase of output from taxonomy-eligible economic activities and/or related to measures implemented to reduce atmospheric emissions were considered eligible. For this reason, consistent with the methodology adopted for turnover, investments in Parking Spaces, Car Parks and removal, advertising and space rental, AREA B-C and SCTT, and kindergarens were excluded. The financial data included in this KPI reflect the investments reported within the Consolidated Financial Statements, in the section Commentary on the ATM Group's Economic and Financial Performance.

Methodology for calculating OpEx

In the denominator, non-capitalised direct costs related to research and development, building renovation measures, short-term rent and variable rents, maintenance and repair as well as any other direct expenditure related to the day-to-day maintenance of property, plant and equipment were taken into account. Expenditure on the day-to-day operation of property, plant and equipment has not been included.

In the numerator, costs included in the denominator relating to the purchase of output from taxonomy-eligible economic activities and/or relating to measures implemented to reduce atmospheric emissions were considered eligible: in particular, costs for Group maintenance labour, costs for material consumption and costs for services in connection with maintenance and leasing/short-term rental were included. Consequently, the remainder of the costs included in the denominator were considered ineligible. The figures considered in this KPI reflect the non-capitalised direct costs reported within the Consolidated Financial Statements, in the section Commentary on the ATM Group's Economic and Financial Results - Costs and Other Operating Charges.

Aligned Activities

A business economic activity that complies with the minimum safeguards and contributes to at least one of the six environmental objectives set out in Article 9 of the Taxonomy Regulation and, does not harm the other five objectives considered by the same Regulation, can be considered an activity aligned to the EU Taxonomy.

Therefore, once the eligible economic activities were identified, the ATM Group undertook to verify that they were in line with the technical criteria set out in the Regulation. *Aligned* analyses were also conducted on the basis of the "*Climate Change Risk Assessment*" document, which aims to identify the exposure of the Group's activities and assets to climate change, in the short, medium and long term. The analysis also aims to assess the Group's resilience to relevant climate risks, identifying the measures and actions implemented to address the highlighted risks. Therefore, for the year 2024, the ATM Group conducted a more in-depth analysis and came up with Turnover, CapEx and OpEx percentages aligned to the Taxonomy.

Turnover Calculation Methodology

All the *checklists* required by the Standard (minimum safeguards - technical screening criteria - DNSH) have been reviewed.

With regard to LPT activity 6.3, the turnover for the underground and Tram Service Contract was taken into account (as they are considered 100% environmentally friendly means of transport as they are electrically driven, as well as meeting the previous checklist).

Activity 6.4 *bike sharing* , on the other hand, was considered eligible and aligned at 100%, and its value was taken into account within the accounts 400106 and 400119.

CapEx Calculation Methodology

All the *checklists* required by the Standard (minimum safeguards - technical screening criteria - DNSH) have been reviewed.

Investments in underground and tram projects were taken into account.

All interventions that, partially or totally, impact on the activities identified as the scope of analysis (trains+tram) were considered aligned with the Taxonomy. This category also includes, for example, interventions on ticketing, equipment or facilities, etc., whose (partial) impact on the activities mentioned above is calculated on the basis of drivers ad hoc, such as the passenger/km of trains and trams.

Methodology for calculating OpEx

All the *checklists* required by the Standard (minimum safeguards - technical screening criteria - DNSH) have been reviewed.

All costs subject to analysis that impact on the activities identified as the scope of analysis (trains+tram) were considered aligned to the taxonomy. All analysed costs incurred by Metro Service, Thema and Rail Diagnostics S.p.A. fall into this category at 100%. As far as ATM S.p.A. is concerned, for each account subject to analysis, the specific share of overturning on the Tram and Train transport modes was considered.

Attached are the taxonomy tables.

Annexes

Table 49: Turnover KPIs

Financial year 2024	2024			Substantial contribution criteria						DNHS criteria for 'do no significant harm' (b)									
Economic activities (1)	Code (a) (2)	Absolute turnover (3)	Share of turnover, 2024 (4)	Climate Change Mitigation	Climate Change Adaptation	Marine Waters and Resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation	Climate Change Adaptation	Marine Waters and Resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Eligible (17)	Share of turnover aligned (A.1.) o eligible (A.2) to taxonomy year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		Year	%	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	YN/	YN/	PN/	YN/	PN/	YN/	PN/	%	A	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmental sustainable activities (Taxonomy-aligned)																			
Urban and suburban transport, road passenger transport	CCM 6.3 /CCA 6.	649,690.17	55.95%	Yes	No	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Management of personal mobility devices, cycling	CCM 6.4 /CCA 6.	976.32	0.08%	Yes	No	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**650,665.50**	**56.03%**	%	%	%	%	%	%	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**0.00%**		
of which enabling			%	%	%	%	%	%	%	Yes	Yes	Yes	Yes	Yes	Yes	Yes			
of which transitional			%	%						Yes	Yes	Yes	Yes	Yes	Yes	Yes			
A.2 Taxonomy-Eligible but not environmental sustainable activities (not Taxonomy-aligned activities) (g)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	Optional							%		
Urban and suburban transport, road passenger transport	CCM 6.3 /CCA 6.	380,985.851	32.81%	EL	EL	N/EL	N/EL	N/EL	N/EL								100.00%		
Management of personal mobility devices, cycling	CCM 6.4 /CCA 6.	-	0.00%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Turnover of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**380,985.85**	32.81%	%	%	%	%	%	%								**88.70%**		
Total (A.1 + A.2)		**1,031,652.34**	88.84%	%	%	%	%	%	%										
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Turnover from activities not eligible for taxonomy (B)		**129,632**	11.16%																
Total (A + B)		**1,161,284**	100.00%																

a) The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:
   - Climate Change Mitigation: CCM,
   - Climate Change Adaptation: CCA,
   - Water and Marine Resources: WTR,
   - Circular Economy: CE,
   - Pollution Prevention and Control: PPC,
   - Biodiversity and Ecosystems: BIO.

Yes - Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

No - No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL - not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of Taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088. Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, that includes alignment with each of environmental objectives for activities contributing substantially to several objectives, by using the template below:

	Share of turnover/total turnover	
	Aligned with taxonomy by objective	Eligible for Taxonomy by objective
CCM	56.03%	88.84%
CCA	%	%
WTS	%	%
CE	%	%
PPC	%	%
BIO	%	%

a) An activity may align with only one or more environmental objectives for which it is eligible.
b) An activity may be eligible and not aligned with the relevant environmental objectives.
c) EL - Taxonomy eligible activity for the relevant objective
   N/EL - Taxonomy non-eligible activity for the relevant objective.
d) Activities are only indicated in section A.2 of this template if they are not aligned with any environmental objective for which they are eligible. Activities that align with at least one environmental objective are indicated in section A.1 of this template.
e) In order for an activity to be included in Section A.1, it must fulfil all DNSH criteria and the relevant minimum safeguards. For the activities listed in Section A.2, non-financial corporations may complete columns 5 to 17 on a voluntary basis. Non-financial enterprises may indicate in Section A.2 the substantive contribution and DNSH criteria met or not met, using: for substantive contribution - codes Yes/No and N/AM instead of AM and N/AM and for DNSH - codes Yes/No.

Table 50: CapEx KPIs

Financial year 2024	2024			Substantial contribution criteria						DNHS criteria for 'do no significant harm' (b)									
Economic activities (1)	Code (a) (2)	Absolute capital expenditure (3)	Capital expenditure share, year	Climate Change Mitigation	Climate Change Adaptation	Marine Waters and Resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation	Climate Change Adaptation	Marine Waters and Resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Eligible (17)	Share of OpEx aligned (A.1) or eligible (A.2) to taxation, Year N-1 (18)	Category (enabling activity) (19)	Category (transitional activity) (20)
		[year]	%	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Yes; No; N/EL [b] [c]	Y/N/	Y/N/	Y/N/	Y/N/	Y/N/	Y/N/	Y/N/	%	A	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmental sustainable activities (Taxonomy-aligned)																			
Urban and suburban transport, road passenger transport	CCM 6.3 /CCA 6.	54,294.03	43.83%	Yes	No	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Management of personal mobility devices, cycling	CCM 6.4 /CCA 6.	-	0.00%	Yes	No	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
CapEx of environmentally sustainable activities (Taxonomy-aligned) (A.1)		**54,294.03**	**43.83%**	%	%	%	%	%	%	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**0.00%**		
of which enabling			%	%	%	%	%	%	%	Yes	Yes	Yes	Yes	Yes	Yes	Yes			
of which transitional			%	%						Yes	Yes	Yes	Yes	Yes	Yes	Yes			
A.2 Taxonomy-Eligible but not environmental sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	Optional							%		
Urban and suburban transport, road passenger transport	CCM 6.3 /CCA 6.	68,164.671	55.02%	EL	EL	N/EL	N/EL	N/EL	N/EL								100.00%		
Management of personal mobility devices, cycling	CCM 6.4 /CCA 6.	-	0.00%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Capital expenditure of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**68,164.67**	**55.02%**	%	%	%	%	%	%								**99.98%**		
Total (A.1 + A.2)		**122,458.70**	**98.85%**	%	%	%	%	%	%								**99.99%**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Capital expenditure of activities not eligible for taxonomy (B)		1,428	1.15%																
Total (A + B)		**123,887**	**100.00%**																

The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:

- Climate Change Mitigation: CCM,
- Climate Change Adaptation: CCA,
- Water and Marine Resources: WTR,
- Circular Economy: CE,
- Pollution Prevention and Control: PPC,
- Biodiversity and Ecosystems: BIO.

a) Yes - Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

No - No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL - not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

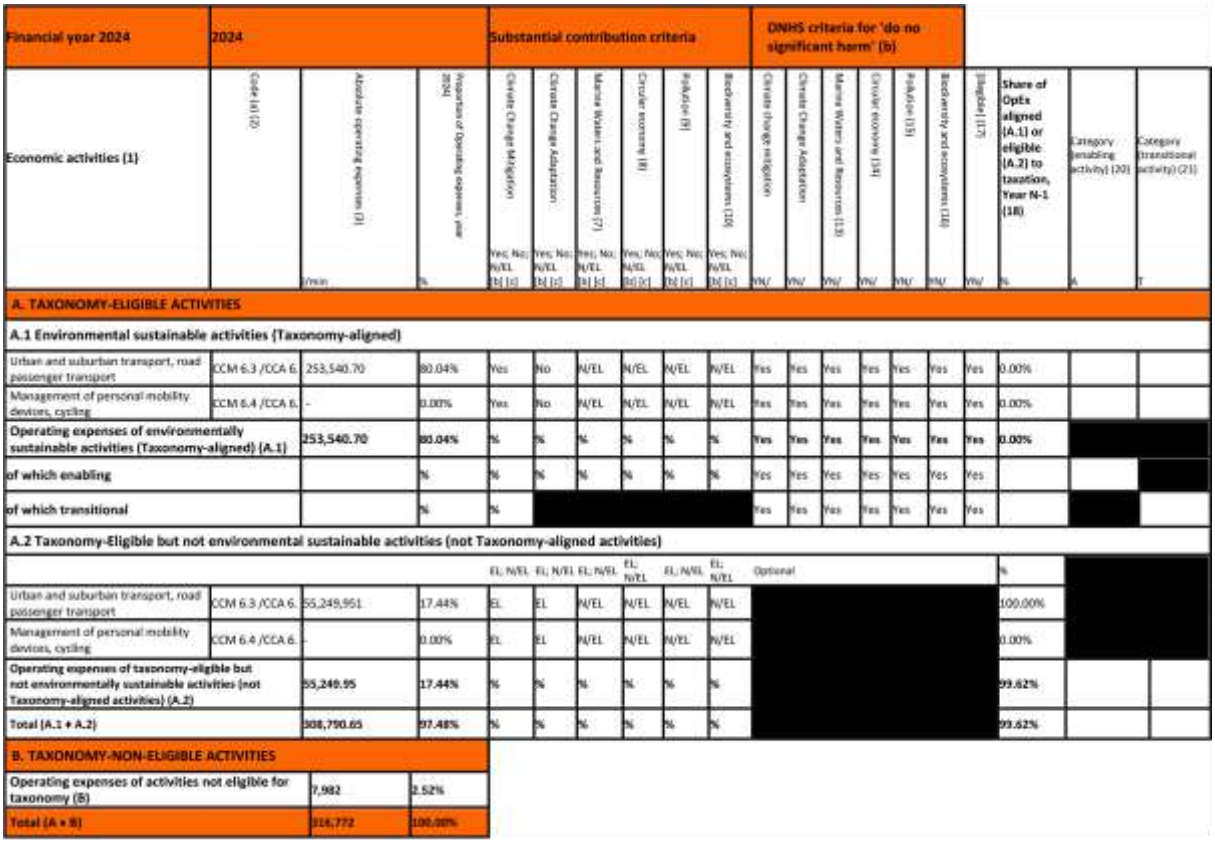
Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of Taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088.

Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, that includes alignment with each of environmental objectives for activities contributing substantially to several objectives, by using the template below:

	Share of CapEx/total CapEx	
	Aligned with taxonomy by objective	Eligible for Taxonomy by objective
CCM	43.83%	98.85%
CCA	%	%
WTS	%	%
CE	%	%
PPC	%	%
BIO	%	%

b) An activity may align with only one or more environmental objectives for which it is eligible.
c) An activity may be eligible and not aligned with the relevant environmental objectives.
d) EL - Taxonomy eligible activity for the relevant objective
   N/EL - Taxonomy non-eligible activity for the relevant objective
e) Activities are only indicated in section A.2 of this template if they are not aligned with any environmental objective for which they are eligible. Activities that align with at least one environmental objective are indicated in section A.1 of this template.
f) In order for an activity to be included in Section A.1, it must fulfil all DNSH criteria and the relevant minimum safeguards. For the activities listed in Section A.2, non-financial corporations may complete columns 5 to 17 on a voluntary basis. Non-financial enterprises may indicate in Section A.2 the substantive contribution and DNSH criteria met or not met, using: for substantive contribution - codes Yes/No and N/AM instead of AM and N/AM and for DNSH - codes Yes/No.

Table 51: OpEx KPIs



Financial year 2024	2024			Substantial contribution criteria						DNHS criteria for 'do no significant harm' (b)									
Economic activities (1)	Code (a) (2)	Absolute operating expenditure (3)	Proportion of Operating expenditure, year 2024	Climate Change Mitigation	Climate Change Adaptation	Marine Waters and Resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation	Climate Change Adaptation	Marine Waters and Resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Eligible (17)	Share of OpEx aligned (A.1) or eligible (A.2) to taxation, Year N-1 (18)	Category (enabling activity) (20)	Category (transitional activity) (21)
		Y/N/n	%	Yes; No; N/EL [a] [c]	Yes; No; N/EL [a] [c]	Yes; No; N/EL [a] [c]	Yes; No; N/EL [a] [c]	Yes; No; N/EL [a] [c]	Yes; No; N/EL [a] [c]	Y/N/	Y/N/	Y/N/	Y/N/	Y/N/	Y/N/	Y/N/	%	A	T
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1 Environmental sustainable activities (Taxonomy-aligned)																			
Urban and suburban transport, road passenger transport	CCM 6.3 /CCA 6.	253,540.70	80.04%	Yes	No	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Management of personal mobility devices, cycling	CCM 6.4 /CCA 6.	-	0.00%	Yes	No	N/EL	N/EL	N/EL	N/EL	Yes	Yes	Yes	Yes	Yes	Yes	Yes	0.00%		
Operating expenses of enviroenmentally sustainable activities (Taxonomy-aligned) (A.1)		**253,540.70**	**80.04%**	%	%	%	%	%	%	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**Yes**	**0.00%**		
of which enabling			%	%	%	%	%	%	%	Yes	Yes	Yes	Yes	Yes	Yes	Yes			
of which transitional			%	%						Yes	Yes	Yes	Yes	Yes	Yes	Yes			
A.2 Taxonomy-Eligible but not environmental sustainable activities (not Taxonomy-aligned activities)																			
				EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	Optional							%		
Urban and suburban transport, road passenger transport	CCM 6.3 /CCA 6.	55,249.951	17.44%	EL	EL	N/EL	N/EL	N/EL	N/EL								100.00%		
Management of personal mobility devices, cycling	CCM 6.4 /CCA 6.	-	0.00%	EL	EL	N/EL	N/EL	N/EL	N/EL								0.00%		
Operating expenses of taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		**55,249.95**	**17.44%**	%	%	%	%	%	%								**99.82%**		
Total (A.1 + A.2)		**308,790.65**	**97.48%**	%	%	%	%	%	%								**99.82%**		
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Operating expenses of activities not eligible for taxonomy (B)		**7,982**	**2.52%**																
Total (A + B)		**316,772**	**100.00%**																

The Code constitutes the abbreviation of the relevant objective to which the economic activity is eligible to make a substantial contribution, as well as the section number of the activity in the relevant Annex covering the objective, i.e.:

- Climate Change Mitigation: CCM,
- Climate Change Adaptation: CCA,
- Water and Marine Resources: WTR,
- Circular Economy: CE,
- Pollution Prevention and Control: PPC,
- Biodiversity and Ecosystems: BIO.

a) Yes - Taxonomy-eligible and Taxonomy-aligned activity with the relevant environmental objective

No - No, Taxonomy-eligible but not Taxonomy-aligned activity with the relevant environmental objective

N/EL - not eligible, Taxonomy-non-eligible activity for the relevant environmental objective

Where an economic activity contributes substantially to multiple environmental objectives, non-financial undertakings shall indicate, in bold, the most relevant environmental objective for the purpose of computing the KPIs of financial undertakings while avoiding double counting. In their respective KPIs, where the use of proceeds from the financing is not known, financial undertakings shall compute the financing of economic activities contributing to multiple environmental objectives under the most relevant environmental objective that is reported in bold in this template by non-financial undertakings. An environmental objective may only be reported in bold once in one row to avoid double counting of economic activities in the KPIs of financial undertakings. This shall not apply to the computation of Taxonomy-alignment of economic activities for financial products defined in point (12) of Article 2 of Regulation (EU) 2019/2088. Non-financial undertakings shall also report the extent of eligibility and alignment per environmental objective, that includes alignment with each of environmental objectives for activities contributing substantially to several objectives, by using the template below:

	Share of OpEx/total OpEx	
	Aligned with taxonomy by objective	Eligible for taxonomy by objective
CCM	80.04%	97.48%
CCA	%	%
WTS	%	%
CE	%	%
PPC	%	%
BIO	%	%

An activity may align with only one or more environmental objectives for which it is eligible.

a) An activity may be eligible and not aligned with the relevant environmental objectives.
b) EL - Taxonomy eligible activity for the relevant objective
c) N/EL - Taxonomy non-eligible activity for the relevant objective
d) Activities are only indicated in section A.2 of this template if they are not aligned with any environmental objective for which they are eligible. Activities that align with at least one environmental objective are indicated in section A.1 of this template.
e) In order for an activity to be included in Section A.1, it must fulfil all DNSH criteria and the relevant minimum safeguards. For the activities listed in Section A.2, non-financial corporations may complete columns 5 to 17 on a voluntary basis. Non-financial enterprises may indicate in Section A.2 the substantive contribution and DNSH criteria met or not met, using: for substantive contribution - codes Yes/No and N/AM instead of AM and N/AM and for DNSH - codes Yes/No.

Annex XII - Turnover, OpEx, CaPeX

Model 1 - Nuclear and Fossil Gas Activities

Line	Nuclear energy related activities	YN/
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Fossil gas related activities	**YN/**
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

ESRS E1 - Climate Change

ESRS 2 GOV-3 – Integrazione delle prestazioni in termini di sostenibilità nei sistemi di incentivazione

Governance

(GOV-3 13) The ATM Group integrates climate considerations into the remuneration of members of the administrative, management and control bodies through specific performance objectives (MBOs). Amongst these, a common company-wide goal is the **reduction of CO_2** emissions produced, with a focus on reducing greenhouse gas emissions from diesel consumption compared to the previous year. This objective contributes **10% to the calculation of the result bonus** destined for ATM S.p.A. executives, thus aligning their performance with the target of GHG emission reduction.

Strategy

E1-1 Transition Plan for climate change mitigation

(E1-1 17) At present, the ATM Group **does not have a Transition Plan** for climate change mitigation that conforms to the ESRS E1-1 standard. However, starting in 2025, the Group will initiate a gap analysis to define the Plan, with the aim of approving it by the end of 2026 and envisaging its implementation in 2027. This pathway lays the groundwork for the definition of a Transition Plan for climate change mitigation as defined by ESRS E1-1, for a longer-term commitment, with the goal of reaching even more ambitious targets by 2050 in order to achieve climate neutrality.

Despite the absence of a formalised plan, ATM has already developed a **Sustainability Policy**, approved by the Board of Directors and monitored annually through Key Performance Indicators (KPIs) to assess the achievement of objectives. This policy was drawn up on the basis of a series of strategic reference documents, including the C40 Paris Agreement, the PUMS (Sustainable Urban Mobility Plan), the PAES (Sustainable Energy Action Plan), the PAC (Climate Air Plan) and the PGT (Territorial Government Plan), all of the Milan City Council, as well as the Milan 2020 strategy (Urban Adaptation Strategy), the SDGs and the GRI indices.

This analysis led to the definition of the pillars of the Sustainability Policy, which include:

- Zero-emission transport,
- Responsible consumption,
- Inclusive mobility,
- Great Workplace,
- Sustainable Supply Chain,

- Responsible Governance (introduced in 2023 in line with the new ESG guidelines).

Two or three KPIs are associated with each pillar, with targets for progressive improvement in the respective subject areas.

As far as greenhouse gas (GHG) emissions are concerned, the ATM Group is committed, through the Zero Emission Transport pillar, to a gradual reduction of its Scope 1, 2 and 3 emissions. In particular, for Scope 1 emissions, the goal is to reach ***Net Zero*** **by 2030**. In conducting the analysis to identify targets, there is no evidence that the 1.5°C decarbonisation scenario was taken into account.

Decarbonisation levers and main mitigation actions

The ATM Group has identified a number of concrete actions to reduce greenhouse gas emissions and mitigate climate change, including:

- Transition to zero-emission mobility
  - Fleet electrification: conversion of 1,200 buses from diesel to electric, which will significantly reduce direct emissions,
  - Energy efficiency of vehicles: implementation of braking energy recovery systems on trams and underground trains.
- Optimising energy consumption
  - 100% renewable energy: energy supply from certified green sources for business operations,
  - Photovoltaic panels on ATM premises: launch of building mapping to assess the technical and economic feasibility of installation,
  - Already equipped area: currently 11 m^2 of photovoltaic panels are operational.
- Integration of urban greenery for offsetting emissions
  - Tree planting: 400 trees have already been planted, with a target of 1,000 by 2030,
  - Installation of Green Walls: there are currently 350 m2 of green walls, with a target of 1 km2 by 2030.
- Sustainability in the value chain
  - Assessment of the supply chain: use of the EcoVadis methodology to assess carbon risk along the supply chain and with the aim of prioritising the most impactful suppliers.

These actions represent a concrete step towards the decarbonisation of business operations and the value chain, in line with GHG emission reduction targets and the ATM Group's sustainability commitments.

Managing locked-in emissions

ATM S.p.A. is gradually replacing diesel vehicles with electric and hybrid vehicles as part of the Full Electric Plan, with the aim of **eliminating diesel vehicles completely by 2030** and drastically reducing CO_2 emissions.

However, 'locked-in' (*locked-in*) emissions could result from:

Vehicles still powered by diesel, which will remain in operation until the transition is completed,

Infrastructure not yet optimised for the large-scale adoption of electric vehicles, in particular the availability of new depots.

These emissions could be a critical factor in achieving the *Net Zero* targets by 2030, especially if there are delays in upgrading infrastructure and replacing vehicles.

Alignment with Municipality of Milan strategies

ATM S.p.A., as a wholly owned subsidiary of the Municipality of Milan, is directly involved in the achievement of the energy transition goals defined by the Paris Agreement.

In 2017, during the C40 summit in Paris, the Mayor of Milan signed a commitment to a city with completely green mobility, stipulating that no more polluting vehicles would be purchased from 2025.

In line with this commitment, ATM launched **its Transition Plan** from diesel to electric in 2017, with the aim of gradually converting the entire fleet. The first electric vehicles have been in service since 2020, marking the concrete beginning of this transformation.

Finally, thanks to its Sustainability Policy and decarbonisation actions, the ATM Group has recorded a Step 1 reduction in emissions, from 76,186 tonnes of CO_2 in 2019 to 58,611 in 2024.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

(SBM-3 18) Through Double Materiality Analysis (ref. ESRS 2, IRO - 1) it was possible to identify **three impacts, 2 risks and 5 opportunities** in the climate field, summarised below:

Impacts:

- Contribution to the reduction of emissions into the environment through the full electric transition to low- or zero-emission vehicles (positive potential),

- Negative contribution to climate change through the generation of direct and indirect GHG emissions (Scope 1, 2 and 3), caused by the Group's activities and products and services (potential negative),
- Positive contribution to the environment through the purchase of certified green energy and the adoption of self-generation of energy from renewable sources (positive potential).

The emissions caused by ATM's activities constitute a significant long-term impact, of which the company is aware and which it seeks to mitigate through, among others, the Full Electric Plan and other initiatives to reduce its environmental footprint. For more information on ATM issues, see ESRS E1-6.

Risks:

- The occurrence of extreme weather events (e.g. heat waves, frost, heavy downpours, tornadoes, tropical cyclones and floods) that may impact the Group's assets with consequences for operations and the generation of extra costs for recovery operations. This risk is identified as a physical risk related to climate change.
- The interruption of power supply by suppliers due to grid overloads related to extreme weather events (e.g. increased demand during heat waves), affecting the Group's operations. This risk is identified as a physical risk related to energy supply.

The Dual Materiality analysis process revealed that no significant transition risks emerged for ATM, either in its own operations or along the value chain.

It should be noted that with reference to physical risks, the preliminary results of the ***Climate Change Risk Assessment*** carried out by the Group, which were obtained considering the *Representative Concentration Pathways 8.5 (RCP 8.5)* scenario of the *Intergovernmental Panel on Climate Change* (IPCC), have confirmed a relevant exposure to extreme weather events in the long term. The *Climate Change Risk Assessment* activity, with reference to transition risks, analysed considering the *Net Zero Emission (NZE)* scenario of the *IEA* (*International Energy Agency*), in its preliminary results confirms the absence of transition risks for the Group.

Opportunities:

- Access to public or private funding related to sustainability and climate change mitigation for the development of investments in green infrastructure and decarbonisation programmes, through collaboration with suppliers operating according to certified sustainability standards.
- **Investment in electric vehicles** and in **infrastructure** for their recharging through the use of nationally allocated funds (PNRR, PTE, etc.).
- **Sourcing** from suppliers that adopt **low-emission production processes and/or means of transport**, fostering sustainability in the supply chain and consequently improving the Group's reputation.

- **Increase in the supply of electric vehicles** due to the introduction of European regulations requiring suppliers to prohibit the introduction of new combustion vehicles, thereby increasing the production of electric vehicles and reducing procurement costs for the Group.
- Gradual reduction of diesel consumption in its operations and implementation of **energy efficiency** systems resulting in a reduction of the Group's cost/maintenance efficiency.

With reference to opportunities, it should be noted that the national and European orientation towards the decarbonisation of transport, in line with the *Net Zero Emissions (NZE)* scenario defined by the IEA (*International Energy Agency*), constitutes a great opportunity for ATM, in line with its Strategic Plan and Sustainability Policy, thanks also to the allocation of numerous funds for the electrification of its fleet, which ATM can also access in the medium term. On the other hand, the regulatory impositions on vehicle manufacturers, light or heavy, for the production of low-emission vehicles will also be an opportunity for ATM in terms of a possible reduction in the purchase costs of the assets needed to carry out its activities.

(SMB-3 19) As mentioned above, in early 2025 ATM initiated, for the first time, a *Climate Change Risk Assessment* process, in order to identify the **exposure of the Group's activities and assets** to climate change, in the short, medium and long term. The analysis also aims to assess the **Group's resilience** to relevant climate risks, identifying the measures and actions implemented to address the highlighted risks.

The analysis took into consideration the main *assets* considered strategic or particularly critical, representative of all the Group's *Business* activities and selected according to criteria of economic-financial relevance and operational utility of the Group. All selected *assets* are located within the Metropolitan City of Milan.

The analysis, conducted in early 2025, was carried out taking into account different climate scenarios, which are necessary to study the effects of climate change in the medium (2030) and long term (2050).

In particular, the analysis performed on physical risks considered the ***Representative Concentration Pathways 8.5 (RCP 8.5)*** scenario***,*** one of the greenhouse gas emission scenarios proposed by the *Intergovernmental Panel on Climate Change* (IPCC). RCP 8.5 represents the *worst case scenario* in which greenhouse gas emissions continue to grow significantly, leading to an increase in global average temperatures of more than 4°C by the end of the century and serious climate impacts.

Instead, to assess the Group's impact on transition risks and opportunities, the ***Net Zero Emissions (NZE)*** scenario defined by the IEA (*International Energy* Agency) was considered; this outlines a global pathway to zero net CO2 emissions by 2050 through radical

decarbonisation efforts. This scenario aims to limit the global average temperature increase to below 1.5°C compared to pre-industrial levels, in line with the Paris Agreement.

The preliminary analysis conducted highlights the attention placed by the Group on its assets with regard to extreme weather events, given their particular exposure to phenomena such as floods, hailstorms, tornadoes and heat waves. The Group's ability to strengthen its resilience is made possible through the implementation of **physical adaptation measures** on assets, the taking out of insurance coverage and the adoption of organisational solutions, including the establishment of replacement services in the event of infrastructure unavailability.

At the date of publication of this document, the *Climate Change Risk Assessment* is still in progress; the final results of the analysis will be shared with the 2025 Sustainability Document.

ESRS 2 IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Relevant climate-related impacts, risks and opportunities were identified during the course of the Dual Materiality process (ref. ESRS 2, IRO - 1) and therefore through the involvement of internal and external *stakeholders*.

(IRO-1 20.a) **The Impacts on Climate Change:**

With reference to climate change impacts, thanks to the involvement of a selected team of internal stakeholders and the involvement of a wide range of the Group's external stakeholders, it was possible to identify, and then assess, the magnitude and likelihood in the short, medium and long term of positive and negative, current and potential impacts caused by the Group.

For further details on the dual materiality process, please refer to ESRS 2 paragraph IRO-1.

(IRO-1 20.b, 20.c; 21) **Climate-related physical and transition risks and opportunities:**

Risks, both physical and transitional, and opportunities related to climate change, were instead identified and assessed through the **direct involvement of the corporate Management** via detailed interviews, during which it was possible to assess the magnitude and likelihood of the risks and opportunities identified, in order to understand those relevant to ATM's business in the short, medium and long term.

With reference to physical risks, the analysis looked at the gross risks to the company, net of the mitigation measures taken, assessing the possible impacts in terms of **recovery costs and loss of revenue.** The latter can result either from direct operational interruptions caused by events, or from defaults by suppliers.

On the other hand, with regard to transition opportunities, potential **economic effects** resulting from cost reductions, e.g. due to the purchase of vehicles through the use of public funds, as well as potential revenue increases, e.g. resulting from positive reputational effects in the case of sourcing from suppliers with sustainable practices, were considered.

Finally, with regard to transition risks, similarly to what was done for opportunities, possible economic effects from cost increases and/or revenue reductions were considered.

Lastly, as mentioned above, it should be noted that ATM, as a complement to the Double Materiality process, is carrying out a *Climate Change Risk Assessment* analysis aimed at exploring the climate risks and opportunities to which the Group may be subjected, by the means of climate scenarios: *Representative Concentration Pathways 8.5 (RCP 8.5) of the*

Intergovernmental Panel on Climate Change (IPCC) and the *Net Zero Emissions (NZE)* scenario defined by the *IEA (International Energy Agency)* (ref. SBM-3 19).

E1-2 Policies related to climate change mitigation and adaptation

(ESRS 2 62) Currently, the ATM Group does not have a specific formalised Policy for Climate Change Mitigation and Adaptation in relation to the Impacts, Risks and Opportunities (IRO) identified through the Dual Materiality Analysis.

The Group is committed to progressively integrating these issues into existing corporate policies, with the aim of developing a more structured approach in the coming reporting years.

However, the Group has defined its own **Sustainability Policy,** in line with the objectives of the Business Plan and with an approach geared towards competitiveness and sustainable growth. This policy consists of six strategic pillars, each of which is supported by KPIs approved by the Board of Directors and monitored annually:

- **Zero-emission transport:** reduction of greenhouse gas emissions and local pollutants through fleet electrification and offsetting actions.
- **Responsible consumption:** Minimisation of resources used through efficiency, recovery and recycling processes.
- **Sustainable Supply chain:** selection of suppliers who respect environmental, social and ethical criteria in line with ATM's values.
- **Inclusive mobility:** promotion of an accessible, multimodal transport system, with investment in innovation and digitisation.
- **Great Workplace:** creating a positive work environment, valuing diversity, equity and inclusion (DEI).
- **Responsible Governance:** adoption of a transparent and sustainable management model, oriented towards efficiency and respect for the environment.

The main objectives of the Sustainability Policy related to the Zero Emission Transport pillar include the reduction of CO2 emissions, through the Full Electric Plan, which includes the renewal of the fleet with electric vehicles and offsetting measures such as planting trees.

Scope of the Sustainability Policy

In 2024, ATM initiated a supply chain assessment for all Group companies, with the aim of assessing the carbon risk of suppliers. This analysis led to the identification of 56 high-risk entities. The analysis is the result between the level of importance for ATM from a Procurement point of view and the supplier's category, which identifies possible issues by type of activity, geographic area and relevance. From 2025, these suppliers will be directly involved in the decarbonisation process.

Governance and Responsibility for Sustainability Policy

The Board of Directors is responsible for the annual approval of the KPIs linked to the pillars of the Sustainability Policy, ensuring that progress is monitored and targets are updated.

As far as reducing emissions is concerned, ATM has set itself the goal of **Zero Emission Transport** through the progressive reduction of *Scope 1, 2 and 3 emissions.*ATM is committed to meeting the targets outlined in the Municipality of Milan's Climate Air Plan, which aims to make the city carbon neutral by 2050. ATM's contribution to this goal is significant, as the *Full Electric Plan* will reduce the city's total emissions by 22%.

ATM makes its Sustainability Policy and its environmental achievements public through a dedicated page on the corporate website and official presentations at relevant venues or upon request by stakeholders.

(E1-2 25) **Managing Climate Change in Sustainability Policy**

The Sustainability Policy addresses several aspects related to climate change:

- Climate change mitigation: managed through the Responsible Consumption pillar,
- Adaptation to climate change: addressed through the Zero Emission Transport pillar,
- Energy efficiency: monitored by measuring Scope *2*,
- Dissemination of renewable energy: not directly included in the Sustainability Policy, but supported through the procurement of energy from renewable sources.

This strategy allows ATM to integrate sustainability into its operations and to **actively contribute to the energy transition** of the city of Milan.

E1-3 Actions and resources in relation to climate change policies

(E1-3 28.a) In 2024, the ATM Group continued the implementation of several strategic initiatives to reduce CO_2 emissions, make resources more efficient and disseminate a sustainability culture within the organisation. These actions are part of the six Pillars of the Group's Sustainability Policy, monitored through specific KPIs with targets set to 2030 and targets measured annually.

The first pillar, 'Zero Emission Transport', represents the Group's main commitment to decarbonising its activities. The goal is to achieve **carbon neutrality by 2030**, mainly through the evolution of the service towards *full electric* mode and, eventually, by considering the purchase of carbon credits.

In 2024, the activities of the *Full Electric* Plan continued, resulting in a reduction of diesel consumption and related Scope 1 CO_2 emissions by 89.4% compared to 2023 (from 65,537 tonnes in 2023 to 58,611 tonnes in 2024). The ultimate goal is zero emissions by 2030.

In parallel, the Group has launched urban forestation initiatives and the implementation of natural solutions for climate mitigation:

- At the San Donato depot, the planting of 100 trees is planned.
- A new green wall will be built at the Sarca depot. These interventions will generate a potential reduction of approximately 30 tonnes of CO_2 per year. The works started in 2024 and will be completed in 2025.

On the renewable energy front, a tender has been launched in 2024 for the construction of a photovoltaic plant at the San Donato depot, as well as a feasibility analysis for the installation of panels on the roofs of ATM premises.

The expected goal of these actions is not only the achievement of zero emissions, but also the complete electrification of the service provided. Currently, ATM S.p.A. already provides **74% of its service in electric mode,** while Metro Service operates entirely with electric vehicles.

(E1-3 28.b) The actions described transversally involve all ATM Group companies and the entire value chain, both upstream and downstream. The sustainability journey involves every area of the company, from top management to the purchasing function, right up to the specific training of drivers on the new electric vehicles.

The *stakeholders* involved include shareholders, investors and the entire supplier network, which also has a positive impact on ATM's perception and competitiveness at an international level, as demonstrated by the high scores obtained in international tenders in the sustainability sections.

Actions and projects are developed both at home (Italy) and in countries where the Group operates, such as Denmark and Greece.

(E1-3 28.c) The target time horizon for the completion of the core actions is 2030, in line with the Sustainability Policy goals. Operational objectives and intermediate results are set and monitored annually.

(E1-3 28.e) From 2019 to 2024, the ATM Group has achieved significant results in reducing its *Scope 1* emissions from 76,186 (2019) to 58,611 tonnes of CO_2 (2024).

With regard to urban greenery, forestation activities and the implementation of *green walls* led to the achievement of:

- 440 trees planted (from zero in 2019),
- 350 m2 of green walls installed (from zero in 2019).

(E1-3 29.a; 29.b) In 2024, the ATM Group pursued several concrete actions for climate change mitigation, acting on multiple decarbonisation levers, including nature-based solutions, with measurable results in terms of greenhouse gas emission reductions.

The main lever the Group is investing in is the transition of the corporate fleet towards full electrification. The Full Electric Plan is one of the cornerstone projects of this strategy and aims to progressively replace diesel-powered vehicles with zero-emission electric vehicles. By the end of 2024, ATM will have placed approximately 280 electric buses in service on 23 urban lines, alongside approximately 290 hybrid buses already in operation. This decarbonisation path has already avoided the emission of around 5,000 tonnes of CO2 in the three-year period 2022-2024. The stated goal is to have 50 per cent of Milan's public transport bus fleet fully electric by 2026, thus contributing significantly to the reduction of climate-changing emissions generated by the transport service.

In parallel, the ATM Group has invested in nature-based solutions, recognising their value both in terms of CO2 sequestration and overall environmental benefits. From 2022 to 2024, 440 trees were planted at the San Donato depot and a 350 m2 green wall was built at the Giambellino depot. According to a study conducted by the University of Genoa, these interventions save an estimated 30 tonnes of CO2 per year, as well as improving air quality and promoting urban biodiversity. In 2024, new measures have also been planned to reinforce this strategy: the construction of a new green wall at the Sarca depot and the planting of an additional 100 trees at the San Donato depot. The actions do not refer to the table of GHG emission reduction targets for 2030.

Finally, a further area of action concerns the digitisation of travel tickets, which results in a positive environmental impact through the reduction of materials used and related emissions. During 2024, more than 80% of tickets were purchased in digital format, marking a major step forward in the dematerialisation of physical media. The environmental impact of this choice is significant: a digital ticket emits 3,000 times less CO2 than a traditional magnetic ticket. In line with this strategy, from March 2025 the magnetic ticket will be definitively discontinued, making way exclusively for digital solutions on a more sustainable and environmentally friendly “Chip on Paper” medium.

Through these three main levers - the electrification of the fleet, the enhancement of natural solutions and digitalisation - the ATM Group confirms its commitment to the fight against climate change, pursuing a concrete and measurable reduction in greenhouse gas emissions

and contributing to the environmental sustainability objectives of the city of Milan and the areas in which it operates.

(E1-3 29.c) For the current reporting year, it was not possible to correlate Capex and Opex for the actions detailed above. The ATM Group is committed to providing these data for future reporting.

Metrics and Targets

E1-4 Targets related to climate change mitigation and adaptation

(E1-4 32.a) The ATM Group, as part of its Sustainability Policy, has identified the 'Zero Emission Transport' pillar by defining KPIs aimed at reducing CO2 emissions into the atmosphere, with the objective of reaching Net Zero by 2030. For the individual emission categories, related actions were defined, such as the definition of a Full Electric Plan to reduce Scope 1 emissions, the purchase of certified green energy and a feasibility plan for the installation of photovoltaic panels to reduce Scope 2 emissions, and finally, an assessment on suppliers with a high carbon risk related to Scope 3 emissions.

(E1-4 32.b, 32.d, 32.e; 34.a, 34.b, 34.c, 34.d) The identified targets have the ultimate goal of lowering Scope 1 and Scope 2 emissions so as to reach Net Zero by 2030. The ATM Group will proceed with the definition of the 2050 targets. The KPIs were monitored from 2019, when the emissions corresponded to:

- Scope 1: 76,186 tCO2
- Scope 2 location-based: 127,254 tCO2

The base year was defined as a consequence of the formalisation of the Full Electric Plan, not influenced by external factors.

KPIs are updated and monitored annually. Below are the relevant targets:

Type of emission	Year	KPI	Objective 2030
Scope 1	2020	70,992 tCO_2	0 tCO_2
	2021	70,453 tCO_2	0 tCO_2
	2022	70,500 tCO_2	0 tCO_2
	2023	66,500 tCO_2	0 tCO_2
	2024	**58,611 tCO_2**	**0 tCO_2**
Scope 2 *Location-based*	2020	116,939 tCO_2	0 tCO_2
	2021	110,192 tCO_2	0 tCO_2
	2022	108,830 tCO_2	0 tCO_2
	2023	109,196 tCO_2	0 tCO_2
	2024	**119,080 tCO_2**	**0 tCO_2**

(E1-4 32.f) The methodologies used to define the above objectives were:

a. Scope 1: calculated on oil and gas consumption for heat with Defra indices,
b. Scope 2: calculated on electricity consumption with Ispra documents, according to GHG Protocol.

The annually monitored targets based on the calculation of emissions and the consequent reduction of CO2 produced, are closely linked to the increase in electric kilometres travelled, thanks to the transition of increasingly green means of transport.

(E1-4 32.c) The analysis for the identification of high carbon risk suppliers includes the entire supply chain and related suppliers of the ATM Group in Italy and Denmark.

The analysis of Scope 3 results for the entire value chain will be carried out in 2025, to understand where improvements can be made and where action can be taken to reduce CO2emissions.

For ATM S.p.A., the main activity relates to the diesel-electric transition in all corporate sectors, in close relation with the Municipality of Milan.

(E1-4 32.g; 34.e) When setting targets, the ATM Group did not consider the methodology related to the Science Based Target standards. Furthermore, compatibility with global warming limitation has not been verified. The compatibility of the targets with the 1.5°C decarbonisation scenario will be carried out from 2025 onwards.

(E1-4 32.h) The ATM Group did not directly involve the stakeholders in the definition of its objectives. The involvement of stakeholders was indirect, following the indications of

stakeholder implementation plans such as the Milan Municipality's Air Climate Plan and PUMS.

(E1-4 32.i, 32.j) To ensure the comparability of targets over time, the same methodologies and metrics were used; therefore, no changes were made in this regard by going in continuity with the planned plans. Reported metrics based on the GHG Protocol are subject to auditor control and certification.

(E1-4 34.f) The decarbonisation levers identified by the ATM Group's objectives are outlined below:

- Full Electric plan,
- Forestation,
- Photovoltaic panel installation.

E1-5 Energy consumption and mix

(E1-5 37; 38.a, 38.b, 38.c, 38.d, 38.e)

Energy consumption and mix (MWh)	31/12/2024
Fossil sources (total)	302,426.88
Of which consumption of fuel from coal and coal products	*0.00*
Of which fuel consumption from crude oil and petroleum products	*181,367.84*
Of which fuel consumption from natural gas	*62,500.00*
Of which fuel consumption from other fossil sources	*0.00*
Of which consumption of electricity, heat, steam or cooling purchased or acquired from fossil sources	*58,559.04*
Share of consumption from fossil sources in total energy consumption (%)	***27.92%***
Nuclear sources	5,836.33
Share of consumption from nuclear sources in total energy consumption (%)	***0.54%***
Renewable sources (total)	775,001.26
Of which fuel consumption for renewables, including biomass	0.00
Of which electricity, heat, steam and cooling purchased or acquired from renewable sources.	771,598.48
Of which self-generated non-fuel renewable energy consumption	3,402.78
Share of consumption from renewable sources in total energy consumption (%)	***71.54%***
TOTAL ENERGY CONSUMPTION (MWH)	1,083,264.47

(E1-5 39) The self-production is 3,402.78 MWh and is entirely produced by photovoltaics.

(E1-5 40) Total energy consumption (MWh) 1,083,264.47 / Net revenue EUR/000 (Group revenue from operations) 995,346.00 = 1.09

(E1-5 41) Total energy consumption (MWh) of the ATM Group in relation to the Group's revenues from operations.

(E1-5 42) The energy intensity was determined by taking as a reference the Transport sector in which the Group's business is concentrated.

(E1-5 43) We consider Net Revenues to be revenues from the Group's core business.

E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions

(E1-6 44)

(E1-6 48.a; 48.b)

Scope 1 Greenhouse gas emissions (tCO_2eq)			
Scope 1	**Comparative**	**N**	**% N/N-1**
Gross direct GHG emissions Scope 1 (tCO_2eq)	65,537	58,611	89.4%
Percentage of GHG emissions Scope 1 subject to regulated trading schemes (%)	0.00%	0.00%	0.00%

(E1-6 44)

(E1-6 49.a; 49.b)

Scope 2 Greenhouse gas emissions (tCO_2eq)			
Scope 2	**Comparative**	**N**	**% N/N-1**
Gross GHG emissions Scope 2 - *location-based* (tCO_2eq)	109,196	119,080	96.21%
Gross GHG emissions Scope 2 - *market-based* (tCO_2eq)	30,099	7,752	100.85%

In 2024, the Scope 2 greenhouse gas emissions calculated according to the market-based approach amount to 7,752 tCO2eq. Of these, only 169 tCO2eq (referring to activities in Italy) are related to electricity purchased in conjunction with renewable origin traceability tools such as Guarantees of Origin (GO). Therefore, the remaining share of market-based emissions is attributable to energy purchased without association with such instruments.

(E1-6 44, 51)

Significant Scope 3 greenhouse gas emissions	N (tCO_2eq)
Total gross indirect GHG emissions (Scope 3) (tCO_2eq)	**209,244**
1. Purchased goods and services	124,994
1.1. *Cloud computing and data centre* services	N/A
2. Capital goods	17,943
3. Fuel and energy-related activities	49,351
4. Upstream transportation and distribution	115
5. Waste generated in operations	1,097
6. Business trips	715
7. Employee commuting	5,955
8. Leased assets upstream	4
9. Transport and downstream distribution	N/A
10. Processing of products sold	N/A
11. Use of products sold	N/A
12. End-of-life treatment of products sold	N/A
13. Downstream Leased goods	5,582
14. *Franchising*	N/A
15. Investments	3,489

(E1-6 45.a) Not applicable

(E1-6 45.b) Part of the Group's emissions, i.e. those related to Scope 2, derive from energy purchased by ATM and used mainly for the operation of electric vehicles. By 2024, only part of the energy purchased abroad is not certified green, so the remainder comes from renewable sources. This implies that ATM's use of this energy has indirect negative impacts on climate change, potentially slowing down the achievement of carbon neutrality goals.

To this end, in order to continually improve its performance, ATM is committed to adopting measures, such as green procurement, in order to mitigate the effect of its activities on climate change.

(E1-6 45.c) Total Scope 3 emissions for 2024 is 209,244 tonnes CO2 and takes into account all categories except the following: 4 (Transport and upstream distribution), 9 (Transport and downstream distribution), 10 (Processing of products sold), 11 (Use of products sold), 12 (End-of-life treatment of products sold), 14 (Franchises).

(E1-6 45.d) The ATM Group's total emission is 386,935 considering for Scope 2 the location-based calculation. The highest CO2 production thus derives from the Group's value chain, in particular for category 1 (The production of purchased or acquired goods and services) amounting to 124,994 tonnes. CO2.

(E1-6 46)

For category 1 (Purchased goods and services): Two calculation methodologies were used.

The first was applied to calculate the CO2eq emissions generated in the production and transport of paper tickets purchased by ATM in 2024. The number of paper tickets purchased was considered and emissions were calculated using the Product Carbon Footprint (PCF) presented in the study "Climate Footprint Assessment of the ATM Milan paper and digital ticket production chain". The PCF includes the transport of tickets at ATM locations.

The second methodology was used to calculate the CO2eq emissions from all other goods and services purchased in 2024. In this methodology, the expenditure-based method was used to calculate emissions.

Method 1: number of paper tickets purchased

Method 2: amount spent on goods and services in 2024

Method 1: Carbon Footprint of the Product presented in the study "Climate Footprint Assessment of the ATM Milan paper and digital ticket production chain"

Method 2: Defra Supply Chain Emission Factors for Product Expenditure; available at https://carbonsaver.org/tools/carbon_factors_database.php

Method 1 (paper tickets only): sum of paper tickets purchased * product carbon footprint (gco2eq/paper ticket)

Method 2: sum of values spent per category of goods and services (EUR) * emission factor of the good or service purchased per unit of economic value (kgco2eq/EUR)

The estimate is 124,994 CO2eq.

For category 2 (Capital goods): The expenditure-based method was used to calculate the CO2eq emissions of all capital goods purchased in 2024.

The scope of analysis is Italy and covers all orders signed in 2024, i.e. with all products, services and capital goods purchased in the reference year. To differentiate in categories 1 and 2, the codes distinguishing CapEx and OpEx were used.

The amount spent on capital goods in 2024.

Defra Supply Chain Emission Factors for Product Expenditure; available at https://carbonsaver.org/tools/carbon_factors_database.php sum of values spent per category of capital goods (EUR) * emission factor of purchased capital goods per unit of

economic value (kgco2eq/EUR)

The estimate is 17,943 CO2eq.

For category 3 (Fuel and energy related activities - not included in 1 or 2): To calculate the CO2eq emissions associated with the fuel value chain and the transport of electricity consumed in 2024, the consumption of 1 and 2 was used. ATM consumes 100% of its electricity from renewable sources.

Fuel, electricity and cheating consumption in 2024. “Fuel and central heating: DEFRA emission factor

Electricity: IEA emission factor (total upstream + T&D)

Self-generated electricity: IEA emission factor (total upstream)”

Fuels: sum of consumption of different fuels reported for scope 1 calculation * DEFRA emission factor (kgCO2eq/litre)

Electricity: sum of purchased electricity consumption reported for scope 2 calculation * IEA emission factor (total upstream + T&D) (kgCO2eq/kWh)

Self-generated electricity: sum of consumption reported for scope 2 calculation * IEA emission factor (total upstream)

Central heating: sum of purchased heating consumption reported for scope 2 calculation * DEFRA emission factor (kgCO2eq/kWh)'

The estimate is 49,351CO2eq.

For category 5 (Waste generated in operations): CO2eq emissions associated with the treatment of waste generated by ATM operations were calculated from waste data and the final treatment given to this waste. ATM is able to trace and confirm that PET bottles are 100% recycled. However, it was not possible to trace the final treatment of the other waste, and therefore all waste is considered to be sent to landfill. To calculate the emissions in the PET bottle recycling process, an average weight of 14 grams per bottle was considered. Another source of emissions considered for this category are the end-of-life emissions of 66 buses that ATM sold to other companies in 2024. ATM has been using these buses in its operations for between 14 and 20 years. This period of use exceeds the lifespan considered for a bus (12-15 years). For this reason, and because it is an important asset in the company's operations, 100% of the buses' end-of-life emissions have been included in this category. To calculate the emissions, the main materials that make up a bus were considered on a weight basis.

Number of PET bottles

Weight of waste per category

Litres of waste water DEFRA 2024

PET bottles: number of PET bottles * 14 grams per bottle * emission factor (kgCO2eq/tonne)

Other waste: weight of waste per category * emission factor (kgCO2eq/tonne)

Waste water: volume in million litres of waste water * emission factor (kgCO2eq/million litres) The estimate is 1,097 CO2eq.

Category 6 (Business trips): ATM employees travel for work using three different means of transport: air plane, train and car. To calculate the emissions, the distances travelled were estimated in kilometres, taking into account the origin and destination of the journey. When choosing emission factors, air travel was classified as short-haul and long-haul, and rail travel was classified as domestic and international (when the train travels through more than one country). For cars, since it is not possible to know the type of car used, an average emission factor was used.

Air travel: estimated distance travelled * emission factor based on short or long haul (kgCO2eq/passenger.km)

Rail travel: estimated distance travelled * emission factor by type - national or international - (kgCO2eq/passenger.km)

Car travel: estimated distance travelled * average emission factor per car (kgCO2eq/km) The estimate is 715 CO2eq.

Category 7 (Employee commuting): We can consider two sources of emissions in this category: those occurring during the employees' commute to work, and emissions resulting from electricity and heating consumption when employees work from home. To calculate the emissions from these two sources, it was important to consider the number of days employees worked from home. ATM has a total of 74,312.5 days worked from home by its office employees. Operational employees and a small number of office employees (69) do not have a smart working policy and therefore 100% of the working days were considered as work at ATM facilities. Employee commuting: ATM shared the study 'Piano Degli Spostamenti Casa-Lavoro del personale dell'Azienda Trasporti Milanesi S.p.A.' (Home-Work Travel Plan for Azienda Trasporti Milanesi S.p.A. personnel), which was used to estimate the total distances travelled by the company's employees in their commuting. Work from home: In order to calculate the emissions from the use of electricity and heating by employees working from

home, the total number of hours worked was calculated considering 8 hours per working day. The total number of employees of the company in 2024 was 9,594, including 1,327 office employees and 8,267 operational employees.

Hours worked from home by office employees;

Distance travelled by means of transport (car, motorbike and train) DEFRA 2024;

Employee commuting: estimated distance travelled by means of transport (car, motorbike and train) * emission factor (kgCO2eq/km or kgCO2eq/passenger.km for train);

Employees working from home: total hours worked from home * emission factor (kgCO2eq/working hour);

The estimate is 5,955 CO2eq.

Category 8 (Leased assets upstream): The only upstream leasing asset identified were the 18 workstations used in a coworking space in Milan by CityLink employees. The total area used was estimated at 56 square metres. Based on these square metres, the electricity and heating consumption corresponding to the space used by CityLink was estimated. Natural gas was used as a heating fuel. CO2eq emissions were calculated using this estimated consumption.

Estimated consumption of electricity and heating in kWh.

Electricity: IEA emission factors

Natural gas: DEFRA 2024

Electricity: estimated electricity consumption * emission factor (gCO2/kWh)

Heating: estimated heat consumption * emission factor (kgCO2eq/kWh)

The estimate is 4 CO2eq.

Category 13 (Downstream Leased Assets): ATM leases buses to various companies. To calculate the CO2eq emissions, the total distances travelled during the year 2024 by these buses were used as data. In addition, an average occupancy of 11 persons per bus was considered (ratio of passengers*km to Bus*Km travelled per year by buses).

Distance travelled in km. DEFRA 2024

Distance travelled * emission factor (kgCO2eq/passenger.km)

The estimate is 5,582 CO2eq.

For Scope 3 category 15, ATM has investments in four companies:

- Movibus S.r.l. whose emissions were estimated for the 2024 inventory, up to November 2024 (last available data), and amounted to 3,489.29 tonnes of CO2,
- The Full Green Consortium is considered irrelevant for this inventory as its economic influence on ATM's financial statements is minimal,
- The SBE Consortium is also considered irrelevant for this inventory as its economic influence on ATM's financial statements is minimal,
- Metrofil S.c.a.r.l. is in liquidation and is considered irrelevant to this inventory.

The emissions of Movibus were estimated on the basis of the company's turnover (EUR 25,424,541) and the industry sector to which it belongs (Road Transport Sector). Revenue for December was not available and was estimated on the basis of the average monthly revenue from January to November 2024. Only the GHG emissions corresponding to ATM's capital share (26.18%) were included in the 2024 GHG inventory.

(E1-6 47) As for the Scope 3, the first year to be calculated is 2023 and it is 279,380 ton CO2, declining to 196,820 (pending final figure) ton CO2 in 2024.

(E1-6 47) With regard to the Scope 3, the first year to be calculated is 2023 and is 279,380 ton CO2, falling to 209,244 ton CO2 in 2024.

(E1-6 50.a, 52.a,b)

Total greenhouse gas emissions	N (tCo2)
Scope 1 + Scope 2 location-based	163,665
Scope 1 + Scope 2 market-based	88,966
Scope 1 + Scope 2 location-based + Scope 3	360,485
Scope 1 + Scope 2 market-based + Scope 3	285,786

GHG intensity based on net revenue

(E1-6 53) Total GHG emissions (location-based) (tCO2eq) 367,137.96 / Net revenue EUR/000 (Group revenue from operations) 995,346.00 = 0.37

Total GHG emissions (market-based) (tCO2eq) 292,438.96 / Net revenue EUR/000 (Group revenue from operations) 995,346.00 = 0.29

(E1-6 54) Total GHG emissions (location-based) (tCO2eq) of the ATM Group as a percentage of Group revenues from operations

Total GHG emissions (market-based) (tCO2eq) as a ratio of Group revenue from operations.

(E1-6 55) Net Revenues are considered to be the Group's core business revenues.

ESRS E1-7 GHG removals and GHG mitigation projects financed through carbon credits
There are no CO2 compensation credits credited. According to a study by the University of Genoa, the capacity of the green wall to absorb CO2 is approximately 30 tonnes CO2 per year, but this study does not count as compensatory credit, as there is still a lack of a legally recognised methodology in Italy. Therefore, ESRS E1-7 is not applicable for the ATM Group.

ESRS E2 Pollution

Impact, risk and opportunity management

ESRS 2 IRO-1 - Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

(IRO-1 11.a; 11.b) The Double Materiality analysis (ref. ESRS 2 - IRO 1, p. 161) resulted in the identification of 6 material impacts for the Group related to pollution, while no material risks or opportunities were identified for ATM.

In order to understand the relevance of each impact, risk or opportunity related to pollution, during the analysis the sites where ATM has, for example, offices, depots, warehouses, as well as the various activities carried out by ATM throughout its geographical perimeter of operations (Italy, Denmark, Greece) were taken into consideration, and the impacts resulting from the use of the various surface and non-surface vehicles, which can contribute to polluting the air, water and soil, were therefore considered. In addition, impacts, as well as risks, arising from maintenance activities along the supply chain were considered.

For the assessment of the impacts, representatives of the affected communities were involved; by sharing a questionnaire for their assessment, they were able to express the significance, in terms of magnitude and likelihood, of the impacts caused by ATM.

Furthermore, the communities concerned are constantly involved through periodic customer satisfaction surveys or working tables, which allow for continuous debate and collaboration with the Municipality of Milan and other Public Administration institutions, and with initiatives aimed at involving local communities by stimulating dialogue between the ATM Group and the territory.

E2-1 - Policies related to pollution

(ESRS 2 62) To date, the ATM Group does not have a specific policy dedicated to pollution, which complies with the requirements of ESRS 2 MDR-P. However, pollution-related issues are addressed within the Group's Quality, Environment and Safety Policy and Sustainability Policy.

The Quality, Environment and Safety Policy, approved by the Board of Directors on 26 July 2023, defines the company's strategic directions and macro-objectives. These include a commitment to environmental protection through the prevention of pollution, the reduction of atmospheric emissions and the containment of resource consumption.

Monitoring is done through a UNI EN ISO 9001 (Quality) and UNI EN ISO 14001 (Environment) certified Integrated Management System, with internal and external audits to verify the effectiveness of company policies and practices. In May 2024, ATM S.p.A. passed Certiquality's external audit for compliance monitoring. The policy is periodically updated and disseminated to all corporate levels and is also accessible to stakeholders. Impacts on air and water are monitored through periodic analytical checks in compliance with regulations.

The Sustainability Policy integrates environmental objectives with the Group's strategic vision, also involving the value chain. The main objectives include:

- Reduction of Emissions (CO2 and air pollutants such as NOx, PM10, PM2.5, NH3, etc.) through fleet renewal and the Full Electric Plan,
- Use of waste water for washing vehicles.

The Board of Directors is the highest body responsible for the implementation of both policies and, in particular, monitors the sustainability policy annually through Key Performance Indicators (KPIs) to assess the achievement of objectives.

The Sustainability Policy is based on several strategic and regulatory documents including:

- C40 Paris Agreement,
- Sustainable Urban Mobility Plan,
- Sustainable Energy Action Plan,
- Climate Air Plan,
- Territorial Governance Plan,
- Milan 2020 Strategy,
- SDGs and GRI.

The policy is published and available in the dedicated section of ATM's official website where reference is also made to its objectives and achievements, and is therefore accessible to both internal and external stakeholders.

(E2-1 15.a) ATM expresses its commitment to mitigation of environmental impacts through its ISO 14001 certified Environmental Management System. Specific operational actions and instructions are provided for the management of normal, abnormal and emergency situations, including:

- Personnel training through emergency simulations,

- Reduction of discharged water volumes through the implementation of recirculation and purification plants,
- Revamping of machinery and facilities with the adoption of more efficient technologies and pollutant abatement systems,
- Replacement of outdated boilers with technologically advanced models equipped with more accurate and optimised combustion control systems.

The scope of the Sustainability Policy covers the ATM Group's internal consumption and the entire value chain.

Furthermore, ATM has several internal procedures aimed at monitoring and managing environmental risks related to pollution. More specifically:

- Management of anomalies and malfunctions of atmospheric emission abatement plants. The procedure provides operational guidance to managers of units on which installations with atmospheric emissions covered by Single Environmental Authorisations (SEAs) depend. It defines how abatement plant anomalies or malfunctions are managed and recorded, with the aim of reducing the risk of reoccurrence and activating the necessary control and maintenance plans. The procedure also regulates how events are reported down the line and, by SPQ Ambiente, to the relevant control bodies.
- Emergency management of spills. This operational instruction provides ATM and NET operators with instructions on how to operationally manage environmental emergencies resulting from spills of pollutants or slippery substances, both inside and outside company premises and sites, through dedicated drills. The document makes it possible to:
    - provide immediate operational guidance,
    - record incidents in order to analyse them later and reduce risks,
    - initiate remediation activities in a timely manner,
    - track all the exercises carried out.

  Third-party companies operating on ATM sites are obliged to apply the provisions of the procedure.

  The scenarios considered involve spills of:

- small size (approximately 1-9 litres),
- medium size (10-500 litres),
- large (over 500 litres approximately).

  For safety purposes, any spillage that may pose a risk to the health or safety of operators is handled as a significant event.

- **Provision of chemicals and materials potentially containing MMVF (man-made vetrous fibres) and management of safety data sheets.** The procedure regulates the

procurement process of products and materials, assessing not only the required technical characteristics, but also the toxicological, environmental, chemical and physical aspects of the substances used. The aim is to ensure maximum safety for users and the lowest possible environmental impact. If there are alternatives, the choice should always go to the product with the least risk to health and the environment.

- **Environmental emergency management.** The procedure governs how environmental emergencies that may occur in the course of the activities of ATM Departments are identified, assessed and managed. The main objectives are:
    - preventing and mitigating potential environmental impacts,
    - defining ways to control and contain accidents in order to limit their effects on people, the environment and property,
    - establishing responsibilities and operational arrangements for implementing health and environmental protection measures,
    - ensuring proper information and communication to workers, emergency services and competent authorities,
    - defining the modalities of restoration and clean-up of sites affected by environmental accidents.

(E2-1 15.b) There is a chemical risk assessment already in place at the procurement stage, to avoid the introduction of hazardous substances and, where not avoidable, to take mitigation measures as per the above procedures.

(E2-1 15.c) The topic is not specifically addressed in the Sustainability Policy, as it is not considered relevant. Nevertheless, current regulations are followed by taking all necessary measures to avoid accidents and emergency situations that may impact people and the environment.

E2-2 Actions and resources related to pollution

(ESRS 2 62) The ATM Group has not prepared an action plan in accordance with the requirements of ESRS 2 MDR-A. Despite this, during 2024 ATM continued various initiatives aimed at reducing pollution-related impacts, contributing to the objectives of its Sustainability Policy. The main actions include:

c. Plan Full Electric: the transition of the bus fleet from diesel to electric continues, with around 280 e-buses in service on 23 routes and 290 hybrid buses already in operation. By 2026, 50% of Milan's bus fleet is expected to be electric. This project will allow an estimated annual reduction of 75,000 tonnes of CO2, with significant benefits also in terms of reducing emissions of NOx (from 900 t to 26.77 t), PM10 (from 18.66 t to 7.09 t) and PM2 (from 93.34 t to 27.40 t).
d. Urban afforestation and green walls: Between 2022 and 2024, 440 trees will be planted at the San Donato depot and a 350 m2 green wall will be created at the Giambellino depot. Such interventions generate an estimated 30 tonnes of CO2 savings per year and contribute to air quality. The green wall also absorbs 0.17 t/year

of PM10 and 0.67 t/year of NO2. In 2024, a new green wall will be installed at the Sarca depot and an additional 100 trees will be planted.

e. Recirculating washing systems: as at 31 December 2024, 12 out of 17 systems were installed, with 70% coverage. The plants allow the recovery and purification of water used for washing vehicles, reducing both water withdrawals and discharges into the sewerage system. The aim is to complete the installation on all sites by 2030.
f. Revamping of heating plants: in 2024, the boilers of the Cascina Gobba, Palmanova, Leoncavallo and Precotto sites were replaced. At the same time, the Giambellino depot was connected to district heating, eliminating direct emissions in the urban area. Such interventions lead to a reduction in polluting emissions by switching to more efficient thermal power plants.

Finally, ATM applies an annual monitoring system, validated by the Board of Directors, to verify the effectiveness of actions and to promptly identify any anomalies and critical issues.

The pollution reduction actions concern the entire Lombardy region where ATM carries out its Local Public Transport activities.

The Full Electric Plan involves the non-guided surface fleet (buses), which accounts for approximately 30% of ATM's total service.

Recirculating washing plants affect all LPT activities, impacting about 70% of the operating sites, generating benefits along the value chain both upstream (reduced water consumption) and downstream (lower discharge volumes and reduced load on city sewage treatment plants).

The time horizon for the completion of the main planned actions is 2030.

As far as industrial discharges are concerned, there was a decrease from a value of 2,634 ml of H2O in discharge in 2022 to a value of 1,997 ml in 2023 to a final value of 2,051 in 2024. The trend is decreasing.

Metrics and Targets

E2-3 - Targets related to pollution

(ESRS 2 81) The ATM Group has not defined any specific pollution-related targets, other than compliance with current legislation.

ATM has a dedicated function for monitoring air emissions to ensure compliance with legal limits and prevent regulatory values from being exceeded. In particular, specific standards are applied for the management of fluorinated gases (FGAS), with the aim of mitigating the greenhouse effect. In addition, the presence of underground double-chambered tanks, which are subject to mandatory leak tests, prevents potential soil contamination. If anomalies are

detected, ATM promptly intervenes with clean-up operations, also carried out for past situations, even when the direct responsibility of the Group is not established.

There are no formalised specific targets on water emissions. However, operating instructions and internal procedures expressly prohibit actions that could compromise the quality of water discharges. A monitoring system is in place to detect any worsening of discharges and activate mitigation actions if necessary. In addition to internal controls, the network is subject to periodic sampling by MM (Metropolitana Milanese), which carries out frequent checks. Currently, no specific ecological thresholds have been identified for the soil. However, soil protection is ensured through operational procedures and instructions that prohibit the deposit of waste on bare ground and regulate maintenance activities to avoid environmental damage. In the case of spills on company or public land, precise operating procedures and prompt intervention by AMSA for clean-up are provided for. These events are also tracked and reported within the environmental management system. We emphasise that incidents such as the accidental impact of oil pans by screeders while vehicles are in motion are detected and handled in this manner.

(E2-3 25) The ATM Group has not defined any specific pollution-related targets, other than compliance with current legislation.

E2-4 Air, water and soil pollution

(E2-4 28.a)

Destination	UoM	Value	Notes
Air	Tonnes	**234**	Nox all other pollutants are below thresholds
Water	Tonnes	**0**	All estimated analytes are below thresholds

(E2-4 28.b) - Not applicable.

(E2-4 29) For the purposes of paragraph 28, the values are consolidated by including emissions from facilities over which the Group has financial and/or operational control, provided that such facilities exceed the thresholds set out in Annex II of Regulation (EC) No 166/2006 (PRTR register). Plants that do not exceed these thresholds, although falling under the Group's control, are not included in the scope of consolidation for this disclosure.

(E2-4 30.a, 30.b, 30.c)

ATM S.p.A and NET Srl take water directly from the public aqueduct in the municipalities where the various company plants are located for both human (canteens and changing rooms)

and industrial (washing company cars) purposes.

All types of water (civil, industrial and first and second rainwater) are discharged into public sewers except in the case of the Famagosta depot, where they are discharged into surface water bodies (Southern Lambro-Olona river). The analysis conducted relates exclusively to industrial-type effluents, the origin of which derives from the use of water for washing company vehicle fleets, for which a number of certified analytical reports are available, considered as input for the determination of pollutants discharged into public sewers or, where authorised, into surface water bodies.

That said, in order to assess the extent of these pollutants, the methodology adopted is as follows:

- all analytical evidence was collected for the industrial water samples at the ATM and NET sites concerned. The mapped parameters are as follows:
- pH, conductivity, total suspended materials, colour, COD (Chemical Oxygen Demand), BOD5 (Biochemical Oxygen Demand), ammoniacal nitrogen, nitric nitrogen, total phosphorus, chlorides, sulphates, total surfactants, aluminium, arsenic, cadmium, total chromium, hexavalent chromium, iron, manganese, nickel, lead, copper, zinc, total hydrocarbons, aromatic organic solvents and halogenated organic compounds,
- each substance is measured in specific units (e.g. mg/l),
- The concentration distribution of the pollutants measured in each sample was assumed to be representative of the trend over the reference period. Therefore, knowing the annual quantities of water discharged into the public sewerage system for each deposit, deduced from the annual declarations of industrial water discharges sent to the respective integrated water services managers, the share of the specific pollutant for each location was apportioned to the total volume discharged (in m3),
- the quantities per pollutant deposition per year were added up to obtain the total value of the specific pollutant for ATM and NET,
- the resulting values were compared with the limits in Annex II of Regulation EC 166/2006.

In analogy to what was carried out for the estimation of emissions into the atmosphere (see Section 1.4) for each individual pollutant, the total value obtained was compared with the relevant quantitative threshold for emissions into water, a threshold indicated in the list of pollutants to be quantified (see Article 28 of EU Delegated Regulation 2023/2772). Again, only for values above the threshold values does the reporting obligation (see Annex II of EC Regulation 166/2006) laid down in the EU Regulation apply.

1.1 Estimation of emissions from stationary installations

To estimate the quantities of pollutants emitted by stationary plants, in the form of ducted emissions, the calculation was based on the annual pollutant emission analyses prescribed by

the local AUAs (specifically, the company locations of Precotto, Molise, Teodosio and Gallaratese). From these data, the following methodology was applied in the calculation process:

- the concentration of pollutants was multiplied by the flow rate (data extrapolated from official reports of analytical campaigns on atmospheric emissions) to obtain a mass flow,
- the mass flow was multiplied by the period of use (identified in excess of 4 hours per day for 250 working days during 2024) to obtain the annual quantity of pollutant (ton/year or kg/year) for the time period of interest (2024).

1.2 Estimation of atmospheric emissions from the operation of surface vehicles

The COPERT software, a calculation application for estimating emissions generated by vehicle traffic developed by the European Environment Agency EEA within the framework of the CORINAIR programme, was used to estimate the quantities of the main pollutants from emissions generated by the diesel and hybrid surface bus fleet. COPERT, an acronym for Computer Programme to calculate Emission from Road Traffic, applies a calculation methodology based on the contents of the EMEP/CORINAIR Emission Inventory Guidebook - 2007, available on the website of the European Environment Agency. The amount of substances emitted into the atmosphere by vehicles depends on many factors. In this specific case, the following software calculation parameters were entered into the input software for the required time frame year (2024) for the ATM Spa and NET Srl fleets:

- numbers and environmental classes of motorisation,
- driving conditions: average speed and kilometres driven by type of road,
- type of fuel,
- climatic conditions: minimum temperature and maximum monthly relative humidity (ARPA Viale Juvara station),
- road slope.

1.3. Estimated emissions from thermal power plants

The quantification of pollutants from thermal power plants in service at ATM Spa and NET Srl locations was based on emission factors proposed by MASE (Ministry of the Environment and Energy Security):

g. The emission factors of the individual pollutants were extracted from the reference document,
h. these were then multiplied by the methane consumption for the year 2024, providing an estimate of the amount of pollutants emitted per location.

1.4. Comparison of Final Results with Threshold Values (Regulation (EC) 166/2006)

Once the calculations detailed in paragraphs 1.1-1.2-1.3 above had been carried out, for each individual analyte the obtained sum of these values was compared with the relevant quantitative threshold for emissions to air, a threshold indicated in the list of pollutants to be quantified (see Article 28 of EU Delegated Regulation 2023/2772). It should be noted that only for values above the threshold values does the reporting obligation (see Annex II of Regulation EC 166/2006) set out in the EU Regulation apply.

E2-5- Substances of Concern and Substances of Very High Concern

(E2-5 34)
Total amount of substances of concern generated or used during production or purchased.

Risk class	UoM	Value	Notes
Risk class not specified	Tonnes	**15,164**	It is specified that 99% is the consumption of automotive diesel.

Total quantity of substances of concern leaving facilities in the form of emissions, products or parts of products or services.

Risk class	UoM	Value	Notes
Risk class not specified	Tonnes	**71**	It is specified that 96% is carbon monoxide emission (air matrix)
Risk class not specified	Kilograms	**5**	Water matrix

(E2-5 35) Total quantities of substances of very high concern leaving facilities in the form of emissions, products or parts of products or services, broken down by main hazard classes of substances of concern.

Risk class	UoM	Value	Notes
Carcinogenic substances category 1 and 2	Kilograms	**6**	Air matrix
Germ cell mutagenicity, categories 1 and 2	Kilograms	**0**	Air matrix
Toxicity for reproduction, categories 1 and 2	Kilograms	**20**	Air matrix
Carcinogenic substances category 1 and 2	Kilograms	**0**	Water matrix
Germ cell mutagenicity, categories 1 and 2	Kilograms	**0**	Water matrix
Toxicity for reproduction, categories 1 and 2	Kilograms	**0**	Water matrix
Endocrine alterations to human health	Kilograms	**0**	Water matrix
Endocrine disruptions to the environment	Kilograms	**0**	Water matrix
Persistent, Mobile and Toxic or Very Persistent, Very Mobile Properties	Kilograms	**0**	Water matrix
Persistent, Bioaccumulative and Toxic (PBT) Properties o Very Persistent, Very Bioaccumulative	Kilograms	**0**	Water matrix
Respiratory sensitisation, category 1	Kilograms	**0**	Water matrix
Skin sensitisation, category 1	Kilograms	**1.974**	Water matrix
Chronic danger to the aquatic environment, categories 1 to 4	Kilograms	**439.259**	Water matrix
Danger to the ozone layer	Kilograms	**0**	Water matrix
Specific target organ toxicity, repeated exposure, categories 1 and 2	Kilograms	**0**	Water matrix
Specific target organ toxicity, single exposure, categories 1 and 2	Kilograms	**380.679**	Water matrix

Total quantities of substances of very high concern generated or used during production or purchased; broken down by the main hazard classes of substances of concern.

Risk class	UoM	Value	Notes
Toxicity for reproduction, categories 1 and 2	Kilograms	**44**	Air matrix
Can interfere with the endocrine system in the environment	Kilograms	**6**	Air matrix
It accumulates in the environment and in living organisms, including humans (persistent, mobile and toxic or very persistent and very mobile properties)	Kilograms	**23**	Air matrix
Accumulates significantly in the environment and in living organisms, including humans (persistent, bioaccumulative and toxic or very persistent and very bioaccumulative properties) (air matrix)	Kilograms	**11**	Air matrix
Carcinogenic substances category 1 and 2	Kilograms	**1.71**	Water matrix
Germ cell mutagenicity, categories 1 and 2	Kilograms	**0**	Water matrix
Toxicity for reproduction, categories 1 and 2	Kilograms	**20.67**	Water matrix
Endocrine alterations to human health	Kilograms	**0**	Water matrix
Endocrine disruptions to the environment	Kilograms	**0**	Water matrix
Persistent, Mobile and Toxic or Very Persistent, Very Mobile Properties	Kilograms	**0.0017**	Water matrix
Persistent, Bioaccumulative and Toxic (PBT) Properties o Very Persistent, Very Bioaccumulative	Kilograms	**0.0017**	Water matrix
Respiratory sensitisation, category 1	Kilograms	**23.58**	Water matrix
Skin sensitisation, category 1	Kilograms	**155.81**	Water matrix
Chronic danger to the aquatic environment, categories 1 to 4	Kilograms	**612.52**	Water matrix
Danger to the ozone layer	Kilograms	**0**	Water matrix
Specific target organ toxicity, repeated exposure, categories 1 and 2	Kilograms	**176.03**	Water matrix
Specific target organ toxicity, single exposure, categories 1 and 2	Kilograms	**202.42**	Water matrix

ESRS E5 Resources use and the circular economy

Impact, risk and opportunity management

ESRS 2 IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

(IRO-1 11.a) As part of the Dual Materiality process, the ATM Group has identified the following material IROs related to resource use and the circular economy:

Impacts

- Contribution to the recovery and recycling of materials through the adoption of a policy for the sustainable management of the disposal and recovery of all or part of the Group's operational vehicles at the end of their life cycle (Potential positive impact in the short to medium term involving the upstream and downstream value chain),
- High consumption of materials and resources, such as steel, aluminium and rare minerals, with indirect negative impacts on the environment and ecosystems caused by their extraction (current negative impact in the short to medium term involving both the Group's own operations and the upstream value chain).

Opportunities

- Adoption of efficient practices for the management and disposal of post-maintenance waste, favouring recycling activities where possible, with consequent potential for reducing disposal costs through resource optimisation (Opportunities in the short to medium term involving the upstream and downstream value chain).

(IRO-1 11.b) For the assessment of IROs, especially with regard to impacts along the value chain, representatives of affected communities/suppliers were involved, who by sharing a questionnaire were able to express the significance of the impacts caused by ATM in terms of magnitude and likelihood.

E5-1 Policies related to resource use and circular economy

(ESRS 2 62) The ATM Group does not have a specific policy dedicated to the use of resources and the circular economy in compliance with the requirements of ESRS 2 MDR-P. However, it pursues a strategic sustainability line integrated into its business model, setting itself as a benchmark in terms of official, operational (mobility services), economic, social and environmental sustainability.

This strategy is developed in the Strategic Industrial Plan 2021-2025 and implemented in the Sustainability Policy. The Policy outlines the sustainability commitments undertaken by the Group through six pillars of action:

- Zero-emission transport,
- Responsible consumption,
- Sustainable Supply Chain,
- Inclusive mobility,
- Great Workplace,
- Responsible Governance.

The pillar on Responsible Consumption aims to use the minimum indispensable resources by means of consumption efficiency processes and the recovery, reconditioning and recycling of used resources. Through its Sustainability Policy, the Group contributes positively to the achievement of the Sustainable Development Goals defined by the United Nations 2030 Agenda. Specifically, the Responsible Consumption pillar contributes to Goal 7 (Ensure access to affordable, reliable, sustainable and modern energy systems for all), Goal 11 (Make cities and human settlements inclusive, safe, secure, durable and sustainable) and Goal 13 (Promote action, at all levels, to combat climate change). The targets are for 2030, but each year the company sets annual targets that are constantly measured and reported to the Board of Directors.

The Board of Directors is involved in the validation of the annual results of the Sustainability Policy KPIs. Since December 2024, the Board Committee on Sustainability has also been operational, liaising with the Sustainability Policy Committee (operational and management body) to review sustainability policy and actions.

There are no references to specific regulations on the circular economy. However, for waste management the ATM Group:

- Complies with current regulations,
- It ensures transparency, efficiency and traceability in waste management,
- It annually prepares the **Single Environmental Declaration Form** to declare waste produced.

Although no specific policy on the circular economy is formalised, in 2024 ATM initiated a ***supply chain assessment*** (Italy and Denmark) using the Ecovadis method, which includes the use of raw materials and the circular economy of products among its evaluation criteria.

(E5-1 15.a, 15.b) Not having formalised a specific policy on resource use and the circular economy, the ATM Group does not address in detail the issues of the phasing out of virgin resources and the sustainable sourcing and use of renewable resources.

E5-2 Actions and resources related to resource use and circular economy

(ESRS 2 62) The ATM Group has not taken any specific actions that can be attributed to a formalised policy on resource use and the circular economy. However, several initiatives have been implemented over time with the aim of reducing environmental impact, improving waste management and promoting resource recovery and recycling.

In particular, ATM favours the procurement of products and materials that are eco-friendly, biodegradable or characterised by high environmental performance. In waste management, the company adopts solutions that favour recovery and reuse over disposal. Waste assimilable to municipal waste is delivered to the municipal separate collection system, while industrial waste, solid and liquid, hazardous and non-hazardous, is handled through contracts with authorised companies. Other types of special waste, such as metals, batteries, oils and tyres, are mainly sent for recovery at specialised centres.

Below is a list of initiatives undertaken over the years:

Sales regulations

Among the main actions taken was the adoption of Sales Regulations aimed at promoting the reuse of materials and outgoing resources. This Regulation provides for the evaluation, by the managers and with the support of the Sustainability Unit, of the possible uses of materials,

giving priority to their second life within the company. If this is not possible, reconditioning is sought or the material is sold externally; only as a last resort is consideration given to recycling, in compliance with current environmental regulations (Leg. Decree No. 152/06) and corporate procedures on special waste management.

Uni En Iso 14001:2015

With regard to the Group's environmental impact management system, the companies ATM S.p.A., Rail Diagnostics S.p.A., and NET S.r.l. use an environmental management system that complies with the UNI EN ISO 14001:2015 environmental standard. In order to maintain this certification, companies adopt specific organisational documents (e.g. manuals, work instructions and procedures) relating to practices for the good management of environmental resources, the management of environmental emergencies and the assessment of the significance of environmental impacts.

Eco-compactors

Among specific actions already under way, since 2021, ATM has started a trial that will see the installation of the first two eco-compactors, for PET plastic recycling, within the company's Monte Rosa site and at the Cascina Gobba underground station. The operation of the eco-compactor is very simple: by inserting a plastic bottle of any size that has contained liquid foodstuffs, it will be recycled and used for the production of new bottles (bottle to bottle). In addition to environmental benefits, this operation also brings personal advantages. By logging in through the Coripet App, you can earn points for each recycled bottle. The prize list is constantly being updated. The initiative is in cooperation with CORIPET, a voluntary non-profit consortium recognised by the Ministry of the Environment. In October 2022, a third machine was placed at the Como-Brunate funicular station. From the start of the installations until the end of 2024, 83,323 bottles equivalent to **3.3 tonnes of recycled plastic** and a saving of more than **5.6 tonnes of CO2.**

Water dispensers

A further intervention concerns the installation of water dispensers at company premises and terminals, with the aim of reducing the use of plastic bottles. The initiative, which started in 2019, was accompanied by the distribution of branded water bottles to employees. The results of this activity have led to a progressive reduction in plastic consumption:

- **2022**: 3,415 bottles saved (~34 kg of plastic),
- **2023**: 4,206 bottles saved (~42 kg of plastic),
- **2024**: 2,446 bottles saved (~24.5 kg of plastic), a figure that is decreasing due to the temporary shutdown of a machine.

Digitisation of tickets

In 2024, more than 80% of tickets were purchased in digital format, significantly reducing paper consumption.

Recycling

In 2024, the provision of waste bins was implemented at all company desks.

Metrics and Targets

E5-3 Targets related to resource use and circular economy

(ESRS 2 80.a) The ATM Group's main objective is to increase the percentage of waste recovered as a percentage of total waste produced, in line with the second pillar of its Sustainability Policy, dedicated to **"Responsible Consumption"**. This objective reflects in a concrete and measurable way the Group's commitment to the efficient management of resources and the reduction of waste-related environmental impact.

KPI	Final Data					Objective
	2019	2022	2023	2023	2024	2030
% of waste recovered on total - Italy	75%	58%	67%	61%* Target not achieved; new tender to be launched in 2024	52%	85%
				with reward criteria for calculating Atm waste recovery		

(ESRS 2 80.b) The quantitative target set is to achieve a recovered waste percentage of 85% by 2030, with annual intermediate targets. The calculation is made considering the quantity and classification of waste produced by ATM according to CER codes.

(ESRS 2 80.c) The scope of the target concerns only the Italian territory and refers in particular to the **maintenance activities** of ATM and its Italian subsidiaries, such as Rail Diagnostics.

(ESRS 2 80.d) The baseline was set in 2019, when the **percentage of waste** recovered stood at 75%. The ultimate goal is to reach 85% by 2030.

(ESRS 2 80.e) The target is set at 2030, with **annual reviews** on the results achieved and with the possibility of updates or corrections during the course of the project.

(ESRS 2 80.f) No specific calculation methodologies or reference scenarios are applicable, as the measurement is directly related to the management of industrial waste according to current legislation.

(ESRS 2 80.g, 80.h) The objectives are not based on sound scientific data and there is no direct

involvement of the stakeholders in defining them.

(ESRS 2 80.i) To date, there have been no changes to the objectives, metrics or measurement methodologies adopted. The assumptions and data collection processes remain unchanged.

(ESRS 2 80.j) An annual monitoring of the results shows a **intermittent trend in the percentage** of waste recovered, closely linked to the type of maintenance work carried out in the different years. By way of example, in 2019 the decommissioning of underground trains allowed a significant portion of the materials to be sent to a second life, which had a positive impact on the recovery figure. On the contrary, in 2022 the replacement of tram tracks and sleepers led to an increase in materials that could not be recovered by law, causing the percentage to worsen.

A further critical element in the reporting of the data concerns the phase after the waste has been handed over to the disposal companies: Indeed, once ownership of the waste has been transferred, ATM is no longer able to trace the actual final fate of the waste, nor whether the part handed over as "disposed of" is then actually recovered by the operator. This dynamic leads to an underestimation of the actual recovery and for this reason, an internal analysis is currently under way to verify the possibility of improving the traceability of the supply chain, with particular attention to the share of waste that, although classified as disposed of, is subsequently sent for recovery.

(E5-3 24 and 25) The objective is closely linked to waste management and the maximisation of waste recovery, with particular reference to the European waste hierarchy that favours recovery over disposal. On the other hand, there are currently no specific targets for increasing the circular design of products, the use of secondary resources or the sustainable supply of renewable resources.

(E5-3 27) The targets set by the ATM Group on waste management and increasing the percentage of waste recovered are not mandatory by law, but are voluntary and optional targets defined within the Group's Sustainability Policy. These objectives represent ATM's commitment to a more responsible management of resources and the gradual integration of circular economy principles into its activities.

E5-4 Resource inflows

(E5-4 30) During 2024, the main material incoming resources for the ATM Group were represented by the new vehicles acquired for the Local Public Transport service, which are fundamental for the performance of ATM S.p.A. and NET.

Specifically, the following were delivered during the year:

- 1 underground train for the M1 line,
- 4 medium-capacity trams,
- 19 trolleybuses,
- 38 electric buses,
- 22 hybrid buses.

The total weight of the main incoming material resources is shown in the table below:

(E5-4 31.a)

Type of incoming resources[26]	UoM	2024 Total weight of products
Electric Buses	Tonnes	524
Hybrid buses	Tonnes	254
Trolleybus	Tonnes	523
Tram	Tonnes	148
Underground trains	Tonnes	183
Total	**Tonnes**	**1,633**

(E5-4 31.b and 31.c) There is currently no specific data available on the percentage of bio-materials from sustainable supply chains or the amount of secondary materials reused or recycled for the production or maintenance of vehicles and infrastructure.

(E5-4 32) The weight of vehicles is defined in data sheets detailing the vehicles purchased in the reporting year. For this reason, the methodology used for the calculation corresponds to the weight given in the cited documents.

E5-5 Resource outflows

Products and materials

(E5-5 35, 36.a, 36.b, 36.c) The ATM Group carries out the management of the Local Public Transport service and does not manufacture or design products or materials.

Therefore, the requested information on:

- design according to circular economy principles (durability, reusability, reparability, disassembly, remanufacturing, etc.),
- expected durability, reparability and recyclable content of products and packaging placed on the market.

In any case, the ATM Group is committed to promoting sustainability and the circular economy in its operational processes and purchases, favouring, where possible, materials and supplies with reusable and recyclable characteristics.

Waste

(E5-5 37.a, 37.b, 37.c, 37.d)

Category	UoM	2024
Total waste produced	**Tonnes**	**6,817.17**
of which hazardous	Tonnes	776.56
Total non-recycled waste	Tonnes	3,653.19
	Percentage	53.59%
Recovery operation	**UoM**	**2024**
Hazardous waste	**Tonnes**	**533.74**
Preparation for re-use	*Tonnes*	*0.05*
Recycling	*Tonnes*	*4.14*
Other recovery operations	*Tonnes*	*529.55*
Non-hazardous waste	**Tonnes**	**2,646.10**
Recycling	*Tonnes*	*135.19*
Other recovery operations	*Tonnes*	*2,510.91*
TOTAL		**3,179.85**
Disposal operation	**UoM**	**2024**
Hazardous waste	**Tonnes**	**242.82**
Other disposal operations	*Tonnes*	*242.82*
Non-hazardous waste	**Tonnes**	**3,394.51**
Incineration	*Tonnes*	*632.44*
Burial	Tonnes	3.96
Other disposal operations	Tonnes	2758.108
TOTAL		**3,637.32**

(E5-5 38.a, 38.b) The ATM Group does not generate a prevailing and recurring type of waste, as the composition of waste depends on the activities carried out and the construction sites active from year to year. However, waste sources of potential relevance to the public transport sector include: waste from vehicle maintenance (e.g. used oils, tyres, batteries), metal waste from mechanical processing or parts replacement, electronic waste (WEEE) from the decommissioning of electronic devices, and assimilable municipal waste from the day-to-day activities of operating sites. Detailed information on the material composition of the waste (e.g. percentage of metals, plastics, biomass, etc.) is currently not available. The ATM Group is committed to strengthening its waste tracking and classification processes in order to improve the quality of environmental information made available in future reporting.

(E5-5 39) The total amount of hazardous waste generated by the ATM Group is shown in the table above and is **776.56** tonnes. The Group does not generate radioactive waste, as defined in Article 3(7) of Directive 2011/70/Euratom.

(E5-5 40) Please refer to chapter ESRS 2 General Information for waste calculation methodologies.