



Object: Stakeholder Engagement Policy

Snam is fully aware of its responsibilities as a leading company in Europe in the construction and integrated management of energy infrastructures, contributing to economic development and the wellbeing of its employees and associates, as well as the local communities in which it operates.

Snam strongly believes that today, more than ever, it is necessary to have a broader outlook and range of action than in the past, aiming to create solid relationships between people, suppliers and communities, responding to the needs of sustainable development for all stakeholders. The introduction of the "corporate purpose" (Energy to inspire the world) in the Bylaws will increasingly orientate the Company's activities towards the creation of long-term value while safeguarding the interests of all relevant stakeholders. This was introduced along with the commitment to favor the energy transition towards forms of use of resources and energy sources compatible with environmental protection and progressive decarbonization. Snam recognizes the central importance of stakeholders as the beneficiaries of the value created through the Company's activities, which is shared with them, on the basis of individual prerogatives and expectations. Respond to their needs can positively influence our license to operate, competitive position and long-term success.

This policy, which applies to all the Group (corporate and its subsidiaries), is aimed at ensuring that the corporate stakeholder engagement strategy is applied consistently across all operations.

Consistent with its Business and Sustainable Development Model, with its Code of Ethics and the strategic Shared Value approach, Snam continuously interacts with its stakeholders according to the criteria of transparency, honesty and impartiality, in compliance with the laws and regulations defined by the national regulatory system.

Stakeholder identification and engagement

Snam's engagement with its stakeholders, at supranational, national and local level (e.g. local communities, public authorities, associations and non-governmental organizations, suppliers, shareholders, investors etc.), is a key activity for the correct development and implementation of the Company's projects.

In order to define the suitable terms of engagement and involvement, stakeholders, after being identified, are then divided and prioritized on the basis of reciprocal interests. Snam adopts diversified and flexible dialogue and involvement practices (e.g. webinars, focus groups, surveys, etc.), in response to the various characteristics and needs of each stakeholder:

- At national and supranational level, the interested stakeholders (employees, suppliers, authorities and institutions, shareholders and investors, gas system operators) contribute with their opinions, perspectives, skills and resources (considered of the utmost importance by Snam) to the implementation of the Company's activities based on a

mutually beneficial approach.

The identification of stakeholders is performed periodically, and stakeholders are then grouped to allow the management of the relationships to be adjusted to specific and local realities, needs and expectations.

- Similarly, at local level, stakeholder engagement strategy consists in a constant and proactive dialogue with all the stakeholders interested by each project, so to promote the social acceptability of infrastructures.
Snam works extensively throughout the territory by interfacing with local communities, local associations, and local governments in the context of permitting and authorizations procedures.
In this scenario, Snam draws up accurate stakeholder maps which identify - directly or indirectly - affected communities and a range of local stakeholders (including the ones who have the capacity to influence both public opinion and decision-making processes).
In accordance with that, Snam defines customized stakeholder engagement programs, to set actions and methods to be undertaken on a periodic basis to successfully manage relations with the different categories.

Snam's stakeholders' identification process includes also vulnerable groups. This activity is carried out by Snam Foundation, a corporate foundation acting in support of Snam to contribute to the Just Transition and active on the national territory to promote the development of the society and fight against social exclusion and poverty in its different dimensions (e.g. food, educational, energy poverty, etc.). Snam Foundation achieves this goal supporting concrete projects, realized in partnership with a plurality of local stakeholders intervening in the most fragile contexts throughout the national territory.

Snam Foundation identifies vulnerable groups to be engaged in its initiatives through the collaboration with a network of different local third sector organizations (NGOs, associations, etc.). These organizations define different criteria to identify vulnerable groups in order to reflect the differences of the local contexts in which they intervene.

The Company' stakeholder engagement aims to:

- implement a continuous and constructive dialogue with Snam's main group of stakeholders on sustainability strategies, taking into consideration any stakeholder requests and identifying areas for improvement and synergies;
- define the Company's material issues in the ESG area;
- contribute maintaining the corporate reputation;
- contribute identifying impact, risks and opportunities .

The stakeholder engagement process is based on constant and proactive communication between Snam and its stakeholders and aims to stimulate continuous and mutual growth. All company departments contribute to the stakeholder engagement activities, each one in relation to their prerogatives, roles and responsibilities. The responsibilities and the processes to identify and prioritize stakeholders are regulated by the procedure *SNAM-SUST-ITL-01*.

Each function is responsible to choose for the relevant stakeholder the best engagement tool, to ensure that stakeholders have sufficient capacity to engage with the Group and to manage potential risks that can arise from the stakeholder engagement activities. As for the management of those risks, should a stakeholder be involved, the internal functions must inform promptly the centralized unit that is responsible of the engagement of the category whose the stakeholder belongs. Each time an institutional stakeholder is involved, the different functions must inform the Institutional Relations centralized unit beforehand. The responsible function will verify the case and will support the colleagues in the implementation of the best

management practices.

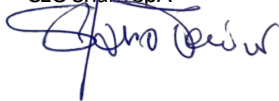
This policy is communicated to stakeholders in the name of transparency and collaboration and is made available to the public and whoever else may request it. Stakeholders can spontaneously contact the Group to establish a dialogue thanks to the channels provided by Snam (e.g. the various contacts present on the company website).

The results of the stakeholder engagement activities are disclosed through the main Group's communication channels (such as the corporate website, social media, corporate reporting, including the sustainable one

Finally, Snam makes communication channels available to receive public requests for information, suggestions and complaints of various kinds. One of the mechanisms available is e-mail, using dedicated addresses which are publicized on the website, in the "Contacts" section, and the [whistleblowing mechanism](#).

28th May 2024

Stefano Venier
CEO Snam SpA

A handwritten signature in blue ink, appearing to read 'Stefano Venier', is written over the printed name and title.