

ITELYUM 4

Itelyum, among the global forerunners of circular economy, is the national leader and a recognized international player in management and valorisation of industrial waste.

ITELYUM SUSTAINABILITY 2018

### Sustainability Report 2018

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Cashes and Gentlemen

Certainly, 2018 represented a key year in the history of the group: with further strategic acquisitions aimed at consolidating the sectoral leadership, we laid the definitive bases for the launch of Itelyum, which formally took place later, in the early months of 2019. Itelyum is the new Italian reality with more than half a century of history, internationally recognized for technology, experience and quality in the regeneration of lube oils, in the purification of solvents and chemical streams and in environmental services for the industrial sector.

Itelyum gathers, integrates and expands the decades-long experience of several efficient and competitive companies, among which Viscolube, Bitolea and Centro Risorse, providing a growing integrated and sustainable offer of products, solutions and services, in a circular economy model that extends the life cycle of products and creates partnerships in the market segments served.

In fact, the creation of Itelyum expresses the strong will to refresh its identity, giving a signal of change from the past, but fully coherent with the goal of always: creating shared value for the market, society and the environment.

We offer the market an integrated structure of 16 well-managed companies, 15 technologically advanced operating sites, over 500 competent and motivated people, capable to respond to the growing needs of the current economic context. Only in this way we can help also our customers saving natural resources and improving the quality of life, with sustainable processes, products and solutions for waste management and the optimisation of the markets served.

Producing responsibly, trading sustainable products and providing the market with efficient and integrated solutions is only the starting point. We want to be inspiration and example for all those who understand people, intellectual capacities, social relations, and natural, technological or financial resources as capitals that cannot be neglected or wasted, but that must be valorised.

In this sense, the adhesion of the whole group to the United Nations Global Compact drives with an integrated and global reference the path of responsibility already undertaken. It is a formal and substantial opportunity to reaffirm the company approach, which, on one hand, sets competence, efficiency, technology, and quality as essential drivers, on the other requires clear governance, based on principles, shared and implemented consistently. We do commit ourselves to not only implementing, disseminating and promoting the universal Ten Principles at the base of the initiative, but most of all embedding them in strategies, decision-making processes, organizational culture and daily operations.

We are aware of the margins of improvement that we still have to explore. At the same time, we consider and support the Sustainable Development Goals as the new reference for the business and all its counterparts, along a shared path that is fundamental to building a sustainable future for all.

Antonio Lazzarinetti

Marco Codognola





# 1.1 Group profile

Itelyum is the synergetic union of a series of well established companies, reporting to the same control group through the Luxembourg-registered finance company SSCP Green Holdings SCA and having as majority shareholder the private equity firm Stirling Square Capital Partners (www.stirlingsquare.com). The combination of assets is capable to provide a growing integrated and sustainable offer of products, solutions and services, adopting a model of circular economic that extends the life cycle of products and creates partnerships in market segments served.

Three strategic lines set the path towards the creation of shared value for the business partners, the society as a whole and the environment, offering sustainable solutions for the regeneration of used lube oils, the purification of solvents and chemical streams, and environmental services for the industrial sector.

Regeneration Solutions<sup>1</sup> includes the activities of Itelyum Regeneration Srl [formerly Viscolube Srl], for over 50 years a European leader in the production of quality lubricant bases through a proprietary process. Developed in an innovative way in collaboration with the French company Axens and exported to many countries of the world, the process is able to regenerate used lube oils with the highest control of product quality and environmental performance. Lube bases are thus obtained with high-end specifications, used by the most important international lubrication companies.

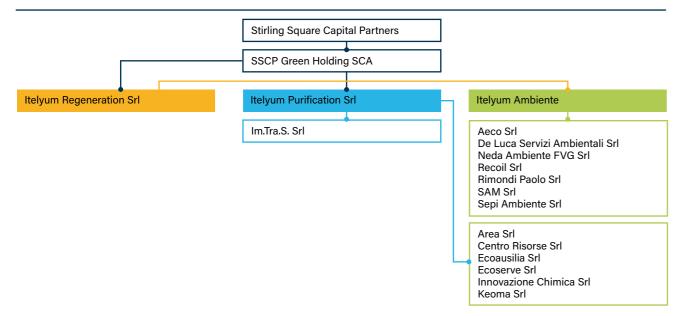
The regeneration plants in Pieve Fissiraga (LO) and Ceccano (FR) process about 170,000 tons of used lube oils annually. In addition to the regenerated lube bases, they also produce diesel oil and bitumen for applications in the waterproofing membrane sector.

**Purification Solutions<sup>2</sup>** includes **Itelyum Purification Srl** (formerly Bitolea Srl Chimica Ecologica), for almost 40 years a leader in the production of solvents for the valorisation of chemical streams and high purity solvents. The Landriano (PV) plant is equipped with flexible distillation lines and is capable to modify its structure according to the streams to be treated and

# Regeneration Solutions 170,000 t/year used lube oils processed. 110,000 t/year lube bases produced. 40,000 t/year other regenerated products.

Purification Solutions
90,000 t/year used solvents
processed.
80,000 t/year recycled
solvents and other products.
30,000 t/year pure solvents
from virgin streams.

#### **Group structure**



the programmed products. The logistics and packaging site of Rho [MI] adds automated capacity of mixing and bottling. Together, they constitute a complex plant structure, specialized in the production, marketing and distribution of solvents, in the recovery and purification of organic solvents, and in chemical synthesis.

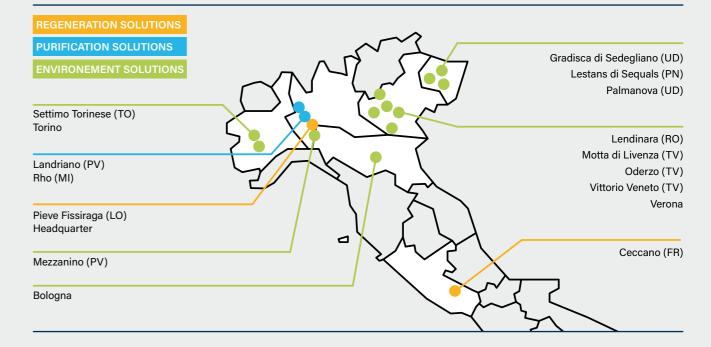
Every year, about 90,000 tons of used solvents, mainly from chemical and pharmaceutical industry, are regenerated or recovered, with high industrial yields and high quality processes. Pharmaceutical industry is also served with a significant range of pure solvents produced from selected chemical fractions (virgin naphtha), technical streams and other virgin raw materials, supplemented by trading activities for a total volume exceeding 50,000 tons per year. Furthermore, a dedicated facility synthesizes pharmaceutical starting materials or custom made products, through organic chemical processes that also benefit from the synergy with the parallel activity of solvents regeneration.

Finally, a proprietary transport company, Im.Tra.S. Srl, and partnerships with leading national and international operators, ensure inbound and outbound logistics continuity

Environment Solutions<sup>3</sup> continues and expands the activity of the pre-existing Viscoambiente division of Viscolube Srl, integrating a diversified and comprehensive range of environmental services for special waste producers, taking an active role also in the sector of hazardous waste collection. With over 450,000 tons per year collected, managed and sent for recovery or disposal, this business unit gathers, controls and coordinates several companies (see opposite page) located in northern Italy, increasing the integrated offer in the management and treatment of industrial waste and in the related sectors of chemical analysis, industrial water treatment, transport and environmental and safety consultancy.

**Environment Solutions** 450,000 t/year industrial waste managed.

#### Presence in Italy (31 December 2018)



#### REGENERATION SOLUTIONS

#### Itelyum Regeneration S.r.l.

**Pieve Fissiraga (L0) / Itelyum Headquarter:** Regeneration of used lube oils; treatment of oil emulsions.

Ceccano (FR): regeneration of used lube oils.

#### **PURIFICATION SOLUTIONS**

#### Itelyum Purification S.r.l.

**Landriano (PV):** recycling and recovery of used solvents; Production and trading of pure solvents; synthesisof farmaceutical starting materials.

Rho (MI): bottling and logistics.

#### Im.Tra.S. S.r.l.

**Landriano (PV):** Transportation of waste and chemicals (operational base).

#### **ENVIRONMENT SOLUTIONS**

#### Aeco S.r.l.

Bologna: waste brokerage.

#### De Luca Servizi Ambiente S.r.l.

**Vittorio Veneto (TV):** collection, transportation and storage of solid and liquid waste; treatment of oil emulsions.

**Verona:** collection, transportation and storage of solid and liquid waste

#### Neda Ambiente FVG S.r.l.

**Palmanova (UD):** collection, transportation and storage of solid and liquid waste.

#### Recoil S.r.l.

**Lendinara (R0):** collection, transportation and storage of liquid waste

#### Rimondi Paolo S.r.l.

**Bologna:** collection, transportation, storage and treatment of solid and liquid waste; treatment of oil emulsions.

#### SAM S.r.l.

Mezzanino (PV): liquid waste storage.

#### Sepi Ambiente S.r.l.

**Settimo Torinese (T0):** collection, transportation, storage and treatment of solid and liquid waste.

Torino: collection, transportation and storage of solid and liquid waste

#### Area S.r.l.

**Gradisca di Sedegliano (UD):** treatment of industrial wastewater (third parties).

Motta di Livenza (TV): administrative site.

#### Centro Risorse S.r.l.

Motta di Livenza (TV): collection, transportation and storage of solid and liquid waste..

#### Ecoausilia S.r.l.

Oderzo (TV): consultancy on safety, environment, food hygiene.

Managemenet of certification systems; training.

#### Ecoserve S.r.l.

**Lestans di Sequals (PN):** environmental assistance and consultancy on waste management.

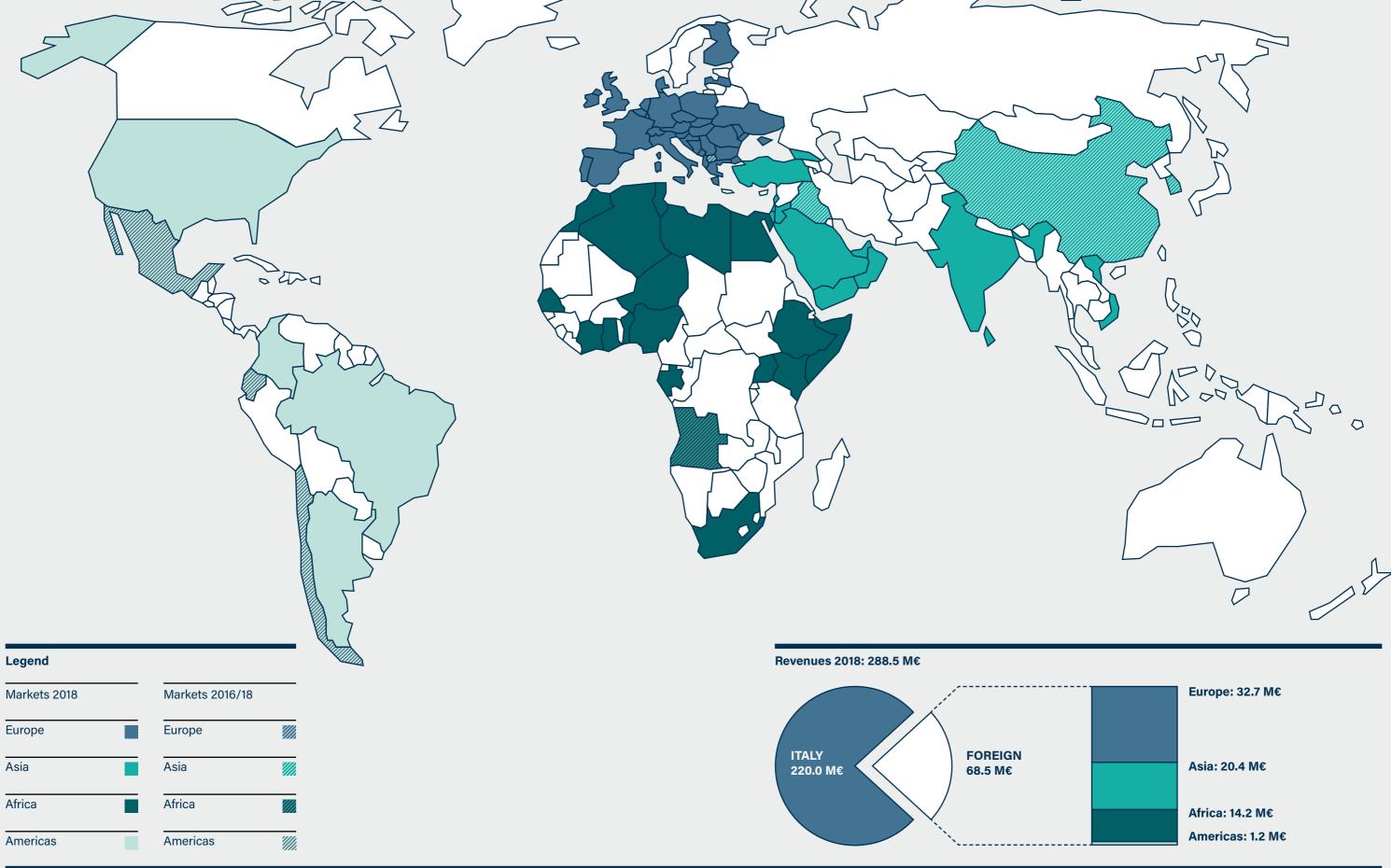
#### Innovazione Chimica S.r.l.

**Motta di Livenza (TV)**: ISO 17025 accredited laboratory; analysis of water, soil, waste, microbiology, emissions; environmental consultancy.

#### Keoma S.r.l.

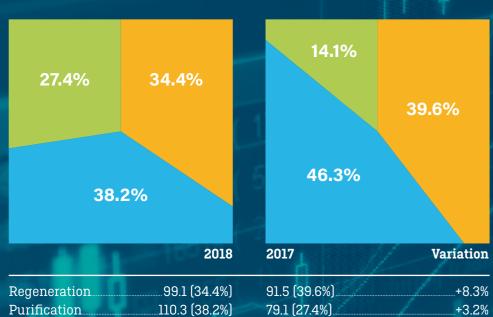
Motta di Livenza (TV): collection and transportation of waste.

# Worldwide presence (31 December 2018) Legend Revenues 2018: 288.5 M€ Europe: 32.7 M€ Markets 2018 Markets 2016/18 Europe Europe ITALY **FOREIGN** Asia



## 1.2 **Highlights**

#### Contribution to turnover (M€)



79.1 (27.4%)

288.5 (100%)

**Environment** 

Itelyum

Key financial and non-financial figures		2018	2017	2016	2015
Revenues	million €	288.5	230.9	122.7	105.3
EBITDA	million €	54.7	48.2	24.0	26.4
Profit (loss)	million €	(7.9)	(10.9)	(11.1)	4.3
Employees	#	518	409	247	231
Circular turnover⁵	%	82%	81%	91%	91%
Carbon intensity (regeneration)	kg CO₂ per tonne product	565	597	587	564
Carbon intensity (purification) <sup>6</sup>	kg CO₂ per tonne product	179	226		
Injury frequency rate <sup>7</sup>	# per million worked hours	6.5	16.6	6.9	2.4
Managerial positions <sup>8</sup> held by women	<u></u>	11%	16%	25%	19%

32.6 (14.1%)

230.9 (100%)

+142.9%

+24.9%

Avoiding the impacts of primary production, the recycling of waste oils, solvents and chemical streams contributes annually to avoid the emission of almost 700,000 tons of CO<sub>2</sub>, the release of over 1,000 tons of air pollutants, the withdrawal of almost 3 million cubic meters of water and the consumption of more than 200 hectares of land.

#### Remarks

The financial results show both organic and external growth, combining improved industrial performance and business acquisitions and diversifications.

In line with the extension of the consolidation perimeter, personnel increases significantly.

Circular turnover remains stable, significantly above 75%, considered a threshold of excellence.

The carbon intensity decreases slightly for Regeneration, although discounting a physiological increase in energy consumption related mainly to the quality of treated waste oils. It improves more sharply for Purification, thanks to the increase in the use of fuel self-produced from waste.

The accident frequency rate shows a positive trend reversal. In any case, "zero injuries" remains the only goal. Furthermore, the cumulative result does not represent the areas of excellence (some major sites with a frequency index already zero for many years) on which the group is strengthening the management model. Thanks to the shared efforts of all the parties involved, the favorable trend continues even in the first months of 2019.

Equal opportunities are the object of particular attention, with actions being defined to favor the presence and representation of women in top positions. The ambition of the group remains to create and maintain an inclusive work environment.

Trend of indicators is affected by the evolution of group perimeter, with acquisitions and business diversification.

Revenues from waste management, recovery/ recycling and supplies of "pure" products to customers/ suppliers of waste streams.

It includes net (see page 92) direct and indirect CO<sub>2</sub> emissions (Scope 1 and Scope 2).

Lost Time Injury Frequency Rate, accounting for all injuries causing more than24 hours absence of employees from work.

Sum of managers and directive white collars.



1.3
Materiality:
key success levers
for the group

Sharing the integrated economic-productive, environmental and social performance with all stakeholders represents an essential step. Ever since 2004, Itelyum Regeneration consolidates and publishes the environmental and social performances of the regeneration plants for waste oils in Pieve Fissiraga (LO) and Ceccano (FR). Starting from 2017, the consolidation has been extended to the entire perimeter (pag. 9). Consistently with the integrated vision, the *highlights* (pag. 14) include financial and dimensional data, but also a selection of non-financial indicators: equal opportunities, as an indicator of social inclusion; occupational safety, as an ethical indicator and managerial capability; carbon intensity, as an integrated indicator of industrial efficiency; circularity, as the main lever for market differentiation.

The report is aligned with the most recent Global Reporting Initiative (GRI) Standards. All activities under operational control as at 31 December of each year of consolidated financial year are included in the perimeter. The trend of the indicators is affected by the evolution of the group, with acquisitions and diversifications of business that took place to a significant extent in the last period. Further details are given on page 105.

Furthermore, the contents are aligned with the group's priorities and with the expectations of the external context. The materiality assessment is the cornerstone of this rational approach, performed following internationally recognized references. Actually, taking inspiration from the latest GRI Standards and the Integrated Reporting Council<sup>9</sup> (IIRC) framework, the group analysed all the elements that may affect the effectiveness of its business model work and business strategy, identifying impacts, risks and opportunities. The "Journey to Materiality" guidelines elaborated by the World Business Council for Sustainable Development<sup>10</sup> (WBCSD) provide applicable procedures and suggest the implementation phases.

The matrix, which graphically matches the interests of the business with the expectations of the stakeholders, is built with the involvement of all the relevant company functions, also requested to interpret the standpoint of the respective stakeholders, thus ensuring the multi-dimensional view

#### 9

The International Integrated Reporting Council is a global coalition of regulators, investors, companies, auditors and NGOs promoting communication on value creation and the evolution of corporate reporting.

#### 10

The World Business Council for Sustainable Development is a global initiative gathering international companies active in the promotion of sustainability.

# The matrix is kept aligned to the continuous evolution of the international agenda.

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on all relevant areas. The materiality analysis has also been presented and discussed with the Board of Directors and top management.

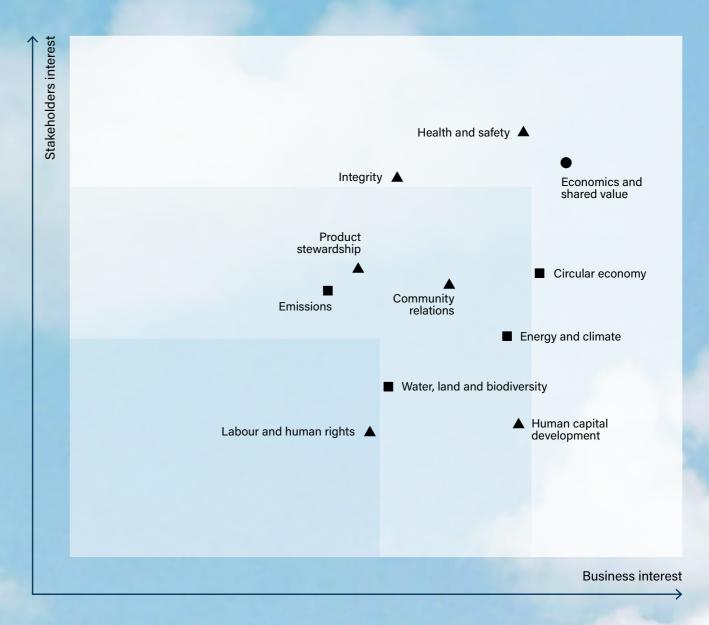
The evaluation will be updated over the years, also with the aim of ensuring continuous alignment with the constantly evolving international agenda and including an external consultation phase through a stakeholder panel or direct contact with the interested parties. In any case, thanks to this approach, the group confirms and develops strategies, objectives and ambitions in line with the aspects assessed as relevant. Finally, the materiality matrix also provides the basic framework for communicating the non-financial performance of the group, clearly identifying the issues on which to report managerial approaches and results.

In addition, the aspects considered to generate the Itelyum materiality matrix have also been evaluated with respect to the different phases of the life cycle typical of the market segment, from the supply of raw materials to end-of-life options.

Finally, also in support of Itelyum's adhesion to the United Nations Global Compact, a specific in-depth study was made of the direct or indirect contribution that the management of material aspects can have with respect to the Sustainable Development Goals (SDGs). More details on page 22 and in the Communication on Progress reported on page 119.

The results are shown on the following pages.

#### **Materiality matrix**



		Management and results	Objectives 2020	Ambitions 2030
ECONOMY (•)				
Financial capital		pag. 43	-	-
Manufactured capital				
SOCIETY (A)		2 137		
Social and relational cap.	Integrity	pag. 53		✓
	Community relations	pag. 75	<b>✓</b>	
Human capital	Labour and human rights	pag. 59		✓
	Human capital development	pag. 65	<b>✓</b>	
	Health and safety	pag. 69	<b>✓</b>	
Intellectual capital	Product stewardship	pag. 79		✓
ENVIRONMENT (■)				
Natural capital	Circular economy	pag. 87	<b>✓</b>	
	Energy and climate	pag. 91	<b>✓</b>	<b>✓</b>
	Emissions	pag. 95	<b>✓</b>	
	Water, land and biodiversity	pag. 99	<b>✓</b>	<b>√</b>

## Materiality matrix and value chain / life cycle

ECONOMY (●)	Source and c	Sourcing, supplies and contracting			on		Market, and com	use phas munity	se	End-of-	life c	ptions
Economics and shared value		✓			<b>✓</b>		<b>√</b>		<b>✓</b>			
SOCIETY(▲)	Source and c	Sourcing, supplies and contracting		Production	on		Market, and com	use phas munity	se	End-of-	life c	ptions
Integrity		✓		✓			v	′		,	<b>/</b>	
Community relations					✓			✓				
Labour and human rights		✓			,	/	✓					
Human capital development					•	/					ļ	
Healt and safety		✓			•	/	<b>✓</b>					
Product stewardship		✓		<b>✓</b>		<b>✓</b>		✓	<b>✓</b>			
ENVIRONMENT (■)	Source and c	cing, su contract	pplies ting	Production	on		Market, and com	use phas munity	se	End-of-	life c	ptions
Circular economy			<b>√</b>		,	/		V	′			<b>√</b>
Energy anch climate	<b>√</b>			<b>√</b>			٧	,		,	<b>/</b>	
Emissions	<b>√</b>				,	/	<b>✓</b>			,	✓	
Water, land and biodiversity	<b>√</b>				<b>√</b>		1	ø		1		

The white bars represent the relative importance of the aspects assessed over the different phases of the entire life cycle, from the supply of raw materials to the end-of-life options. The check marks highlight the aspects that are covered within this report.



The integrated vision of business and the global context dynamics support decision-making processes and strategies.

















































Economicos and shared value	Integrity	Community relations	Labour and human rights	Humand capital development	Healt and safety	Product stewardship	Circular economy	Energy and climate	Emissions	Water, land and biodiversity		
											No poverty	1
											Zero hunger	2
											Good health and well-being	3
											Quality education	4
											Gender equality	5
											Clean water and sanitation	6
											Affordable and clean energy	7
											Decent work and economic growth	8
											Industry, innovation and infrastructure	9
											Reduced inequalities	10
											Sustainable cities and communities	11
											Responsible consuption and production	12
											Climate action	13
											Life below water	14
											Life on land	15
											Peace, justice and strong institutions	16
											Partnerships for the goals	17

The graphics on these two pages matches the material aspects of the Group with the 17 Sustainable Development Goals<sup>11</sup>. Ratified by the United Nations in 2015, they inspire the actions of governments, the private sector, civil society, stakeholders and individuals, standing out as the new reference also for the business and its counterparts. The colored squares above mark the areas in which the activities and initiatives of the group can be particularly effective. On the opposite page the SDGs targeted by the direct actions described on page 119 are highlighted.

11 Details on page 30.



1.4 Vision, mission, values

The group strongly affirms the value of resources, whether they are related to human beings or their intellectual, natural or financial capabilities. At the same time, it extends an open invitation to all the involved counterparts not to waste, promoting business and life styles in line with the circular economy model that underlines the group's strategy, taking a prominent role in creating a better and sustainable future for all stakeholders.

The group's Vision is expressed in the operational Mission, which aims at creating shared value for the market, society and the environment.

# **VISION**

Producing responsibly, trading sustainable products and providing the market with efficient and integrated solutions is only the starting point.

We want to be inspiration and example for all those who understand people, intellectual capacities, social relations, and natural, technological or financial resources as capitals that cannot be neglected or wasted, but that must be valorised.

# **MISSION**

We help saving natural resources and improving the quality of life, with sustainable processes, products and solutions for waste management and the optimization of served markets, sharing creation of value with our business partners, the society and the environment.

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We want to be inspiration and example for all those who understand people, intellectual capacities, social relations, and natural, technological or financial resources as capitals that cannot be neglected or wasted, but that must be valorised.

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Business fully integrates sustainability as a founding element, guided by Vision, Mission and Values. The ethical formalization lays with the codes, which rule the behaviour of all employees and stakeholders with which they relate, while Itelyum Policy<sup>12</sup> set operational reference for all the key issues in the sphere of influence of the group's activities: the centrality of the person, the working environment, human capital development, health and safety, business integrity, fair relationships with suppliers and customers, social initiatives, environmental protection and energy efficiency, quality of processes, products and services through research and innovation and eventually the creation of shared value.

Itelyum Sustainability Policies are inspired by the highest international references and in particular: the Universal Declaration of Human Rights, the United Nations Sustainable Development Goals (SDGs), the Conventions, Protocols and Recommendations of the Organization International Labor, the SA8000 standards, ISO 26000 and the Global Reporting Initiative. These Policies are also based on the Codes adopted by Itelyum, on the agreements signed with the social partners and on the commitments deriving from the adhesion to the United Nations Global Compact.

12
Sustainability Policy:
Guiding Principles and four
documents focused on Health
and Safety, Environment
and Resources, Rights
and Society, Quality and
Responsibility.

The founding Values are marked by the Code of Ethics adopted by the group's companies.

While planning a future homogenisation and enhancement of existing reference documents, all the codes adopted contain a clear reference to some basic common elements.

#### **INTEGRITY**

Ethics at the centre of our activities, grounded on the trust of business partners and the communities that we engage through a coherent governance, acting with respect, honesty and transparency.

#### **DIVERSITY**

People as a source of energy for our growth, in an environment inspired by trust and a sense of belonging, where differences create added value and where everyone feels part of the same group, redistributing local knowledge and experience for the benefit of whole organization.

#### **EFFICIENCY**

We aim to achieve and maintain high operating standards, combining technical experience, management skills and proactivity to ensure integrated processes, products and services that are efficient, effective and sustainable at global level and customized for each market.

#### **RESPONSABILITY**

Sustainability as a responsible and winning combination of excellence in economic performance, protection and valorisation of natural capital and improvement of the quality of life of present and future generations.

#### **INNOVATION**

Quality, technology and research as an entrepreneurial approach able to capture changes to meet new ideas, attract new talent and open up to new markets, with solutions in line with constantly evolving expectations.



# 1.5 Governance

The group makes sustainability its strategic axis, supporting an advanced circular economy model, aiming to provide an increasingly integrated and sustainable offer of products, solutions and services. In this approach it is fully supported by the reference shareholder (Stirling Square Capital Partners) who follows the United Nations PRI<sup>13</sup> and adopts planning and control tools to improve integrated performance at every stage of the investment process.

Circularity can be achieved with a direct model aimed at prolonging the life cycle of products: this is the case of the regeneration of waste oils. Starting from the market and the use phase of lubricating oils, regeneration allows recycling at the end of their life and, thanks to technologically advanced processes, produces new lube base oils and other valuable fractions to be returned to industrial cycles.

It can also follow models of toll-manufacturing, as an example by recovering spent solvent streams from pharmaceutical chemistry and returning them to the same company, in a close partnership beyond contracts, after purification through advanced distillation phases. Another circular option is to valorise organic waste streams from different sources to engineer products to be commercialized in other markets, different in terms of both industrial segments and geography.

Eventually, circularity can find further rationalization in a model of extended service, supplying products from the distillation of virgin oil fractions to market segments and companies which supplies even more significant quantities of waste to be regenerated and valorised, or in the synthesis of pharmaceutical starting materials, on the specs protocol of a company that supplies waste at the same time.

As well, vertical integration in the sector is fundamental for the group's strategy, as it shortens space and time gaps between the generation and the valorisation of waste, supported by an active presence also in the collection, transport and pre-treatment of waste and through other servicing activities, consulting and intermediation. This is the model inspiring, but

The principles for responsible investing (PRI), launched by

the United Nations in 2006.

not exclusively, the companies within the functional area environment, also characterized by strong geographical territoriality. Also in this case, the sustainable approach is clearly visible, ensuring traceability and transparency in environmental and administrative management and maximizing the recycling and recovery options compared to other possible forms of disposal.

In parallel to the entrepreneurial vision, some fundamental international references have influence on group's strategy, which starts from the national context but has the ambition to move within the international agenda. In particular, towards the end of 2015, two events definitively redefined the way of doing business.

On September 25th, 2015, UN member countries adopted a set of goals to end poverty, protect the planet and ensure prosperity for all as part of a new development agenda. The 17 Sustainable Development Goals, detailed in 169 targets, require a strong involvement by all the components of society, from companies to the public sector, from civil society to philanthropic institutions, from universities and research bodies to information and culture operators. The role of business remains central.

At the Paris climate conference (COP21) in December 2015, 195 countries adopted the first universal and legally binding global climate agreement. The agreement defines a global action plan, aimed at putting the world back on track to avoid dangerous climate change by limiting global warming to well below 2 °C. The role of companies remains fundamental, both for the direct contribution and for the promotion of virtuous cycles in the supply chain and support for sustainable consumption patterns and lifestyles.

Walking the talk of this awareness on the company's role, the group adheres to the United Nations Global Compact, being at the same time a founding member of the Fondazione Global Compact Network Italia<sup>14</sup>. The Global Compact is the world's largest strategic sustainability initiative. It stems from the desire to promote a global economy that respects human

Fondazione Global Compact Network Italia promotes at national level the implementation of Global Compact's principles.

The group adheres to the **United Nations Global** Compact. At the same time, it is founding member of the Foundation Global **Compact Network Italy,** with a seat in the Steering Committee.

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and labour rights, environmental protection and the fight against corruption. Launched in year 2,000, it currently involves almost 10,000 companies in over 160 countries around the world, but also almost 4,000 UN agencies, governments, civil society organizations, labour organizations and other nonbusiness organizations, giving rise to a unique global collaboration its kind. Membership offers the opportunity to interact in an internationally recognized context for the development, implementation and definition of good environmental, social and governance practices; to share excellent practices to develop concrete strategies and solutions to face common challenges; to promote sustainable solutions in partnership with a broad representation of stakeholders (UN agencies, governments, civil society organizations, labour organizations and other non-business organizations); to access the knowledge base and experiences on sustainability and growth promoted by the United Nations and acquire specific know-how; to improve company reputation and increase trust in the company by renewing the license to operate; to take a leading role on critical issues, networking with other organizations; to meet the expectations of the financial market and promote access to capital; to use the tools and management resources developed in sharing.

All of the above strongly influenced the group's strategies, together with the material evidence that a sustainable approach, in addition to creating shared value for the society and the environment, provides success levers to pursue the improvement of turnover and economic margins, the mitigation of enterprise risk, the attraction of capital and investors, the full motivation of employees and the consolidation of the brand. Accordingly, the group has defined medium-term objectives and long-term ambitions, as described in the following paragraph.

For the same reasons, sustainability deeply permeates governance. Group's integrated performances, with particular reference to the critical aspects and leading indicators, are normally included in the exchanges and the agenda of the periodic meetings with the shareholder and in the Boards of Directors of the group companies, also with dedicated training sessions to maintain skills aligned with the international sustainability agenda. With the aim to

The management systems represent a key asset to ensure operations fully aligned to group's strategy.

strengthen this approach, a Sustainability Steering Committee (SSC) is being formalized, as the cornerstone of the sustainability management within the group. Actually, SSC is already active, chaired by the CEO, with the participation of all direct reports and animated by the Chief Sustainability Officer. The SSC meets periodically and on demand, having the scope to trace performance, to confirm or update strategies, to verify the state of implementation of the objectives or to define new ones and to deploy operational mandate to the group companies.

The composition and management of the governance bodies guarantee representation, skills and the absence of conflicts of interest, aiming at the highest operational efficiency and integrity.

At functional level, management systems represent a fundamental asset to ensure operations fully aligned with the group's strategy, seeking continuous improvement. The integration in business processes of the many reference schemes adopted contributes to the consolidation, in terms of quality and effectiveness, of the organizational, technological and behavioural methods implemented.

#### Management systems and reference protocols

#### ISO 9001

The ISO 9001 standard defines the requirements for a quality management system of an organization. It is the reference standard for those who want their production process subjected to quality control in a cyclical way, from the definition of the requirements, expressed or not, of the customers to the monitoring of the entire production process, from supply of raw materials and utilities to finished products.

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#### ISO 14001

The ISO 14001 standard identifies the requirements of an environmental management system, as a voluntary choice of an organization that wants to keep the environmental aspects of its activities under control, systematically searching for improvement in a coherent, effective and, above all, sustainable way.

#### **EMAS**

EMAS (Eco-Management and Audit Scheme) is a voluntary tool created by the European Commission through which organizations evaluate and improve their environmental performance, providing information on their environmental management to the public and other stakeholders.

#### ISO 45001/0HSAS 18001

OHSAS 18001, (Occupational Health and Safety Assessment Series), issued by the British Standard Institute, is the reference for a voluntary management system for occupational health and safety. It is being substituted by the new ISO 45001

#### **SA 8000**

SA 8000 (Social Accountability) is an international standard defined by the CEPAA (Council of the Economic Priorities Accreditation Agency) aimed at regulating certain management aspects related to social responsibility, such as respect for human and labour rights including, in addition to health and safety, freedom of association and the right to collective bargaining, the fight against discrimination, working time and remuneration criteria.

#### ISO 17025

The ISO 17025 standard defines the general, management and operational requirements for the competence qualification of the testing and calibration laboratories.

The integrated implementation, maintenance and evolution of management systems create value for Itelyum and its stakeholders.

#### SGS-PIR

It is the safety management system specifically targeted at preventing majoraccidents hazards associated with the use of specific substances, as defined by the "Seveso" legislation.

#### UNI 10617

The UNI 10617 standard specifies the basic requirements for the preparation and implementation of a safety management system specifically targeted at preventing major-accidents hazards associated with the use of specific substances, as defined by the "Seveso" legislation.

#### BIOC/ISCC

In the context of biofuels and bio-liquids, sustainable management is based on the BIOC system, in compliance with the national certification system, and on the ISCC scheme (International Sustainability and Carbon Certification), approved by the European Commission.

#### REMADE IN ITALY®

Remade in Italy® is an environmental product certification, accredited and valid for green procurement, which traces the recycled content in products and the traceability of materials flows within the production process.

#### DMF

The Drug Master File (DMF) is a document prepared by a pharmaceutical manufacturer and presented exclusively at its discretion to the appropriate regulatory authority in the intended drug market, which provides confidential and detailed information on structures, processes or items used in manufacturing, processing, packaging and storage of Active Pharmaceutical Ingredient (API).

#### RESPONSIBLE CARE

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"Responsible Care" is the voluntary program of the global chemical industry to promote sustainable development, with focus to health and safety, the environment and more generally to social responsibility.

The implementation, maintenance and the integrated evolution of management systems create value for the group and its stakeholders. On top, some of them may also be subject to certification by third parties.

For specific types of products.

35

For the synthesis of pharmaceutical starting materials.

#### Management sistems:

<ul> <li>protocols in operation ■</li> <li>under implementation ●</li> <li>certified ▲</li> </ul>			ISO 14001	EMAS	ISO 45001 OHSAS 18001	SA 8000	ISO 17025	віос	ISCC	SGS-PIR	UNI 10617	REMADE IN ITALY®	DMF	RESPONSIBLE CARE
Regeneration	Impianto di Pieve Fissiraga										<b>A</b>	<b>■ ▲</b> <sup>15</sup>		
	Impianto di Ceccano										<b>A</b>	<b>■ ▲</b> <sup>15</sup>		
Purification	Impianto di Landriano		•		•						•	•	<b>■</b> <sup>16</sup>	
	Impianto di Rho		•		•						•	•		
	Im.Tra.S.													
Environment	Aeco													
	De Luca Servizi Ambiente													
	Neda Ambiente FVG													
	Recoil													
	Rimondi Paolo													
	Sepi Ambiente													
	Area													
	Centro Risorse													
	Ecoausilia													
	Ecoserve													
	Innovazione Chimica													
	Keoma													
	SAM													

Data reporting and analysis processes create positive tension and managerial awareness.

## 1.6 Targeting the future

### 1.6.1 / Objectives 2020

The medium-term objectives for 2020 respond to the group's main material levers, exploring margins for improvement and performance. Already in the definition, they capture the most important strategic elements. Incorporated into managerial objectives, they effectively guide the improvement of the group's overall performance. The trend of some indicators can be negatively affected by the changes of consolidation perimeter. All the companies and the operating units of the group are progressively aligning to best practices.

		Unit	Objective	2018	2017	2016	Remarks
SOCIAL AND RELATIONAL CA	PITAL						
Integrity	Spending covered by integrated qualification of suppliers	% spending	100%	80%	84%	98%	While integrating the protocols adopted by the group's companies, in full alignment with the sustainability commitments taken by the group, integrated qualification refers to ISO 9001, ISO 14001 and ISO 45001 implementation .
	Sales supported by integrated management and customer satisfaction	% sales	100%	47%	49%	49%	While integrating the protocols adopted by the group's companies, in full alignment with the sustainability commitments taken by the group, integrated management refers to ISO 9001 implementation.
Community relations	Major sites with structured community relations	# implementation	100%	53%	53%	40%	Reference to approach described on page 75
HUMAN CAPITAL							
Health and safety	Injury frequency rate	# per million worked hours	<1	6.5	16.6	6.9	Favourable trend reversal. First months of 2019 show further improvement.
	Major sites with verified management systems	# implementation	100%	78%	78%	100%	Shift from OHSAS 18001 to ISO 45001 almost completed. New implementa-tion planned.
Human capital development	Hours of training	# per employees	30	23	17	18	Training programs to be homogenized for all group's companies.
NATURAL CAPITAL							
Circular economy; Energy and climate; Emissions; Water, land and biodiversity	Sites with Management Systems	# implementation	100%	79%	80%	98%	It applies to IPPC and "Seveso" sites. Reference to ISO 14001 and UNI 10617 systems.

#### 1.6.2 / Ambitions 2030

Group values set the direction on a longer time horizon, giving rationales to the ambitions for 2030, in full alignment with the United Nations Sustainable Development Goals.

#### INTEGRITY

Ethics at the centre of our activities, grounded on the trust of business partners and the communities that we engage through a coherent governance, acting with respect, honesty and transparency.

Complementing the many initiatives already launched, the group has the ambition to set and implement and integrated system of governance, from basic principles to transparency on results, grounded upon:

- 1. A new Code of Ethics, extended to all controlled group's companies, embedding the sustainable solu-tions responding to the ever changing global context;
- 2. A new set of Sustainability Policies, closely descending from the Code of Ethics, as internal reference for operations management.

#### **DIVERSITY**

People as a source of energy for our growth, in an environment inspired by trust and a sense of belonging, where differences create added value and where everyone feels part of the same group, redistributing local knowledge and experience for the benefit of whole organization.

The group considers the promotion of equal opportunities as a key success factor. In this respect, the group's ambition is to:

- 3. Increase the percentage of managerial positions occupied by women, including executive levels;
- 4. Structure homogeneously the evaluation, remuneration and reward mechanisms for managers, employ-ees and workers in the different group's companies, in order to ensure the highest level of skills and eq-uity in career paths.

#### **EFFICIENCY**

We aim to achieve and maintain high operating standards, combining technical experience, management skills and proactivity to ensure integrated processes, products and services that are efficient, effective and sustainable at global level and customized for each market.

CO<sub>2</sub> emissions, as sum of direct and indirect, are a representative indicator of group efficiency, on a global scale, combining all the major levers of industrial excellence. The group aims to achieve:

- 5. A net carbon intensity for waste oils regeneration activities below 500 kg of CO<sub>2</sub> per ton of product;
- 6. A net carbon intensity for Solvents and chemical streams purification activities below 200 of di CO<sub>2</sub> per ton of product;

#### **RESPONSABILITY**

Sustainability as a responsible and winning combination of excellence in economic performance, protection and valorisation of natural capital and improvement of the quality of life of present and future generations.

The loss of biodiversity and land, and the scarcity of water are among the main challenges for the future of the planet, also affected by climate change. The group has the ambition to promote:

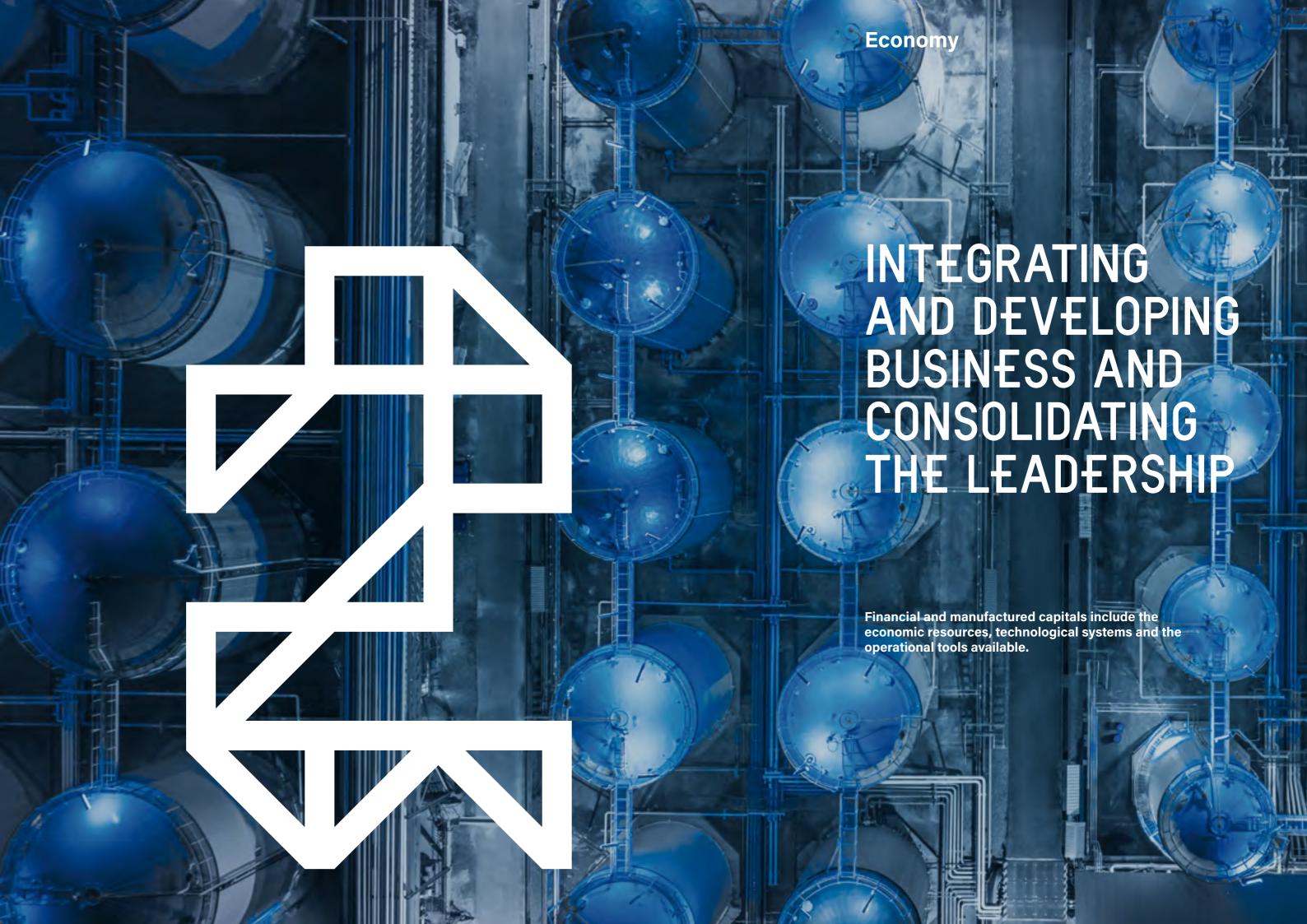
- 7. The reduction of net water withdrawal;
- 8. The improvement of the balance between disturbed and restored land. This may happen by continuing the reclamation of polluted sites, extending or maintaining green areas in industrial sites and offsetting through participation in initiatives aimed at restoration or preserving natural area.

#### **INNOVATION**

Quality, technology and research as an entrepreneurial approach able to capture changes to meet new ide-as, attract new talent and open up to new markets, with solutions in line with constantly evolving expecta-tions.

Products and applications characterized by sustainable performance are fundamental to align the group's product portfolio with the constantly evolving expectations of the market. Product stewardship is one of the key levers. The group aspires to:

- 9. Keeping the circular turnover above 75%;
- 10. Achieve the third party verification for recycled content and provide extended information of responsi-bility for all the products put on the market.





# 2.1 Economics and shared value

#### 2.1.1 / Economic and market aspects

In 2018, the Itelyum continued to consolidate its leadership, marking a further growth in the sector of collection and valorisation of industrial waste. Actually, the existing activity of regeneration of used mineral oils has been integrated with additional capacity: purification of spent solvents, production of pure solvents and treatment of industrial waste. This significant development follows the strategic line of completing the offer of environmental services for the market: today the group is capable to cover a wide range of managed waste, guaranteeing the whole process, from collection to recycling, following a circular economic model.

Also in 2018, the sector of waste oils regeneration benefited from the outstanding national performance at collection. Thanks also to the efforts of CONOU<sup>17</sup> (to which the group adheres), almost all of collectable waste oils are collected. The national experience in the sector remains the best performance in Europe which clearly perceives the Italian value chain as a concrete reference for a circular economic model.

The sector of recovery and purification of spent solvents and chemical and pharmaceutical waste streams was able to enforce a solid partnership with the major players in the pharmaceutical, fine chemicals and petrochemical sectors, built on reliability and professionalism. This is even more noticeable, considering that for these specific types of industrial streams there is limited availability of destination plants capable of sustainable and integrated solutions.

Lastly, the industrial waste management sector clearly benefitted from organic growth, supported by high competence and an efficient managerial organisation.

For information on economic results, see the highlights on page 14.

However, such a market leadership must be grounded on an equally strong leadership in process technologies and know-how, in order to guarantee

National Consortium for the Management, Collection and Treatment of Used Mineral Oils. Itelyum manages a wide range of waste, guaranteeing the entire value chain, from collection to recycling.

high recycling efficiency and constant quality of marketed products; on the capability to be a reliable partner able to match the waste disposal needs of suppliers and to guarantee quality products from both recycling and virgin streams; on integrated development in the recycling of industrial waste and in the wider field of environmental services. Any operation is managed in compliance with the most stringent safety and environmental protection standards.

This can only happen thanks to a proactive management and targeted consolidation and growth plans. The table below shows the breakdown of group's investment to support continuity and competitiveness of the business, with details on those exclusively aimed at improving environmental and safety performance, and those for quality, research and development of processes and products, which represent significant percentages of total investment.

Environment (M€)	2018	2017	2016
Environment, health and safety	6.1 (51%)	4.0 (36%)	2.7 (52%)
Quality, research and development	1.9 (16%)	1.4 (13%)	1.1 (21%)
Other investment	4.0 (33%)	5.6 (51%)	1.4 (27%)
Total	12.0	11.0	5.2

Also the investment dedicated to strategic projects and, quite extensively, to capitalised maintenance have equally important influence on both the overall improvement of environmental and safety performance and product quality. A noticeable part of specific and non-specific operating costs also contributes to the same objective.

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#### 2.1.2 / Shared value

The group's integrated strategic approach aims to maximize shared value creation for the company and its stakeholders. The set of policies and operational practices adopted reinforce competitiveness, while at the same time improving the economic and social conditions of the communities in which the group operates. All activities may create value (e.g. processes, services, technologies and innovation). Benefits for internal and external stakeholders, including those along the supply chain, the local community and the environment, derive from the capability to create value.

The initiatives aimed at creating value bring positive results for the shareholders, through the improvement of economic, social and environmental performances. Furthermore, information on the generation and distribution of economic value provides a first evidence on how the group creates value for all its stakeholders. Building on this vision, the table below shows the details of the economic value generated and distributed by the group, on an annual basis. The figures are categorized according to the most recent GRI Standards.

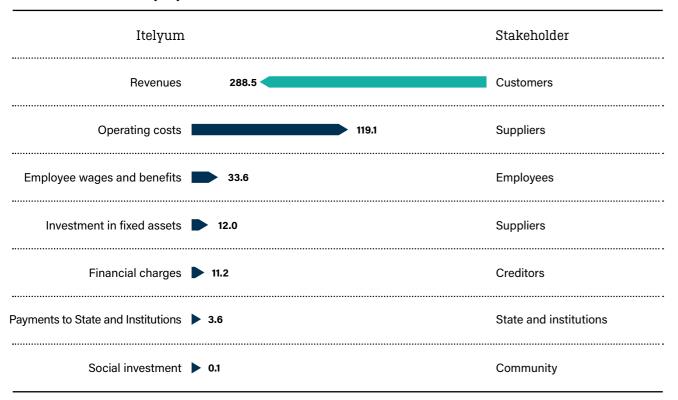
Economic value generated and distributed (1	M€) 2018	2017	2016								
Direct economic value generated											
Revenues <sup>18</sup>	288.5	230.9	122.7	18							
Other incomes				Including the contribution for waste oils treatment.							
Inputs from providers of capital		1.0	-	waste ons treatment.							
Direct economic value distributed											
Operating costs <sup>19</sup>	199.1	153.0	80.7	19							
Employee wages and benefits		27.4	18.1	Supply of raw materials, services including							
Investment in fixed assets	12.0	11.0	5.2	transportation, other							
Financial charges to providers of capital	11.6	8.7	5.9	consumables, energy and							
Payments to government and institutions	3.6	2.7	3.2	fuels, plants equipment, and maintenance of industrial							
Community investments	0.1	0.1	0.1	assets.							

Shared value creation affects positively all stakeholders.

46

For 2018 only, the same economic and financial flows are shown in the following graph, with evidence of the involved stakeholders.

#### Involved stakeholders (M€)



The group believes in the need to build the strategy in line with its material aspects as a necessary element to create shared value. Right in the attempt to quantify the value creation for all its stakeholders, the group already started to estimate the monetary value of its financial, socio-economic and environmental externalities.

This first exercise starts from the consolidation of the group's economic, environmental and social performance, combining it with accounting criteria borrowed from sector references and similar experiences in industrial sectors.

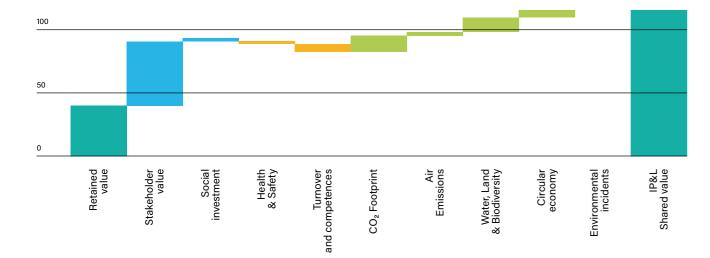
The aim of the Integrated Profit & Loss is not to correct the value of economic P&L with the identified social and environmental variables, but to better understand the dynamics of the sector and its success levers, adopting tools and evaluation metrics useful to support a better awareness in internal decision-making processes.



Sustainability: living well, within the limits of the planet.

#### Integrated Profit & Loss (M€)





This graph shows a possible way to represent the creation of shared value, detailing the various areas of influence. Also for 2018, it is evident that the group's "capital gains" arise mainly from three elements. The first, of social nature, is the value transferred to major stakeholders through employment and salaries, taxes paid to the state and its institutions, and interest paid to financing entities.

The others are of an environmental nature, or thanks to the circular economy, which saves primary production, avoids emissions of  $\rm CO_2$  and other substances, impacts on water, land and biodiversity, and consumption of primary resources, with a positive balance between recycled and generated waste. The following table helps to understand the variables taken into account in terms of results, socio-economic and environmental impact.

Much more than the mere calculation of the absolute annual value, the variation over time offers useful elements of analysis and helps to better understand the dynamics of the sector and to confirm, improve or refine the group's strategies. The comparison among successive periods of consolidation in fact shows the creation of socio-economic and environmental value related to the group's initiatives, such as the leadership in health and safety, the contribution to the reduction of greenhouse gas emissions on the life cycle of products, the circular use of resources and much more. Benchmark with 2017 is shown in the following table.

Profit & Loss integrato (M€)	2018	2017	variation
Retained value	39.9	36.0	+3.9
Net socio-economic value	42.1	37.0	+5.1
Net environmental value	30.6	29.5	+1.1
IP&L - shared value	112.6	102.5	+10.1

#### 20

The socio-economic impact of other human rights, in addition to health and safety, has not yet been evaluated.

#### 21

It includes emissions avoided by offsetting with renewable energy, if not already accounted for as indirect CO<sub>2</sub> emissions and emissions avoided over the life cycle.

$\sim$	DED	ΔTII	10	INIA	$\sim$	B /	
	PFK	$\Delta$ I II	V( -	11/1/1	80	IIV	11

#### **Retained value**

Internal value, equal to operating margin (EBITDA) reduced by the taxes paid to the state and its institutions, the costs of finance (i.e. interest paid to banks and other providers of capital) and the dividends eventually distributed.

#### SOCIO-ECONOMIC ASPECTS

#### Stakeholder value

Value distributed to the main stakeholders, namely through the remuneration of employees, the taxes paid to the state and its institutions, the costs of finance (or interest paid to banks and other lenders) and the dividends eventually distributed.

#### Social initiatives

Socio-economic value of investments for communities, applying a result factor by type of initiative. For example, community environmental improvement initiatives make 250% of the value invested.

#### Health and safety<sup>20</sup>

Socio-economic impact of injuries, accidents and exposure to occupational health risks. It evaluates the social cost associated with accidents with absence from work and that related to the portion of workers potentially exposed to specific health risks.

# Turnover and competences

Impact of staff turnover on efficiency and skills development. It estimates the loss of value con-nected to the rotation of personnel, in terms of investments for training and other social elements of productive and organizational efficiency.

#### **ENVIRONMENTAL ASPECTS**

#### CO<sub>2</sub> Footprint<sup>21</sup>

Balance between total  $CO_2$  emitted (direct, indirect and value chain) and  $CO_2$  emissions avoided from primary production of lube bases and solvents, evaluated through Life Cycle Analysis. An ap-propriately precautionary internal price is applied, also used for the assessment of investment scenarios.

#### Air emissions

Balance between emissions to atmpsphere (dust, sulfur and nitrogen oxides, volatile organic com-pounds and other micro-pollutants) and emissions avoided from primary production of lube bases and solvents, evaluated with Life Cycle Analysis.

# Water, land and biodiversity

Water balance and assessment of disturbed and restored land. It evaluates the consumption of water resources, also according to local availability and competition with other industrial or social uses, the occupation of land due to the group's activities and the environmental value of the im-pacts avoided on water, land and biodiversity with reference to primary production, applying the most recent accounts of CONOU, also used for solvents.

#### Circular economy

Environmental value deriving from the use of resources from waste, biomass and recycled materi-als. It represents the benefit of using alternative resources instead of natural and non-renewable fossil resources. The environmental impact of the waste generated by the production process is deducted. It also evaluates, with a precautionary approach, the environmental cost of the fraction that the recycling processes are not able to exploit, destined to end-of-life options, however sus-tainable.

#### **Environmental incidents**

Cost of environmental incidents. Net of any production losses which already affect the retained value, it estimates the environmental value of any possible environmental accident, for example in terms of loss of value of the territory or restoration works.





The group and its companies are committed to ensuring that all the activities are managed inline with group's values, deeply convinced that ethical conduct and business success go hand in hand.

The vast majority of group's companies have a formal Code of Ethics, in any case being all fully aligned with the requested management practices, also pursuant to the organizational model adopted to regulate administrative responsibility.

In particular, all the codes adopted are aligned with the best practices in the sector, embedding not only the key ethical and conduct principles underlying the group's governance model, but also the founding principles of its sustainable strategy.

The sensitivity and attention remain high, especially considering that 88% of 2018 turnover (90% in 2017) is generated in countries, including Italy, identified as being at risk for corruption according to the latest ratings from World Bank<sup>22</sup> and Transparency International<sup>23</sup>.

All group's companies adopt an Organizational, Management and Control Model<sup>24</sup> to prevent the risk of commission of specific relevant offenses, mainly in the areas of corruption, bribery, fraud against the State, corporate offenses, fencing, unintentional serious injuries or fatalities due to non-compliance with safety norms, serious environmental crimes, but also terrorism or violations against individuals, market abuse and others. In addition, each group company has also appointed a Supervisory Body<sup>25</sup>, autonomous and independent, to oversee the functioning and observance of the Model itself, also identifying a corporate structure dedicated to internal auditing.

In addition to specific periodic training, the approach adopted includes a procedure for reporting illicit behavior, in order to offer employees and third parties confidential channels to raise concerns or violations of the procedure itself, without fear of retaliation, discrimination or disciplinary action. Inspired to the same need to spread and consolidate the culture of

Part of the specialized organizations of the United Nations, the World Bank pursues economic growth, environmental and social protection through a financing system based also on risk ratings, including business integrity.

Transparency International is a global network that aims to combat corruption and its effects. It publishes an annual rating on corruption and other integrity risks.

Planned in accordance with the law, even if not mandatory.

Independent body that monitors corporate responsibility.



Itelyum disseminates and consolidates the culture of transparency and integrity in the operations of all group companies.

transparency and integrity, and to ensure conditions of fairness in the conduct of the activities, all the group's companies operating in the waste management sector are registered and strive to maintain their registration in the White List, the lists of suppliers, service providers and executors of works not subject to Mafia infiltration attempts published and updated by the Prefectures. With full extension of this approach, all the companies of the Group have already presented or are going to present to the Italian Competition Authority for the Competition and the Market request for obtaining the Legality Rating.

There are no episodes of corruption, risks to integrity or anti-competitive behavior. However, despite the efforts made, in 2018 the group recorded fines of around 90 k $\in$  as a result of minor non-compliance with the regulations in force.

Sanctions (k€)	2018	2017	2016
Environment	13.3	6.5	1.8
Health and safety	13.1	3.8	0.0
Other	61.9	6.7	15.7
Total	88.3	17.0	17.5

#### 3.1.1 / Supplier management

All group companies aim to establish and maintain relations with suppliers based on partnerships, shared commitments and a transparent exchange of information and experience. The internal processes for managing purchases of goods and services define the work methods to be followed, aiming for the most complete efficiency, compliance with internal rules, including those concerning health and safety, and the dissemination of best practices, aiming at homogenization of management procedures.

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The adhesion to the United Nations Global Compact confirms and renews good practices, already inspired by the adopted Code of Ethics, in order to achieve better risk management (financial, technical and ethical) of suppliers and critical contractors, defining some minimum requirements, non-negotiable, to be evaluated before entering the group's supply chain. The minimum requirements, selected right on the basis of the principles of the United Nations Global Compact, the ILO<sup>26</sup> Conventions and the ISO<sup>27</sup> principles, require suppliers and contractors to respect human rights, guarantee acceptable working conditions, freedom of association, and mitigation of environmental impacts and the rejection of any form of corruption and crime. Within a perimeter of application defined on the basis of the potential risk related to the supply, the supplier will subsequently be assessed through questionnaires relating to financial, technical and sustainability aspects, and further verified by audit activities.

It is the objective of the group to extend the protocol to all companies, and to arrive at the assessment of all suppliers, with different approaches based on dimensional and risk profiles, which also depend on geographical distribution, today outside national borders for no more than 10 % of overall spending on goods and services. Furthermore, almost all of the service contracts are carried out on a restricted territorial basis.

The management systems adopted for quality, environment, health and safety, and social responsibility give a first valid support to the purchasing procedures. As a further element of standardization of the approach, Itelyum is considering adopting the TenP<sup>28</sup> platform created by the Global Compact Network Italy Foundation.

In next reports, progress will be detailed in the definition of the management procedure and in its application, calculated as a percentage of the economic value of the supplies covered by this approach.

#### 26

The International Labor Organization is a specialized agency of the United Nations, which promotes social justice and internationally recognized human rights, with particular reference to those concerning work in all its aspects.

### 27

The International Standards
Organization is the most
important organization in
the world for the definition of
technical standards, including
those concerning quality,
environment and safety.

#### 2

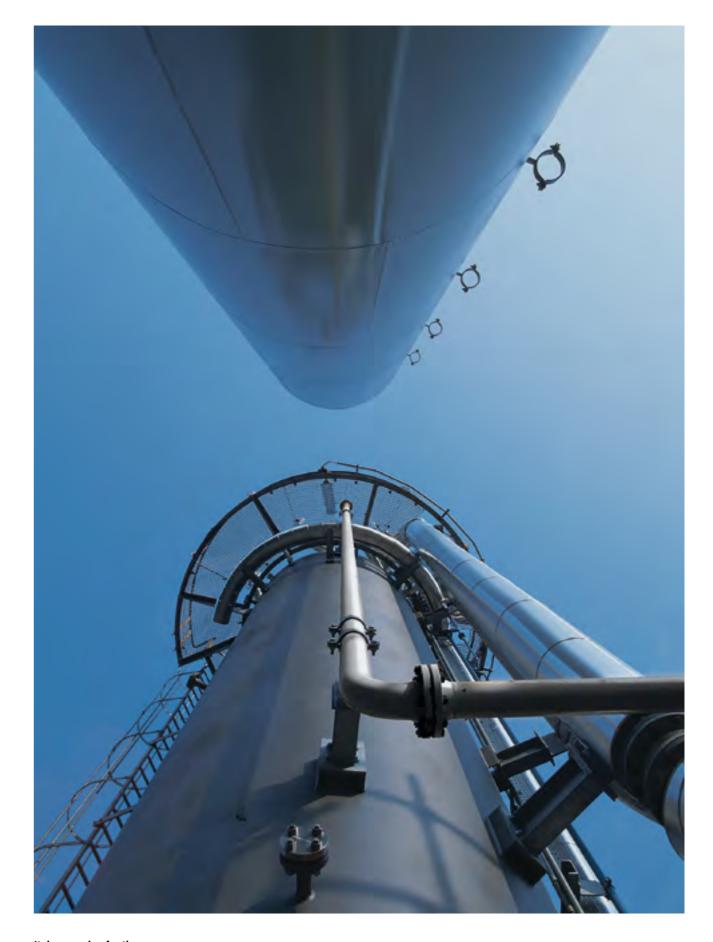
Developed and managed directly by the Foundation Global Compact Network Italy, it helps participating companies in gathering information on the sustainability performance of their suppliers and can be used free of charge by any company interested to use it consistently with the purposes for which it was created.

56

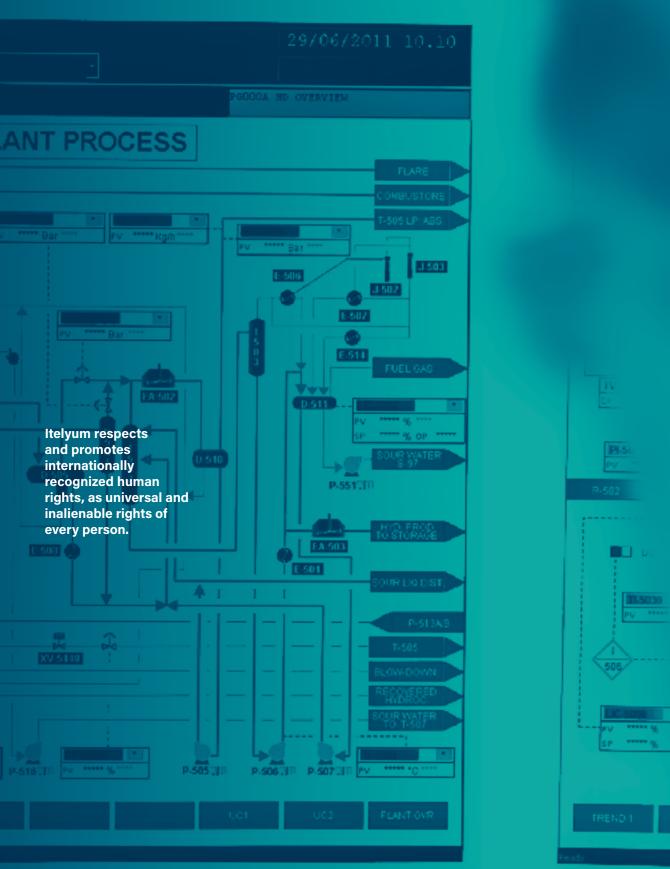
#### 3.1.2 / Customer relations

Being a global player capable of operating in very different markets, by business segment, geographical location, culture and size, with an offer of products, solutions and services that meets the current and future needs of its customers, requires support of research and innovation, not only technological but also management. In addition, the group's companies aim to establish and maintain relationships with their customers based on consolidated partnerships and full information transparency, both in terms of quality, environment and product safety and in the detailed prequalification and qualification processes to which we come subject, in which the group's sustainable strategy is measured and evaluated.

To complement current relations, the group intends to structure a systematic approach to Customer Satisfaction, which includes corporate perception, quality, environment and safety aspects and logistics and service aspects. In next reports, the percentage of sales covered by this approach, calculated on the economic value, will be reported in detail.



Itelyum: value for the market, beyond the quality of products and services



Φ



3.2 **Labour and human rights** 

In line with the Guiding Principles of the Sustainability Policy and guided in particular by the Rights and Society Policy, Itelyum respects and promotes internationally recognized human rights, such as universal and inalienable rights of every person. It also guarantees working conditions based on correct relationships, equal opportunities, development of skills, in a context that considers diversity as a true source of value.

The group considers the management of human capital as a clear responsibility of all its managers, aimed not only at the respect and protection of skills and diversity, but above all at their development and full exploitation. Equal opportunities are the object of particular attention, with actions being defined to favor the presence and representation of women in top positions. In fact, currently there is no female presence in the Boards of Directors of the group companies, in the Steering Committees and in top management positions. Limited presence also in middle management. The ambition of the group is to create and maintain an inclusive working environment, which fosters the increase in the presence of women in these roles. The female presence is decidedly reduced even at the level of operating personnel. This makes it possible to compare wage levels between reasonably comparable jobs only for the level of employees, excluding middle managers: the analysis shows inevitable differences (in 2018, the average for men is about 15-20% more than for women) that reflect the current distribution of roles. Although the figure is in line with European trends, there are still further steps to be explored to ensure and promote equal opportunities in career paths.

The evolution of salaries is in line with the local context. Surveys on the level of local wages are carried out regularly. Principles of fairness in remuneration are also applied to senior management, for which reference is made in particular to the principles contained in the ethical codes and the supervision of the Boards of Directors and Supervisory Bodies. To this end, the group also monitors the variation in the net remuneration of the highest paid employee and the median of all other employees. In 2018 this ratio remains in a range close to 10, in line with previous years. The companies of the group follow the indications dictated by the legislation for the insertion in the world of people of disabled people, in

59

Particular attention is given to the management of changes, from the organizational evolutions to the training and coaching for new resources.

60

some cases with specific initiatives dedicated to a better social inclusion.

All group employees are covered by collective bargaining agreements. In addition, the regeneration area staff (about 30% of the entire population of the group) benefits from a second level contract and reward elements that include specific sections relating to health and safety issues. At the end of the year, 518 people work for the group. Almost all of the population is hired full-time and undetermined. In any case, the benefits (eg supplementary health coverage) are implemented without difference between full-time, part-time or temporary workers. No gender differences in the application of parental leave. The organization of work involves activities at the level of production sites that require a continuous presence organized in shifts. Good management of industrial relations also manifests itself in the absence of strikes.

The overall annual turnover remains significant (around 22%<sup>29</sup> in 2018), especially in some of the group companies, confirming a dynamic and competitive sector also in terms of professionalism, while keeping open the internal discussion on the management and improvement of internal climate, considered in any case one of the success levers. Right in such a context, particular attention is given to the management of the change, from the notice for organizational *changes* to the training and *the support to the entry of the* new resources, also in the case of internal mobility between different units of the group.

In order to better monitor risks and plan improvement actions, also inspired by the SA8000<sup>30</sup> approach already adopted in some companies, the group intends to adopt a tool for the assessment of human rights. Meanwhile, the group has begun to collect data and information on possible accidents related to working conditions. Situations considered to be potentially critical are mainly linked to the risk of discrimination in the workforce of companies, including working conditions in subcontracts and also those related to the use of products marketed in countries at risk. In fact, 13% of 2018 turnover (11% in 2017) is generated in countries considered at risk for human rights according to Freedom House<sup>31</sup>.

#### 29

As sum of entries (13%) and exits (9%) on the average number of employees in the year. The net balance is significantly positive, with increase of employment.

#### 30

SA 8000 is an international standard aimed at regulating some managerial aspects related to social responsibility, such as respect for human and labour rights including, in addition to health and safety, freedom of association and the right to collective bargaining, the fight against discrimination, working hours and remuneration criteria.

#### 31

Freedom House is an international nongovernmental organization based in Washington (USA), which conducts research and awareness-raising activities on democracy, political freedoms, and human rights. Every year it issues an updated list of countries at risk.



Itelyum Purification: competence and technology in partnership with pharmaceutical industry.

### EMPLOYEES AND CONTRACTS

Employees	2018	2017	2016
Regeneration	152	147	147
Regeneration Purification	148	145	-
Environment	218	111	100
Itelyum	518	403	247

Open-end contracts		2018	2017	2016	Fixed-term contracts		2018	2017	2016
	Female	Male				Donne	Male		
Regeneration	17	133	144	147	Regeneration	0	2	3	0
Purification	22	121	143	-	Purification	1	4	2	-
Environment	70	119	96	90	Environment	9	20	15	10
Itelyum	109	373	383	237	Itelyum	10	26	20	10
Full-time employees		2018	2017	2016	Part-time employees		2018	2017	2016
	Female	Male				Female	Male		
Regeneration	13	134	142	143	Regeneration	4	1	5	4
Purification	20	125	141	-	Purification	3	0	4	-
Environment	66	136	99	91	Environment	13	3	12	9

EMPLOYEES VA	RIATION (2018 VS 2017)	#	%
ENTRIES	Acquisitions	99	64%
	Hiring (open and fixed-term contracts)	55	36%
	Total	154	-
EXITS	Resignations	23	60%
	Dismissals	8	20%
	Fixed-term contracts and trial period closures	4	10%
	Retirements	4	10%
	Total	39	-

FEMALE AND	MALE			BREAKDOWN B	Y RESIDENC	E (%)	
Total	2018	2017	2016	Total	2018	2017	2016
Managers	19	18	8	Municipality	16%	21%	26%
White collars	288	199	135	Province	44%	47%	55%
Blue collars	211	186	104	Region	32%	30%	15%
Total	518	403	247	Other	7%	2%	4%
Female	2018	2017	2016	Female	2018	2017	2016
Managers	0 (0%)	0 (0%)	0 (0%)	Municipality	22%	36%	37%
White collars	117 (40%)	71 (37%)	48 (36%)	Province	39%	38%	47%
Blue collars	2 (1%)	2 (1%)	1 (1%)	Region	29%	23%	14%
Total	119 (23)%	76 (19)%	49 (20%)	Other	9%	3%	2%
Male	2018	2017	2016	Male	2018	2017	2016
Managers	19 (100%)	18 (100%)	8 (100%)	Municipality	15%	18%	23%
White collars		127 (63%)	87 (64%)	Province		49%	58%
Blue collars	209 (99%)	185 (99%)	103 (99%)	Region	33%	31%	15%
Total	399 (77%)	333 (81%)	198 (80%)	Other	7%	2%	4%

BY AGE (%)			BREAKDOWN	I BY SENIORITY	7 (%)	
2018	2017	2016	Total	2018	2017	2016
10%	7%	8%	<3	22%	14%	16%
18%	16%	19%	3-5	9%	12%	9%
31%	34%	34%	5-10	13%	14%	18%
34%	37%	33%	10-20	33%	34%	28%
7%	6%	6%	>20	23%	26%	30%
2018	2017	2016	Female	2018	2017	2016
17%	7%	12%	<3	33%	26%	27%
28%	25%	31%	3-5	9%	14%	18%
30%	38%	33%	5-10	16%	10%	12%
24%	29%	20%	10-20	25%	30%	33%
2%	1%	4%	>20	17%	21%	10%
2018	2017	2016	Male	2018	2017	2016
8%	7%	7%	<3	19%	12%	14%
16%	14%	16%	3-5	9%	12%	6%
31%	34%	35%	5-10	12%	15%	20%
37%	39%	36%	10-20	36%	35%	26%
9%	7%	6%	>20	25%	27%	34%
	2018  10% 18% 31% 34% 7%  2018  17% 28% 30% 24% 2%  2018  8% 16% 31% 37%	2018         2017           10%         7%           18%         16%           31%         34%           34%         37%           7%         6%           2018         2017           17%         7%           28%         25%           30%         38%           24%         29%           2%         1%           2018         2017           8%         7%           16%         14%           31%         34%           37%         39%	2018         2017         2016           10%         7%         8%           18%         16%         19%           31%         34%         34%           34%         37%         33%           7%         6%         6%           2018         2017         2016           17%         7%         12%           28%         25%         31%           30%         38%         33%           24%         29%         20%           2%         1%         4%           2018         2017         2016           8%         7%         7%           16%         14%         16%           31%         34%         35%           37%         39%         36%	2018         2017         2016         Total           10%         7%         8%         <3	2018         2017         2016         Total         2018           10%         7%         8%         <3	2018         2017         2016         Total         2018         2017           10%         7%         8%         <3



3.3 Human capital development

Group's companies have already implemented many training and coaching initiatives. The training activities are structured along three areas: safety, environment and skills development. With a total investment of over 150 k€, in addition to the support of internal resources, the group carried out almost 12.000 hours of training in 2018, reaching 90% of employees with at least one session. The evolution of the dimensional perimeter still leaves room for improvement both in the sharing of skill development programs, and in the capacity to intercept and formalize all training opportunities carried out even outside of classroom sessions, such as coaching, training-on-the-job, field exercises and more. In the following, the data recorded and accounted for to date, certainly not yet fully representative of the training effort provided.

Hours of training	2018	2017	2010
Safety	4,746	3,766	2,598
Environment		1,451	70
Skill development	6,002	1,829	1,14
Total		7,045	4,45
Hours of training	2018	2017	2010
Managers	350	196	113
White collars	6,433	3,919	2,36
Blue collars	5,154	2,930	1,96
Hours of training by gender (2018)		Female	Mal
Safety		388	4,36
Environment		173	1,01
Skill development		1,170	4,82
Total		1,731	10,20

# The integrated approach to all functions aims at improving the organization and competences.

66

Seats	2018	2017	2016
Safety	400	329	194
Environment		220	88
Skill development	195	151	147
Total (minimum 1 session)	464	347	202
Trained employees (minimum 1 session, %)	2018	2017	2016
Managers	18%	89%	75%
White collars	22%	81%	81%
Blue collars	24%	89%	84%
Total	90%	85%	82%
Hours of training pro capita	2018	2017	2016
Managers	18	11	14
White collars	22	19	18
Blue collars	24	15	19
Total	23	17	18

To improve the efficiency of training and the development of human capital, the group intends to define a complex development and training protocol, through a model able to define the key competences of managers, workers and workers, with priority for those occupying key positions. It is a fundamental element for the enhancement of human capital, in order to guarantee that everyone in positions of responsibility has the necessary leadership, managerial, technical and operational skills.

Through this model the group plans to implement an integrated approach to all the functions aimed at improving the structures and individual

competences. Similarly, the group intends to structure the annual performance evaluation and career path review definitively and uniformly in the various Group companies, also for the purpose of better defining and managing and succession plans for key positions.



Itelyum Environment: professionalism and transparency in the integrated management of industrial waste.



3.4 Health and safety

In line with the Guiding Principles of the Sustainability Policy and guided in particular by the Health and Safety Policy, Itelyum promotes the safety, health and well-being of all employees, including within the same approach contractors, visitors, the local community, customers and suppliers and end users of its processes, products, applications and services.

The management model adopted, constantly evolving and gradually extended to all sites, finds its foundation in managerial leadership that supports the motivational elements, organizational structures and operational tools required. Beyond mere legislative compliance, it responds not only to the protection of the safety of anyone who has relations in any capacity with operating activities, but also to the group's efficiency objectives.

Beyond the formalities foreseen by the applicable legislation, the approach targets the full sharing of the objectives with all the interested parties, from the top management to the workers' organizations, with which formal periodic sessions of updating, consultation and discussion on all issues related to health and safety, by employees directed at company personnel and transporters.

Despite the continuous efforts, in the last three years the group has unfortunately recorded a fatal accident of a third party involved in a road accident outside its own appurtenances. With the aim of creating and maintaining the greatest possible attention, all serious accidents or even situations that could have generated more serious consequences are discussed at the highest corporate level. The Board of Directors is updated at least monthly on the performance of the security indicators.

Fatalities	2018	2017	2016
Employees	0	0	0
Contractors	0	0	0
Third parties	0	0	1
Total	0	0	1

The management model adopted finds its foundation in managerial leadership that supports the motivational elements, organizational structures and the operational tools required.

In 2018, employees' absences due to occupational accidents totaled 111 days lost, or significantly less than 0.5% on the total absenteeism rate, slightly below 4% of the total number of workable days. Below is a breakdown of performance, which inevitably reflects the structural growth of the perimeter.

# Absenteeism, employees

(% of theoretical workable hours)	2018	2017	2016
Regeneration	3.0%	4.6%	4.1%
Purification	3.6%	3.7%	-
Environment	3.4%	4.5%	4.3%
Itelyum	3.4	4.3%	4.2%

Lost Time Injuries (LTI) <sup>32</sup> , employees	2018	2017	2016
Regeneration	0	0	0
Purification	2	3	-
Environment	4	9	3
Itelyum	6	12	3

Lost days (on LTI), employees	2018	2017	2016
Regeneration	0	0	0
Purification	66	27	-
Environment	45	246	38
Itelvum	111	273	38

With at least 24-hour absence from workplace.

70

LTI frequancy rate <sup>33</sup> , employees	2018	2017	2016
Regeneration	0.0	0.0	0.0
Purification	7.6	11.5	-
Ambiente	10.4	39.7	16.9
Itelyum	6.5	16.6	6.9

Ambiente	10.4	39.7	16.9
Itelyum	6.5	16.6	6.9
LTI severity rate <sup>34</sup> , employees	2018	2017	2016
Degeneration	0.00	0.00	0.00
Regeneration		0.00	0.00
Purification	0.25	0.08	-
Ambiente	0.11	1.11	0.21
Itelyum	0.12	0.38	0.09

worked hours. Number of days lost on

Number of LTI per milion

injuries per thousand worked

71

The analysis of the historical trend of the frequency indexes, even like-for-like (i.e. considering the performances of the companies that are now part of the group when they were not yet acquired), shows some difficulties, completely understandable, in managing the expansion of the group perimeter. The most recent data show with equal clarity how, once the consolidation has been completed and operational control has been activated, the efforts made to align the approach and performance with the best practices begin to trigger a positive trend. On this effect, the group will consolidate the safety culture as a value both for the corporate and all the individuals who are involved in its activities.

In the next reports, the collection of information will be extended to company employees and any third parties involved, with greater statistical details.

Applying the precautionary principle, a significant part of the group's employees (around 300 workers) is considered to be potentially exposed to specific health risks. All potentially exposed workers are subject to occupational exposure monitoring (eg exposure to noise and chemical risk) while everyone is guaranteed proper health surveillance according to

specific roles. However, mitigation measures are adopted for all. Moreover, a limited number of workers is formally registered in the register of personnel potentially exposed to carcinogens and therefore subjected to additional prevention protocols. There are no occupational diseases.

In addition to specific procedures for receiving, storing, handling and handling hazardous substances (products or waste) treated in the production sites, the presence of other potentially sensitive materials, such as asbestoscontaining products, for which they are in progress is monitored and inventoried multi-year replacement or encapsulation programs. All the sites are free of other substances historically considered dangerous for health such as, for example, PCBs<sup>35</sup> and CFCs<sup>36</sup>.

The health and safety objective extends to local communities, especially in the four sites of the group that according to the legislation are classified at "major-accident hazard" due to the volume of storage of flammable or potentially toxic substances for human health or for the environment. In these sites that actually represent more than 70% of the group's turnover, dedicated protocols and measures are adopted, also involving local communities, with a real integrated management system aimed at risk prevention, according to the best practice of the sector.

#### 35

Polychlorinated biphenyls, once used as thermal and electrical insulators in equipment (eg industrial transformers) are considered to be highly toxic persistent pollutants.

#### 36

Chlorofluorocarbons (trade name freons), once used as refrigerant fluids, are substances that damage the ozone layer.



The constant attention to health and safety rates managerial skills and collective involvement.



# 3.5 Community relations

In line with the Guiding Principles of the Sustainability Policy and guided in particular by the Rights and Society Policy, all the group's companies, at all sites, aim to creating and maintaining good relationships with the community and with the relevant stakeholders, based on shared commitments, trust, transparency and active collaboration in the long term. Creating relationships with communities and stakeholders means understanding their needs, supporting projects of territorial and local interest without creating dependency and promoting the involvement of stakeholders in any significant event during the life of the plants and in all cases of significant initiatives by the group. The types of involvement can vary greatly based on the nature of relationships and geographical proximity. The following table describes the multidimensional approach towards stakeholders, identified by categories. Group's companies regularly involve relevant authorities and institutions through individual or collective dialogues during the authorization phases or other institutional procedures or through voluntary multi-stakeholder and partnership initiatives. This also includes active participation in local trade associations, encouraging common initiatives and the dissemination of responsible business practices. Starting from the three main sites, namely the oil regeneration plants of Pieve Fissiraga and Ceccano and Landriano solvent purification plant, the group intends to structure even more effectively the continuous contact with the local community and all stakeholders in the territory, implementing progressively tools that go beyond the strictly institutional dynamics. The collected experience will be used to extend the approach, in the most appropriate forms, to all the sites of the group.

Stakeholder engagement	2018	2017	2016
Major sites	3	3	2
Open Day in last 3 years	<b></b> -	-	-
Local Stakeholder Advisory Panel	<b></b> -	-	-
Annual report on sustainability performance	2	2	2
Organized educational visits	2	2	2
Organized institutional visits	3	3	2

Finally, starting from the understanding of needs and opportunities and verifying full alignment with the shared principles and lines of action, the Group annually involves and supports the global and local communities through a series of extended, but not limited, initiatives in the field of promoting sustainability and education, supporting culture or sport, developing and training local skills and competences, and more.

Support to community (k€)	2018	2017	2016
Itelyum	95.4	76.5	53.1

In the next reports, information on support earmarked for the community will be collected with more detail on the type, distinguishing between donations, social investments and sponsorships. The methods of delivery will also be detailed: in cash, on time (eg paid volunteering), in kind (eg donation of products or services, projects / partnerships and the like) and general overheads for the community.

Among the most significant memberships, the group actively	CONOU National Consortium for the Management, Collection and Treatment of Used Mineral Oils	UP Association of Oil Products Enterprises	GEIR Groupement Européen de l'Industrie de la Régénération
participates, also with joint sustainability initiatives, in:	ANCO National Association of Consortium Dealers	COBAT National Collection and Recycling Consortium	Federchimica National Federation of Chemical Industry
	AssICC Italian Chemical Trade Association	UNICIRCULAR Union of Circular Economy Enterprises	ESRG European Solvent Recycler Group

STAKEHOLDER	ENGAGEMENT CHANNELS	ISSUES
Employees and their representatives	<ul> <li>Continuous dialogue manager/team</li> <li>Safety initiatives</li> <li>Theme events</li> <li>Institutional industrial relations</li> </ul>	<ul><li>Job organization</li><li>Working climate</li><li>Health, safety and well-being</li><li>Sustainability</li></ul>
Partners and providers of capital	Dedicated meetings and open dialogue     Corporate websites	<ul> <li>Performance (economic, environmental and social)</li> <li>Strategic development</li> <li>Business risk management</li> </ul>
Suppliers and contractors	<ul> <li>Partnership relationships with key suppliers</li> <li>Involvement in sustainable management promotion programs</li> <li>Contacts and talks during qualification audits</li> </ul>	- Contract terms and conditions - Prequalification requirements (integrity, human and labor rights, health, safety and environment) - Audit feedback
Customers and end-users	- Trade shows, forums and industry events - Group initiatives dedicated to sustainability - Individual direct contacts - Customer Satisfaction and quality management	Customer services and product logistics     Products and solutions, also with     reference to environmental and social     performance     Strategic partnership
Communities, NGOs, local and global media	<ul> <li>Individual or collective interactions (eg interviews, conferences, Open Doors)</li> <li>Dialogue sessions with the community</li> <li>Social initiatives</li> </ul>	<ul> <li>Transparency and responsibility on sustainability issues</li> <li>Environmental and social performance</li> <li>Presence in the territory and investment for the community</li> </ul>
Membership, partnership and academic world	Individual or collective interactions (eg meetings, conferences)     Partnerships     Research activity	<ul> <li>Transparency and accountability on sustainability issues</li> <li>Sustainable governance and impact mitigation</li> <li>Social investments and community initiatives</li> <li>Individual and sectoral contribution</li> </ul>
Authorities and institutions	Individual or collective interactions (eg meetings, conferences, events)	Legal compliance     Transparency and accountability on sustainability issues     Strategic development



# 3.6 Product stewardship

Sustainability and circularity remain the main incentives for innovation and research. The objectives are many: to increase the technological flexibility of the plants, making them suitable for receiving and handling variable and different charges; improve the quality of products, to access increasingly qualified market segments; increase process transformation efficiency, maximizing raw materials and waste; optimize waste management to better target sustainable destinations; define new solutions and services for the integration of the commercial offer.

With this in mind, the group works to guarantee and continuously improve the quality of its products, processes and services, implementing a systematic approach aimed at satisfying quality requirements, creating value throughout the life cycle of products and improving relations with customers and providers. All companies operate with management systems compliant with the ISO 9001 standard or, in addition, with other quality standards defined by the specific reference markets. External certification is not limited to production systems, but also covers products distributed with the quality label issued by recognized certification bodies. The products are certified according to the applicable commercial standards or, if necessary, specific sectoral qualifications (eg API-Active Pharmaceutical Ingredient).

Furthermore, by combining sustainable vision with growing market demands, the group aims to understand, control and communicate technical and environmental performance and the effects related to product health and safety throughout the entire life cycle, from production to final disposal or reuse. In this sense, the Life Cycle Assessment (LCA) methodology applied at sectoral level gives indications for both the regeneration of waste oils and the purification of waste-containing solvents.

The main data on the group's activity clearly illustrate the path of diversification and integration of the overall commercial offer. The content of recycled material in the products sold remains one of the guiding principles: about 250,000 tons of product obtained thanks to the responsible valorisation of waste coming from other production or consumption cycles, to which must

Itelyum supplies solvents produced from virgin streams to customers that, following the value chain, supply in exchange waste to be recycled in the group's plants.

be added the almost 450,000 tons of waste handled, pre-treated and sent to sustainable destinations.

Finally, again with a view to circularity, it is important not only to market recycled products, or to manage waste responsibly, but also to supply products from virgin streams to customers who, in the value chain, then become suppliers of waste to be recycled within the group's plants. Also in 2018, 82% of the group's turnover comes from the combination of these three methods, while strongly increasing from 2017 as absolute figure (+25%).

Marketed products (% volume)	2018	2017	2016	
Regeneration				
Lube bases Group I+	40.6 %	42.5 %	77.7 %	
Lube bases Group II+	1.0 %	-	-	
Gasoil	4.8 %	5.0 %	8.1 %	
Bitumen	9.0 %	9.0 %	14.2 %	
Purification				
Eco products: thinner	18.1 %	17.7 %	-	
Eco products: solvents and others	4.1 %	3.4 %	-	
Pure products: technical grade aliphatics	5.6 %	4.9 %	-	
Pure products: high purity aliphatics	5.7 %	5.9 %		
Pure products: others	1.4 %	1.3 %		37
Pure products: API - pharma	0.1 %	0.1 %	-	Products traded and marketed without product
Pure products: trading <sup>37</sup>	9.6 %	10.2 %	-	marketed Without product

Recycled contento of marketed products (% volume)	2018	2017	2016	
Regeneration				
Products 100% recycled and certified <sup>38</sup>	41.6%	42.5 %	77.7 %	38
Products 100% recycled	13.8%	14.0 %	22.3 %	Certified to Remade in Italy®.
Purification				
Products 100% recycled	22.2%	21.2 %	-	
Products not containing recycled	22.4%	22.3 %	-	
Circular turnover (M€)	2018	2017	2016	
Regeneration				
Total turnover	99.1	91.5	95.9	
Circular turnover	99.1	91.5	95.9	
%	100%	100%	100%	
Purification				
Total turnover	110.3	106.9	-	
Circular turnove <sup>39</sup>	75.8	73.9	-	39
- Eco products	53.8	49.6	-	For Purification, the circular turnover includes the
- Pure products sold to waste suppliers	22.0	24.3	-	recycling activities including
%	69%	69%	-	bitoil, a fuel produced from
Environment				recovery used internally, and the sale of pure to waste
Total turnover	79.1	32.6	26.9	suppliers.
Circular turnover <sup>40</sup>	60.7	21.0	16.0	40
%		64%	60%	For Ambiente, the circular
Itelyum				turnover is calculated pro-
Total turnover	288.5	231.0	122.8	rata on the percentage of managed waste sent to
Circular turnover	235.6	186.4	111.9	recovery operations and the
%	82%	81%	91%	industrial wastewaters treated

Particularly important for the regeneration of waste oils sector is the Remade in Italy® certification, an accredited environmental product label, qualifying for green procurement.

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All products sold, for any destination, are accompanied by appropriate safety information, which contains the necessary information on the physicochemical, toxicological and environmental hazard properties necessary for the correct and safe handling of substances and mixtures.

Particularly important in the regeneration of waste oils sector is the Remade in Italy® certification. Based on stringent protocols, it is an accredited environmental product label valid for green procurement, which tracks the content of recycled products and the traceability of material flows within the production process. All the lubricant bases produced by the group in the Ceccano and Pieve Fissiraga plants meet these requirements, with 100% recycled content.



Itelyum Regeneration: technological innovation for the regeneration of used oils.



Itelyum Purification: the synthesis facility integrates the offer for pharmaceutical industry.



# **KEY FIGURES**

Over **700,000 tons** of waste managed and valorised, with high recycling efficiency.

Recycling of used oils, solvents and chemical streams has created net environmental value, helping to avoid:

- the emissions of almost
   700,000 tons of CO<sub>2</sub>;
- the release of over 1,000 tons of air pollutants;
- the withdrawal of almost 3,000,000 m³ of water;
- the consumption of over
   200 hectares of land.

More than **45 million** kWh produced by high-efficiency cogeneration.

Itelyum's business model is based on circularity, maximizing the use of recycled raw materials, the transformation efficiency of industrial processes and the most sustainable options for the destinations of the waste generated. Hereunder, the material balance sheet of the group's activities, excluding the auxiliary process materials used (such as catalysts, technical gases, reagents, additives, lubricants), which in any case constitute less than 2% of the total raw materials used.

4.1

Circular economy

Material balance (t)	2018	2017	2016
Regeneration			
In: raw materials and waste	171,133	167,826	168,944
Raw materia		-	-
Used oils and emulsions	171,133	167,826	168,944
Out: products	147,680	144,924	144,888
Regenerated lube bases	111,009	109,014	112,512
Gasoil	12,740	12,785	11,813
Bitumen	23,931	23,125	20,563
Out: depurated water	14,564	13,402	14,160
Out: waste sent to recovery (third parties)	2,439	1,444	832
Circularity (%)	96%	95%	95%
Purification			
In: raw materials and waste	127,875	115,054	-
Raw materials	38,056	36,516	-
Waste containing solvents	89,819	78,538	-
Out: products	109,074	94,915	-
Solvents and other recycled products	77,069	66,608	-
Pure solvents	31,871	28,175	-
Other products	134	132	-
Out: depurated water (third parties)	12,260	9,978	-
Out: waste sent to recovery (third parties)	1,870	2,572	-
Circularity (%)	96%	93%	

In the case of used oils regeneration of, the difference between entries and exits from the processes consists mainly of the water contained in the feedstock of the plants; these waters are pretreated to extract residues of organic substances and then returned to the environment after biological treatment. A minor fraction is represented by process waste sent to recovery or disposal operations by specialized third parties.

Also in the solvent purification process the difference between entries and exits from the processes consists mainly of acqueous waste streams. In this case, they are distilled to reduce the quantity and recover industrial water to be reintegrated into the production process. The remaining part is sent for recovery or disposal operations to specialized third parties.

In both cases, the waste generated by the process and the waste generated by the auxiliary activities and maintenance are duly managed and sent for treatment according to the most sustainable option.

Waste generated (t)	2018	2017	2016
Regeneration			
Waste generated			
Non hazardous	2,015	1,694	1,515
Hazardous	4,583	4,627	3,700
Origin			
Process	5,486	4,736	4,222
Auxiliary and maitenance activities	1,112	1,585	993
Destination			
Recovery	<i>2,439</i>	1,444	832
Disposal	3,761	4,687	4,366

Over 700.000 tons of industrial waste managed responsibly, with high circularity.

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Rifiuti prodotti (t)	2018	2017	2016
Purification			
Waste generated			
Non hazardous	179	204	-
Hazardous	27,471	24,993	-
Origin			
Process	27,299	24,794	-
Auxiliary activities and maitenance	350	403	-
Destination			
Recovery	1,870	2,572	-
Industrial water depuration	16,346	13,304	-
Disposal	9,427	9,235	-

In 2018, Itelyum Environment handled globally almost 450,000 tons of hazardous and non-hazardous waste, sorted and homogenized in rational fractions, if necessary also with appropriate pre-treatment, and eventually sent for treatment according to the most sustainable option. Hereunder the details.

Waste managed and destination (t)	2018	2017	2016
Environment			
Waste managed			
Non hazardous	198,581	42,503	25,841
Hazardous	250,292	119,735	112,864
Destination			
Recovery	283,855	84,463	61,705
Industrial water depuration	60,906	7,132	6,798
Disposal	104,112	50,711	46,609
Circularity (%)	76.8%	64.4%	59.5%



# 4.2 Energy and climate

Itelyum's activities are energy intensive. Pieve Fissiraga and Ceccano oil regeneration plants and Landriano solvent purification plant consume both thermal and electrical energy for the process. In all three plants, electricity demand is largely supported by high-efficiency cogeneration.

The main fuel is natural gas. At the Landriano plant significant amounts of liquid fuel are used, self-produced from waste, and assimilated to very low-sulfur fuel oil. Secondary energy consumption is due to the emergency power supply systems, the fire fighting motor pumps and the office heating.

In the activities of Itelyum Environment there is a prevalent use of electricity purchased from the grid and transport fuel used by the internal fleet. As a partial offset of energy consumption, three photovoltaic fields, for a total installed power of over 800 kW, self-produce and inject electricity into the grid.

All sources are monitored and accounted for, to track consumption and the generation of greenhouse gases. In particular, Pieve Fissiraga, Ceccano and Landriano plants fall within the scope of the European Emission Trading System, partly benefiting from free  $\rm CO_2$  allocations, and are therefore subjected to specific environmental accounting rules and third-party verification.

The combination of optimization initiatives implemented in the most energy-intensive sites ensure specific consumption and carbon intensity in line with the best practices of the reference sectors. In any case, further improvement plans are being studied. Despite this, the purchase on the market of  $CO_2$  quotas to offset greenhouse gas emissions requires a significant financial effort.

In this regard, it is important to emphasize that the production of lube bases and solvents by recycling industrial wastes makes it possible to avoid significant quantities of CO<sub>2</sub> when compared to the same production from virgin resources. Sector-wide studies on the entire life cycle (LCA) or carbon footprint carried out at European level, lead to calculate, based on 2018 production, almost 700,000 tons of CO<sub>2</sub> avoided, more than three times the carbon footprint of the entire group.

The production of lube bases and solvents from recycled industrial streams contributes to avoiding significant quantities of CO<sub>2</sub>, if compared to the equivalent production from virgin resources.

The overall performance in energy and the fight against climate change is summarized in the following tables.

Carbon intensity <sup>41</sup> gross and net <sup>42</sup> (kg CO <sub>2</sub> /t product)	2018	2017	2016
Regeneration			
Gross			
Net	565	597	587
Purification			
Gross	704	751	-
Net	179	226	-
Totale			
Gross	624	658	F07
Net	401	481	587
Carbon footprint, gross (kt CO₂)	2018	2017	2016
"Scope 1" (direct emissions)	157.7	153.5	90.4
"Scope 2" (indirect emissions)		8.0	2.4
"Scope 3" (value chain emissions) <sup>43</sup>		32.2	23.2
ITELYUM	107.0	193.7	116.0

41
It includes both direct
emissions for cogeneration
activities (thermal and electrical
energy) and indirect emissions
from purchased electricity.

92

Direct emissions also include contributions not subject to EU-ETS legislation.

42

Gross emissions consider all carbon sources, net of any biomass. Net emissions also exclude those derived directly or indirectly from the recovery of waste.

43

This figure, currently estimated on the basis of sector data, includes the emissions related to the production of the raw materials purchased, the upstream and downstream logistics not managed with own resources, the commuting of employees, business trips and other minor contributions. In the next reports t will be calculated in detail.

Fuels (% heat)	2018	2017	2016	
Natural gas	67.2%	69.4%	98.4%	
Low-sulphur fuel oil <sup>44</sup>	30.9%	22.2%	-	44
Gasoil (including automotive)	1.9%	1.4%	1.6%	Low-sulphur fuel oil self- produced from waste.
ITELYUM (milion GJ)	2.2	2.1	1.2	produced from waste.
Electrical energy (%)	2018	2017	2016	
Self-production / Cogeneration	66.5%	61.4%	77.9%	
Purchased from the grid	33.5%	38.6%	22.1%	
Total (milion kWh)	69.2	65.0	31.6	
(tep/t product)	2018	2017	2016	
· · · ·		2017	2016	
Regeneration	0.204	0.202	0.203	
Regeneration Purification	0.204	0.202 0.243	0.203	
Regeneration	0.204	0.202		
Regeneration Purification Total  Energy consumption, thermal and electric	0.204 0.222 <b>0.211</b>	0.202 0.243 <b>0.218</b>	0.203 - <b>0.203</b>	
Regeneration Purification Total	0.204	0.202 0.243	0.203	
Regeneration Purification Total  Energy consumption, thermal and electric (ktep)	0.204 0.222 0.211	0.202 0.243 <b>0.218</b>	0.203 - <b>0.203</b>	
Regeneration Purification Total  Energy consumption, thermal and electric (ktep)  Regeneration	0.204 0.222 <b>0.211</b> <b>2018</b>	0.202 0.243 <b>0.218</b>	0.203 0.203 2016	
Regeneration Purification Total  Energy consumption, thermal and electric (ktep)  Regeneration Purification	0.204 0.222 0.211 2018	0.202 0.243 <b>0.218</b> <b>2017</b>	0.203 0.203 2016	
Regeneration Purification Total  Energy consumption, thermal and electric		0.202 0.243 <b>0.218</b> <b>2017</b> 29.3 23.3	0.203 0.203 2016 29.4	



Almost all emissions to atmosphere are attributable to the oil regeneration plants of Pieve Fissiraga and Ceccano and to the Landriano solvent purification plant. There are also minor channeled emissions points in the Rho logistics center and in some of the operating sites of the Itelyum Ambiente companies. In addition, fleets of managed vehicles generate emissions in proportion to the mileage and the type of fleet in circulation.

The most significant emissions are subjected to periodic measurement campaigns and, in some cases, are covered by continuous monitoring systems of the main emission parameters. Hereunder, a breakdown of performance related to macro pollutants. The specific emission factors, per ton of product, refer separately to the activities of regeneration of used oils and solvent purification. For the entire group, the total absolute emissions are reported, including those related to the service activities of Itelyum Environment.

Emissions to atmosphere <sup>45</sup>	2018	2017	2016
Regeneration (g/t product)			
Dust	5.1	2.1	6.4
NO <sub>x</sub>	498.7	555.4	605.3
SO <sub>2</sub>	772.9	776.1	1,029.6
CO	32.8	48.4	35.6
COV	4.1	7.0	4.8
Purification (g/t product)			
Dust	18.3	18.4	-
NO <sub>x</sub>	543.9	442.3	-
SO <sub>2</sub>	5.5	2.2	-
CO	21.0	17.8	-
COV		32.3	-

45
NO<sub>x</sub> – nitrogen oxides;
SO<sub>2</sub> – sulphur dioxide;
CO – carbon monoxide;
COV – vlolatile organic
compounds



Emissions to atmosphere	2018	2017	2016
ITELYUM (t)			
Dust	5.0	4.0	0.9
NO <sub>x</sub>	174.7	159.1	87.7
SO <sub>2</sub>	1100	112.8	149.2
CO	17.0	17.4	5.2
COV	14.3	6.7	0.9

Also in this case, it is important to underline that the production of lubricant bases and solvents by recycling industrial waste allows to avoid significant quantities of emissions, in particular dust and acidifying substances such as nitrogen and sulfur oxides, when compared to the same production from virgin resources. The detailed evaluation, thanks to the studies carried out on the entire life cycle (LCA) at European level for the regeneration sector, leads to calculate at least 3 tons of fine dust and almost 1,000 tons of acidifiers (including  $NO_x$  and  $SO_2$ ) avoided and estimate an even higher beneficial effect for the entire activity of the group.



Advanced technologies and integrated management systems guarantee high environmental performance.



4.4 Water, land and biodiversity

At operating sites, water resources meet supply needs for drinking and civil use (eg showers, canteens, toilets) or for industrial use. Where possible the industrial cycle is managed in a closed circuit, with water withdrawal only to restore the unavoidable consumption.

Industrial uses include the production of steam, cooling equipment for process equipment, rinsing waters and fire-fighting devices.

Water withdrawal (m³)	2018	2017	2016
Regeneration			_
Underground water	1,329,434	1,361,379	1,330,805
Aqueduct	27,198	34,905	36,144
Purification			
Underground water	493,270	342,200	-
Aqueduct	34,282	27,485	-
Environment			
Underground water	2,880	-	-
Aqueduct	17,216	9,378	8,711
ITELYUM			
Underground water	1,771,584	1,703,579	1,330,805
Aqueduct	78,696	71,768	44,855
Total	1,850,280	1,775,347	1,375,660
Water consumption (m³/t product)	2018	2017	2016
Regeneration	9.2	9.6	9.4
Purification		3.9	-
Total	7.1	7.4	9.4

No site operated by Itelyum is located in or adjacent to or has effects on protected or high value areas for biodiversity. The areas of particular interest are those identified by bodies responsible for safeguarding the territory and biodiversity, flora and fauna (eg Natura 2000<sup>46</sup>, Ramsar Convention<sup>47</sup>, UNESCO World Heritage<sup>48</sup>, IUCN<sup>49</sup> and others).

In any case, attention to the land and its natural value remains high, also in consideration of the portions of territory occupied, used or influenced by the presence of the industrial activities managed. In fact, the group's sites managed at the end of 2018 totaled an occupied area of over 40 hectares (of which about one third is greened or draining), with potential effects and influence on a much larger area outside the sites, which is object of the proactive management adopted.

In all sites, discharges of industrial or meteoric waters, both in surface bodies water or sewage, are equipped by modern treatment systems that guarantee the full environmental quality of wastewater.

In addition, some of the raw materials, the treated, managed or transported waste, and the products have specific characteristics of danger for aquatic environments. For these types, specific precautionary operational protocols are adopted.

Lastly, in four sites of the group, namely the oil regeneration plants of Pieve Fissiraga and Ceccano and the solvent purification plant of Landriano and the Rho bottling and logistics center, hydraulic barrier systems are active, where necessary complemented by treatment of pumped water, aimed at reducing pre-existing contamination of soils and aquifers. The advanced management of the sites, with particular attention to the possible uncontrolled spill or release scenarios, guarantees against further environmental risks.

#### 46

Natura 2000 is a network of sites of community importance (SCIs), and special areas of conservation (SACs) created by the European Union for the protection and conservation of habitats and species of animals and plants identified as priorities.

#### 4

The Ramsar Convention is the first true intergovernmental treaty with a global purpose, in its most modern sense, concerning the conservation and management of natural ecosystems.

#### 4

The United Nations
Educational, Scientific and
Cultural Organization is a
specialized United Nations
agency that promotes the
identification and preservation
of cultural and natural heritage
worldwide.

#### 49

The International Union for the Conservation of Nature is an international nongovernmental organization based in Switzerland, regarded as the most authoritative international scientific institution dealing with nature conservation.



Integration with the territory and its environment: a non-negotiable objective.





This Sustainability Report includes, on an annual basis, the services, data and information on all Itelyum entities under operational control as at 31 December 2018, which represent 100% of the revenue generation capacity on the same date. With reference to the structure represented on page 10, the business sectors, the companies and the consolidated sites are detailed in the following table.

5.1

Boundaries and methodology

Regeneration solutions	Sites/activities
Itelyum Regeneration S.r.l.	•
recry unit regeneration 5.1.1.	Pieve Fissiraga (LO) plant
	<u> </u>
Purification solutions	Sites/activities
Itelyum Purification S.r.l.	Landriano (PV) plant
	Rho (MI) bottling and logistic plant
Im.Tra.S. S.r.l.	Transportation activity based in Landriano (PV)
Environment solutions	Sites/activities
Aeco S.r.l.	Bologna office
De Luca Servizi Ambiente S.r.l.	Vittorio Veneto (TV) unit
	Verona unit
Neda Ambiente FVG S.r.l.	Palmanova (UD) unit
Recoil S.r.l.	Lendinara (RO) unit
Rimondi Paolo S.r.l.	Bologna unit
Sepi Ambiente S.r.l.	Settimo Torinese (TO) unit
	Torino unit
Centro Risorse S.r.l.	Motta di Livenza (TV) unit
Area S.r.l.	Motta di Livenza unit
	Gradisca di Sedegliano (UD) oprational site (third parties)
Ecoausilia S.r.l.	Oderzo (TV)Office
Ecoserve	Lestans di Sequals (PN) office
	Motta di Livenza (TV) laboratory
	Transportation activity based in Motta di Livenza (TV)
SAM S.r.l.	•

Unless expressly indicated, the indicators and information refer to the entire perimeter under the operational control of the group at December 31 of each calendar year of consolidated financial year, and in particular for the three years reported:

Society	2018	2017	2016
Regeneration solutions			
Itelyum Regeneration S.r.l.		✓	✓
Purification solutions			
Itelyum Purification S.r.l.	<b>√</b>	✓	
Im.Tra.S. S.r.l.		$\checkmark$	
Environment solutions			
Aeco S.r.l.	<b>√</b>	✓	<b>✓</b>
De Luca Servizi Ambiente S.r.l.	<b>√</b>	✓	<b>✓</b>
Neda Ambiente S.r.l.	<b>√</b>	✓	<b>✓</b>
Recoil S.r.l.	<b>√</b>	✓	<b>✓</b>
Rimondi Paolo S.r.l.	✓	✓	<b>✓</b>
Sepi Ambiente S.r.l.		✓	✓
Centro Risorse S.r.l.	✓		
Area S.r.l.	<b>√</b>		
Ecoausilia S.r.l.			
Ecoserve	✓		
Innovazione Chimica S.r.l.			
Keoma S.r.l.	√		
SAM S.r.l.	<b></b> ✓		

IThe trend of the indicators is unavoidably affected by the evolution of the group, with acquisitions and diversifications of business that took place in a significant measure in the last period. Where necessary, in order to facilitate the understanding of the main performance trends from the very first edition, data or comments with a like-for-like perimeter can be included,

presented are in line with the group's materiality matrix in order to provide the reader with a clear vision of the main impacts and opportunities in the economic, environmental and social aspects.

The topics selected and

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or by consolidating the entities that entered the group only more recently for previous years. When relevant, information is also provided on events or initiatives that occurred after December 31, 2018. This edition has not required any correction of results previously communicated or previously published, even partially.

Data and information are collected through a validation process that arises from the proprietary functions. The Chief Sustainability Officer then proceeds with the consolidation, carrying out a consistency check, before sending the Report to the approval of the Chief Executive Officer.

Already today, most of the environmental and social indicators referring to the area of activity of the regeneration area are subject to a certification process. The same can be said for a significant part of the data relating to the environment, which operate according to an ISO 14001 certified environmental management system. Among the next evolutionary steps, the verification of the third part of the entire document is certainly foreseen.

The topics selected and presented are in line with the group's materiality matrix (page 19) in order to provide the reader with a clear vision of the main impacts and opportunities in the economic, environmental and social aspects of the group's vision and activities.

In any case, since the first edition, the group is committed to the continuous improvement of the quality, materiality, completeness and reliability of the information published in order to guarantee the maximum level of transparency, declaring the level of "comprehensive" reporting according to the new GRI Standard. Detailed information on the correspondence of the GRI indicators is available in the following paragraph.



# 5.2 GRI correspondance

GRI 102	General Disclosures	Page / notes
102-1	Name of the organization	9
102-2	Activities, brands, products, and services	9
102-3	Location of headquarters	11
102-4	Location of operations	11
102-5	Ownership and legal form	9
102-6	Markets served	12
102-7	Scale of the organization	14
102-8	Information on employees and other workers	62
102-9	Supply chain	54
102-10	Significant changes to the organization and its supply chain	106
102-11	Precautionary Principle or approach	26
102-12	External initiatives	30
102-13	Membership of associations	76
102-14	Statement from senior decision-maker	4
102-15	Key impacts, risks, and opportunities	17
102-16	Values, principles, standards, and norms of behavior	25
102-17	Mechanisms for advice and concerns about ethics	53
102-18	Governance structure	29
102-19	Delegating authority	32
102-20	Executive-level responsibility for economic, environmental, and social topics	32
102-21	Consulting stakeholders on economic, environmental, and social topics	
102-22	Composition of the highest governance body and its committees.	32
102-23	Chair of the highest governance body	
102-24	Nominating and selecting the highest governance body	32
102-25	Conflicts of interest	
102-26	Role of highest governance body in setting purpose, values, and strategy	32
102-27	Collective knowledge of highest governance body	32
102-28	Evaluating the highest governance body's performance	
102-29	Identifying and managing economic, environmental, and social impacts	17
102-30	Effectiveness of risk management processes	29

102-31	Review of economic, environmental, and social topics	17
102-32	Highest governance body's role in sustainability reporting	107
102-33	Communicating critical concerns	77
102-34	Nature and total number of critical concerns	17
102-35	Remuneration policies	59
102-36	Process for determining remuneration	
102-37	Stakeholders' involvement in remuneration	60
102-38	Annual total compensation ratio	59
102-39	Percentage increase in annual total compensation ratio	59
102-40	List of stakeholder groups	7
102-41	Collective bargaining agreements	60
102-42	Identifying and selecting stakeholders	75
102-43	Approach to stakeholder engagement	75
102-44	Key topics and concerns raised	7
102-45	Entities included in the consolidated financial statements	105
102-46	Defining report content and topic Boundaries	105
102-47	List of material topics	19
102-48	Restatements of information	10
102-49	Changes in reporting	106
102-50	Reporting period	105
102-51	Date of most recent report	10!
102-52	Reporting cycle	
102-53	Contact point for questions regarding the report	122
102-54	Claims of reporting in accordance with the GRI Standards	10
102-55	GRI content index	109
102-56	External assurance	107
GRI 103	Management Approach	Page / notes
103-1	Explanation of the material topic and its Boundary	1
103-2	The management approach and its components	29
103-3	Evaluation of the management approach	29

GRI 201	21 Economic Performance		
201-1	Direct economic value generated and distributed	45	
201-2	Financial implications and other risks and opportunities due		
	to climate change	91	
201-3	Defined benefit plan obligations and other retirement plans	59	
201-4	Financial assistance received from government	45	
GRI 202	Market Presence	Page / notes	
202-1	Ratios of standard entry level wage by gender compared to local		
	minimum wage		
202-1	Proportion of senior management hired from the local community	63	
GRI 203	Indirect Economic Impacts	Page / notes	
203-1	Infrastructure investments and services supported	45	
203-2	Significant indirect economic impacts	45	
GRI 204	Procurement Practices	Page / notes	
204-1	Proportion of spending on local suppliers	55	
GRI 205	Anti-corruption	Page / notes	
205-1	Operations assessed for risks related to corruption	53	
205-2	Communication and training about anti-corruption policies and procedures		
205-3	Confirmed incidents of corruption and actions taken		
GRI 206	Anti-competitive Behavior	Page / notes	
206-1	Legal actions for anti-competitive behavior anti-trust and monopoly practices	none	

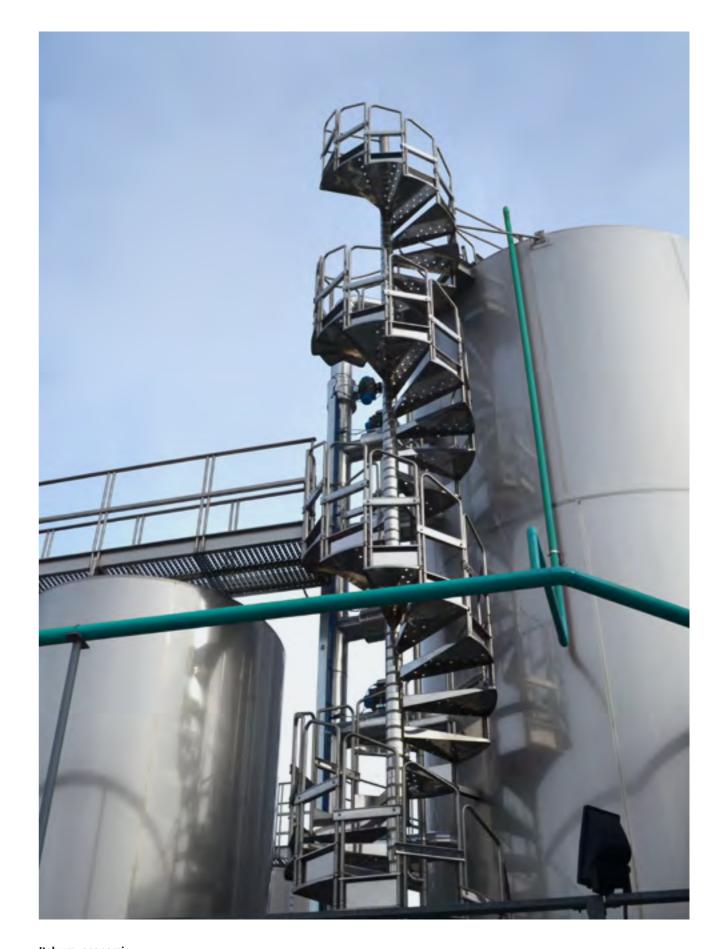
GRI 301	Materials	Page / notes
301-1	Materials used by weight or volume	87
301-2	Recycled input materials used	87
301-3	Reclaimed products and their packaging materials	87
GRI 302	Energy	Page / notes
302-1	Energy consumption within the organization	91
302-2	Energy consumption outside of the organization	91
302-3	Energy intensity	91
302-4	Reduction of energy consumption	91
302-5	Reductions in energy requirements of products and services	91
GRI 303	Water	Page / notes
303-1	Water withdrawal by source	99
303-2	Water sources significantly affected by withdrawal of water	99
303-3	Water recycled and reused	99
GRI 304	Biodiversity	Page / notes
304-1	Operational sites owned, leased, managed in, or adjacent to, protected	
	areas and areas of high biodiversity value outside protected areas	100
304-2	Significant impacts of activities, products, and services on biodiversity	100
304-3	Habitats protected or restored	not applicable
304-4	IUCN Red List species and national conservation list species with habitats	
	in areas affected by operations	not applicable
GRI 305	Emissions	Page / notes
305-1	Direct (Scope 1) GHG emissions	92
305-2	Energy indirect (Scope 2) GHG emissions	92
305-3	Other indirect (Scope 3) GHG emissions	92

305-4	GHG emissions intensity	92
305-5	Reduction of GHG emissions	92
305-6	Emissions of ozone-depleting substances (ODS)	72
305-7	Nitrogen oxides $(NO_x)$ , sulfur oxides $(SO_2)$ , and other significant air emissions	95
GRI 306	Effluents and Waste	Page / notes
306-1	Water discharge by quality and destination	100
306-2	Waste by type and disposal method	88
306-3	Significant spills	100
306-4	Transport of hazardous waste	88
306-5	Water bodies affected by water discharges and/or runoff	100
GRI 307	Environmental Compliance	Page / notes
307-1	Non-compliance with environmental laws and regulations	54
GRI 308	Supplier Environmental Assessment	Page / notes
308-1	New suppliers that were screened using environmental criteria	37
308-2	Negative environmental impacts in the supply chain and actions taken	54
GRI 401	Employment	Page / notes
401-1	New employee hires and employee turnover	62
401-2	Benefits provided to full-time employees that are not provided to temporary	
	or part-time employees	60
401-3	Parental leave	60
GRI 402	Labor/Management Relations	Page / notes
402-1	Minimum notice periods regarding operational changes	60

404-2 Programs for upgrading employee skills and transition assistance programs 404-3 Percentage of employees receiving regular performance and career development reviews  GRI 405 Diversity and Equal Opportunity  405-1 Diversity of governance bodies and employees 405-2 Ratio of basic salary and remuneration of women to men  GRI 406 Non-discrimination	Page / notes	
403-1		
		69
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403-4	Health and safety topics covered in formal agreements with trade unions	7'
GRI 404	Training and Education	Page / notes
404-1	Average hours of training per year per employee	65
404-2	Programs for upgrading employee skills and transition assistance programs	66
404-3	Percentage of employees receiving regular performance and career	
	development reviews	67
GRI 405	Diversity and Equal Opportunity	Page / notes
405-1	Diversity of governance bodies and employees	59
405-2	Ratio of basic salary and remuneration of women to men	
GRI 406	Non-discrimination	Page / notes
406-1	Incidents of discrimination and corrective actions taken	60
GRI 407	Freedom of Association and Collective Bargaining	Page / notes
407-1	Operations and suppliers in which the right to freedom of association	
	and collective bargaining may be at risk	54
GRI 408	Child Labor	Page / notes
408-1	Operations and suppliers at significant risk for incidents of child labor	60

GRI 409	or compulsory labor  RI 410 Security Practices	Page / notes	
409-1	- · · · · · · · · · · · · · · · · · · ·	60	
GRI 410	Security Practices	Page / notes	
410-1	Security personnel trained in human rights policies or procedures	not applicable	
GRI 411	Rights of Indigenous Peoples	Page / notes	
411-1	Incidents of violations involving rights of indigenous peoples	not applicable	
GRI 412	Human Rights Assessment	Page / notes	
412-1	Operations that have been subject to human rights reviews or impact assessments	60	
412-2	Employee training on human rights policies or procedures		
412-3	Significant investment agreements and contracts that include human		
	rights clauses or that underwent human rights screening	54	
GRI 413	Local Communities	Page / notes	
413-1	Operations with local community engagement, impact assessments, and development programs	75	
413-2	Operations with significant actual and potential negative impacts on local communities		
GRI 414	Supplier Social Assessment	Page / notes	
414-1	New suppliers that were screened using social criteria	37	
414-2	Negative social impacts in the supply chain and actions taken	54	

GRI 415	Public Policy	Page / notes	
415-1	Political contributions	none	
GRI 416	Customer Health and Safety	Page / notes	
416-1 416-2	Assessment of the health and safety impacts of product and service categories.  Incidents of non-compliance concerning the health and safety impacts	79	
	of products and services	54	
GRI 417	Marketing and Labeling	Page / notes	
417-1 417-2	Requirements for product and service information and labeling  Incidents of non-compliance concerning product and service information	79	
	and labeling	none	
417-3	Incidents of non-compliance concerning marketing communications	none	
GRI 418	Customer Privacy	Page / notes	
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	none	
GRI 419	Socioeconomic Compliance	Page / notes	
419-1	Non-compliance with laws and regulations in the social and economic area	54	



Itelyum: economic, social and environmental performances in continuous evolution.



Itelyum aderisce al Global Compact delle Nazioni Unite da giugno 2018. La Comunicazione sui Progressi (COP) nell'implementazione dei Dieci Principi e nel supportare i Sustainable Development Goals (SDGs) è formalmente dovuta entro un anno dall'adesione. La seguente tabella vuole rappresentare come il gruppo sia sostanzialmente già indirizzato verso gli impegni assunti.

GLOBAL COMPACT	PRINCIPLES		Involved stakeholders	Governance	Actions	Contribute to SDGs
HUMAN RIGHTS	Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights; and	Employees, suppliers, contractors and customers	Code of Ethics	Sustainability Policy; Model 231; SA8000	Direct to Goal 8 Indirect to Goals 1-8
	Principle 2	make sure that they are not complicit in human rights abuses.	Suppliers, contractors and customers	Code of Ethics	Sustainability Policy; Modello 231; SA8000; Procuremente and contracting management; Customers management	Direct to Goal 8 Indirect to Goals 1-8
LABOUR	Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	Employees, suppliers, contractors and customers	Code of Ethics	Risks not found. However, subjects are covered by: Sustainability Policy; SA8000; HR management	Direct to Goal 8 Indirect to Goals 1-8
	Principle 4	the elimination of all forms of forced and compulsory labour;			o/locoo, filt management	
	Principle 5	the effective abolition of child labour; and				
	Principle 6	the elimination of discrimination in respect of employment and occupation.	Employees, suppliers, contractors and customers	Code of Ethics	Sustainability Policy; SA8000; HR management	Direct to Goal 8 Indirect to Goals 3, 5 and 8
ENVIRONMENT	Principle 7	Businesses should support a precautionary approach to environmental challenges;	Employees, suppliers, contractors, customers and community	Code of Ethics	Sustainability Policy; Management systems; Model 231	Direct to Goals 8 and 12-13 Indirect to Goals 8-9 and 14 -15
	Principle 8	undertake initiatives to promote greater environmental responsibility; and	Employees, suppliers, contractors, customers and community	Code of Ethics	Sustainability Policy; Management systems; Communication, publications, direct testimonies and events	Direct to Goals 8 and 12-13 Indirect to Goals 8-9 and 14 -15
	Principle 8	encourage the development and diffusion of environmentally friendly technologies.	Employees, suppliers, contractors, customers and community	Code of Ethics	Sustainability Policy; Management systems; Circular economy; Product stewardship	Direct to Goals 12-13 Indirect to Goals 8-9 and 14 -15
ANTI-CORRUPTION	Principle 9	Businesses should work against corruption in all its forms, including extortion and bribery.	Employees, suppliers, contractors and customers	Code of Ethics	Sustainability Policy; Model 231; White List; Legality Rating; Procuremente and	Diretto ai Goal 8 and 16 Indirect to Goals 1-7 and 9-15
	TELYUM		customers		contracting management; Customers management	unu J-10

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# Itelyum Sustainability Report 2018

For additional info: sustainability@itelyum.com www.itelyum.com/report-di-sostenibilita

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