



MILAN
BERGAMO
AIRPORT | **BGY**

POLICY ESG

ENVIRONMENTAL, SOCIAL
AND GOVERNANCE

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Revision	Date	Prepared by	Verified by	Approved by
01	31/10/2025	SVD,RUE,LEG,REC,MKT	DG	General Manager



1. INTRODUCTION



1. INTRODUCTION

The “**ESG (Environmental, Social and Governance) Policy**” regarding Sustainability Governance establishes Corporate Social Responsibility (CSR), recognising the company’s goal of integrating social, environmental and governance commitments into the company’s strategic vision.

This goal is a direct expression of the values from which the SACBO Group draws inspiration in the performance of its business activities, promoting a style of development that embraces long-term sustainability, assessing the impact caused by the organisation’s activities within the context of which it is part and with which it acknowledges a relationship of mutual interdependence.

This Policy aims to foster a culture of ESG within the Group and to guide corporate governance, processes, structure and functions, which serve to ensure the pursuit of sustainable success, with a particular focus on environmental, social and governance topics, in compliance with applicable legislation, the principles established by competent international organisations and indications from regulators.



2. VISION, MISSION, VALUES AND SKILLS



2. VISION

The **SACBO** Group aims to manage and adapt the airport in relation to the forecast evolution in national and local demand for the transport of persons and goods in order to:

- **guarantee** an increasingly excellent and efficient service to the country and to mobility, deftly adapting to the evolution of relative demands both explicit and implicit.
- **create** added value for its own structure and for its stakeholders.
- **favour** the assertion of its abilities as a leading figure in the sectors in which it operates as well as the consolidation of its productive and cultural role within the area surrounding the airport, a source of wealth and profitability.

2. MISSION

The Group has defined the following mission:

With a view to achieving its vision, the **SACBO Group** intends to promote prompt and sustainable adaptation as well as effective and informed management of the airport infrastructure and passenger services, planning investments in human capital and technology and respecting the essential role that the airport plays on a national and international level.

The **SACBO Group**, through its professional figures and consolidating a culture of responsibility, belonging and cohesion, aims to pursue these common, challenging goals by developing the best strategic and tactical solutions through the continuous balancing of economic, social and environmental values, as well as with regard to the viewpoint of its stakeholders through constant and transparent dialogue.



2. VALUES AND SKILLS

Excellence: the continuous improvement of the company's activities for all stakeholders involved. Excellence is represented by skills such as: Efficiency - Practicality - Quality - Willpower - Determination - Responsiveness - Innovation - Training/Information.

Balance: the constant striving for the best solutions that satisfy and adapt to the needs of all stakeholders involved. Balance can be represented by skills such as: Equilibrium - Mediation - Transparency - Exchange - Cooperation.

The creation of value: understood not only as profit for the company but as value and wealth for our local community and the country as a whole. The creation of value is represented by skills such as: Serving as driver of sustainable economy - Distributing wealth - Creating profit - Maintaining a sense of belonging to the community - Playing an integral part of a system of infrastructure that serves the country.

Responsibility: understood as awareness for the role of the company and the positive and negative effects of its activities. Responsibility can be represented by skills such as: Professionalism - Identity - Teamwork - Resilience - Coherence - Ethics.



3. GOAL



3. GOAL

SACBO sees sustainability as a commitment to social progress, environmental balance and economic growth, aspects that must form an integral part of the business model itself and guide the company's actions.

This Policy defines the reference framework that brings together all the commitments undertaken in the field of sustainability.

With a view to guiding the process of identifying and **managing ESG risks**, the structure of governance and oversight of compliance with ESG topics identifies the main areas for the integration of sustainability factors into the Group's business and activities. The medium- to long-term aim is to achieve a system that serves **ESG goals**.

As previously mentioned in the introduction, this Policy is aimed at increasing the level of knowledge, awareness and engagement in terms of sustainability policies and results.

The Policy forms an integral part of the Group's sustainability strategy, in application of both European and Italian regulatory requirements and in continuity with the path that has led to the process of sustainability reporting.

The group participates in the international **Airport Carbon Accreditation programme** promoted by ACI (Airports Council International) Europe, dedicated to the management and reduction of CO₂ emissions generated by airport activities.

The group is fully committed to the reduction of direct emissions as part of a long-term decarbonisation strategy in line with the global climate goals of the Paris Agreement, with the aim of limiting global warming to within 1.5 °C by 2050.



4. SCOPE AND AREA OF APPLICATION



4. SCOPE AND AREA OF APPLICATION

This document applies to **SACBO S.p.A.** and to **BGY International Services S.r.l.**, the company subject to management and coordination, wholly owned by SACBO S.p.A., (hereinafter jointly referred to as the “SACBO Group”); the document is drawn up by the **Sustainable Development Unit**, the **Human Resources Department** and the **Risk & Compliance, Legal & Corporate Affairs** and **Marketing Units**, and is submitted to the Managing Director for assessment.

Lastly, the document is approved by the Board of Directors of the parent company SACBO, with the exception of cases involving non-substantial changes to be verified and approved by the **Managing Director**.

This document is communicated and made available to all Group personnel through the appropriate communication channels.



5. REFERENCE REGULATORY, LEGISLATIVE AND DOCUMENTARY FRAMEWORK



5. REFERENCE REGULATORY, LEGISLATIVE AND DOCUMENTARY FRAMEWORK

References on which **Environmental, Social and Governance reasoning** is based can be found in the following documents: the 2030 Agenda for Sustainable Development, the SDGs of the UN, and the Paris Agreements.

The **2030 Agenda for Sustainable Development** programme was signed on 25 September 2015 by the UN General Assembly, i.e., the governments of the 193 member states. The 2030 Agenda concerns commitments to the people, prosperity and preservation of the planet, and is composed of 17 Sustainable Development Goals (SDGs) that represent a wide-ranging programme of actions and interventions consisting of 169 targets.

The 17 SDGs are profoundly interconnected and address an extensive range of economic and social development issues, from the fight against poverty and hunger to the guaranteeing the right to health and education, access to water and energy, decent work and the possibility to create the conditions for inclusive and sustainable economic growth. Not least, the 17 SDGs address the issues of climate change and environmental protection, urbanisation, and new models of production and consumption, alongside issues of social and gender equality, justice and peace.

On 12 December 2015, the 197 member states of the UNFCCC (United Nations Framework Convention on Climate Change) signed the **Paris Agreement**, reaching the first major universal and legally binding agreement on climate change, namely the decision for the long-term maintaining of the increase in global average temperature to well below 2°C above pre-industrial levels, and to limit this increase to 1.5 °C.

With regard to the commercial aviation sector, the reference framework also includes the Net Zero Resolution, which was signed on 26 June 2019 in Cyprus as part of the 29th Annual Congress and General Assembly. The Association of European Airport Operators - ACI EUROPE - officially announced **the Resolution NetZero2050**, the commitment of the European airport industry to achieving net zero CO2 emissions by 2050 at the latest.

Milan Bergamo Airport is among the signatories of this fundamental commitment to ensure the sustainable development of airport infrastructure.

So far, the Resolution has been signed by 194 airports in 24 European countries, and also has the support of several national associations of European airport operators.

This commitment goes hand in hand with the call for the entire aviation industry to jointly develop a shared objective and a common path towards the ultimate goal of zero net carbon emissions for the entire aviation system.

In May 2024, **SACBO published its own road map for achieving zero emissions by 2045**, which was formalised through its transmission to ACI Europe in accordance with the commitment made in the resolution signed, and its subsequent publication on the association's website, which is also in harmony with the sustainability strategy proposed by ACI Europe for the commitment towards "Net Zero Carbon Emissions from Airport Operations".

References to European legislation

- Directive 2013/34/EU of 26 June 2013 on the annual financial statements, consolidated financial statements and related reports of certain types of undertakings, amending Directive 2006/43/EC of the European Parliament and of the Council and repealing Council Directives 78/660/EEC and 83/349/EEC (Text with EEA relevance), most recently amended by Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (known as the Corporate Sustainability Reporting Directive - CSRD).

- Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 - the Non-Financial Reporting Directive (NFRD), later superseded and extended by the aforementioned Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 (the Corporate Sustainability Reporting Directive - CSRD).

- Regulation (EU) 2019/2089 of the European Parliament and of the Council of 27 November 2019, amending Regulation (EU) 2016/1011.

- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020, supplemented by Commission Delegated Regulation (EU) 2023/2486, by Commission Delegated Regulation (EU) 2021/2139 and by Commission Delegated Regulation (EU) 2021/2178.

- Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022, as regards corporate sustainability reporting (known as the Corporate Sustainability Reporting Directive - CSRD).

- Commission Delegated Regulation (EU) 2023/2486, recently supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020.

- Directive (EU) 2025/794 of the European Parliament and of the Council of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements.

References to national legislation

- Italian Legislative Decree no. 125 of 6 September 2024, implementing Directive (EU) 2022/2464 as amended.

Internal documentation

- Sustainability Report/Annual Non-Financial Report.
- Sustainability Action Plan.
- Position paper on prospects for airport development and sustainability.
- Master Plan.
- Business Plan.
- Code of Ethics and Conduct.
- Organisation, Management and Control Model.
- Anti-corruption model.
- Anti-Money Laundering Model.
- Whistleblowing Procedure.
- Privacy Model.
- ERM Policy.
- Sustainable Procurement Policy.
- Integrated ISO system.





6. RISK MANAGEMENT PROCESS



6. RISK MANAGEMENT PROCESS

SACBO operates in a highly competitive and dynamic environment, and it has therefore adopted a risk management process in order to pursue sustainable, long-term success.

This increasingly “risk-based” approach is aimed at protecting corporate value and embracing the opportunities offered by market evolutions, seeing (managed) risk as an indispensable aspect of doing business.

Aware of the growing importance of sustainability topics, **SACBO has extended its corporate vision to include the sustainability factors necessary for the pursuit of environmental, social and good governance (ESG) goals, thus integrating these aspects into the risk management system.**

In these terms, ESG risk is defined as the risk of suffering financial and non-financial losses resulting from the actual or prospective impact of Environmental, Social or Governance factors on the Group’s assets or profitability.

Economic, operational and reputational impacts have been identified for each ESG risk; once prioritised, the owner defines the mitigation actions either in place or to be implemented.



7. ESG PRINCIPLES AND ACTIONS



7. ESG PRINCIPLES AND ACTIONS

Below is a summary of the principles and related actions for the ESG-related working areas:

7.1 Environmental Protection and Sustainable Mobility

With a view to encouraging the reduction of polluting emissions, SACBO is pursuing a strategy aimed at **sustainable mobility**, adopting actions aimed at providing passengers with a range of options and developing the intermodality that already has a significant presence at the airport, with a view to encouraging the **ecological transition** of operators.

In line with defined sustainability goals, SACBO conducts a wide range of initiatives aimed at guaranteeing environmental protection, including through actions aimed at promoting, developing and implementing collective transport services, with a particular focus on rail transport. The commitment to **intermodal integration** is also represented by the construction of a cycle ring around the airport, in line with the Bike Friendly Airport certification issued to SACBO by FIAB.

The SACBO Group has adopted a plan of action aimed at environmental sustainability that takes the form of environmental compensation measures such as the implementation of **noise mitigation** measures in public buildings (i.e., schools) and homes particularly close to the airport; **energy efficiency** in the new airport buildings, and the creation of **natural areas** around the airport grounds to protect the biodiversity of the area, while also guaranteeing the safety standards required by airport activities.

7.2 Development of human resources

Sustainable development is also pursued by SACBO through initiatives aimed at **welfare**, **equal opportunities** and **the enhancement of employee skills**. The latter is achieved through structured training programmes that foster the development of managerial and mid-managerial mindset, including leadership training projects for both junior figures and current management.

This development takes the form of both practical and theoretical training.

Particular attention is dedicated to **work-life balance** through the implementation of smart working and flexible working hours.

SACBO invests in creating an inclusive working environment through **diversity management** programmes and initiatives to promote gender equality in positions of responsibility.

In addition, performance management systems based on clear and measurable objectives and linked to individual development plans and career opportunities have been introduced.

The company has also established **partnerships with universities** and training institutes for highly specialised projects and master's degrees for employees.

7.3 Creating local value

The creation of value for the local area and stakeholders is one of the main goals of SACBO's strategy.

Reciprocal development-related economic interactions have fostered **collaborations** that represent intrinsic value for both SACBO and the local area through partnerships with universities, technical upper secondary schools, etc.

7.4 Sustainable Business

In carrying out its activities, SACBO draws inspiration from the **principles of ethical integrity**, encouraging compliance with legislation and **principles of ethics and conduct**.

Company personnel who have business relationships with third parties must conduct their relations with the latter in a fair, impartial, correct and ethical manner.

These principles are applicable to clients, suppliers, consultants and all those who directly carry out activities for the Group Companies or on their behalf.

In particular, the selection of suppliers and the drawing up of terms and conditions for the procurement of goods and services for the Company must be characterised by the **granting of equal opportunities to all suppliers**. Pre-contractual and contractual conduct must be based on the essential and reciprocal concepts of **loyalty, transparency and collaboration**, inspired by the values and parameters of **competition, objectivity, fairness, impartiality, equality, price, quality of goods and services, guaranteed support** and, in general, an accurate and precise assessment of the offer.

With a view to promoting this conduct, the Company has introduced a Group Sustainable Procurement Policy.



8. MONITORING AND CONTROL: SUSTAINABILITY GOVERNANCE STRUCTURE



8. MONITORING AND CONTROL: SUSTAINABILITY GOVERNANCE STRUCTURE

Through its governance structure, **SACBO** ensures a **comprehensive and integrated approach to sustainability, involving all levels of the organisation** and aligning corporate practices with the highest standards of the airport industry. It also assigns specific responsibilities to its governing body and its Directorates/Operational Units, as outlined below:

The Board of Directors (BoD):

- The BoD approves the long-term sustainability strategy and periodic goals (current Master Plan, Industrial Plan and ENAC Programme Contract, Sustainability Action Plan, Sustainability Report).
- It oversees the implementation of sustainability initiatives through regular reviews.
- It assesses and manages sustainability risks and opportunities, including those related to climate change, energy efficiency and human resource management.
- It assesses the suitability of the organisation for the ongoing pursuit of sustainability goals.
- It ensures alignment between sustainability goals and the overall corporate strategy.
- It can appoint one or more board members as representatives to set out the guidelines for board-level sustainability initiatives.
- It approves the annual budget for sustainability projects.
- It oversees sustainability performance transparency and communication to stakeholders.

With regard to the above, the company endeavours to create an internal structure through the definition of roles and responsibilities for the units and directorates involved in ESG-related matters.

FLIGHT	DEST	SCHED	STIM	BANCO	NOTE
R 2285	ROMA - FCO	09:20	10:12		
R 3448	NAPOLI	10:05			
R 3217	BRINDISI	10:15			IMBARCO
5655	MANCHESTER	10:25			IMBARCO
3402	MARRAKECH	10:30			IMBARCO
847	MARRAKECH	10:30			IMBARCO
2739	MARRAKECH	10:35			IMBARCO
4037	DUBLIN	10:35			
5494	MADRID	10:40			
1853	MARSEILLE	10:40			
1847	OSLO	10:40			
132	BARI	10:40			
45		10:50			31
042	PORTO	11:00			
334	IBIZA	11:00			
1	NEWCASTLE	11:15			
11	ASTURIAS	11:15			
75	CATANIA	11:25			
19	ATHENS	11:30			
12		11:35			
8		11:40			
2	BRNO	11:40			09-11
0	LAMEZIA	11:50			
1	VALENCIA	11:50			
3	PRAGUE	11:55			
7		12:00			
	SARAJEVO	12:15			
	OLBIA	12:25			
	PALERMO	12:25			
	TIMISOARA	12:35			12-13
		12:45			28-30
		12:45			
	BARI	13:05			15-26
	BERLIN	13:15			15-26
		13:20			15-26
	FEZ	13:20			15-26
	IASI	13:35			15-26
	DUBAI	13:40	17:40	05-08	RITARDO
	DUBAI	13:40	17:40	05-08	RITARDO
	ROMA - FCO	14:00		02	Passa a Impostazioni di sistema e attiva Windows.
	DUBLIN	14:40			15-26

FLIGHT	DEST	SCHED	ESTIM	STATUS	REMARKS
FR 1319	ATHENS	11:35		15-26	
PC 1212		11:40		09-11	
AZ 7048		11:40		09-11	
FR 9372	BRNO	11:50		15-26	
FR 3440	LAMEZIA	11:50		15-26	
FR 4631	VALENCIA	11:50		15-26	
FR 3528	PRAGUE	11:55		15-26	
FR 2287		12:00		15-26	
FR 2428	SARAJEVO	12:15		15-26	
FR 6501	OLBIA	12:25		15-26	
FR 4869	PALERMO	12:25		15-26	
W4 3562	TIMISOARA	12:35		12-13	
VF 062		12:45		28-30	
TK 7495		12:45			
FR 4658	BARI	13:05		15-26	
FR 3312	BERLIN	13:15		15-26	
FR 4475		13:20		15-26	
FR 3548	FEZ	13:20		15-26	
FR 3112	IASI	13:35		15-26	

9. COMMUNICATION AND DISTRIBUTION OF THE POLICY

WELCOME TO MILAN BERGAMO AIRPORT 9:45



9. COMMUNICATION AND DISTRIBUTION OF THE POLICY

This Policy is communicated through multiple channels to ensure maximum distribution:

- **Internally:** through publication on the company intranet, dedicated staff training sessions and inclusion in on-boarding programmes for new recruits.
- **Externally:** through the corporate website, the Sustainability Report, corporate social media and communications to airport stakeholders (airlines, sub-contractors and suppliers).

SACBO undertakes to monitor the effective understanding and application of the Policy through periodic audits and to gather feedback for the continuous improvement of the same.

A large, stylized, dark blue silhouette of an airplane is centered in the background of the image. The airplane is shown from a top-down perspective, with its wings spread and tail visible. The silhouette is composed of several overlapping, semi-transparent shapes that create a sense of depth and movement.

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