

FROM DESIGNING TO BUILDING A BETTER REALITY — SUSTAINABILITY REPORT 2025

3TI is an independent
fully employee-owned
engineering & consultancy
company founded in 1997
in Rome.

For nearly 30 years, we have been providing integrated services in planning, design, project and construction management in the areas of sustainable mobility, people-centred infrastructure and environmental engineering. Our activities aim to support safe, resilient and sustainable development for both people and the environment.

To date, **we have delivered more than 3,000 projects** in over 70 countries, contributing to infrastructure development and urban transformation worldwide.

Since 2015, 3TI has been included in the ENR Top 225 International Design Firms, reflecting its international presence and positioning within the global engineering and design sector. The Company supports integrated design and construction activities in the Italian and international markets.

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LETTER FROM THE CHAIR

At the core of 3TI's values lies a rigorous analytical mindset, combined with a continuous ambition to improve the impact of design and construction. We operate across sectors in Italy and internationally, guided by quality, responsibility and the value embedded in every project.

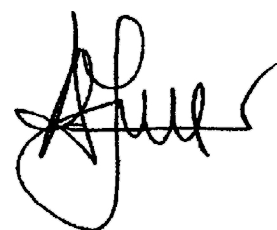
Since the company's founding, our growth has been built project by project. Each project strengthens our expertise and helps us work confidently across scales, from specialised services to complex masterplans.

Sustainability is fully embedded in how we think and operate as a core element of our ESG approach. It is not an add-on but a strategic driver of our business model, positioning and resilience in an increasingly complex global context. As a signatory of the United Nations Global Compact, 3TI supports the Ten Principles of the UN Global Compact in the areas of human rights, labour, environment and anti-corruption, which guide our commitment to responsible and sustainable business practices.

Our people are at the core of everything we do. Value is created through collaboration, trust and the continuous exchange of expertise across disciplines and geographies.

This Sustainability Report reflects our growth, our responsibilities and our contribution to sustainable development, shaped by ongoing engagement with our stakeholders, clients, partners, people, institutions and communities. As we approach our 30-year milestone, we move forward with clarity and determination, focused on strengthening our international presence and delivering long-term sustainable value.

Alfredo Ingletti
Chairman



We look far ahead, embracing tomorrow as a shared challenge while staying grounded in the values that define who we are.

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our

company

A4 Milano-Venezia Motorway / 3rd Lane Quarto-S. Donà
Veneto, Italy



Iasi International Airport
Iasi, Romania

KEY VALUES

Inclusion is at
the center

We put people and their experiences at the heart of our solutions; equality and inclusion are deeply embedded within our organization. Together, we strive to make 3TI an engaging workplace where employees feel valued, empowered, and supported.

Employee
Ownership

Employee ownership principles lead the company from its beginning. Sharing equity fosters a strong sense of belonging and collaboration, driving robust growth through continuous generational renewal.

Sustainability
choices

We embrace the fight against climate change alongside our clients and partners to build a better future for the planet and the people. Through our projects, we contribute to connecting communities and ensuring their wellbeing.

Innovation
& Technology

We are committed to harnessing cutting-edge technology to minimize waste and improve the effectiveness of our solutions. Our team of experts stays at the forefront of digital advancements, using their knowledge to support clients in reaching their objectives.

Integrated
Engineering

We operate across all sectors of engineering and architecture, managing every phase from master planning to technical support during construction. Project coordination involves all specialized disciplines in an integrated design process, enabled by a well-organized team and the structured expertise of each individual.

Directors & Partners

01.	Agnese Perego	partner
02.	Alfredo Ingletti	founding partner & chairman
03.	Andrea Piacenti	senior partner & technical director
04.	Aronne Fratus	partner
05.	Barbara Paone	partner
06.	Carla Gerundino	partner
07.	Daniele Biondi	partner
08.	Eleonora Bello	partner
09.	Federica Stravato	partner
10.	Francesca Salvador	senior partner & technical director
11.	Franca Francescucci	partner & technical director
12.	Giovanni Maria Cepparotti	founding partner & technical director
13.	Giorgia Di Biagio	partner
14.	Giorgia Gunnella	senior partner & technical director
15.	Lavinia Forte	senior partner & director
16.	Livia Capobianchi	partner
17.	Luca Felicetti	partner
18.	Luana Gazerro	partner
19.	Manuela Regna	partner
20.	Mara Franchi	partner
21.	Maria Scala	partner & director
22.	Maria Teresa Navarra	senior partner & technical director
23.	Michele Amerio	senior partner & technical director
24.	Pier Paolo Martini	partner
25.	Sara Di Pompeo	partner
26.	Stefano Luca Possati	founding partner & technical director



The strength of a partnership lies in combining expertise to pursue a common purpose.

OUR JOURNEY

Milestones

1997

3TI Progetti
Cepparotti Ingletti Possati
3TI Ingegneri Associati Foundation

2002

3TI Ingegneri Associati
turns into 3TI PROGETTI ITALIA

2018

Towards employee share
transition: appointed 10 partners
as shareholders of the company

2015

3TI ranked in ENR TOP 225
for the first time

2023

The highest revenue
of all time

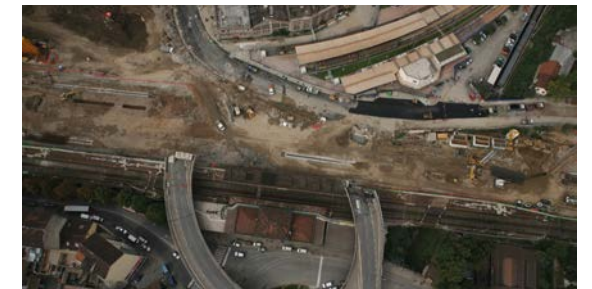
2025

The total number of partners
has increased to 26

Projects turning points



1998 Italian high-speed
railway project



2005 Passante of Turin
and Porta Susa Station



2018 Doha metro
BIM project in Qatar



2014 La Spezia Hospital
BIM project



2023 Cluj Regional
Emergency Hospital



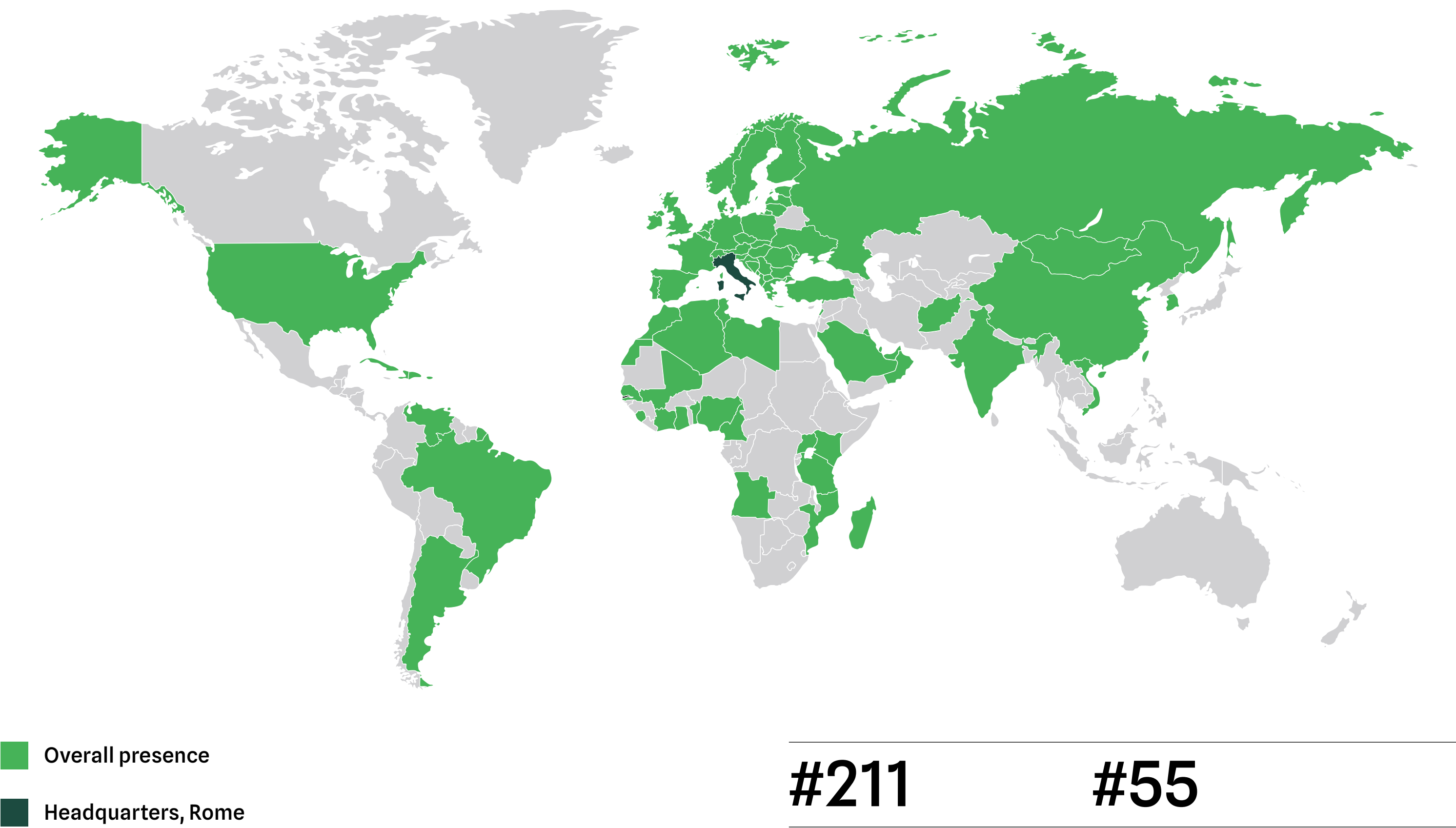
2025 Hydrogen Production
and Refueling Station

Our journey started as a small studio founded by three friends and has grown into one of Italy's leading engineering firms with an international presence.

OUR GLOBAL OFFERING



OUR PERFORMANCE



#211	#55
ENR The Top 225 International Design Firms	Guamari Top 200 on the Italian engineering company

financial key figures and ratios

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ESG key figures and ratios

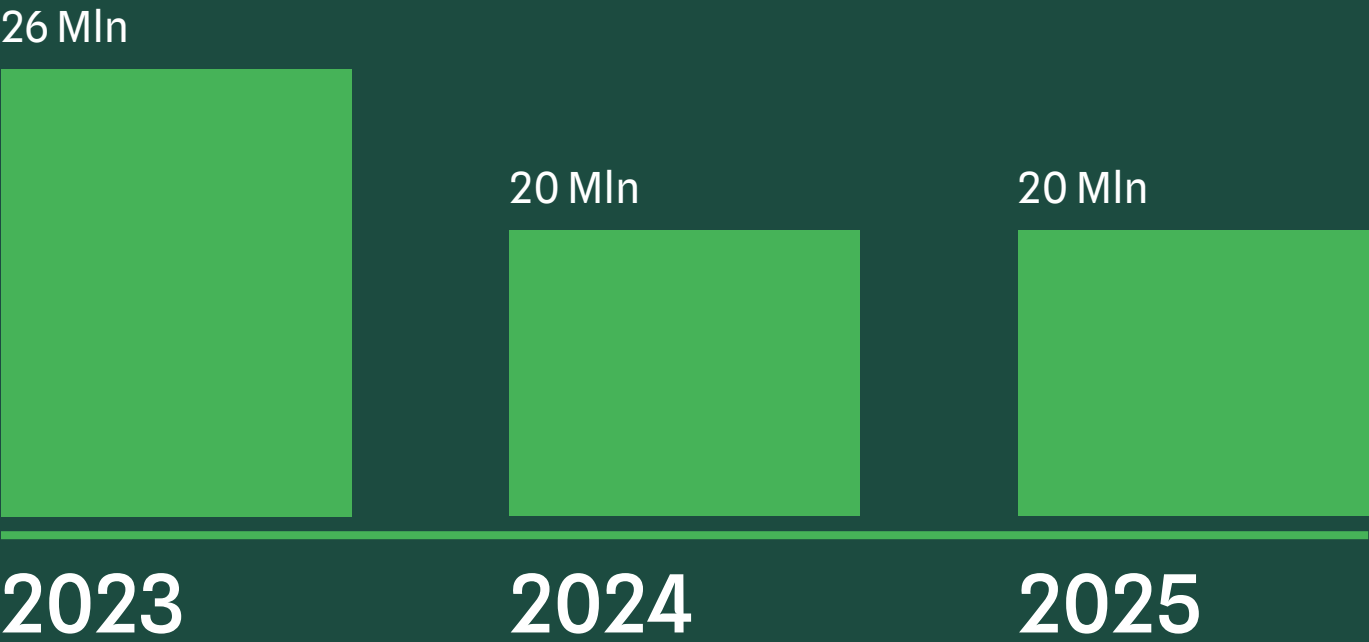
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key

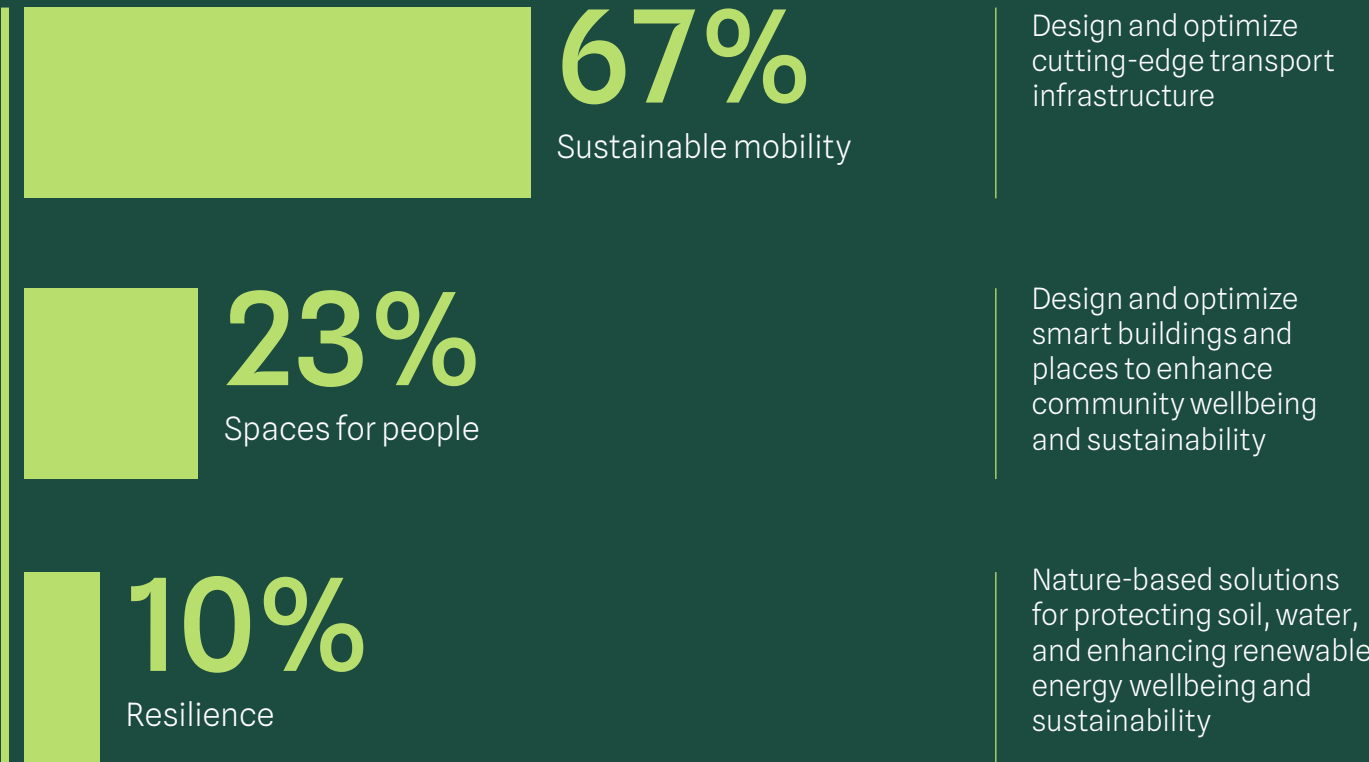
numbers

FINANCIAL KEY FIGURES & RATIOS

Revenue



Revenue by sector



PROFIT

1,4 Mln

EBITDA Margin

18%

ROE

22%

Net working capital

6,5 Mln

Solid financial performance supports 3TI’s long-term strategy, enabling continued investment in innovation, people and development.

ESG KEY
FIGURES & RATIOS

Environmental
Social
Governance



	ESG KEY FIGURES AND RATIOS*	UNIT	2023	2024	2025
Environment	GHG emissions scope 1	tCO ₂ e	5.21	18.34	15.50
	GHG emissions scope 2	tCO ₂ e	57.40	52.55	51.80
	GHG emissions scope 3	tCO ₂ e	on track	986.64	45.4
	Total GHG emissions scope 1,2 and 3	tCO ₂ e	62.61	84.25	112.70
	Energy consumption	kWh	225,110	1057.52	220,599
	Water consumption	M³	550	203	256
Social	Total headcount	HC	94	101	112
	Voluntary employee turnover	%	11	27	22
	Gender diversity, women	%	61	64	64
	Gender diversity, Administrative support women	%	50	50	50
	Gender diversity, production women	%	56	62	60
	Gender diversity, operative women	%	75	80	78
	Gender diversity, engineer-architect women	%	56	63	62
	Gender pay gap	%	0	0	-4
Governance	Incidents of discrimination (substantiated)	Number	0	0	0
	Global health and safety training	%	100	100	100
	Gender diversity, Partners women	%	61	61	65
	Gender diversity, Group Board of Technical Directors, women	%	44	44	40
	Compliance concerns and whistleblowers (ethics and anti-corruption)	Number	0	0	0
	Anti-corruption Training	%	100	100	100

*ESG key numbers have been analyzed is in the following Sustainability Report.

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business

model

OUR STRATEGY & COMMITMENTS



Sustainability as a Strategic Driver

Addressing the challenges posed by climate change, biodiversity loss and growing social inequalities requires a profound evolution in the way infrastructure and buildings are designed and delivered. In this context, engineers and architects play a strategic role in building a more sustainable future through solutions that integrate innovation, technical excellence and environmental and social value.

To integrate sustainability into strategic decision-making processes, 3TI has established an ESG Committee (Comitato ESG) that supports the Board of Directors in defining and monitoring the Company's sustainability strategy and priorities. The Committee is coordinated by the Head of Sustainability and includes the heads of Health & Safety, Legal, IT, Human Resources, Communications & Marketing, and Facilities & Logistics. In addition, the Company has established a Steering Committee (Comitato Guida) and a Listening Committee (Comitato di Ascolto), responsible respectively for operational coordination and implementation of gender equality objectives and for internal engagement and feedback processes.

Delivering integrated Solutions

We integrate sustainability across all our projects by leveraging our knowledge, technical skills and innovation capabilities as a key contribution to the green transition process, providing expertise throughout the entire project lifecycle, from early-stage analysis and planning through to detailed design, construction and maintenance, and developing integrated solutions that combine sustainability, circularity, innovation and digital technologies to deliver value for our clients.

People, Society & Company

For People, we are committed to developing buildings that enhance users' wellbeing, health and quality of life.

For Society, we are dedicated to creating more inclusive and resilient environments in harmony with nature, strengthening connections between communities worldwide.

For Our Company, we are committed to fostering a long-term, inclusive and respectful working environment for present and future generations of employees.

OUR VALUE FOR CLIENTS

Delivering trusted expertise and sustainable solutions.



MIA – Interactive Immaterial Museum of Modernity
Melfi, Italy

clients 2025

+220

62%

38%

public clients Government ministries, Municipalities, Transport infrastructure entities, Local Health Authorities.

private clients Construction companies, Industrial companies, Transport and logistics companies, Real Estate.

We serve as a trusted partner, supporting our clients in tackling the most complex challenges on their journey towards a more sustainable future.

We focus on understanding each client’s specific needs and work closely with them to deliver high-quality results on time, supported by strong project management capabilities that ensure full control of the process, reducing risks and optimising time and costs.

Drawing on our extensive experience across all phases of the engineering process, we have established ourselves as a trusted and reliable partner, capable of building long-lasting relationships with our clients, coordinating specialist disciplines and acting as the main point of contact.

In parallel, we actively support our clients by proposing sustainable approaches and solutions that contribute to a better future, in line with our strategy based on nature-positive principles and circular economy practices. To further strengthen this commitment, we provide a team of highly qualified professionals with expertise in sustainable infrastructure design, including specialists certified in CAM, Envision, SP and other recognised standards, also supporting the assessment and mitigation of environmental impacts.

Sustainable key Projects



Nature positive solutions



Sustainable buildings



Clean energy transition



Circular Economy & Resources

3TI integrates sustainability as a core principle within its business model, aimed at generating long-term value.

The Company addresses sustainability through both environmental and social dimensions, which are integrated across all project phases, from design to construction supervision, and throughout the life cycle of infrastructure and buildings.

3TI influences environmental outcomes primarily through design and construction supervision activities, which shape the interaction between infrastructure, buildings and natural systems. While not directly controlling all

environmental impacts, the Company systematically integrates environmental considerations into technical decision-making processes, with the objective of reducing environmental pressures and enhancing project resilience. Key areas of focus include the assessment of climate-related risks in design alternatives, as well as the protection of biodiversity and landscapes.

Social sustainability is embedded in design quality and decision-making processes. 3TI integrates considerations related to wellbeing, accessibility, territorial cohesion and socio-economic impacts, contributing to the creation of public value.

Projects are developed in line with principles of inclusiveness, usability and climate resilience, supporting improved quality of life and the regeneration of urban and peri-urban areas.



Hydrogen Production and Refueling Station

ACCELERATING THE GREEN ENERGY TRANSITION



5 MW hydrogen facility producing 81.3 kg/h to power zero-emission trains and buses

In recent years, European and national efforts to decarbonise transport systems and promote sustainable energy solutions have intensified. In this context, the Italian National Recovery and Resilience Plan (PNRR) provides funding to accelerate the energy transition and support renewable hydrogen as a strategic enabler of sustainable mobility.

Within this framework, 3TI designed the hydrogen facility along the “S. Maria Capua Vetere–Piedimonte Matese” railway line in southern Italy as a pilot project to demonstrate the integration of hydrogen technologies into rail and road transport systems and support the decarbonisation of mobility. The facility is designed to produce 5 MW of electricity and up to 81.3 kg/h of hydrogen, using exclusively renewable energy sources. Hydrogen

storage combines metal hydride technologies and high-pressure tanks (up to 550 bar), ensuring safe and flexible operations.

The infrastructure enables zero-emission mobility, supporting the refuelling of up to 6 hydrogen trains and 25 buses, with refuelling cycles completed in around 4 hours during vehicle downtime. Operational continuity is further ensured through supply via tube trailers.

In addition, the project includes the seismic upgrading and extension of the existing workshop (+18 metres), the creation of new technical areas and a dedicated hydrogen control room, as well as external works to improve site accessibility and operational efficiency.

BUILDING SOCIAL VALUE THROUGH NET-ZERO DESIGN



NZEB building design approach integrating life cycle assessment (LCA)-based sustainability

Sustainable design aims to create social value through accessible public spaces while promoting environmental responsibility.

The Polo della Memoria Democratica, at the heart of the regeneration of Bologna's Ex Scalo Ravone district, reflects this vision by preserving collective memory and creating inclusive spaces that strengthen civic life.

Designed as a Nearly Zero Energy Building (NZEB), the project integrates a high-performance building envelope, rooftop photovoltaics and a green roof to minimise energy demand and maximise renewable energy generation. Permeable surfaces and Sustainable Urban Drainage Systems (SuDS) improve stormwater management, climate resilience and urban heat island mitigation, in line

with CAM and DNSH principles. The building will provide flexible spaces for co-working, study, research, exhibitions and community activities, supported by digital technologies that enhance accessibility and participation. The surrounding outdoor area is designed as a public square that encourages social interaction and inclusion.

Environmental sustainability guides every stage of the project. Construction activities will be carried out in compliance with CAM requirements, while a circular economy approach prioritises certified, low-impact materials with recycled content. High-efficiency systems, passive design strategies and renewable energy technologies will deliver a resilient, resource-efficient and energy-efficient public building.

RESTORING NATURE



Renaturalizing the Po River through 56 interventions, restoring over 600 hectares of ecosystems

For many decades, flooding has been one of the leading climate-related threats to human life, causing widespread damage across regions. In the current context of climate change, it is increasingly important to adopt strategies aimed at reducing flood risk and protecting biodiversity.

A significant example of our work is represented by the morphological reconstruction and ecological restoration interventions aimed at the renaturalization of the main Italian river basin.

The feasibility study aims to accelerate the ecological transition by reducing the artificiality of the watercourse and its surrounding areas, increasing biodiversity and natural riparian habitats, and improving hydraulic safety levels.

The programme includes the following key intervention types:

- lowering hydraulic groynes to reactivate oxbow lakes;
- reforestation and ecological restoration of over 600 hectares;
- control of invasive alien species across more than 220 hectares;
- planting of over 1 million native trees and shrubs.

CERN - ISOLDE (Isotope Separator Online Device)

SUPPORTING ISOTOPE RESEARCH AND MEDICAL INNOVATION



Delivering advanced underground infrastructure for nuclear science and healthcare applications

The project supports the development of advanced scientific research infrastructure at CERN (European Organization for Nuclear Research), located in Meyrin on the Franco-Swiss border, through the design and construction of a new underground facility dedicated to the ISOLDE (Isotope Separator On-Line Device) experiment.

Developed within Phase 2 of a broader infrastructure programme, the intervention covered the full design, procurement and construction process of a two-storey underground building and connected technical galleries. The facility, with an area of approximately 500 m², supports the production of isotopes for nuclear physics research and for advanced medical applications, including cancer treatment. The intervention is part of a

wider programme aimed at replacing the existing infrastructure with a modern facility designed to improve durability, performance and maintenance accessibility.

It replaces ageing infrastructure with a solution engineered to ensure long-term operational reliability and efficiency. The building incorporates a high-performance isotope beam dump system and is designed to guarantee full accessibility, safety and maintainability throughout its lifecycle.

AMA Spa - Organic Waste Treatment and Valorisation Facility (FORSU)

CIRCULAR ECONOMY



From Organic Waste to Renewable Energy: 7 Million Sm³/year of Biomethane from the Circular Economy

The current transition towards sustainable development models is increasingly driven by the need for resource recovery, renewable energy production, and decarbonisation. In this context, modern waste-to-resource facilities play a key role in enabling efficient waste management and supporting circular economy strategies.

The Cesano facility, located near Rome and promoted by AMA S.p.A., processes organic waste from separate collection (FORSU), producing approximately 7 million Sm³/year of biomethane and composted soil improver, while contributing to Rome's broader circular economy strategy. The plant integrates anaerobic digestion, biogas upgrading, energy recovery, and air and water treatment within a highly efficient system designed to ensure safety, operational

continuity, and logistical optimisation.

Covering more than 67,000 sqm, it includes process buildings, anaerobic digesters, biofilters, laboratories, and biogas handling infrastructure. Photovoltaic systems generating approximately 1.9 GWh/year further enhance renewable energy production and on-site energy autonomy. Developed according to environmental sustainability principles, the project prioritises low-impact materials, recycled or recyclable components, and high-performance prefabricated systems, aiming to minimise energy use, emissions, and overall environmental impact.

New school complex “Andrea Bacci”

CREATING SUSTAINABLE SPACES FOR FUTURE GENERATIONS



Exceeding NZEB performance by over 20%

High-performance energy design is a key approach to sustainable building development, based on the optimization of the building envelope, the use of efficient systems, and the integration of renewable energy sources to reduce energy consumption and environmental impact. In this context, Nearly Zero-Energy Buildings (NZEBs) represent a benchmark, combining very low primary energy demand with high indoor comfort and reduced operational costs.

The new “Andrea Bacci” School Complex in Fermo, central Italy, exceeds NZEB performance requirements, with a primary energy demand over 20% lower than the maximum threshold. The project involves the demolition and in situ reconstruction of the educational complex hosting the

“G. Mazzoni” Primary School and the “A. Bacci” Lower Secondary School.

The aim is to create a modern, flexible, and energy-efficient learning environment, ensuring structural safety, durability, and reduced energy demand through advanced building systems. Designed as an innovative facility, the complex also includes a Civic Centre for extracurricular activities, contributing to the regeneration and environmental enhancement of the surrounding urban context.

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Spitalul Regional de Urgență Cluj

sustainability

reporting

ESG: ENVIRONMENTAL, SOCIAL & GOVERNANCE

Environmental

We have consistently strengthened our commitment to environmental stewardship at both the corporate and project levels, focusing on reducing emissions, improving energy efficiency, advancing circular economy principles and leveraging digital technologies as key enablers of sustainable outcomes. Grounded in recognised sustainability principles and protocols, our projects aim to reduce environmental impact, optimise energy use and improve resource efficiency across the built environment, with increasing attention also to social impacts.

Social

3TI has consistently prioritised diversity and inclusion as core values and has championed female empowerment since its foundation. The Company was the sixth in Italy to obtain the PdR 125:2022 Gender Equality Certification.

We believe that fostering an inclusive and respectful workplace that embraces diverse identities, skills and backgrounds is essential to sustainable, productive and long-term growth, alongside a strong focus on multiculturalism and on recognising the individuality and specific characteristics of each member of our team.

We are committed to ensuring equal opportunities for career progression and personal development for all employees, a commitment reflected in the consistent presence of women in technical leadership roles, managerial positions and strategic partnerships. In this context, we have signed the Italian Diversity Charter, an initiative promoting equal opportunity and workplace equality promoted by Fondazione Sodalitas and recognised at the European level, further strengthening our commitment to diversity and inclusion.

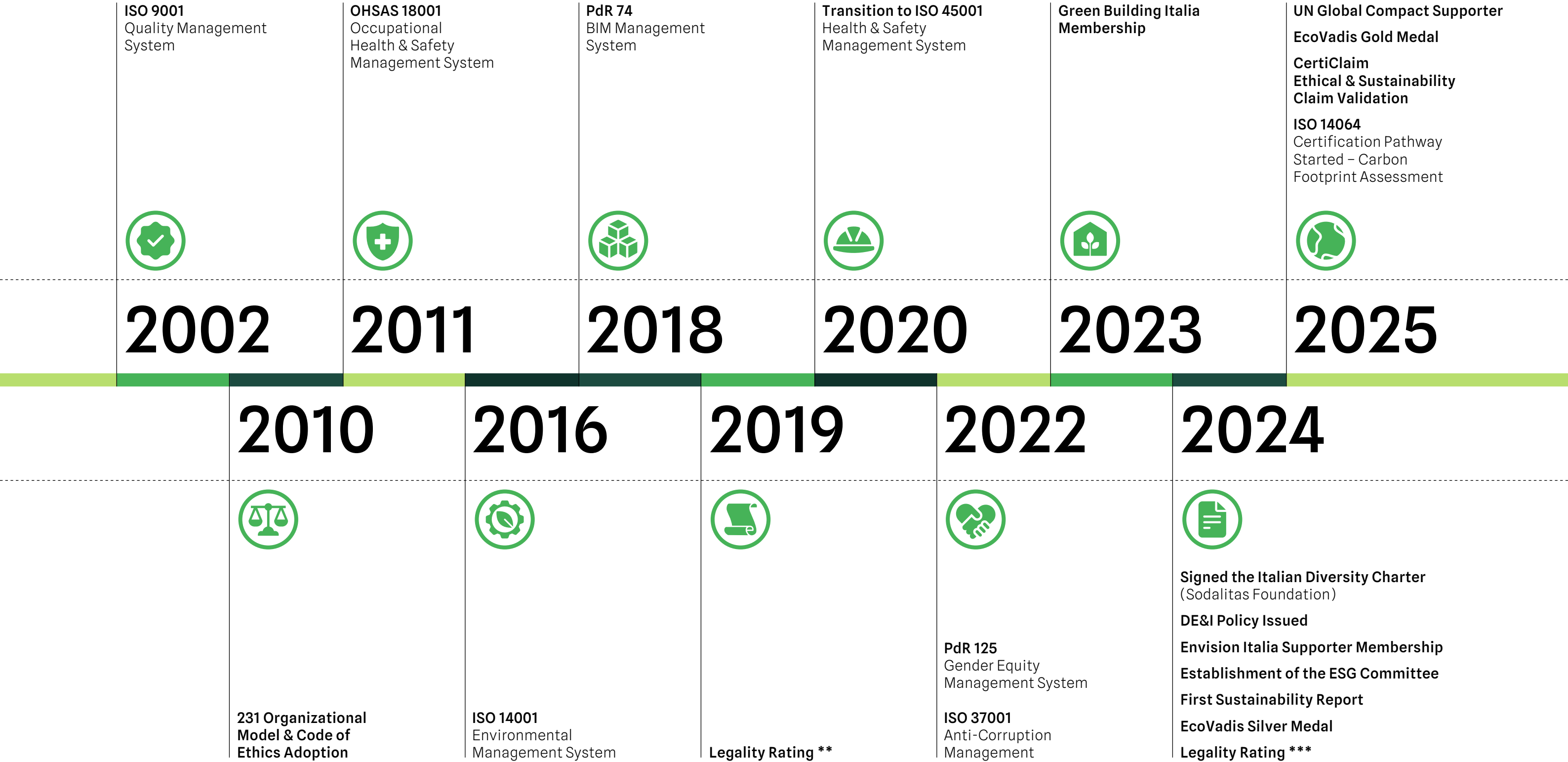
Governance

Our activities have long been guided by an Integrated Management System (IMS), which includes Quality Management (ISO 9001:2015), Environmental Management (ISO 14001:2015), and Occupational Health and Safety Management (ISO 45001:2018). The system has been further strengthened through the commitment to and achievement of ISO 37001 certification for anti-bribery management. In January 2026, following the reporting period, PAS 24000 certification for social responsibility was also achieved, confirming an increasingly structured approach to corporate responsibility and corporate governance.



SUSTAINABILITY TIMELINE

Over the years, we have progressively strengthened our commitment to sustainability by integrating ESG principles into our projects, governance and business practices. This timeline highlights the key milestones achieved along our sustainability journey.



GHG Emissions

Scope 1

Compared to 2024, Scope 1 emissions from company vehicles have been reduced by 15.5%.

Scope 2

Compared to 2024, Scope 2 emissions from energy consumption have been reduced by 1.4%.

Scope 3

As previously reported, the 2024 GHG emissions inventory has been completed in accordance with ISO 14064-1, resulting in updated 2024 data and its establishment as the baseline year. The 2025 inventory will be updated again at year-end in accordance with ISO 14064-1.

EMISSIONS		2023	2024 ¹	2025 ²
Scope 1	Company vehicle travel	5.21	18.34	15.5
Scope 2	Energy consumption in office headquarters	57.40	52.55	51.8
Scope 3	Other indirect emissions	On track	986.64	45.4
Emissions tCO ₂ e		62.61	1057.52	112.7

1. The 2024 Scope 1, 2 and 3 emissions values have been updated following the completion of a detailed GHG inventory in accordance with ISO 14064-1. As a result, 2024 is established as the new reference (baseline) year.

2. The 2025 Scope 1, 2 and 3 emissions values are based on the data available at the reporting date. They may be revised following the completion of the GHG emissions inventory in accordance with ISO 14064-1, scheduled by the end of 2026.

Climate Commitment

Our reforestation projects



Our trees have been planted in the following areas:

Amazon | Peru | Guatemala | Tanzania | Argentina | Italy



CO₂ absorbed

36 tCO₂



Reforested surface

+650 sqm
(between 2023 and 2025)



Positive impact

biodiversity reforestation
soil regeneration
support for local farming
communities

**dolomiti
energia**

Renewable energy



100%

We source 100% of the renewable energy provided by Dolomiti Energia

We are committed to reducing our environmental impact and contributing to a low-carbon future through concrete actions.

Key Actions & Targets

The following overview highlights the key actions implemented to date and the targets guiding our ongoing environmental performance.



Energy

Actions to date

- Since the end of 2024 use of 100% certified renewable electricity;
- Implementation of the office lighting system to optimise energy use and control.

Target

- Continue to purchase 100% renewable electricity in 2026;
- Improve the office lighting system to optimise energy use and control by 2030.



Business travel

Actions to date

- Implementation of a system to track business travel and associated GHG emissions.

Target

- Promote responsible decision-making and provide access to business travel analytics and performance data.



Company vehicles

Actions to date

- Installation of the “fleet2track” system to continuously monitor CO₂ emissions and fuel consumption of each company vehicle.

Target

- Progressive transition away from fossil fuel vehicles towards hybrid or electric vehicles owned or leased, and a 15% reduction in CO₂ emissions from company vehicle travel, by 2030.



Carbon footprint

Actions to date

- First GHG emissions inventory conducted in 2024 in accordance with ISO 14064-1, establishing 2024 as the baseline year.

Target

- Repeat and expand the GHG emissions inventory for 2025 in accordance with ISO 14064-1, improving coverage and data quality compared to the 2024 baseline.



Supplier engagement

Actions to date

- Supplier Code of Conduct in place and signed by suppliers.

Target

- Implement and distribute ESG self-assessment questionnaires to suppliers by 2026, and progressively use them to support supplier ESG evaluation and selection by 2030.



Criteria and data

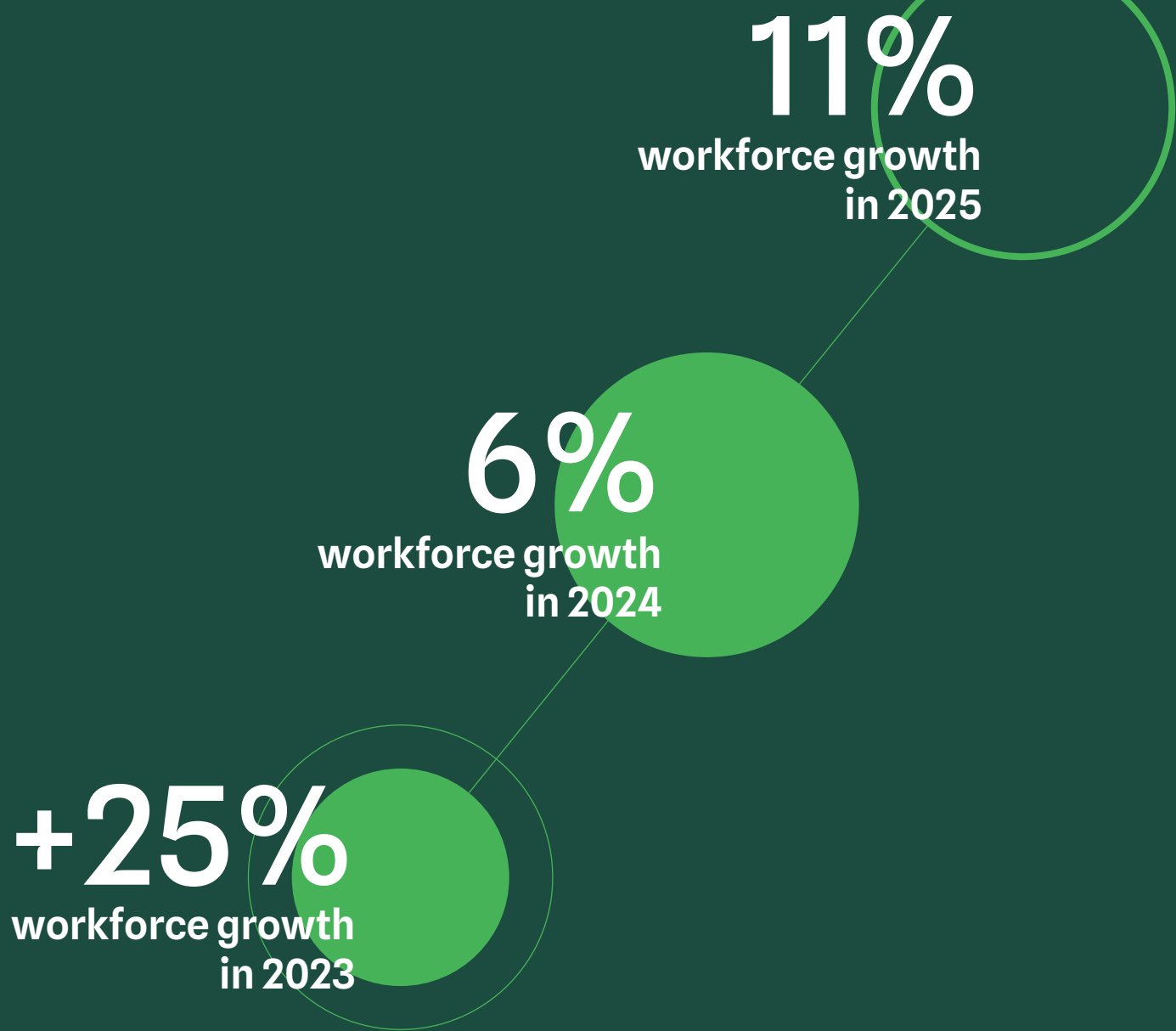
Actions to date

- Sustainability criteria and emission commitments included in selection processes.

Target

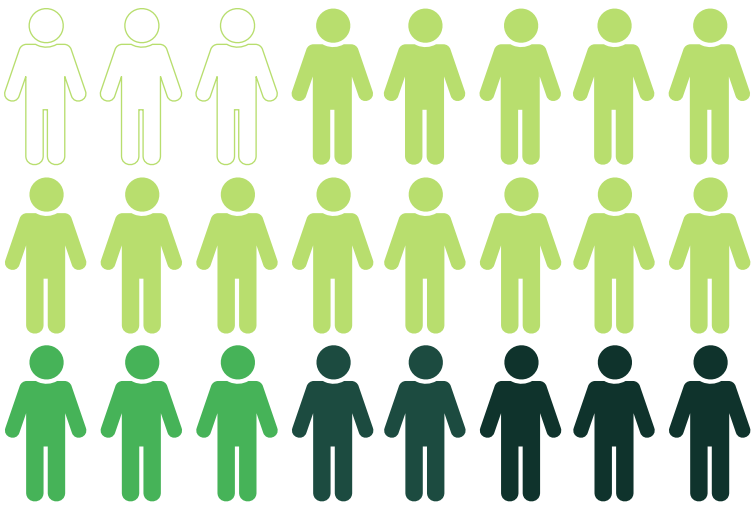
- Improvement of data quality, including supplier-specific data where available, by 2030.

Our
People
& Future



Human capital is at the core of our business model, building on a strong legacy that continues to shape how we think, work and evolve as a company.

2025



Our **workforce grew by 11%** year-on-year, with continued progress in diversity and inclusion: the share of **women in Partner roles increased by 4%** and the representation of **professionals from different nationalities rose by 4%**, reinforcing our commitment to inclusive leadership and a more diverse workforce.

The steady growth of our workforce reflects 3TI’s continued expansion and strengthening organizational capacity, while the increasing diversity of our team in terms of gender, age, and nationality enriches our collective expertise, fosters innovation, and supports the sustainable growth of our business.



Consolidation in international markets



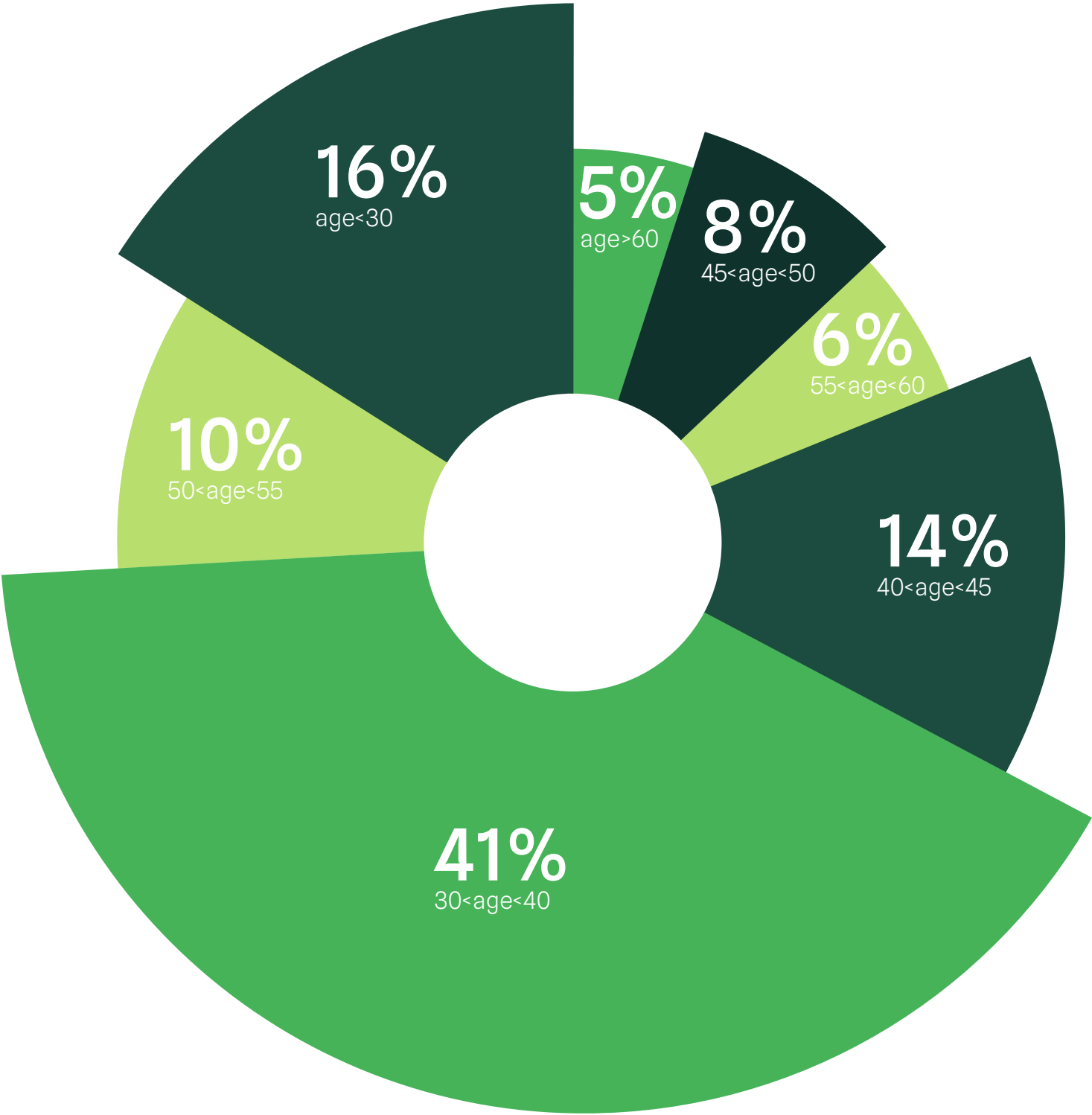
Stronger ability to attract global talent



Sustainable growth ahead

Employees by age

age group	total	women	men
<30	16%	44%	56%
30<age<35	17%	84%	16%
35<age<40	24%	63%	37%
40<age<45	14%	88%	12%
45<age<50	8%	56%	44%
50<age<55	10%	45%	55%
55<age<60	6%	57%	43%
age>60	5%	40%	60%



The chart presents the staff’s age distribution, with the largest share of employees aged between 30 and 40. This reflects a well-balanced workforce that supports long-term growth.



Gender Equality & Inclusion

UNI PdR 125:2022 CERTIFIED
(6th company in Italy)

Gender equality is a cornerstone of an inclusive culture and sustainable business growth.

3TI is committed to fostering an inclusive and equitable workplace where people are valued for their skills, experience, and potential, regardless of gender. The Company promotes equal opportunities throughout the employee lifecycle and works to ensure a working environment based on respect, fairness, and the prevention of discrimination. Increasing gender diversity across the organisation

remains a key priority. Women make a valuable contribution to the Company’s technical excellence, innovation, and business performance through their expertise, leadership, and collaborative approach.

The gradual growth in female representation in leadership and partnership positions reflects 3TI’s ongoing commitment to supporting career development and equal

access to advancement opportunities.

Through its people policies and development initiatives, 3TI continues to promote gender equality and women’s empowerment, fostering an inclusive culture in which all employees have the opportunity to develop their careers and contribute to the Company’s long-term success.

Female representation within the organization:



Monitoring female representation across the organisation supports 3TI’s commitment to gender equality and women’s empowerment.

We are committed to responsible business conduct towards our clients, employees, the company and society.



Ospedali Riuniti of Foggia “Monoblocco” of M.C.
Foggia, Italy

Human rights

As an international engineering company, 3TI recognizes that its activities, business relationships and projects may be associated with potential human rights impacts. We are therefore committed to upholding human rights across our operations and, where possible, promoting these principles in the projects developed for our clients. Employees are encouraged to report any concerns regarding potential human rights violations to Senior Management, which is responsible for reviewing and addressing them. In 2025, 3TI further strengthened its commitment to human rights and responsible business practices through the adoption of a Social Responsibility Policy aligned with PAS 24000. Through our engineering solutions, we contribute to sustainable development by addressing challenges such as climate change, rapid urbanization and resource efficiency, delivering projects that create value for both people and the environment.

Policy

Our Organization, Management and Control Model provides a framework supporting ethical conduct and responsible business practices across the organisation. It defines key principles and procedures relating to anti-corruption, sanctions compliance, speak-up and whistleblowing mechanisms, data privacy, and human rights due diligence, including the integration of human rights principles within the Social Responsibility Policy aligned with PAS 24000. 3TI has long implemented a whistleblowing system as part of its corporate integrity framework, aimed at ensuring transparency and confidentiality, and designed to provide protection against retaliation, while encouraging the reporting of potential misconduct. This contributes to promoting an ethical and accountable working environment. The Company has also signed the Italian Diversity Charter, and the Board of Directors has formally committed to promoting diversity, equity and inclusion across the organisation. In 2025, 3TI further advanced its employee wellbeing approach by developing a corporate welfare framework, including a dedicated welfare platform expected to be fully operational by 2026, as well as supplementary healthcare coverage, in line with its commitment to social sustainability. No cases of violations of the Code of Ethics, discrimination, violence or corruption were reported through legal actions or formal complaints, nor were any such cases identified by the organisation in 2025.

Code of Ethics

The Code of Ethics is based on the fundamental principles of the Company and defines the core way in which we operate, both internally and externally. Its main principles include integrity, legality, anti-corruption, protection of health and safety at work, environmental protection, market transparency and fairness, competition protection, and respect for human and labour rights (ESRS G1). 3TI considers the dissemination and understanding of the Code of Ethics essential. It is published on the official website (<https://www.3tiprogetti.it>) and available on the company intranet. Employees accept the Code of Ethics upon hiring, while consultants and suppliers are required to expressly adhere to it within contractual agreements.

Anti-Corruption Management System

3TI conducted a corruption risk assessment of its business activities and implemented policies and procedures to manage these risks, aiming to prevent and combat corruption and unethical practices. Since 2022, 3TI has been certified according to ISO 37001.

Legality Rating

This rating allows for the evaluation of various aspects of a company, such as transparency, tax compliance, adherence to environmental and labor regulations, compliance with antitrust laws, management of legal risks, and the adoption of ethical and compliance procedures. 3TI has achieved the highest rating (3 stars).

3TI is a member of global importance associations

FIDIC	The International Federation of Consulting Engineers is the global representative body for national associations of consulting engineers and represents over one million engineering professionals and 40,000 firms in about 100 countries worldwide. 3TI is a MA of Fidic and our chairman is the President of Federation.	
EFCA	The European Federation of Engineering Consultancy Associations is the only federation to represent the engineering consultancy industry in Europe, has MA in 26 European countries and represents more than one million staff in engineering and related services.	
OICE	OICE is an employers' Association, belonging to Confindustria (the Confederation of Italian Industry), which represents Italian engineering, architectural and technical economic consulting organizations. 3TI is a MA of OICE since 1999 and our chairman is Vice President for Digitalization and Computerization.	
UN GLOBAL COMPACT	Our company is a participant in the United Nations Global Compact, a voluntary initiative of the United Nations that encourages companies to align their strategies and operations with universally accepted principles in the areas of human rights, labour, environment and anti-corruption, and to support the achievement of the Sustainable Development Goals (SDGs). We support Un Global Compact since 2025.	
GBC ITALIA	Green Building Council Italia is a non-profit association that is part of the World GBC, a network of national GBCs present in more than 80 countries, representing the largest international organization in the world active in the sustainable construction sector. 3TI is a MA of GBC since 2023.	
ENVISION	Envision® Protocol is the leading rating system for infrastructure sustainability, providing a comprehensive criteria framework adaptable to any type of infrastructure project. Developed by the Institute for Sustainable Infrastructure (ISI) and the Zofnass Program at Harvard University, it is the global standard for civil engineering sustainability. 3TI is a Supporter since 2025.	
EOA	Employee Ownership Association is the UK organization that promotes and supports employee-owned companies. 3TI is a MA of EOA since 2014.	
ITALIAN DIVERSITY CHARTER	Signing of the Italian Diversity Charter, promoted by the Sodalitas Foundation and recognized at the European level, with the aim of fostering an inclusive corporate culture and eliminating all forms of discrimination in the workplace.	

3TI's certifications

Ecovadis Sustainability Rating 2025	Gold Medal Top 5%
certiClaim sustainability programme	by EthicsGO n.13/26_ATT_P Rev.0
Sustainability certificate by Synesgy	Score ESG B: “Good” sustainability level
ISO 9001:2015 Quality Management System	Certificate issued by Bureau Veritas n. IT333473
ISO 14001:2015 Environmental Management System	Certificate issued by Bureau Veritas n. IT343381
ISO 45001:2018 Health & Safety Management System	Certificate issued by Bureau Veritas n. IT353611
PdR 125:2022 Gender Equity Management System	Certificate issued by Bureau Veritas n. IT344352
PdR 74:2019 BIM Management System	Certificate issued by Bureau Veritas n. IT333414 - 1
ISO 37001 Anti-Corruption Management System	Certificate issued by Bureau Veritas n. IT345655
PAS 24000:2022 Social Responsibility Policy	Certificate issued by Bureau Veritas n. IT348700 in January 2026

Transportation & Infrastructure Design

Extension of Bucharest Metro Line 5
Bucharest, Romania

Awards & key achievements for the company and its partners in 2025

3TI ranked 1st in the national 'Planet Green Cup' competition, organised by Up2You, a sustainability challenge involving companies across Italy

Mara Franchi, the youngest partner of 3TI, won the "Impact on Climate and Biodiversity" category at the EFCA Future Leader Awards.

Alfredo Ingletti, chairman of 3TI, was appointed President of FIDIC and received the OICE CEO of the Year Award.

Award-winning or nominated projects in 2025

Extension of Bucharest Metro Line 5, Bucharest - Romania
IADA Awards Gold Winner - Transportation & Infrastructure Design

Railway Urban Park and Archaeological Park in Monterotondo (Rome), Italy
IIDA Awards - Gold Winner - Landscape Architecture

Human Technopole, Milan - Italy
OICE Award - Steel Structure Design

New COTRAL Headquarters, Rome - Italy
- IADA Awards Platinum Winner - Airport, Train Station & Terminal Design
- IIDA Awards - Silver Winner - Office Space

Regional Emergency Cluj Hospital - Romania
- IADA Awards Platinum Winner - Healthcare & Medical Facility Design
- IIDA Awards Gold Winner - Public Architecture

Actions towards the SDGs 2025

UN Agenda 2030 Sustainable Development Goals



Local communities

- SDGs
- Engagement with local authorities and associations through participatory initiatives supporting shared urban and territorial planning.
- Continuous communication of project progress via corporate channels for projects under development and construction.
- Participation of employees in charitable initiatives, including the Race for the Cure (25th edition), the largest breast cancer awareness event in Italy and globally, with over 60 employees involved.
- Promotion of circular economy practices through internal “Swap Party” initiatives, with residual items donated to local social organisations in Garbatella, the district where the company is based, strengthening ties with the local community.
- Corporate volunteering activities supporting Dynamo Camp, involve employees in the preparation of items for children’s therapeutic programmes.
- Collaboration with “A Roma, Insieme – Casa Famiglia Protetta Leda”, supporting recreational activities for children whose mothers are serving alternative detention measures.
- Donation of IT equipment no longer meeting operational requirements to charitable organisations.
- Sponsorship of Olos Gym 2000, a women’s artistic gymnastics club promoting youth development.

Technical-scientific community

- Membership in the National Forum for Sustainable Development, promoted by the Italian Ministry of Environment and Energy Security (MASE), with active participation in the “Planet” and “Youth for Sustainability” working groups.
- Election of Alfredo Ingletti, Chairman of 3TI, as President of FIDIC (International Federation of Consulting Engineers).
- Active role within OICE – Association of Engineering, Architecture and Technical-Economic Consulting Organisations, contributing to strategic working groups on ESG, environment, water, energy, digitalisation and AI, buildings and urban development, transport infrastructure, project and construction management, internationalisation, health, legal development, MIPIM and Young Leaders.
- Election of Giorgia Gunnella, Senior Partner of 3TI, to the OICE General Council.
- Election of Lavinia Forte, Senior Partner of 3TI, to the OICE Board of Statutory Auditors.
- Participation in EFCA – European Federation of Engineering Consultancy Associations activities, including working groups on European External Action and the Internal Market.
- Participation in technical and scientific conferences to share know-how and best practices, and to foster collaboration among engineering firms, construction companies and institutions.
- Engagement in academic initiatives through lectures and educational contributions.
- Involvement in client-led ESG and development programmes as a trusted technical partner.
- Publication of technical articles in specialised industry journals related to company projects.

Actions towards the SDGs 2025

People Development & Future Generation

SDGs



Participation in the CV@Lunch initiative at UniRomaTre twice a year, engaging with engineering students and graduates to present the company’s activities and professional opportunities.

Collaboration with leading universities for internship and traineeship programmes supporting early-career development.

Delivery of professional training programmes for employees, organised by the 3TI Training Division in line with the annual training plan, including both refresher and advanced/qualification courses, as well as training initiatives proposed by staff.

Launch of internal knowledge-sharing format “3TI Talks”, featuring external experts and industry representatives, including the founder of PMP and representatives of the Order of Architects of Rome.

Hosting of 5th-year Building Engineering and Architecture students from the University of Rome “La Sapienza” at the Via Pietro Gasparri site (Primavalle–Torrevecchia), one of our project sites, as part of academic engagement and orientation activities.

Regular publication of news and storytelling content on the company website and social media channels to promote knowledge sharing and awareness.

Employee climate survey conducted through an anonymous questionnaire assessing workplace wellbeing, engagement and organisational climate, to identify improvement actions and support continuous enhancement of the working environment.

Diversity, Equity & Inclusion (DEI)

SDGs



Promotion of an inclusive workplace culture supported by structured DEI awareness initiatives.

Increased presence of female partners within the company.

Two Partners joined AREL – Real Estate Ladies, a network promoting female leadership and cross-sector professional networking.

Continued role as Ambassador for the 4th edition of the “Premio Tesi di Laurea Ingenio al Femminile”, promoted by the National Council of Engineers (CNI) to support and encourage young women in STEM disciplines, for the second consecutive year.

Participation as speakers in external webinars organised by ADR (ESG programme “Elevate”, focusing on ESG certifications) and OICE Academy (governance topics), presenting company best practices.

Delivery of inclusive language training to all employees to strengthen bias-free communication and cultural awareness.

Introduction of workplace well-being initiatives on cultural and religious inclusion, based on the results of an anonymous employee survey, leading to the creation of dedicated spaces for meditation and prayer in support of a multicultural and multi-faith workforce.

Climate Action & Environmental Responsibility



Membership in the UN Global Compact Network Italia, reinforces alignment with global sustainability principles and the SDGs.

First-time preparation of the corporate greenhouse gas emissions inventory in accordance with ISO 14064-1 standards, initiating a structured carbon footprint assessment and reinforcing the company’s commitment to climate accountability and transparency.

Development and enhancement of ESG communication channels, including website and LinkedIn sustainability content.

Delivery of internal training programmes on ESG, sustainability and circular economy topics.

Development and adoption of internal Sustainable Procurement Guidelines to integrate environmental and social criteria into purchasing processes and promote responsible supply chain practices.

Company employees participated in the 2025 “Planet Green Cup”, organised by Up2You, a nationwide sustainability challenge promoting environmental awareness and sustainable practices.

Expansion of reforestation projects across the Amazon region, Guatemala, Peru, Tanzania, Argentina and Italy, supporting climate change mitigation, biodiversity protection and local farming communities.

Innovation & Digital Transformation



Adoption of a new integrated platform for IT asset and equipment management, enhancing operational efficiency and strengthening access security through multi-factor authentication.

Enhancement of a workstation virtualization system enabling secure remote access to company servers and supporting flexible and remote working arrangements.

Delivery of cybersecurity training programmes for employees to strengthen digital risk awareness and promote secure behaviours across the organisation.

Zero substantiated information security incidents recorded during the reporting period.

50% increase in BIM-certified professionals within the organisation (year-on-year), strengthening digital capabilities in project design and management.

The matrix shows the outcome of the analysis conducted to identify the key economic, governance, social, and environmental themes (“material” themes) related to the company’s business. The priorities are based on the relevance of the actual and potential positive and negative impacts on the economy, the environment, and the people associated with them.

The evaluation of each identified theme (both material and non-material) was made regarding the GRI guidelines.

Theme	Driver	GRI reference	SDGs	Key indicators
LEGALITY	Respect all laws, rules, and regulations, both mandatory and voluntary, applicable to the company's business activities and the services provided.	205		Non-conformities reported or identified related to the application of Model 231. Convictions for legal violations (n).
ETHICS AND INTEGRITY	Operate ethically and sustainably, taking into account the economic, social, and environmental impacts of its activities and striving to create value not only for partners, but also for other stakeholders such as employees, customers, and local communities.	206 406		Non-conformities reported or identified related to non-compliance with the Code of Ethics; violations or inappropriate behaviors reported through the whistleblowing system; reports of behavior violating the gender equality management system policy (uni/ PDR125:2022).
REPUTATION	Consolidate a corporate image based on reliability, legal compliance, technical expertise, and flexibility in addressing customer needs to retain and attract new clients.			Social media posts (website, LinkedIn, Instagram); articles in online or print industry magazines; interviews in industry press (n.); and participation in conferences and meetings.
SERVICE QUALITY	Ensure a high level of service quality to retain customers and gain recognition in the market.			Non-conformity of service (n); customer complaints (n);
TECHNOLOGICAL INNOVATION	Improve hardware and software equipment and digital skills to enhance operational efficiency and performance quality in order to achieve greater competitiveness in the market.			Costs for equipment/production value (%); competence certifications in BIM (n) and in sustainable protocols (n.).
DATA PROTECTION	Ensure the protection of data and information belonging to customers, employees, and/or suppliers provided by the organization during service delivery.	418		Privacy violation complaints (n); complaints related to incidents of data breach, theft or loss (n).

Theme	Driver	GRI reference	SDGs	Key indicators
STRATEGIC POSITIONING	Adoption of diversification, development, and market consolidation policies.			Domestic/international revenue (%); new public/private market (%); new public/private clients (n.).
ECONOMIC PERFORMANCE	Improve economic performance to enhance the company's sustainability and its ability to invest in innovation and training.	201		Production value (mln€); order backlog (mln€); contribution margin (mln).
HEALTH AND SAFETY AT WORK	Promote the health and safety of workers and individuals who operate within the organization's offices and construction sites.	403		Workplace injuries / hours worked (n.); cases of occupational disease (n.).
HUMAN RESOURCES MANAGEMENT	Engaging in dialogue with political, labor and wage stakeholders to reach agreements that are both sustainable for the company and rewarding for the workers aiming to attract and retain talent within the organization.	401		Increase in workforce (%); turnover (%).
DEVELOPMENT OF HUMAN CAPITAL	Ensure the provision of training courses and awareness initiatives to share knowledge, in order to guarantee the presence of qualified personnel with technical expertise, as well as a commitment to ethics and professional integrity.	404		Training hours (n.); skills certifications (n.); started internship (n.)
DIVERSITY, INCLUSION AND EQUAL OPPORTUNITY	Promote diversity, eliminate gender bias, and support equal opportunities in hiring procedures, career advancement opportunities, and compensation policies.	405 406		Women in the workforce (n); women on the corporate board (%); discrimination incidents (n); promotion and participation in awareness initiatives on diversity and inclusion.
INDUSTRY RELATIONSHIPS	Establish stable relationships with selected clients, strategic partners, and professional associations to expand the market and enhance business lines.			Memberships in trade and professional associations (n.).
RELATIONSHIPS WITH THE TERRITORY	a) promote the creation of sustainable infrastructure, in particular in developing countries, and generate opportunities for development and local employment. b) promote activities to make local communities safer, more inclusive, and sustainable.	413	 	a) Social impact initiatives (n); b) STEM promotion and engineering awareness initiatives (n); c) Young people involved in educational and awareness initiatives (n); d) Partnerships with universities, schools and local communities (n).
ENVIRONMENTAL SUSTAINABILITY OF DESIGNED AND MANAGED PROJECTS	Improve the environmental performance of designed and realized projects both social and transport infrastructure.		 	NZEB buildings (n.); certified buildings / buildings under certification (n.); application of sustainable design criteria.
ENERGY EFFICIENCY	Improve the energy efficiency of corporate headquarters.	302		Monitoring of the total energy consumed within the organization; signed a contract with a renewable energy supplier.
ATMOSPHERIC EMISSIONS	Reduce CO2 emissions from direct and indirect sources related to activities at the company headquarters, as well as those resulting from travel between headquarters, customers, and construction sites.	305		Total CO2 emissions eq (T).
MATERIAL RESOURCES CONSUMPTION	Reduce the environmental impact of paper, toner, and plastic consumption.	301		Paper consumption; ink consumption; use of plastic bottles.

GRI Content Index

The Sustainability Report refers to the year 2025 (from January 1 to December 31) and has been prepared with reference to the GRI Standards, including GRI 1: Foundation 2021, as well as relevant topic-specific Standards (2016–2018 versions, where applicable).

The following table provides an overview of the information disclosed in this report with reference to the GRI Standards, indicating where such information can be found and supporting users in easily locating the relevant disclosures.

GRI STANDARD	DISCLOSURE	LOCATION
GRI 2: General Disclosures 2021	2-1 Organizational details	pp. 2,7,10,42
	2-2 Entities included in the organization’s sustainability reporting	p. 40
	2-3 Reporting period, frequency and contact point	p. 39
	2-4 Restatements of information	p. 27
	2-6 Activities, value chain and other business relationships	pp. 9,16,26
	2-7 Employees	p. 13,30,31,32
	2-8 Workers who are not employees	p. 13,30,31,32
	2-9 Governance structure and composition	p. 7
	2-10 Nomination and selection of the highest governance body	p. 7
	2-11 Chair of the highest governance body	p. 7
	2-12 Role of the highest governance body in overseeing the management of impacts	p. 15
	2-13 Delegation of responsibility for managing impacts	p. 15
	2-14 Role of the highest governance body in sustainability reporting	p. 15
	2-22 Statement on sustainable development strategy	p. 4
	2-23 Policy commitments	p. 25,26,33
	2-24 Embedding policy commitments	pp. 15,26,32,36,37
	2-25 Processes to remediate negative impacts	p. 33
	2-26 Mechanisms for seeking advice and raising concerns	p. 33
	2-27 Compliance with laws and regulations	p. 33
	2-28 Membership associations	p. 34
	2-29 Approach to stakeholder engagement	p. 16
GRI 3: Material Topics 2021	3-1 Process to determine material topics	p. 38
	3-2 List of material topics	p. 38
	3-3 Management of material topics	p. 38
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	p. 13
	205-2 Communication and training about anti-corruption policies and procedures	p. 13
	205-3 Confirmed incidents of corruption and actions taken	p. 13
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	p. 13
GRI 302: Energy 2016	302-1 Energy consumption within the organization	p. 27
	302-2 Energy consumption outside of the organization	p. 27
	302-3 Energy intensity	p. 27
	302-4 Reduction of energy consumption	p. 27
	302-5 Reductions in energy requirements of products and services	p. 27
GRI 303: Water and Effluents 2018	303-5 Water consumption	p. 13
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	p. 27
	305-2 Energy indirect (Scope 2) GHG emissions	p. 27
	305-3 Other indirect (Scope 3) GHG emissions	p. 27
	305-4 GHG emissions intensity	p. 27
	305-5 Reduction of GHG emissions	p. 27
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	p. 13
GRI 403: Occupational Health and Safety 2018	403-1 Occupational health and safety management system	p. 33,34
	403-2 Hazard identification, risk assessment, and incident investigation	p. 13
	403-3 Occupational health services	p. 34
	403-5 Worker training on occupational health and safety	p. 13
	403-6 Promotion of worker health	p. 13,34,35
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	p. 13,33,34
	403-8 Workers covered by an occupational health and safety management system	p. 13
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	p. 37
	404-2 Programs for upgrading employee skills and transition assistance programs	p. 37
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	pp. 7,30,31,32
	405-2 Ratio of basic salary and remuneration of women to men	p. 32
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	p. 13
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	pp. 36,37
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	p. 37

This Sustainability Report represents our commitment to providing an accurate and clear depiction of our performance related to Sustainability.

The main goal is to communicate to our Stakeholders, both internal and external, up-to-date economic, social and environmental performance.

The Sustainability Reporting refers to 3TI Italia S.p.A.’s headquarters in Rome. The reporting period covers the entire calendar year 2025, from January 1st to December 31st.

Regarding Sustainability and ESG values, we decided to include a focus on the activities carried out in 2025.

Environmental indicators

The operational boundaries of 3TI’s GHG inventory include:

- Scope 1 – Mobile combustion from company vehicles
- Scope 2 – Purchased electricity and heat
- Scope 3 – business travel by train and air

- Scope 1:** for vehicle data, the Department for Environment Food and Rural Affairs (DEFRA) - 2024 year emissions factors are applied.
- Scope 2:** emissions are calculated by multiplying energy consumption data by the relevant emission factors. Greenhouse gas emission factors in the national electricity sector and in key European countries for the Italian company ISPRA’s 2023.
- Scope 3:** for business travel by train and air data, Department for Environment Food and Rural Affairs (DEFRA) - 2024 year emissions factors are applied.

Energy consumption: the quantity of energy consumed in the form of electricity and heat at 3TI’s headquarters.

Social indicators

Total headcount: based on registrations in 3TI’s human resources system including both part-time and full-time.

Voluntary employee turnover: voluntary employee turnover is based on registrations in 3TI’s human resources system of employees who resigned within the reporting period.

Gender diversity: gender diversity data is based on registrations in 3TI’s human resource system. Gender diversity numbers are also consolidated for technical qualification, board of technical direction and partner roles.

Incidents of discrimination: number of incidents of discrimination is assessed through our whistleblowing system. 3TI’s non-discrimination policy is based on the protection of the right to non-discrimination on the basis of race, color, nationality, ethnic or social origin, language, religion, gender identity, disability, political or other opinion, sexual orientation, age.

3TI whistleblowing mechanisms is available to both internal and external parties.

Governance indicators

Gender diversity: Group of Partners is composed of seventeen women and nine men. The total number of technical directors, who are part of the the group of partners is four women and six men.

Compliance, business integrity, and privacy

All new employees are informed about compliance, business integrity, and data privacy and our policies are published and available on 3TI’s website in a designated section.

Compliance concerns and whistleblowers

Compliance concerns and whistleblowers: A compliance concern is related to an illegal act and/or a breach of: laws, policies, and/or obligations. Laws, policies, and/or obligations are to be interpreted broadly, and include regulations, compliance requirements in client, supplier, sub-consultant, or joint venture partner contracts which are enforceable against 3TI. The nature of concerns could include:

- **Unlawful activity**
- **Financial fraud**
(e.g. accounting manipulation, non-compliance with internal controls procedures, misappropriation of assets, or fraudulent statements)
- **Bribery or corruption**
(e.g. conflicts of interest, bribery, sponsorships & donations, gifts, or facilitation payments) **Acts by senior management** that cannot be reported using other channels **Violation of competition laws** (e.g. price fixing, exchange of price sensitive information, collusion with competitors) **Activities**, that, by law, treaty, or agreement amount to serious improper conduct (e.g. discriminatory practices, sexual harassment, use of child labour, human rights violations).



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