

Abstract Guideline for Energy Management of the ASPI Group

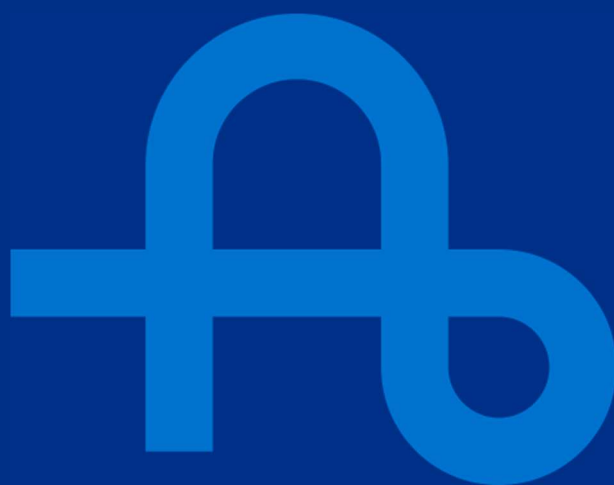


TABLE OF CONTENTS

1	INTRODUCTION.....	3
2	PRINCIPLES OF CONTROL, GUIDELINES AND RULES OF CONDUCT	3
	2.1 RULES OF CONDUCT	4
3	SCOPE AND DISSEMINATION OF CONTENT.....	5

1 INTRODUCTION

The Guideline describes the governance, the strategic principles, controls system and the rules of conduct for the Management of Energy and Energy Uses of the assets owned and/or managed by Autostrade per l'Italia (hereinafter ASPI) and the other Group Companies that manage processes involving the use of energy, with the aim of ensuring the development and homogeneous implementation of energy management within the ASPI Group.

The Guideline provides the basis for implementing the principles of the Group's Integrated Energy Policy in all phases of the activities of ASPI and the Group Companies, from the design and construction to the management and operation of the motorway network, with the aim of optimizing the performance of the energy use of the assets, providing the tools to strengthen the culture and foster continuous improvement.

2 PRINCIPLES OF CONTROL, GUIDELINES AND RULES OF CONDUCT

In compliance with the Code of Ethics and the Group's Integrated Management Systems Policy, the ASPI Group's Energy Management System is based on several principles that guide all activities related to energy management. These principles include:

- **Risk-based approach**

The Group adopts a *risk-based* approach in the planning of activities related to the improvement of energy performance. This approach provides for a systematic assessment of risks and opportunities, consistent with the Energy Policy defined by Top Management, to ensure the achievement of continuous improvement objectives.

- **Compliance**

The Group's activities are periodically adapted to national and EU regulatory requirements and international standards in the field of energy and energy efficiency, thanks to constant monitoring of legislative developments.

- **Energy planning**

Energy efficiency is integrated into the design and maintenance of the Group's assets, both from an economic and operational point of view. The planning process includes regular reviews to ensure that the principles of the Guideline are applied and that any corrective actions are identified.

- **Energy performance**

The Group's energy management is based on the continuous assessment of the energy efficiency of assets and project activities. Through the monitoring of energy performance indicators (EnPIs), periodic improvement objectives are established and corrective/improvement actions to ensure the continuous progress of the system are implemented.

- **Segregation of responsibilities (SOD)**

The principle provides that the person responsible for the execution of an activity must always be a person other than the person who controls the activity (and/or who, where applicable, authorizes it), so that the operational activities and control functions are adequately segregated. The parties involved in the process are required to promptly report any situation of non-compliance with the principle itself.

- **Traceability and archiving**

All the activities carried out, together with the related checks carried out, must be documented in such a way as to guarantee their traceability and the possibility of verification even after the event. If specific company applications are available for the management of the process, their use is mandatory for the execution of the various activities. The documentation produced must be archived in such a way as to be easily available, while ensuring adequate protection against improper use, in order to guarantee the security of the information and compliance with current privacy legislation.

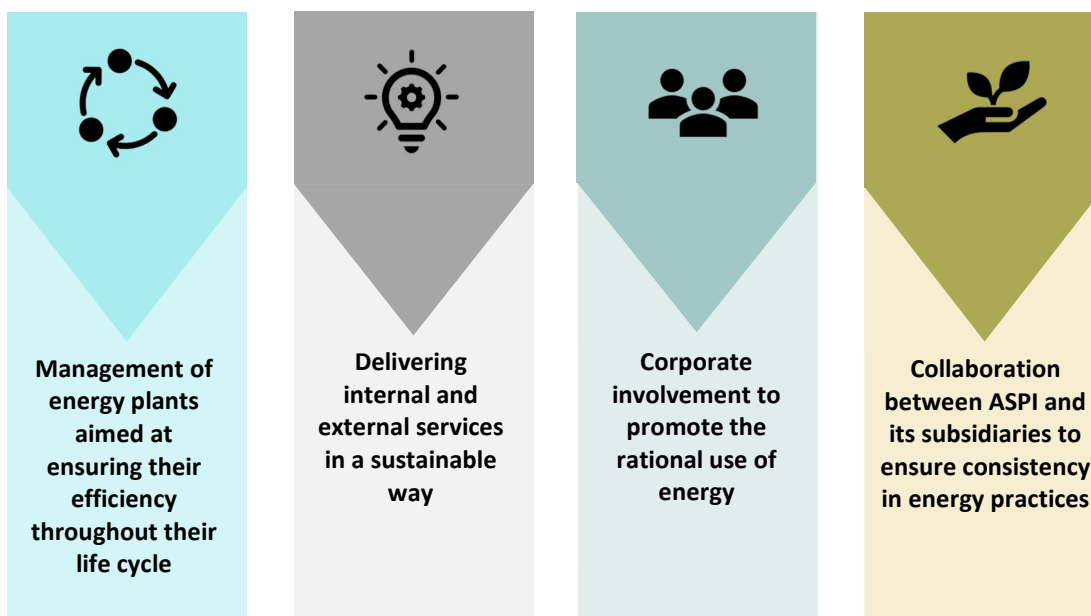
In addition, the documentation must clearly record the history of changes, revisions and reviews, in accordance with applicable regulations.

These principles are applied uniformly within the ASPI Group and its Subsidiaries, with the aim of promoting a corporate culture focused on energy efficiency and sustainability.

2.1 Rules of conduct

The ASPI Group Guidelines are based on a solid governance model that integrates rules of conduct and control principles.

For example, in **the Energy Management Guideline**, the rules include:



The rules of conduct are formalized through operating procedures, which include the continuous monitoring of performance and the adoption of the energy action plan.

3 SCOPE AND DISSEMINATION OF CONTENT

The Energy Management Guideline covers all processes and assets that involve the use of energy at national level. This Guideline applies to ASPI and to all Group Subsidiaries that have implemented an Energy Management System that complies with and/or is certified in accordance with the principles of the ISO 50001 standard.

The Guideline is disseminated at all levels of the organization to ensure a clear and uniform understanding of the principles and rules. Communication must be timely and effective, involving all relevant stakeholders, including workers' safety representatives and trade unions. The Subsidiaries must ensure the correct implementation of the principles and guidelines provided by the Guideline, organizing the operating procedures to ensure their application.

**autostrade
per l'Italia**

