

Abstract HSE & RTS Management Guideline of the ASPI Group

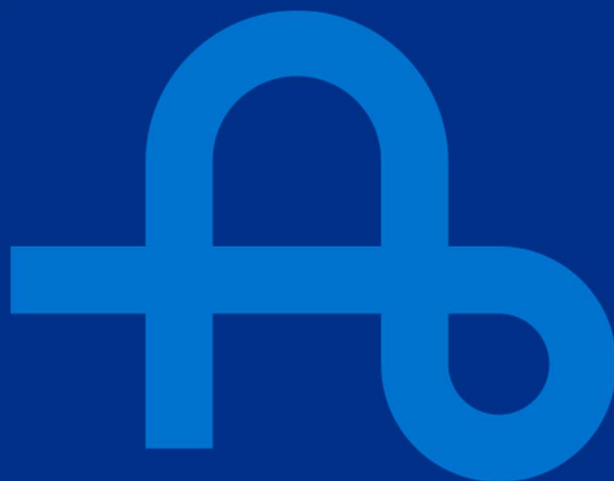


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1 INTRODUCTION

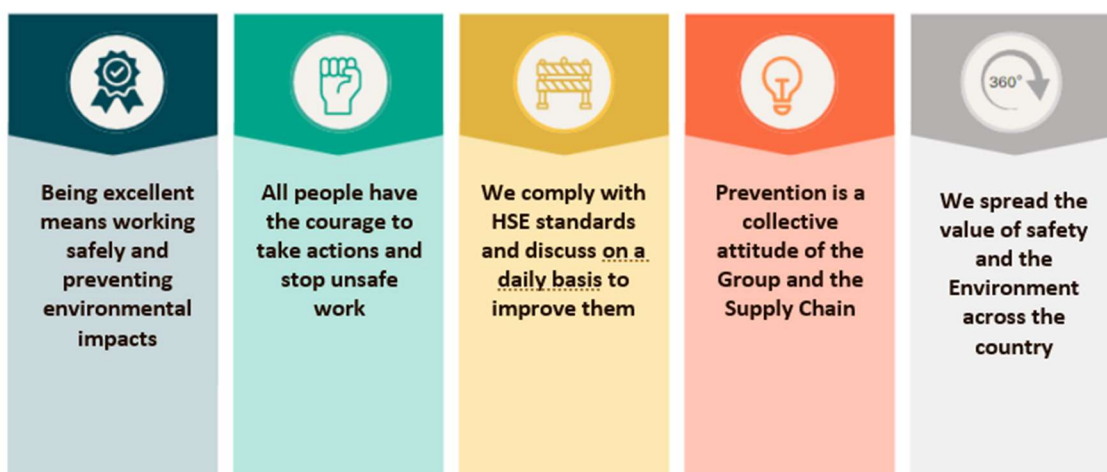
This Guideline describes principles and rules of conduct with reference to the management processes of Health and Safety in the workplace ("HS" - Health & Safety), Safety of workers' activities on the road ("RTS" - Road Traffic Safety) and Environment ("E" - Environment) of Autostrade per l'Italia S.p.A. (hereinafter ASPI) and the Group companies, with the aim of ensuring the development and homogeneous implementation of the HSE&RTS discipline within the ASPI Group.

This document provides guidelines for implementing the HSE Vision and the principles of the Group's Integrated Policy on HSE and RTS in all phases of ASPI's activities, from the design to the construction, management and operation of the motorway network and in all the activities managed by the Group's Companies with the following objectives:

- pursue pollution prevention and grant the safety and health of people, whether they are employees or third parties operating in various capacities within the Group;
- guarantee operational management of business processes based on the principle of prevention of HSE risks and protection of human life and the environment;
- guide the process of transformation of the corporate culture regarding safety and environmental protection, providing the tools to strengthen knowledge and promote continuous improvement of performance.

2 MAIN CONTENTS AND CONTROL SYSTEM

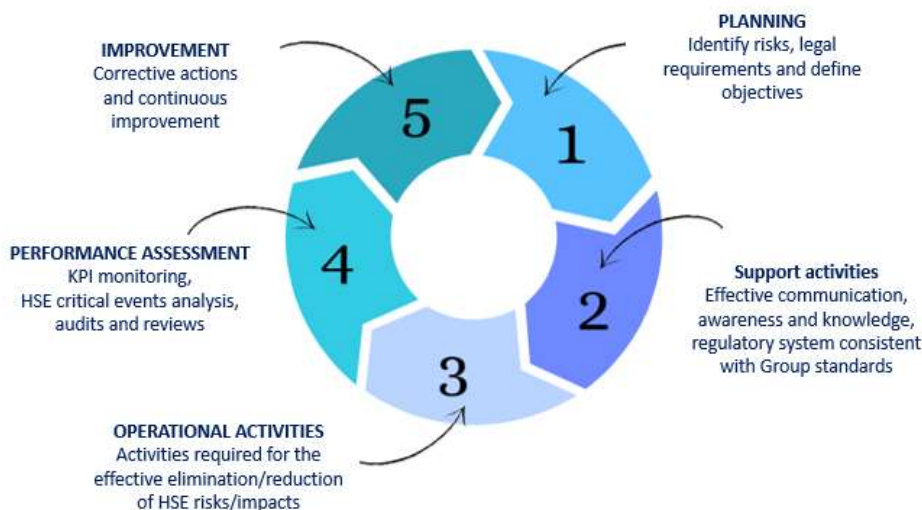
The HSE Vision is the Group's long-term ambition:



The Vision guides the ASPI Group in integrating HSE management into business strategies and priorities, in compliance with the regulatory and organisational system and internal powers and delegations and in compliance with the laws and regulations in force.

The HSE/RTS process in the Group is structured according to the Deming cycle methodology to ensure continuous improvement:

HSE/RTS PROCESS IN THE ASPI GROUP



In order to comply with the Guideline, the Group adopts, implements and requires compliance with the following principles:

Leadership: the ASPI Group is committed to integrating HSE/RTS management into corporate strategies and business operations, promoting strong leadership. All managers have the task of seizing and exploiting the opportunities associated with HSE management, in particular those that have strategic and competitive implications. They must also ensure the integration of HSE requirements into business processes and promote a culture of safety and environmental sustainability.

Continuous improvement: the ASPI Group ensures continuous improvement in the management of HSE processes, also through an adequate monitoring system in order to ensure their evolution. It is necessary to monitor performance through appropriate reporting tools.

Stakeholder engagement: the ASPI Group values dialogue with its stakeholders. The Group's commitment to HSE is not only focused on the adoption of correct methodologies and rules in line with legal requirements and international standards, but also on the awareness and involvement of all stakeholders.

Promotion of HSE culture: the ASPI Group encourages the design and implementation of initiatives and projects that contribute to the creation, improvement and consolidation of strategies and behaviors inspired by the principles of protection of health, safety, the environment and public safety.

Participation & Stop Work Authority: the ASPI Group encourages the involvement and participation of workers in the process of safeguarding health, safety, the environment and public safety, towards themselves, their colleagues and the community. It recognizes that every worker, whether employee or contractor, has the authority to stop an

activity when she/he detects a dangerous behavior or condition that is of imminent and serious danger to his or her own safety, that of others or to the environment.

Compliance with applicable regulations and commitments: the ASPI Group ensures the appropriate organisation to identify and update information relating to regulations and other relevant requirements in the HSE and RTS areas, to ensure knowledge and understanding of the regulations and to ensure their correct implementation.

Prevention and adoption of HSE best practices: the ASPI Group defines the risk assessment criteria, identifying the most effective and suitable mitigation measures in line with experience, technique and best practices to avoid or reduce, as far as possible, HSE risks, adopting behaviours that are always based on prevention and aimed at continuous improvement. In carrying out its activities, ASPI adopts the principles, standards and solutions that constitute the "best practices" for the protection of health, safety and the environment.

Measurability: ASPI Group guarantees an efficient HSE & RTS Dialogue performance process, ensuring that the exchange of information is accurate, reliable, timely, relevant, clear, comparable, complete, contextualized and verifiable. The data collection system aims to identify key indicators to evaluate performance, control processes and identify opportunities for improvement in the HSE & RTS area.

Traceability and Archiving: all activities and controls must be recordable, traceable and verifiable.

Segregation of responsibilities (SOD): All activities must comply with the principle of segregation of responsibilities. The person responsible for performing an activity must be different from the person who controls or authorizes it, and must perform compatible roles in the same process. The parties involved must promptly report any situation of non-compliance with this principle.

2.1 Control system

The ASPI Group has designed an **HSE control model**, consistent with the structure and organisational levels of the Companies, the system of delegations and responsibilities. In particular, the HSE control activity model is developed on three levels:

First level of control: the "line controls" consisting of the set of control activities that the individual structures of the Production/Organizational Units carry out on their processes in order to ensure the correct performance of operations. These control activities are delegated to the primary responsibility of management and are considered an integral part of every business process.

Second level of control: carries out internal audits and checks aimed at ensuring the effectiveness and efficiency in the treatment of HSE risks, monitors the adequacy and operation of the controls put in place to oversee the main risks by the respective owners. This control is implemented both at corporate level in the most complex/articulated Group companies (e.g. ASPI, Amplia, Tecne) and at a more operational level by HSE Managers and RSPP.

Third level of control: provides independent and objective assurance on the adequacy and effective operation of the first and second levels of control and, in general, on HSE/RTS Management as a whole and is carried out on the basis of the Audit Plan approved by the Boards of Directors of the Companies.

Finally, ASPI's HSE and RTS Management System is subject to independent third-party audit, according to ISO 14001, ISO 45001 and ISO 39001 standards.

The ASPI Group is also equipped with an adequate information system for top management regarding significant events with HSE impacts that occurred during HSE-relevant activities and the related solutions implemented.

3 SCOPE AND DISSEMINATION OF CONTENT

The Guideline applies to all the Production and Organisational Units of the ASPI Group, as well as to the Subsidiaries. The heads of the Production and Organisational Units guarantee the organisation to ensure the correct application of the principles and guidelines provided by the Guideline in their context.

The Guideline is disseminated at all levels of the organization to ensure a clear and uniform understanding of HSE 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, organising the operating procedures to ensure their application.

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