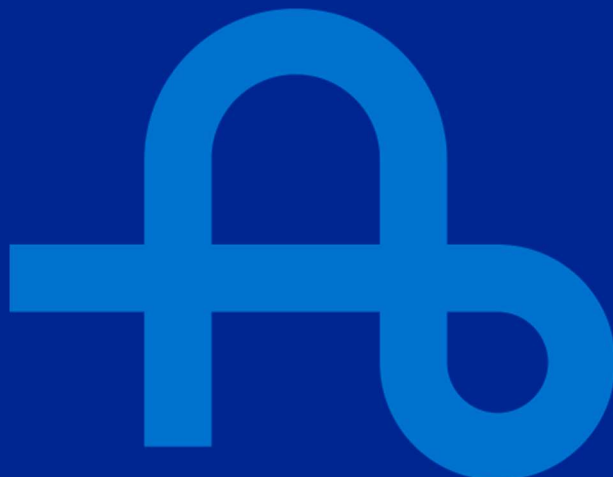


# **Abstract**

## **Guideline on Diversity, Equity & Inclusion**

### **of the ASPI Group**



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## 1. INTRODUCTION

The Autostrade per l'Italia Group ("ASPI") recognises equal opportunities and believes that diversity is a value, promoting the uniqueness of the people who are part of the Group. ASPI considers it of fundamental importance that the principles and rules of conduct on which the Group's actions, in terms of diversity, equity, inclusion and gender equality are based, **are respected, adopted and pursued** across all its activities. The promotion of the same principles and rules is extended through the selection of suppliers and subcontractors who share and respect the principles of legality, ethics, protection of human rights and the environment. By disseminating this Guideline, the Group aims to promote and protect diversity, equity, inclusion and gender equality, preventing any form of discrimination or harassment. The goal is to spread an inclusive culture, reduce generational inequalities and enhance all forms of diversity (gender, age, disability, culture, affective-sexual orientation) in an integrated way across the business.

In accordance with the Women's Empowerment Principles and the principles of the Global Compact to which ASPI adheres, as well as national and international regulations, the Group is committed to promoting a culture of inclusion and ensuring gender equality, as well as reducing generational disparities, through policies to attract, develop and enhance human resources.

The Group has set up a DE&I Steering Committee, in line with the provisions of the UNI PdR 125:2022 Equality Certification. The DE&I Steering Committee promotes the culture of Gender Equality and the dissemination of the guiding principles of equality and equity to all Group Companies.

### 1.1 MANIFEST

The ASPI Group's commitments are summarised in a Manifesto<sup>1</sup>, which is set out in five key principles:

1. **Our choices are guided by Diversity, Equity and Inclusivity:** diversity as a driver of innovation and resilience, as a fundamental resource for innovation, cohesion and organizational resilience.
2. **We aim for a real balance between work, family and free time:** balance between the professional and private spheres as an organizational priority recognizing the centrality of time and people's personal needs.
3. **People's well-being is at the heart of our commitment:** establishment of corporate welfare to support widespread well-being, a lever to support individual and collective well-being.
4. **We promise equality, fairness and transparency for hiring, compensation and career advancement:** fairness in the hiring, career and compensation processes, to ensure equal conditions and opportunities.
5. **We involve all our stakeholders in the diversity, equity and inclusiveness strategy:** active involvement of internal and external stakeholders in building an inclusive and sustainable work environment.

<sup>1</sup> The Manifesto (Annex 1) was presented to the Minister of Equal Opportunities on 21 June 2021.

## 2. MAIN CONTENTS AND GUIDING PRINCIPLES AND CONTROL SYSTEM

The Group adopts and requires compliance with the following principles by all recipients of the Guideline:

- **Non-discrimination and inclusion:** promote the inclusion of all diversities and value individual differences to create an environment in which everyone can express themselves freely, condemning all forms of discrimination.
- **Zero tolerance:** implement preventive measures and measures to combat violence and harassment in the workplace, constantly monitoring the phenomenon.
- **Equal opportunities:** guarantee equal opportunities regardless of race, gender and sexual orientation, removing invisible obstacles to professional growth.
- **Equal pay:** guarantee equal pay for the same role and skills, with fair evaluation systems.
- **Work-life balance and Work-life integration:** supports work-life balance with flexible approaches.
- **Balanced participation:** promote gender equality in all roles through empowerment and dedicated goals.
- **Well-being:** promote the physical, mental and social health of employees to improve the quality of life and business performance.
- **Accessibility:** create inclusive environments for all types of disabilities or neurodivergence.
- **Reintegration:** support the employment of fragile people, such as prisoners and refugees, for a more equitable society.
- **Intergenerationality:** enhance the dialogue between generations and the exchange of skills and experiences.

### 2.1 RULES OF CONDUCT

The rules described here guide all business processes according to the principles of **diversity, equity, inclusion and gender equality**. The expected behaviors are:

1. **Respect others:**  
everyone must interact with respect and dignity by valuing individual differences, ideas and opinions, ensuring ethical and respectful behavior in every interaction to promote an inclusive and safe work environment, free from any form of discrimination or harassment.

2. **Listening to others:**

the Group encourages dialogue to promote free expression and active participation in the company's growth. To do this, it uses tools such as focus groups, climate surveys and discussion with trade unions and internal groups.

3. **Using appropriate language**

the Group promotes the conscious use of correct and respectful language through training and awareness-raising initiatives, also resorting, if necessary, to the publication of decalogues.

4. **Communicating and sharing**

the Group supports internal and external communication projects, collaborations with schools, universities and associations, as well as awareness campaigns and participation in events.

5. **Learning and Orientation**

the Group encourages and promotes individual training as an element of persona and, professional growth and development with the aim of ensuring a constant evolution of skills and counteracting prejudices through equal participation in courses on bias, diversity, inclusive leadership, disability, neurodivergence and intergenerational collaboration.

## 2.2 DISCIPLINARY AND SANCTIONING SYSTEM

ASPI considers it essential that its organisation implements the contents of this Guideline at all levels, including through those appointed to this role, and guarantees that no employee can suffer damage related to the refusal to engage in unlawful conduct. In the event of violations to the Guideline, penalties are applied proportionately to the seriousness of the infraction, in line with regulations and disciplinary codes.

The Group manages misconduct reports through collegial bodies composed of trained and independent personnel, in accordance with Legislative Decree no. 24/2023, using a secure and confidential IT platform (Whistleblowing Platform), which ensures the segregation, security and protection of data as well as the confidentiality of the content of the report and related documentation, in line with the provisions of the relevant legislation. This Platform is accessible by all whistleblowers through all corporate websites and Intranets of the Group companies and allows reports to be made both in writing and via voicemail .

## 3. SCOPE AND DISSEMINATION OF CONTENT

The Guideline applies to all ASPI Group companies, which must adapt it to their own specificities and reference regulations, and to the people who work for these companies regardless of the type of employment relationship. It also caters:

- **to the Groups's Stakeholders** that financeand/or support initiatives that can generate a positive social impact through awareness campaigns, partnerships, training and orientation courses, events dedicated to the issues of diversity, equity and inclusion and to the issues of violence;
- **to Suppliers of goods, services and works**, for example through the introduction of specific DE&I criteria in the calls for selection and accreditation of suppliers and the adoption in the supplier code of conduct of the same founding values in terms of DE&I adopted for the internal community.

The Guideline is disseminated at all levels of the organization to ensure a clear and uniform understanding of the principles and rules contained therein. 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.

# autostrade per l'Italia

