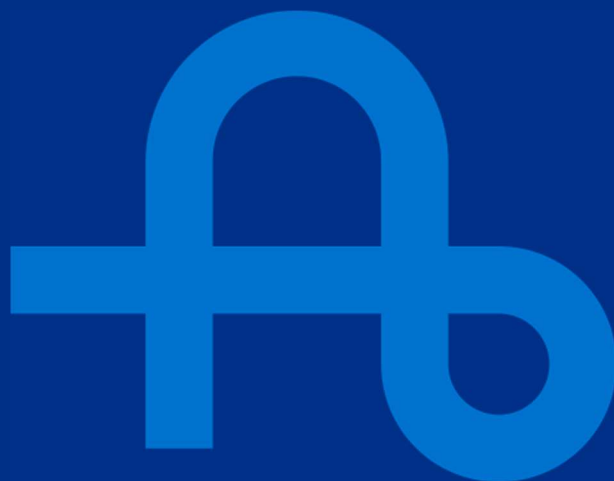


# **Abstract Group ESG Procurement & Supply Chain Guideline ASPI**



## TABLE OF CONTENTS

|          |   |          |
|----------|---|----------|
| <b>1</b> | <b>INTRODUCTION.....</b>                      | <b>3</b> |
| <b>2</b> | <b>CONTROL PRINCIPLES AND FRAMEWORKS.....</b> | <b>3</b> |
| <b>3</b> | <b>SCOPE OF APPLICATION .....</b>             | <b>6</b> |

## 1 INTRODUCTION

This Guideline defines the fundamental principles and operating framework that govern the Procurement process within the Autostrade per l'Italia S.p.A. Group (hereinafter the "Group"), with the aim of ensuring transparency, integrity, efficiency and sustainability throughout the life cycle of the Contracts.

Through the adoption of general, specific and integrated control principles, the Group intends to ensure compliance with current regulations, the correct management of responsibilities, the traceability of activities and the promotion of both ethical and environmental values.

The document outlines the minimum safeguards to be observed in the planning, awarding and execution phases, promoting a corporate culture oriented towards responsibility, digitization and sustainability.

## 2 CONTROL PRINCIPLES AND PROCESS FRAMEWORKS



### 2.1 CONTROL PRINCIPLES

To comply with this Guideline, the Group adopts, implements and requires compliance with the following general, specific and integrated principles.

**GENERAL PRINCIPLES:**

**Accountability:** the identification of control roles and responsibilities must be clear and formalized in a specific corporate document that certifies their ownership and entrusts them to a specific company entity.

**System of powers:** the documents generated in the Procurement process must be approved/signed by subjects with an adequate level of responsibility and the related authority for signature/representation.

**Segregation of responsibilities:** all activities of the procurement process must be managed in compliance with the principle of segregation of duties. The person responsible for carrying out an activity must always be a different person from the person who controls the activity.

**Traceability and archiving:** all activities and the related controls carried out must be documented, tracked and verifiable once complete. All documentation must be drawn up at the same time as the execution of the activities and be archived in a manner that allows the traceability of the process and its monitoring.

**SPECIFIC PRINCIPLES:**

**Market Access:** ASPI adopts control measures to ensure that access to the market by economic operators takes place in compliance with the principles of competition, impartiality, non-discrimination, publicity, transparency and proportionality, ensuring compliance with current regulations.

**Sustainability:** ASPI promotes the adoption of the principles of sustainability by economic operators in the provision of their services and products, including in the tender phase. As part of the life cycle of the Contract, environmental, social and governance impacts are also considered, where applicable.

**Digitization and Transparency:** the design and implementation of IT systems must take place in such a way that automatic control rules are defined.

**Absence of conflict of interest:** all company resources involved in the Procurement process must operate in compliance with Anti-Corruption legislation, the Group's Code of Ethics and the Group's Anti-Corruption Guidelines, promptly reporting any situation from which a conflict of interest may arise.

**INTEGRATED PRINCIPLES:**

**Know Your Parties:** compatibly with the regulations in force and with the support of specific information systems, the reliability, integrity, reputational profile and adequacy of third parties are verified both during the establishment of the contractual relationship and during its constancy.

**Confidentiality of information:** all parties involved in the process must respect the confidentiality of company information to which they have access by reason of the employment and/or business relationship, even after the termination of the same, in accordance with the provisions of law and contractual provisions.

## 2.2 PROCESS FRAMEWORK

As part of the Procurement Life Cycle, divided into the macro-phases of planning, awarding and execution, the minimum specific safeguards that must be respected in the implementation of the specific activities of the Procurement process have been identified.

The minimum safeguards are divided into the following activities:

**Supplier Register management:** contracted suppliers information is reported in a supplier register in the company ERP.

**List of Suppliers<sup>1</sup> management** the process of registering the Economic Operators, to be involved in both public and private award procedures, is managed through the Supplier List in compliance with the Code of Ethics, the Integrated Policy of Group Management Systems, the Group's Anti-Corruption Guidelines, the Group's ESG Procurement & Supply Chain Guideline and the Code of Public Contracts.

**Collection, Planning and Management of Needs:** the purchasing needs necessary for the complete development of operational activities are collected, planned and managed within a single process called the Purchasing Plan.

**Purchase Requisitions:** the Purchase Request (RFQ) is the tool by which a purchase need is formalized and communicated, thus starting the procurement process. They must be accompanied by a Technical Specification and supported by suitable and complete documentation. The formalization, verification and approval activity must always be carried out in compliance with the responsibilities assigned and the powers conferred.

**Award procedure:** purchases for which it is necessary to proceed through public award must be carried out in full compliance with the Public Procurement Code and, more generally, with the national and EU legislation in force. In cases where it is possible to proceed with a private contract, competitive procedures are utilised in order to obtain the best possible technical and economic market conditions.

The possibility of introducing ESG parameters, such as the possession of specific certifications, the possession of a certain level of ESG rating and/or compliance with the principles of gender equality, is always evaluated. The adoption of measures to promote equal opportunities, the protection of wages and working conditions, the adoption of work/life balance tools and compliance with environmental standards are also considered.

The use of the Minimum Environmental Criteria (CAM) is also utilised as technical specifications, as minimum requirements of the specifications, and as rewarding criteria, aimed at enhancing environmental and social performance better than those guaranteed in the minimum technical specifications of the tender.

Each contractual relationship must be formalized before the start of the supplier's activities<sup>2</sup> and sent via certified email/trading platform.

**Administrative management of the Contract:** for any changes to the contracts stipulated, it is necessary to restart the authorization cycle by retracing all the phases carried out previously. Passive invoices sent by Economic Operators must be accepted only if they have a clear reference to the signed Order/contract and if they present the real progress of the activities carried out.

**PERFORMANCE AND CLOSURE OF THE CONTRACT:** upon receipt of the service, it is always necessary to verify correspondence/consistency with the provisions of the contract, including all the parameters declared during the tender. Payment to the supplier is due upon receipt and verification of adequate supporting documentation sent by the OO. EE..

---

<sup>1</sup> The Supplier List is the consultation tool (centralized database) of Economic Operators in possession of the requirements - previously declared - of a general nature and relating to the product category for which the same Economic Operators apply for registration.

<sup>2</sup> Except in cases in which the RUP deems it necessary to proceed with early delivery in the cases specifically provided for and governed by the Public Procurement Code.

### 3 SCOPE OF APPLICATION

The Guideline applies to ASPI and to the Group companies directly or indirectly controlled, which incorporate the contents represented in the document and adopt them, adapting them where necessary to the peculiarities of their business, corporate governance and organizational structure and considering the regulatory framework applicable to them.

The Guideline also applies to all Group personnel as well as to all those who operate, nationally and/or internationally, in the name and/or on behalf and/or in the interest of the Group itself and/or who have professional or business relations with it.

# autostrade per l'Italia

