

Autostrade per l'Italia Group ESG Statement

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1 PURPOSE

The Autostrade per l'Italia Group (hereinafter referred to as “ASPI” or “Group”) is Italy's leading motorway operator with a network under concession of about 3,000 km, accounting for about 49% of the entire Italian toll network and is one of the leading motorway mobility operators in Europe.

ASPI has embraced a transformation programme defined by its Mission:

“MAKE MOBILITY INCREASINGLY SUSTAINABLE, SAFE, INNOVATIVE AND EFFICIENT TO MEET THE PRESENT AND FUTURE NEEDS OF THE COMMUNITY”

ASPI strongly believes that Environmental, Social and Governance objectives, supported by technological innovation and digitalisation, can promote continuous improvement of business processes and results, fostering the creation of “shared value” for all stakeholders.

This ESG statement defines the Group's strategies for adopting sustainable actions and behaviours, in line with the objectives of the UN 2030 Agenda (SDGs - Sustainable Development Goals) and consistent with the results of the annual Materiality Assessment to identify the most relevant issues for ASPI and its stakeholders.



2 INTERNAL REGULATORY REFERENCES ON SUSTAINABILITY

This ESG Statement defines the Group's commitments consistent with the main internal regulatory references listed below:

- ASPI Group Code of Ethics
- ASPI Group Integrated Management Systems Policy
- ASPI Group internal control system guideline on non-financial reporting
- ASPI Group Anti-Bribery Guideline
- ASPI Group Anti-Fraud Fraud Free Zone (FFZ) Model Guideline
- ASPI Group HSE and RTS Management Guideline
- Organisation and management models pursuant to Legislative Decree 231/01 adopted by each Group company
- ASPI Group Gender Equality & Inclusion Guideline
- ASPI Group Anti-Harassment Decalogue
- Standards of Control on Procurement Process Guideline
- ASPI Group Internal Control and Risk Management System (ICSRM) Guideline
- ASPI Group Enterprise Risk Management Guidelines
- ASPI Group Business Continuity Guideline
- ASPI Group Data Protection Guideline
- ASPI Group Information Security Guideline
- Tax Compliance Model and Tax Strategy

3 SUSTAINABILITY GOVERNANCE

The Group sustainability model is based on a Governance consistent with Best Practices and extended to all levels of the organisation.



The Board of Directors defines and approves strategic guidelines and policies on ESG issues, with the aim of creating long-term value for all stakeholders.

The ESG&HS Board Committee, whose main tasks on ESG issues are:

- reviewing and evaluating ESG guidelines;
- evaluate annual and multi-year goals, initiatives and programs of sustainability plans and monitor their associated risks and opportunities;
- examine, with reference to ESG profiles, the general approach and content articulation of the Sustainability Report/Non-Financial Statement.

The ESG Management Committee, chaired by the CEO of Autostrade per l'Italia, whose main tasks are:

- propose the Group's ESG guideline to the ESG&HS Committee;
- validate the Sustainability Plan, analyzing its initiatives and proposing any additional ones, and encouraging the integration of ESG initiatives into the Group's multi-year and annual planning;
- ensure monitoring of the progress of the Sustainability Plan initiatives;
- coordinate, in addition, ESG activities by liaising with other committees and business divisions involved in sustainability-related projects.

The ESG Management Committee normally meets at least every three months.

At the end of 2022, the Diversity, Equity & Inclusion Subcommittee was established within the ESG Management Committee, whose tasks include the definition and identification of the DE&I action and communication plan, the dissemination of DE&I guidelines, and the definition of KPIs to monitor DE&I projects.

The Sustainability Department, whose main tasks are:

- ensure the preparation of the Sustainability Report/Non-Financial Statement, in accordance with current regulations and reporting standards, and ensure the monitoring of ESG-related regulatory developments;
- ensure the dissemination of the Group's ESG guidelines and objectives to all corporate structures, promoting their integration into the Group's initiatives and projects;
- define and monitor, in collaboration with the relevant corporate structures, the Group Sustainability Plan, identifying the set of indicators for monitoring performance.

The Community of ESG Ambassadors, made up of experts identified within the organisation who are involved in:

- turning the ESG strategy into initiatives, identifying KPIs, baselines and targets and monitoring their implementation in cooperation with the Sustainability Dept.;
- identifying and promoting new initiatives in line with ESG guidelines.

In its Sustainability Plan - integrated in the Group's Industrial Plan - ASPI identifies specific targets and initiatives related to individual issues.

ASPI's ESG commitments are consistent with the Sustainable Development Goals (SDGs) defined within the United Nations 2030 Agenda and the principles of the UN Global Compact, which ASPI upholds.

The targets defined are constantly monitored by the Sustainability department and are reported to the relevant committees. ESG targets are also included in the Group's remuneration policy.

4 SCOPE OF APPLICATION

This ESG statement applies to the ASPI Group and refers to the following areas:

- Business Ethics and Integrity
- People
- Community
- Combating Climate Change
- Environment and Biodiversity
- Supply Chain
- Customers
- Privacy and Cybersecurity
- Business Resilience Model
- Sustainable mobility of the future

ASPI undertakes to promote awareness of this ESG statement and to make it available to all interested stakeholders through specific tools such as the website www.autostrade.it.

5 ESG COMMITMENTS

The ESG Statement develops through the following areas:

Business Ethics and Integrity



ASPI adopts environmental, social, ethical and governance principles in compliance with the most prestigious international standards and performs its activities with professional and ethical integrity and fairness, in compliance with the rules and regulations in force in the countries where it operates. ASPI adheres to the 10 principles of the Global Compact and is actively committed to the protection of Human Rights, Labour Rights, Environment and to the achievement of the “Zero Corruption” objective.

Therefore, ASPI has adopted a Code of Ethics, a document steering decisions and actions consistent with the culture of responsibility, legality, transparency and the creation of long-term value for all the Group's stakeholders. The Code of Ethics forms part of the broader Internal Control and Risk Management System, which includes, *inter alia*, an “Ethics Office”, a whistleblowing and report management system, an Organisation, Management and Control model pursuant to Legislative Decree 231/01, an ISO 37001-certified Bribery Prevention Management System, an anti-fraud model and an Enterprise Risk Management process, compliant with the ISO 31000 standard, integrated with ESG- related issues and, therefore, capable of constantly monitoring the Group's ESG risk profile.

Moreover, ASPI adopts a synergetic and integrated approach within the management systems to oversee the main processes having an ESG-related impact, in order to achieve continuous improvement in performance and effectiveness of risk prevention and mitigation¹.

Therefore, ASPI undertakes to:

- forbid behaviours deviating from the principles enshrined in the documents, which form part of the Group's internal control and risk management system;
- raise awareness on issues of legality and business integrity among employees, suppliers and partners, including the promotion of specific training initiatives, where advisable;

¹ The Management Systems adopted by ASPI comply with the international standards ISO 9001, ISO 14001, ISO 45001, ISO 39001, ISO 27001, ISO 27701, ISO 27017, ISO 27018, ISO 30415, ISO 31000, ISO 22301, ISO 50001 and the UNI/PDR 125:2022 Gender Equality Management System Guideline. ASPI also obtained the Certificate of Excellence issued by an accredited third party in 2022, certifying the integration of the company's management systems.

- protect the value of competition in the countries in which it operates and oppose any form of restriction of competition;
- work to develop and secure a constructive and transparent dialogue with national and international institutions and authorities;
- pursue an integrated and holistic approach within the management systems adopted and in the achievement of the related objectives.

People



ASPI's business develops around the conviction that the centrality of people is a key factor in creating long-term value. Diversity is considered a value and the Group guarantees safe, fair and inclusive working conditions.

ASPI ensures respect for universally recognised human rights, as defined in the UN Universal Declaration of Human Rights and Guiding Principles on Business and Human Rights and the Declaration on Fundamental Principles and Rights at Work (ILO).

Moreover, ASPI has implemented an integrated management system also certified according to UNI PDR 125 (Gender Equality), ISO 45001 (Safety in the Workplace) and ISO 30415 (Diversity and Inclusion).

Specifically, ASPI undertakes to:

- foster the development of people's potential by investing in skills, taking due account of everyone's needs and aspirations while promoting personal and professional growth;
- build an inclusive work environment, open to dialogue, valuing diversity and talent and ensuring fair and inclusive working conditions;
- promote flexible working arrangements and to manage work performance in a balanced manner, recognising and protecting the right to rest and leisure, with reference to the International Labour Organisation (ILO) Conventions;
- safeguard the health and safety of people, pursuing continuous improvement towards the "zero accidents" goal (for its own personnel and that of suppliers);
- Respect workers' rights and trade union freedoms, in particular freedom of association and collective bargaining, while promoting awareness of trade union rights and free association among workers;

- carry out activities with respect for human rights, by taking due account of potential and actual impacts on human rights resulting from the activities of business partners.

Community



In line with its ambition to become a leading operator in sustainable mobility, ASPI operates and develops its infrastructure by promoting the well-being of local communities and responding to the needs of citizens.

As a matter of fact, ASPI contributes to the socio-economic development of the communities in which it operates by supporting and promoting the use of local suppliers as far as possible.

Therefore, ASPI undertakes to:

- promote a continuous and transparent dialogue with communities and key local stakeholders directly and/or indirectly involved in the activities;
- build sustainable infrastructures, assessing the economic, social and environmental impacts generated by its activities, meeting the country's mobility needs and fostering the regeneration of the areas it passes through;
- respect the rights of individuals and communities, recognising and valuing their culture, way of life and institutions;
- support social, cultural and educational initiatives aimed at improving people's living conditions, including through the financing of solidarity and social promotion projects, partnerships, sponsorship programmes and donations;
- promote the cultural, naturalistic and gastronomic heritage of the territories crossed by the network, through specific initiatives designed in collaboration with partners of excellence.

Combating climate change



Aware of the important role it plays in the national energy transition, ASPI is committed to an ambitious programme to minimise its direct and indirect carbon footprint. The group's GHG

emission reduction targets have been defined according to a “Science Based Target” approach and validated by SBTi² ; a Net Zero plan has been drawn up in line with these targets.

To achieve its objectives, ASPI structured its plan along five strategic lines of action:

- *reduction of emissions from fossil fuels;*
- *energy efficiency;*
- *green procurement and supply chain engagement;*
- *production and consumption of energy from renewable sources;*
- *emission offsetting*

As far as energy management is concerned, ASPI has implemented an integrated management system that is also certified according to ISO UNI 50000 standards.

Moreover, ASPI is working to become a low-emission mobility enabler, committing itself to the construction of electric recharging stations throughout the network and to the identification of solutions and partnerships for the distribution of alternative fuels.

The fight against climate change includes the analysis of climate change risks, which are a category of the ASPI Risk Model in the Enterprise Risk Management framework.

Therefore, ASPI undertakes to:

- meet defined emission reduction targets by promoting all solutions that contribute to decarbonisation, leveraging innovation and digitisation as drivers to accelerate the energy transition;
- support the transformation of the operating vehicle fleet towards sustainable forms of mobility by structuring the infrastructure accordingly;
- promote initiatives to reduce the emissions of their people's daily commuting;
- monitor and manage climate change risks.

Environment and Biodiversity



ASPI operates in compliance with environmental regulations and incorporates the protection of biodiversity and habitats into its activities, minimising environmental impact at all stages of the infrastructure's life cycle.

² SBTi is a partnership between CDP (formerly Carbon Disclosure Project), the UN Global Compact, WRI (World Resources Institute) and WWF to drive private sector climate action through science-based emission reduction targets. See the Sustainability Report 2022 for details of the targets.

ASPI has implemented an integrated environmental management system that is also certified according to UNI ISO 14001 standards.

Therefore, ASPI undertakes to:

- promote a “sustainable infrastructure” model by adopting internationally recognised sustainability protocols and the certification of the main assets of the investment plan;
- monitor and manage the potential environmental impacts generated by the investment plan, according to a preventive, transparent and shared approach with local stakeholders;
- prevent any form of pollution, local and/or accidental;
- promote sustainable water management;
- protect the soil and subsoil in the management and development of the infrastructure, combating deforestation and land degradation with specific interventions;
- promote a comprehensive material management strategy geared towards circular economy approaches, making efficient use of resources and minimising the flow of waste to landfills;
- pursue the objective of “neutrality” of the potential impact on biodiversity generated by its activities.

Supply Chain



ASPI's supply chain management policy is based on a relationship with suppliers based upon the criteria of legality, fairness, transparency and good faith, consistent with the Code of Ethics and the Group's Integrated Management Systems Policy.

ASPI is working to foster the integration of ESG factors in the procurement process and support the supply chain development programme, also thanks to the adoption of advanced tools for ESG supplier management/assessment.

To this end, ASPI operates by:

- complying with, in the selection of suppliers, criteria of transparency, traceability, openness, free competition, non-discrimination, equal treatment and rotation on the basis of objective criteria linked to competitiveness and the quality of the products and services requested;
- redefining the procurement lifecycle from a sustainable perspective by adopting a supply chain control framework that incorporates ESG factors at key stages of the process;
- adopting a set of actions aimed at improving suppliers' ESG performance such as: the adoption of an advanced ESG assessment platform, specific sustainability surveys, vendor monitoring systems that include the ESG component, and engagement and awareness-raising actions such as online workshops;

- improving the inclusion of ESG criteria in tender documentation and introducing, where possible, rewarding ESG criteria to enhance environmental and social performance;
- implementing appropriate and regulation-compliant methods aimed at assessing the reliability, reputational profile and suitability of third parties both when entering into contracts with them and during the performance of such contracts, in compliance with corporate regulations (e.g. Code of Ethics, Anti-Bribery Guidelines, "Anti-Bribery Due Diligence" operating instruction).

Customers



ASPI places the well-being, safety and satisfaction of its customers at the centre of its business decisions, working with the highest technical and management standards to provide the country with a cutting-edge infrastructure, guaranteeing the highest levels of road safety, security and network resilience.

ASPI works relentlessly to ensure excellence in the quality of the service provided and in the ability to respond to critical events (landslides, fires, extreme weather events etc.) likely to threaten the safety of people and the operation of the service, while promoting innovation to anticipate customer needs and build a relationship of trust.

Therefore, ASPI undertakes to:

- ensure the highest standards of safety and traffic flow and effective traffic management;
- adopt measures for the prevention and timely management of critical events, through the implementation of protocols for restoring and securing network assets potentially impacted by the event;
- progressively reduce the accident and fatality rates on the network through continuous improvement of traffic safety standards in infrastructure operation and maintenance processes;
- implement the highest quality standards in the design, construction and maintenance of the motorway asset throughout its life cycle;
- provide users with the best services, to ensure the achievement of customer satisfaction also in compliance with the ESG Statement;
- improve the customer's travel experience by promoting service innovation, also through the implementation of an integrated management system, aimed at improving performances and designed to provide adequate customer service;

- offer travel experiences for the enhancement of the cultural, naturalistic and gastronomic heritage of the territories crossed by the network;
- develop advanced mobility services, such as the cashback service, for toll reimbursement for delays due to construction sites;
- monitor the quality of service and the timely handling of complaints and reports.

Privacy and Cybersecurity



ASPI believes the management of information security to be a priority and has adopted an ISO/IEC 27001:2017 certified management system for this purpose, with extensions to ISO/IEC 27701:2017 for the protection of personal data and ISO/IEC 27017:2017 and ISO/IEC 27018:2017 for the provision and use of cloud services.

In compliance with current regulations, ASPI undertakes to take all necessary measures to protect the security of information in terms of confidentiality, integrity and availability, and especially to

- implement and constantly update the system of rules through the dissemination, within the organisation, of Group guidelines and procedures for the definition of: i) the Privacy and Cybersecurity Governance ii) guiding principles iii) rules of conduct iv) the Privacy control system and v) the Cybersecurity risk prevention and mitigation system;
- adopt a “Privacy & Cyber by Design” approach for new Group initiatives that impact on the processing of personal data and more generally on the security of corporate information;
- implement continuous improvement of Privacy and Cybersecurity in compliance with national and international standards and best practices;
- ensure adequate training and awareness on Privacy and Cybersecurity issues also with reference to new emerging technologies.

Business Resilience Model



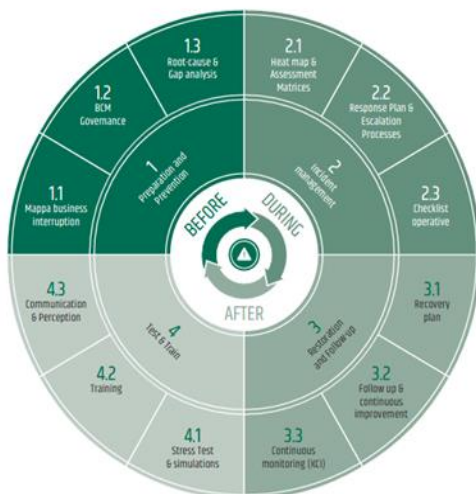
ASPI runs, maintains and innovates its infrastructure assets in an environment increasingly characterised by volatility, uncertainty, complexity and ambiguity. These factors amplify the magnitude of potential crises in terms of impact and probability, making it crucial to adopt a structured management of events likely to generate a significant impact on the company's business.

Therefore, the Group has adopted a Business Continuity Framework that aims to strengthen the organisation's ability to:

- prevent potential “disruptions” to business processes;
- promptly and properly manage interruptions, if any;
- ensure the restoration of critical services within an acceptable timeframe and with predefined service levels.

The above framework, which integrates processes, tools and operational mechanisms to protect the organisation from business disruptive events, can be broken down - from a logical and operational standpoint - into the following phases:

- **Preparation and Prevention:** continuous readiness training activities, both from a “preventive” perspective, to reduce the probability of occurrence of incidents, and from a “reactive” perspective, to develop response protocols suitable to enable effective and structured incident management, with adequate and sustainable recovery times.



- **Incident Management:** in the event of a Business Interruption event, ensure its proper management in order to allow the restoration of ordinary operations and the activation of appropriate escalation mechanisms and communication plans to internal and external stakeholders.

- **Restoration and Follow-up:** consistent with the type and level of criticality of the incident occurred, implement recovery plans for interrupted activities, in compliance with defined timeframes and expected service levels. Then, *ex-post* evaluation of

the incident occurred in order to identify corrective actions.

- **Test & Train:** planning of periodic exercises and information and training initiatives intended for Staff and third parties that deal with the Group in order to validate the effectiveness of its strategies and solutions over time, while enabling greater awareness and accountability.

As part of the Group's broader Integrated Management System, the Business Continuity Management System has also been certified according to the ISO 22301:2019 standard for traffic, toll collection and revenue recognition processes.

Sustainable mobility of the future



ASPI is committed to studying innovative solutions and valorising data, to design and implement systems and services aimed at improving all aspects of sustainable mobility, from safety to customer experience and environmental sustainability. ASPI has therefore promoted a profound “digital transformation” across all company departments and a technological innovation programme (“Mercury Programme”), which defines the five action clusters on which ASPI has decided to focus its efforts to become the sustainable mobility leader of the future:

- Connected Infrastructure, through the promotion of initiatives to gather and exchange new information thanks to advanced technological solutions (e.g., wireless networks and “infrastructure to everything” communication systems; integrated management of messaging through traditional and innovative communication channels, with connected vehicles through Road Side Units etc.).
- Intelligent Roads, through the promotion of ITS initiatives for the improvement of traffic flow through the implementation of intelligent road systems (e.g., traffic detection and facility monitoring solutions, construction site monitoring and management, dynamic lane management and info-mobility).
- Flexible Pricing, through the promotion of initiatives to make toll payment mechanisms more flexible in order to increase payment options, simplify operations and multi-modality, to mitigate traffic disruptions such as queues and congestion.
- Green Solutions, through the promotion of initiatives to enable the energy transition of vehicles with the installation of high-power electric charging stations, the identification of solutions and partnerships for the distribution of alternative fuels, and the generation of electricity from renewable sources.
- Urban Mobility, through the promotion of initiatives that enable the integration of motorway mobility with that of metropolitan areas through customised journey management, e.g., through the booking and payment of parking, the use of MaaS (Mobility-as-a-Service) systems, inter-modality management with LPT (Local Public Transport) systems, optimisation of traffic light control and more.

6 DISSEMINATION AND UPDATING

ASPI is committed to the dissemination of the principles enshrined in the ESG Statement both inside and outside the organisation. This document has been approved by the Board of Directors, which will review and approve any updates to it that may be necessary in line with developments in the Group's ESG strategy.