

ASPI Group Diversity, Equity and Inclusion Policy

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1. OBJECTIVES

The purpose of this Policy is to value and safeguard diversity across the ASPI Group, as well as to prevent and address any form of discrimination or harassment through the definition of commitments and principles that underpin the Group's approach to diversity, equity, inclusion and gender equality, in alignment with the values system adopted by the ASPI Group (hereinafter also referred to as "the Group" or "Organisation") and consistent with the contents of the Group's Integrated Management Systems Policy.

To ensure the establishment of a culturally diverse environment, our DEI policies address various forms of diversity from an intersectional perspective, including gender, age, disability, culture and emotional-sexual orientation.

2. SCOPE OF APPLICATION

The contents described in this Policy shall apply to Autostrade per l'Italia (hereinafter ASPI) and all the Group Subsidiaries directly or indirectly controlled, operating at a national and/or international level, which adopt the provisions set out in this document, adapting them where necessary to the peculiarities of their business, corporate governance and organisational structure and in consideration of the regulatory framework applicable to them (e.g. specific reference regulations).

This document is also intended for all Group staff and for all persons acting in the name, on behalf of or in the interests of the Group, as well as for third parties (such as, for example, suppliers, sub-suppliers, sub-licensees, consultants, representatives, business partners, etc.) with whom the Group engages in professional or business relationships, and for all persons collaborating with the Group at national and/or international level.

3. REFERENCE CONTEXT

3.1 External context

- Italian Constitution: Articles 2 and 3;
- Law No. 170 of 8 October 2010;
- Decree-Law No. 4 of 27 January 2022, converted with amendments by Law No. 25 of 28 March 2022, on urgent measures in support of businesses and economic operators, labour, health and territorial services related to the COVID-19 emergency, as well as for the containment of the effects of price increases in the electricity sector, which requires companies to put in place tools and procedures to include and support people with neurodiverse conditions, particularly dyslexia;
- Legislative Decree No. 198 of 2006, as amended and supplemented: the Code of Equal Opportunities between men and women;
- Presidential Decree No. 115 of 14 May 2007, Regulation for the reorganisation of the Commission for Equal Opportunities between men and women, pursuant to Article 29 of Decree-Law No. 223 of 4 July 2006, converted with amendments by Law No. 248 of 4 August 2006;

- Legislative Decree No. 151 of 14 September 2015, Provisions for the rationalisation and simplification of procedures and obligations for citizens and businesses, as well as other provisions on employment relationships and equal opportunities, implementing of Law No. 183 of 10 December 2014;
- Legislative Decree No. 5 of 25 January 2010, Implementing Directive 2006/54/EC on the principle of equal opportunities and equal treatment between men and women in matters of employment and occupation;
- Legislative Decree No. 62 of 3 May 2024, Definition of disability condition, basic assessment, reasonable accommodation, multidimensional assessment for the elaboration and implementation of the personalised and participatory individual life project;
- Legislative Decree No. 125 of 6 September 2024, Implementing Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No. 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive (EU) 2013/34 as regards corporate sustainability reporting;
- Legislative Decree No. 105 of 30 June 2022, Implementing Directive (EU) 2019/1158 of the European Parliament and of the Council of 20 June 2019 on work-life balance for parents and carers and repealing Council Directive (EU) 2010/18;
- Council of Europe Convention on preventing and combating violence against women and domestic violence, also known as the Istanbul Convention;
- Legislative Decree No. 36/2023, Article 57 “Social clauses in tender notices, announcements and invitations to tender, and criteria relating to energy and environmental sustainability” and Article 102 “Commitments of the economic operator”;
- 2030 Agenda for Sustainable Development;
- National Recovery and Resilience Plan, known as “NRRP”;
- UNESCO Universal Declaration on Cultural Diversity;
- Universal Declaration of Human Rights - (UN, 10 December 1948);
- Directive (EU) 2019/882;
- EU Strategy for Gender Equality 2020-2025;
- Directive (EU) 2024/1385 on combating violence against women and domestic violence;
- Directive (EU) 2023/970: European Directive aimed at strengthening the application of the principle of equal pay between men and women for the same work or work of equal value through pay transparency and the relevant enforcement mechanisms;
- Legislative Decree No. 96 of 7 May 2026, Implementing Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023, aimed at strengthening the application of the principle of equal pay between men and women for the same work or work of equal value through pay transparency and the relevant enforcement mechanisms;
- Legislative Decree No. 91 of 7 May 2026: Implementing Council Directive (EU) 2024/1499 of 7 May 2024 on rules concerning equality bodies in relation to equal treatment between persons irrespective of race or ethnic origin, between persons in the field of employment and occupation irrespective of religion or belief, disability, age or sexual orientation, and between women and men in the field of social security and as regards access to and supply of goods and services, and amending Directives 2000/43/EC and 2004/113/EC, as well as implementing Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 on rules concerning equality bodies in the field of equal treatment and equal opportunities between women and men in the field of employment and occupation, and amending Directives 2006/54/EC and 2010/41/EU;
- Directive (EU) 2016/2102 for digital accessibility;
- Directive (EU) 2019/882 (European Accessibility Act): introduces further accessibility requirements for digital products and services provided by private companies, applicable to organisations operating in key sectors, ensuring equal access for all users, including people with disabilities.

- Legislative Decree No. 82 of 27 May 2022: transposed the European Accessibility Act into Italian law, introducing the obligation for private entities, including SMEs, to comply with EU standards (e.g. EN 301 549, WCAG 2.1 Level AA);
- Law No. 4 of 9 January 2004 as amended and supplemented, Provisions to facilitate and simplify access to IT tools for users and for people with disabilities;
- ILO (International Labour Organisation) standards: In particular, ILO Convention No. 190 of 2019 against violence and harassment in the world of work, which enshrines the right of workers to a safe and respectful environment;
- UNI ISO 30415:2021 Standard - Human resource management - Diversity and inclusion;
- UNI ISO 53800:2025 Standard – Guidelines for the promotion and implementation of gender equality;
- UNI ISO 37001:2025 Standard – Prevention of corruption;
- UNI/PdR 125:2022 reference standard - Guidelines on the management system for gender equality, which provides for the adoption of specific KPIs (Key Performance Indicators) related to gender equality policies in organisations;
- Women's Empowerment Principles (WEPs) promoted by the UN Global Compact in collaboration with UN Women;

3.2 Internal context

- Group Code of Ethics;
- Organisation, Management and Control Model pursuant to Legislative Decree No. 231 of 8 June 2001 (available on the company intranet, in the 'Model 231' section);
- Integrated Group Management Systems Policy;
- ASPI Group HR Processes Policy;
- Stakeholder Engagement Policy;
- Human Rights Policy;
- ASPI Group Anti-Bribery Guideline;
- ASPI Group Guideline for the Integration of Management Systems;
- ASPI Group Enterprise Risk Management Guideline;
- ASPI Group Internal Control and Risk Management System Guideline;
- ASPI Group Reporting Guideline;
- Performance Dialogue Management Procedure;
- Staff Selection and Recruitment - Management Procedure.
- National Collective Labour Agreement (*Contratto Collettivo Nazionale di Lavoro* - CCNL) containing the Joint Declaration on the prevention and combating of harassment, violence and discrimination in the workplace: A commitment made by the ASPI Group to create a safe, inclusive and respectful working environment;

4. MANIFESTO

The commitments of the ASPI Group are outlined in a Manifesto¹, structured around five objectives:

¹ The Manifesto was submitted to the Minister of Equal Opportunities on 21 June 2021.

DIVERSITY, EQUITY & INCLUSION MANIFESTO

1 OUR CHOICES ARE DRIVEN BY DIVERSITY, EQUITY AND INCLUSIVENESS.

Objective: recognising the significant role of diversity in ASPI, by enhancing its intrinsic value and potential.

Promoting full representation of diversity within the workforce and ensuring broad understanding including in terms of governance.

Creating an inclusive and participatory culture open to innovation where all people feel valued and respected, and thus, able to live their life within the company with authenticity.

2 WE AIM FOR A TRUE BALANCE BETWEEN WORK, FAMILY AND LEISURE.

Objective: promoting work-life balance for all people in the Group by favouring actual balance between work, family and leisure; providing instruments and mechanisms to harmonise work, family and personal life.

3 PEOPLE'S WELL-BEING AT THE CORE OF OUR COMMITMENT.

Objective: Fostering actions and programmes to improve psychophysical health, with the aim of ensuring the well-being of all people in the group.

4 WE PROMISE EQUALITY, EQUITY AND TRANSPARENCY IN RECRUITMENT, REMUNERATION AND CAREER ADVANCEMENT.

Objective: Integrating the principle of equal treatment into all processes governing the professional and career life cycle.

Ensuring that recruitment, training and career advancement decisions are based on fair and objective criteria, informed by people's skills, experience and potential.

Promoting greater transparency to eliminate the pay and gender gap.

5 WE INVOLVE ALL OUR STAKEHOLDERS IN THE DIVERSITY, EQUITY AND INCLUSIVENESS STRATEGY.

Objective: engaging and motivating our customers, partners and suppliers in the change, encouraging them to respect and internalise these principles of equity and inclusion.

5. GOVERNANCE

The Management System for diversity, equity, inclusion and gender equality is directed, coordinated and implemented with reference to the following corporate bodies:

- **Top Management:** one or more individuals within the organisation who, at the highest level, ensure the leadership, monitoring and improvement of the management system and, in particular, define the principles of gender equality, equity and inclusion; communicate and promote shared values to the Group's stakeholders, ensuring the harmonisation of the organisation's systems, policies, processes and practices with the objectives of Equality and Inclusion, and allocating the resources required to achieve these objectives;
- **ESG-QHSE Management Committee:** established to integrate ESG objectives into the Group's business strategies, the Committee is also responsible for promoting the guiding principles of equality, fairness, inclusion and gender equality; it provides guidance through a DE&I strategic plan, which it helps to draw up and whose implementation and results it monitors, proposing any necessary additions should critical issues arise in the pursuit of the Group's gender equality policy.
- **System Manager:** each Group company shall appoint a System manager, who is, inter alia, in charge of supervising the definition of the plan of welfare initiatives, protection of gender equality, equity, diversity and inclusion, identifying and implementing projects aimed at guaranteeing equal opportunities for all staff while securing a healthy, fair and inclusive working environment, with no barriers related to gender differences, disability, intergenerationality, sexual and affective orientation, multiculturalism, etc.. The System Manager also ensures consistency in the definition and implementation of DE&I issues across all company policies dedicated to staff; prepares voluntary reports or those required by the chosen certification schemes, including the three-year Gender Equality Plan (GEP), the Gender Budget (GB) and the social report; and contributes to sustainability reporting. The System Manager may appoint a System Representative who is responsible for implementing the Policy within their operational context. This includes initiating all necessary actions to enforce the principles and rules outlined in the Guideline and ensuring their awareness and understanding.

As part of its DEI initiatives, the Group has also established:

- **Bilateral Committee for the Protection and Inclusion of Diversity:** consisting of company representatives and trade union representatives, with the aim of fostering a people-centred culture through DEI initiatives that ensure the protection and promotion of diversity, focusing its work on four main areas:
 - Gender Equality: monitoring female employment trends in the company through the implementation of "female recruiting strategies"; countering pay gap, ensuring equal professional growth between men and women;
 - Countering violence and discrimination: signing and implementing a Protocol for Countering Harassment Violence and Discrimination in the Workplace;
 - Support for parenthood: promote flexible working initiatives, work-life balance and support for dual parenting and caregivers;
 - Protecting the frail and implementing integration policies: promoting remote work, accessibility of offices, psychological first aid desk against any form of discomfort.
- **Community Employee Resource Group (ERG):** A voluntary network of people who support the Group in fostering an inclusive corporate culture to drive change within the organisation, addressing all diversity issues from an intersectional perspective. The ERG groups have a Steering Committee with representatives selected by the group itself, which acts as a guide and liaison with ASPI's DEI structure. Their operations are governed by a charter.

6. COMMITMENTS

6.1 Respecting others

The Group undertakes to guarantee mutual respect among all employees, promoting an inclusive and safe working environment, free from any form of discrimination or harassment. Each person must treat colleagues and collaborators with dignity, valuing individual differences, ideas and opinions, ensuring ethical and respectful behaviour in all interactions. Respect is the basis of professional relations and business decisions and contributes to creating an organisational culture based on equity, cooperation and respect for rules to protect and safeguard safety, health and human rights.

6.2 Listening to others

Dialogue and discussion between people enable all employees to express opinions and actively contribute to the company's growth. To this end, the Group defines and continuously updates its inclusion strategies, adapting them to the needs identified from the ground up, which are gathered through the following listening initiatives:

- qualitative and quantitative analysis carried out through focus groups and climate surveys;
- cooperation with ERG Groups and trade unions through the Bilateral Committee for the Protection and Inclusion of Diversity.

6.3 Using appropriate language

The Group is committed to spreading a culture based on the use of language that is inclusive and respectful of the dignity of others through words and linguistic structures that contribute to the generation of a psychologically safe and stereotype-free environment. To raise awareness on the correct use of language, the Group involves the entire population in training and awareness-raising initiatives, resorting, if necessary, also to the publication of decalogues to highlight the correct words to use with reference to the various forms of diversity.

6.4 Communicating and sharing

Communication is a strategic lever for achieving the objectives of diversity, equity, inclusion, and gender equality. To this end, the Group designs, organises and supports communication initiatives addressed to all stakeholders inside and outside the company, with the aim of enhancing the culture of diversity and the adoption of an inclusive language.

Communication initiatives may concern collaboration with schools and universities, membership of associations, partnerships with external entities, participation in industry events, the dissemination of thematic and awareness-raising campaigns inside and outside the company, the publication of in-depth reports on social networks and the media, and the celebration of anniversaries and/or corporate projects. All individuals within the Group are encouraged to propose and share best practices in the areas of diversity and inclusion.

6.5 Learning and guidance

The Group encourages and promotes individual training as an element of personal, professional, and developmental growth.

The Group constantly updates its training programmes to further foster a culture of non-discrimination, providing training for the entire workforce on the following topics:

- combating prejudice and bias;
- valuing diversity and talent;
- inclusive leadership; raising awareness of language use;

- ageing, to strengthen collaboration and the intergenerational exchange of skills and experiences;
- raising awareness of issues relating to disability and neurodiversity.

In managing training programmes designed and offered with the aim of constantly evolving skills (including particular reference to STEM skills—Science, Technology, Engineering, and Mathematics—for business growth and innovation), the Group ensures equal participation to all employees without any distinction.

To promote a context characterised by behaviours that respect and value diversity (in various forms such as gender, age, disability, culture and sexual and emotional orientation) and the use of inclusive, respectful language in everyday interactions, particular responsibility is entrusted to all those who manage, supervise or are involved in selection, onboarding, promotion and training processes, to whom the Group dedicates continuous awareness-raising and training activities.

7. PRINCIPLES

The Group, under this Policy, by signing the Women's Empowerment Principles (WEPs), promoted by the United Nations Global Compact in collaboration with UN Women, and in alignment with the commitments arising from the 2030 Agenda and other national and international regulations, ensures a safe, inclusive and respectful working environment.

The Group, therefore, considers it of fundamental importance that the principles to which each Company is inspired in the performance of its activities are respected, adopted and pursued in all areas, and encourages them also through the selection of suppliers and subcontractors that share and respect the principles of legality, ethics, protection of human rights and the environment.

7.1 Non-discrimination

The Group promotes equality and mutual respect between individuals of all genders, ages, religions, and sexual orientations; encourages and supports dialogue between different cultures and forbids and condemns any behaviour that alludes to disabilities, physical or mental impairments, or forms of cultural and religious diversity, fostering greater awareness to break down any type of barriers and prejudices.

7.2 Inclusion

The Group recognises, values, and considers gender, identity, generational, cultural, educational background differences, as well as physical and mental disabilities, as a fundamental asset.

Moreover, being aware that the gender with which people identify and wish to represent themselves may not correspond to the gender they are assigned at birth, the Group makes the work environment increasingly inclusive so that people can be authentically themselves.

7.3 Zero Tolerance

The Group does not tolerate violence or harassment in the workplace and implements concrete measures for their prevention and counteraction. Through data collection and awareness-raising initiatives aimed at staff, the Group constantly monitors the occurrence of these phenomena to ensure a safe and respectful working environment for all employees.

7.4 Equal Opportunities

The Group removes the invisible barriers, known as the 'Glass Ceiling', that hinder career advancement, especially for women and minorities, often linked to gender or racial discrimination, which prevent fair recognition of merit and professional potential, talent and skills possessed regardless of a person's characteristics.

7.5 Pay equity

The Group undertakes to ensure that women and men receive equal pay for equal work or work of equal value and, to this end, adopts job classification systems based on common criteria and free from any type of discrimination when determining pay.

Equal pay is not only a matter of social justice but contributes to improving the productivity and well-being of the organisation.

7.6 Work-life balance and work-life integration

The Group supports EU policies on work-life balance, with initiatives that, among others, promote bi-parenting and the sharing of family responsibilities, including access to remote work and the distribution of care-giving tasks.

The Group adopts a work-life-integration approach in its organisational culture, recognising and enhancing the coexistence of each employee's personal and professional life spheres, also through the use of flexible working arrangements and the right to disconnect, which improve employees' quality of life, their satisfaction and company productivity.

7.7 Balanced participation

The Group promotes balanced participation of women and men in all areas of work, in both operational and staff roles, with the aim of increasing diversity in the workplace, thus fostering innovation and improving business competitiveness.

Similarly, the Group promotes gender balance in management roles and on Boards of Directors through empowerment programmes and support for women's professional growth, the use of challenging gender objectives in top management variable incentive plans and awareness programmes for the development of inclusive leadership.

7.8 Well-being

The Group, recognising the importance of employees fully expressing their potential and talent for the success of the Organisation, is committed to breaking down stereotypes and/or prejudices of any kind within the workplace that, by influencing perceptions, decisions, and interactions, may impact the psychological well-being of its employees.

The Group, with an integrated approach aimed at enhancing the mental, physical and social dimensions, promotes a healthier and more productive working environment, both for a better quality of life for people and to boost everyone's performance in achieving company objectives.

7.9 Accessibility

The Group adopts all necessary support and tools to ensure environments and services that promote fully accessible workplaces for any form of physical, sensory, or cognitive disability (including neurodivergence), enabling and facilitating everyone to express themselves and contribute fully to the success of the Organisation by implementing universal design models.

7.10 Reintegration

The Group supports projects for the social and professional reintegration of vulnerable individuals (prisoners, refugees, asylum seekers), with an ethical duty and social solidarity in the Group's companies committed to building a motivated and diverse workforce and ensuring a life project that restores trust and new opportunities.

7.11 Intergenerationality

The Group recognises the value of the contribution from different generations within the organisation, promoting dialogue, knowledge transfer, and intergenerational exchange, also through the blending of the distinct social, cultural, and work experiences of each generation.

8. CONTROL SYSTEM

The diversity, equity, inclusion and gender equality management system is characterised by a Control System² that includes risk analysis (PLAN phase of the Deming³ cycle), first-level controls (DO phase of the Deming cycle), monitoring activities (CHECK phase of the Deming cycle), continuous improvement (ACT phase of the Deming cycle), and the sanctions system.

8.1 Process to implement the Management System

8.1.1 Risk analysis

Each Group company shall implement a systematic and structured Enterprise Risk Management process to ensure proper identification, assessment and ongoing monitoring of the main risks, also by resorting to fit-for-purpose analytics.

8.1.2 Execution

The companies within the Group, during their daily operations, ensure that the activities carried out are in line with DEI objectives and gender equality, in order to identify any discrepancies and issues from the early stages of these activities. These controls are, therefore, essential to prevent gender discrimination and to ensure a fair and inclusive working environment.

8.1.3 Monitoring

The Group is committed to defining a set of key indicators (around 100 KPIs) that are quantifiable, measurable and objective, for the periodic monitoring of performance, so as to be able to assess the organisation's level of maturity on gender equality issues and report on the relevant progress within the annual consolidated sustainability report, the GEP and the Gender Budget⁴.

To evaluate the performance of the DEI Management System, the System Manager must ensure:

- the regular performance of internal audits through an integrated approach, in accordance with the ISO 19011 standard and company procedures;
- the review of the company's management system, within the scope of its responsibilities.

8.1.4 Continuous Improvement

Following the monitoring activities, the Group guarantees the implementation of corrective or improvement actions aimed at managing any detected misalignments, context evolutions and the strategic guidelines proposed by the Top Management.

² This is applicable in alignment with the certification schemes adopted by each individual company within the Group.

³ In accordance with the Group's Guideline for the integration of ASPI Group's Management Systems.

⁴ In the spirit of transparency, the Group's companies periodically publish, according to their needs and in line with their respective certification processes, information related to diversity, equity, and inclusion topics in their Integrated Annual Reporting and in reports dedicated to highlighting specific DEI areas, also in relation to the certification processes obtained by the individual companies within the Group (Gender Budgeting, Gender Equality Plan, Social Report).

8.2 Disciplinary and Sanctioning System

In the event of a breach of the provisions outlined in this Policy, the Group will take disciplinary action against its employees, based on the severity of the violations, the assessments made by the relevant departments in line with applicable legal and contractual regulations, the disciplinary code, and considering any potential criminal relevance and the impact on the Company's reputation.

8.3 Reporting breaches

The Group companies have implemented a system for the submission and management of reports in accordance with Legislative Decree No. 24 of 10 March 2023 (the Whistleblowing Decree), not least to ensure a working environment that upholds the dignity and inviolability of the individual, as well as to guarantee the principles of respect and fairness in interpersonal relations. Reports are handled by collegial bodies, comprising staff meeting the autonomy requirements laid down by the legislation – defined in terms of impartiality and independence – and who have undergone specific training.

A dedicated online channel is available for each company to submit reports; this is hosted on the Group's Whistleblowing Platform, which is accessible via the corporate website or each company's intranet. The online platform guarantees, including through the use of encryption tools, the strict confidentiality of the whistleblower's identity and any other information from which that identity might be inferred. The same safeguards are also guaranteed for reported persons and any other persons involved, in accordance with current legislation.

9. ROLL-OUT AND ASSESSMENT OF THE POLICY'S APPLICABILITY WITHIN SUBSIDIARY COMPANIES

Subsidiaries, in compliance with their autonomy and independence, shall assess the applicability of this Guideline in relation to their own regulatory and organisational context, according to the Comply or Explain principle.

The Internal Control System (ICS) Manager is in charge of monitoring, with the support of the relevant Process Owner, the process of adoption and dissemination of this Guideline within the Group Company.

10. ACRONYMS AND DEFINITIONS

ASPI (or Parent Company)	Autostrade per l'Italia S.p.A.
Code of Ethics	Code of Ethics of the Autostrade Group.
Subsidiaries (or Subsidiary Companies)	Companies directly or indirectly controlled by Autostrade.
DEI	Diversity, Equity and Inclusion
Body responsible for managing reports	A collective body responsible for the process of managing reports, which assesses their adequacy, suggests the Board of Directors any improvements to the process and promotes the necessary information and training actions intended for corporate staff.

	For ASPI, this refers to the ASPI Ethics Office. For the Subsidiaries, this refers to the respective or shared Collegial Body responsible for managing reports.
ERG	Employee Resource Groups, involving employees with the aim of fostering an even more inclusive corporate culture and driving change within the company.
GEP	Gender Equality Plan
Group (or also Group Companies)	Includes Autostrade per l'Italia S.p.A. and its subsidiaries pursuant to Article 2359 of the Italian Civil Code.
KPI	Acronym for Key Performance Indicator, reflecting the critical success factors for an organisation used to measure the organisation's achievements.
STEM	Science, Technology, Engineering and Mathematics: set of scientific-technological subjects (science, technology, engineering and mathematics) and related study programmes.

REVISION HISTORY

Revision	Notes	Date
00	<i>First issue</i>	02/03/2022
01	<i>First revision of the document. Principles for gender equality have been integrated, consistent with the UNI/PDR 125:2022 reference standards, applied to all processes and defined in the Group Management Systems Policy.</i>	06/04/2023
02	<i>First revision of the document.</i> - adaptation to external regulations (e.g. European Directive no. 70/2023; European Directive no. 135/2024; Legislative Decree no. 62/2024) - adjustments to organisational and corporate regulations; - adaptations to the evolution of the DE&I Model (e.g. expansion of principles).	13/02/2025
03	<i>Third revision of the document:</i> - adjustment of governance to the new organisational structure; - adjustment to the new policy format	23/07/2026