

ASPI Group Human Rights Policy

Approved during the Board of Directors' meeting of 23 July 2026

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1. OBJECTIVES

The Autostrade per l'Italia Group (hereinafter the "Group" or "ASPI") incorporates the protection of universally recognised human rights into every aspect of its activities as an essential prerequisite for sustainability and ensures compliance with these rights in accordance with the provisions of the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work, and the Organisation for Economic Co-operation and Development's (OECD) Guidelines for Multinational Enterprises.

In a context of profound transformation in mobility, the Group recognises its role in promoting safe, innovative and inclusive infrastructure, and is committed to ensuring that the protection of human rights becomes an intrinsic part of the design, construction, management and maintenance its assets and the services provided.

The Group aims to generate shared value whilst fully respecting the human rights of the individuals and communities with whom it interacts, thereby consolidating its role as a responsible leader in the mobility infrastructure sector; to this end, it is committed to ensuring 'zero violations' of human rights.

To achieve these objectives and ensure sound and sustainable governance, the Group adopts this Human Rights Policy (hereinafter the "Policy"), which sets out the commitments to be pursued in every area of its operations and throughout its value chain, requiring partners and suppliers to adhere to consistent standards.

2. SCOPE OF APPLICATION

This Policy applies to ASPI and the Group Companies (hereinafter also referred to as "GCs"), 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 specific characteristics of their business and corporate structure, taking due account of the regulatory framework applicable to them (e.g. specific reference regulations).

This Policy shall also apply to all persons who operate in the name of and/or on behalf of and/or in the interest of the Group itself and/or who are engaged in professional or business relations with it.

3. REFERENCE CONTEXT

3.1 External context

International standards and frameworks encourage companies to engage in a structured and inclusive dialogue with their stakeholders.

The Group adheres to the fundamental values of international and European law and applies their guiding principles, which are set out, *inter alia*, in the following documents:

- United Nations (UN) International Charter of Human Rights:
 - Universal Declaration of Human Rights;
 - International Covenant on Civil and Political Rights;
 - International Covenant on Economic, Social and Cultural Rights.
- United Nations Guiding Principles on Business and Human Rights (UNGPs);

- Declaration on Fundamental Principles and Rights at Work;
- OECD Guidelines for Multinational Enterprises;
- European Convention on Human Rights (ECHR);
- EU Directive 2022/2464 on Corporate Sustainability Reporting (CSRD) and the related Legislative Decree 125/2024 implementing it in the Italian context;
- Regulation (EU) 2020/852 establishing a framework to promote sustainable investment, specifically Article 18 on Minimum Safeguard Requirements; EU Regulation 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR);
- Legislative Decree No. 81/2008 – Consolidated Act on health and safety at work;
- UNI/PdR 125:2022 – Guidelines on the management system for gender equality;
- ISO 30415:2021 – Human resource management — Diversity and Inclusion;
- ISO/IEC 27001:2017 – Information security management systems (ISMS);
- ISO/IEC 27701:2017 – Protection of personal data;
- ISO/IEC 27018:2017 – Code of practice for the protection of personally identifiable information (PII) in public clouds operated as data processors (PII processors);
- Legislative Decree No. 36 of 31 March 2023 “Public Procurement Code” as amended and supplemented (hereinafter also referred to as the “Procurement Code” or the “Code”);
- Legislative Decree No. 24/2023 Implementing Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of EU law and laying down provisions on the protection of persons reporting breaches of national law;
- Guidelines No. 1/2025 on whistleblowing via internal reporting channels, approved by Resolution No. 478 of 26 November 2025;
- Regulations on minimum user rights introduced by the Transport Regulation Authority (ART) under Resolution 132/24, as amended.

3.2 Internal context

With regard to the internal regulatory framework, this Policy is supplemented by the following documents:

- Company Bylaws;
- Group Code of Ethics;
- Organisation, management and control model pursuant to Legislative Decree No. 231/2001;
- ASPI Group Integrated Management Systems;
- Group HR Processes and Policy;
- Stakeholder Engagement Policy;
- ASPI Group Diversity, Equity & Inclusion Policy;
- ASPI Group Anti-Bribery Guideline;
- ASPI Group Antitrust Compliance and Consumer Protection Guideline;
- ASPI Group Reporting Guideline;
- ASPI Group HSE& RTS Management Guideline;
- ASPI Group ESG Procurement and Supply Chain Guideline;
- ASPI Group Data Protection Guideline;
- ASPI Group Third-Party Monitoring Model Guideline;
- Group Management Procedure for Internal Privacy Policy;

- Management procedure - Public works, services and supply contracts (Legislative Decree 36/2023);
- Group management procedure - Purchase of supplies of goods, services and private professional services;
- Operating Instructions for Business Indicators monitored as part of Sustainability Reporting and not covered by ESRS;
- Operating Manual relating to Digital and Document Accessibility;
- Ten-Point Code of Conduct on Anti-Harassment, Anti-Violence and Anti-Discrimination in the Workplace;
- ASPI Group Supplier Code of Conduct;
- ASPI Group ESG Commitments Charter;
- Service Charter;
- Protocol for combating violence, harassment and discrimination in the workplace;
- Autostrade per l'Italia's Gender Equality Plan.

This refers to any other documents within the company's regulatory framework setting out the principles, methodologies and operational procedures relating to the Group's interaction with the various stakeholders involved.

4. THE GROUP'S COMMITMENTS TO RESPECTING HUMAN RIGHTS

4.1. Fair working practices

4.1.1 Combating child labour, forced labour and modern slavery

The Group upholds human dignity by prohibiting all forms of child labour, forced labour and modern slavery, ensuring that work is always voluntary, carried out without coercion or unfair practices, under fair conditions and with a living wage.

These principles are applied to employment contracts through the company's contractual framework. These same commitments extend to the entire value chain through the Supplier Code of Conduct, acceptance of which is mandatory during the qualification and contracting phases.

4.1.2 Freedom of association and collective bargaining

The Group fully recognises and protects trade union rights, guaranteeing all individuals the freedom to join trade unions, in accordance with the National Collective Labour Agreement, without the risk of discrimination or reprisals. The Group promotes a system of industrial relations based on a model founded on the principles of sharing and transparency, fostering a climate of respect and engagement throughout its entire value chain.

4.1.3 Health, safety and physical and mental wellbeing at work

People's health, safety and physical and mental wellbeing are a fundamental right and a strategic priority for the Group, which, with this in mind, operates in compliance with international regulations and principles, adopting an approach based on prevention, protection and risk management. Furthermore, the Group adopts certified management systems, carries out periodic risk assessments and implements preventive, technical and organisational measures to minimise accidents, occupational illnesses and operational hazards, promoting a strong safety culture – including amongst partners and suppliers – and the active involvement of staff, including through specific training initiatives.

4.1.4 Non-discrimination, inclusion, equal treatment and opportunities, and promotion of diversity

The Group recognises diversity as a driver of innovation and value for itself and for the communities it serves. To this end, it promotes inclusive, safe, fair and respectful working environments, rejecting any form of discrimination and ensuring equal opportunities based on merit and skills at all stages of a career. It values diversity in terms of gender, age, religion, culture, ability, sexual orientation and background, ensuring a psychologically safe environment based on zero tolerance towards violence, harassment and retaliation. It engages with its workforce through structured consultation and invests in training on bias, inclusion and intergenerational collaboration, so that every individual can fully fulfil their potential. It also promotes the principle of universal accessibility, committing to ensuring fair and dignified access to infrastructure and services.

4.1.5 Welfare and work-life balance

The Group promotes an organisational model that fosters people's overall wellbeing through welfare schemes, flexibility and work-life balance measures supporting parenting, family care and personal needs. It introduces additional safeguards, dedicated services and innovative working methods to promote a sustainable work-life balance and a gradual shift towards a work-life harmony model – defined as the harmonious and flexible integration of the various aspects of people's lives – supported by an ecosystem of services dedicated to health, wellbeing and the different stages of working life, whilst ensuring equal access to opportunities. This approach contributes to a better quality of working life and a more inclusive and motivating working environment.

4.2. Community

4.1.6 Protection of the natural environment and ecosystems

The Group regards environmental protection as an essential prerequisite for the well-being of people and communities, adopting certified management systems and applying the principles of precaution and prevention at every stage of the design, construction and management of infrastructure. It reduces environmental impacts through strategies focused on efficiency, energy transition, performance monitoring and the enhancement of biodiversity, whilst preventing pollution. It integrates sustainability criteria into the design and management of infrastructure, promoting innovative and circular solutions.

The Group systematically assesses and mitigates the direct and indirect impacts of its business, ensuring continuous monitoring and transparent decision-making based on stakeholder engagement.

4.1.7 Rights of the communities concerned

The Group engages in ongoing and transparent dialogue with local communities, assessing the impact of its activities on the local area and promoting infrastructure that generates social, economic and environmental value. The Group recognises the importance of local cultures, needs and identities, supporting initiatives that improve quality of life – including through partnerships with local stakeholders – and encouraging the involvement of the local supply chain.

4.1.8 Privacy and information security (cybersecurity)

The Group recognises the protection of privacy and information security as essential elements in safeguarding user-related data, ensuring that information is processed in accordance with the principles of lawfulness, fairness, transparency and data minimisation, in compliance with current legislation. The parent company, ASPI, has adopted a certified management system and an integrated Privacy and Cybersecurity governance framework that defines principles, responsibilities and controls, promoting the application of the 'Privacy & Cyber by Design' approach in the development of new initiatives, processes and services. It sets out technical and organisational requirements that ensure the confidentiality and integrity of systems and information, whilst preventing misuse and unauthorised access. The Group invests in training, awareness-raising, monitoring and improvement, ensuring the prompt handling of incidents and reports, as well as proactive alignment with international best practice.

4.1.9 Relations with users and customers

The Group ensures that its relationships with users and customers are based on security, transparency, fairness and quality of service, in full compliance with current legislation and consumer rights. It ensures that information is comprehensive, verified and easily accessible; safeguards service continuity; and adopts high technical and management standards, practising responsible marketing and upholding the principles of fair competition. It promotes an inclusive service experience, including in the digital environment, with particular concern for people with disabilities and the most vulnerable users. Through simple and timely channels, proactive complaint handling and the structured use of feedback, it fosters a relationship of trust and the continuous improvement of services. In the event of incidents or disruptions, it communicates timelines, alternatives and mitigation measures transparently. Front-line staff are trained to provide professional, respectful assistance that focuses on users' rights.

5. IMPLEMENTATION AND MONITORING

The ASPI Group's compliance with its human rights commitments is ensured through a structured and ongoing due diligence process, designed to identify, assess, prevent and mitigate potential adverse impacts associated with the Group's business activities and relationships throughout the value chain.

This process is carried out annually by the relevant departments within their respective areas of expertise to ensure substantive compliance with the principles set out in this Policy.

The process applies to all business areas and is integrated into the ESG management framework, in line with the corporate strategy. As part of its risk and impact management, the Group systematically assesses its activities and interrelationships with regard to the key areas of human rights protection, using structured methodologies and control tools integrated into the company's management systems.

The due diligence process is supported by regular analysis and monitoring activities, including internal audits and, where appropriate, third-party audits, as well as reporting mechanisms accessible to stakeholders. Any critical issues identified are assessed in accordance with formalised processes and, where necessary, addressed through the implementation and monitoring of appropriate corrective and improvement measures, managed directly by the relevant departments in their respective fields of expertise.

In line with the outcomes of the due diligence process, the Group implements specific prevention and mitigation measures aimed at reducing potential adverse impacts on human rights, which include:

- the definition of structured and transparent criteria for the selection and registration of stakeholders (in particular suppliers), based on fairness, non-discrimination, traceability and objectivity, in line with the Code of Ethics, the Procurement Guidelines and the Supplier Code of Conduct;
- integration of ESG criteria into supply chain selection, assessment and monitoring processes, using monitoring and reporting tools (including ESG assessment systems).

The due diligence process is supported by regular analysis and monitoring of the mitigation measures adopted, including the collection of relevant evidence, including internal audits and, where appropriate, third-party audits, as well as reporting mechanisms accessible to stakeholders. These activities are managed by the relevant Communications, Marketing and DEI department, which is also responsible for updating, disseminating, providing training on and managing any reporting procedures relating to this Policy, ensuring that information provided to stakeholders is clear, accessible and reliable.

6. TRAINING

The Group is committed to making the contents of this Policy available to all stakeholders on the corporate intranet and on the official websites of the respective Group companies, as well as to disseminating its contents to the entire workforce, including through specific training programmes.

7. IMPLEMENTATION AND EVALUATION OF THE POLICY IN SUBSIDIARIES

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

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

8. DEFINITIONS

ASPI (or Parent Company)	Autostrade per l'Italia S.p.A.
Human Rights	Universal and inalienable rights recognised for all people without distinction as to race, nationality, language, age, sex/gender, gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic status, political or trade union views, or any other grounds.
Child labour	Any form of work which, by its nature or the circumstances in which it is carried out, is likely to jeopardise the health, safety or morals of a child.
Forced labour and modern slavery	Any form of work or service performed without consent (for which the person has not volunteered - ILO Convention No. 29) or in return for payment, but under threats or physical coercion, as well as prostitution, human trafficking and sexual slavery.
Freedom of association	The right of workers, without any distinction and without prior authorisation, to set up organisations of their choice, and to become members of such organisations, without suffering any form of discrimination or other adverse consequences.

Health, safety and mental and physical wellbeing	A state in which staff work in safe, healthy and suitable working environments that safeguard physical and mental health and promote the prevention of risks, including psychosocial risks. This includes protection from physical, environmental or organisational hazards, access to adequate essential services, and the safeguarding of mental and psychosocial wellbeing.
Key stakeholders	All internal and external stakeholders – whether individuals, organisations, companies, authorities or institutional bodies – who may influence or be influenced by a decision and/or activity carried out by the ASPI Group.
Environmental protection	Safeguarding natural resources and the environment as a whole by preserving their integrity and minimising the impact of human activities on biodiversity and local ecosystems, including through appropriate renaturalisation measures.
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>	23/07/2026