

ASPI GROUP ANTI-BRIBERY GUIDELINE

*Information for organisations benefitting
from Donation and Sponsorship initiatives*

autostrade
per l'Italia



Foreword



Autostrade per l'Italia has adopted the ASPI Group Anti-Bribery Guideline by implementing a Anti-Bribery Management System, in line with the International Standard **UNI ISO 37001:2016**

In its commitment to the prevention of corruption, ASPI considers it essential to make its **consultants and professionals** aware of the anti-corruption measures adopted by the Company and especially of the content of the **Group Anti-Bribery Guideline**, making them aware of the obligations imposed on them as "Recipients" of it



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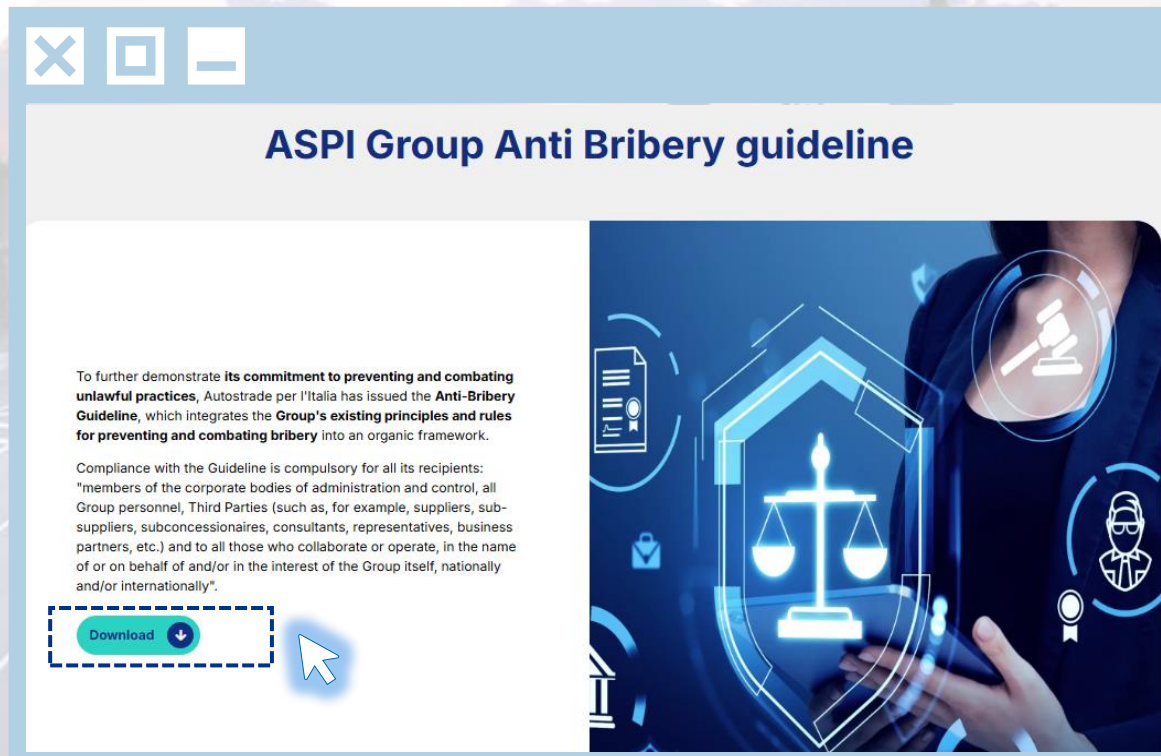
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1. Anti-Bribery Guideline: where to find it



The guideline is in the public domain, downloadable from the [Autostrade per l'Italia website](https://www.autostrade.it/chi-siamo/Linea-Guida-Anticorruzione)

([autostrade.it/chi siamo/Linea Guida Anticorruzione](https://www.autostrade.it/chi-siamo/Linea-Guida-Anticorruzione))

2. The Recipients of the Guideline



ASPI Group Staff



Those who collaborate or act on behalf of or for and/or in the interest of the Group



Third Parties of ASPI

APPLICATION PRINCIPLE "ZERO TOLERANCE"

- The Group **does not tolerate corruption in any form**
- The Group **does not allow exceptions** to the requirements and prohibitions in the Guideline
- **The belief that one is acting for the benefit of the Group can in no way justify** the adoption of behavior that is contrary to the principles and rules set forth in the Guideline.

3. The "Zero Corruption" Manifesto of the ASPI Group



MANIFESTO

Corruption is a global issue that we have a duty to fight to ensure a sustainable future for the next generation

- 1> **TARGET ZERO CORRUPTION**
Commitment to convince that corruption can be eliminated.
- 2> **LEAD BY EXAMPLE**
Commitment to developing a culture of Business Integrity at all levels of the company through the dedication and example of top management.
- 3> **HUMAN RIGHTS & ANTI-CORRUPTION**
Commitment to spreading the idea that corruption is a crime that can limit human rights and contribute to inequality.
- 4> **STIMULATE RESPONSIBLE CONDUCT**
Commitment to building trust at all levels to incentivize responsible behavior by breaking down resistance and barriers to change.
- 5> **ZERO TOLERANCE**
Commitment to disseminate clear rules and firm sanctions for the prevention of corruption, not tolerating exceptions to prescriptions and prohibitions.
- 6> **PROTECT ALERTS**
Commitment to support and protect whistleblowers and whistleblowers by providing a safe and transparent environment.
- 7> **ADVANCED TRAINING**
Commitment to implement training and awareness paths for all staff and critical Third Parties.
- 8> **COMMUNICATION AS A VALUE**
Commitment to ensure, through innovative and pervasive communication, the dissemination of principles, values and rules in order to align the perception of consequences with reality.
- 9> **TECHNOLOGY IN THE SERVICE OF TRANSPARENCY**
Commitment to using technological and innovative solutions as tools for fighting corruption.
- 10> **TURNING COMMITMENT INTO ACTION**
Translate commitments into specific and concrete actions that demonstrate determination in achieving goals in the fight against Corruption.

STATEMENT OF COMMITMENTS IN THE FIGHT AGAINST CORRUPTION

In carrying out its activities, the Group is guided by the Sustainable Development Goals (SDGs) defined by the United Nations 2030 Agenda

In this regard, the Group is committed to achieving the **goal of "Zero Corruption"** through the 10 rules within the Manifesto

4. The selection and management of donors and sponsees



PRINCIPLES

Donations and sponsorships fall under corporate discretion according to **common business practices**



CHECKS ON THE UNFOLDING

The allocation of funds **is monitored** both with reference to the **compatibility of the authorized initiative** with the program proposed to the Company, and on the **actual performance of the same**, maintaining the **traceability of the feedback purchases**



ANTI-CORRUPTION DUE DILIGENCE

Donors and sponsees are required to **provide information, documents and statements** requested by ASPI for the purpose of Anti-Bribery Due Diligence.*

5. Some focus on donor and sponsee obligations



Giveaways and representation expenses

Make **only gifts** according to common business and/or professional courtesy practice that are **appropriate, reasonable and of modest value** (< €150 also understood as cumulative threshold in the year)



Relationships with the Public Administration

- Observe **anti-corruption regulations**
- Do not harm the **integrity** and **reputation** of ASPI
- Do not try to improperly influence the decision of the institution concerned



Facilitation payments

Do **not make** facilitation payments for any reason



Benefits undue

Do not offer, promise, accept or demand **undue benefits, economic or otherwise**, from a third party (public or private) as an inducement or reward for acting or omitting actions



Conflicts of interest

Certify that there are no conflicts of interest, declaring any changes during the course of the relationship in a timely manner

6. Consequences of non-compliance with the Guideline

In case of non-compliance with the Anti-Bribery Guideline by grantees and sponsees, ASPI may **cancel the establishment of the relationship** or impose **the termination of contractual relationships**



ASPI contract standards contain the **Ethics Clauses**



The Third Part Commits to compliance with the **Anti-Bribery Guideline**



Failure to comply with the Guideline constitutes a **breach of contract**

Through the **Ethics Clauses**, the Third Party agrees to abide by the standards and principles set forth in a number of documents adopted by ASPI, including the Anti-Bribery Guideline.

Failure to comply with these documents will constitute a breach of contract, pursuant to Article 1456 of the Civil Code, which may result in the **application of remedial measures up to and including termination of the contract**, depending on the severity of the violation and the extent of risk exposure for ASPI

7. Reporting a violation of the Guideline



Internal corporate Whistleblowing channels

An IT platform is available for submitting reports, which guarantees data security and confidentiality, through an advanced encryption system for communications and the database, in line with the relevant regulations.

SUBMIT YOUR REPORT HERE

To monitor the status of a report sent before 01/10/2024 and/or to talk to the Report Management Authority click here

The system allows the submission of reports through a guided online path **without the obligation to register or to declare one's personal details**. At the end of the submission, a **unique identification code will be displayed, which must be memorised** in order to access the report later and to dialogue with the relevant offices.

This tool protects the identity of the whistleblower and makes it possible to issue an acknowledgement of receipt of the report, maintain contact with the whistleblower and request, if necessary, additions and provide feedback to the report, within the timeframe provided for by the legislation.

The offices in charge of handling Reports are also available to **meet with the Whistleblower**, if he/she so requests through the digital platform, to collect the Report.

The reported channels **should NOT be used to send complaints and requests for assistance on commercial matters**.
For such types of communication, please **click here**.

MANAGEMENT OF REPORTS IN THE ASPI GROUP

Anyone can make a report of a violation - even a suspected violation - of the regulations or the Anti-Bribery Guideline (benefiting from the **protections** provided by Legislative Decree no. 24/2023) through a special **IT platform**.

(Austostrade.it/chi-siamo/ethics-officer)

Thank you