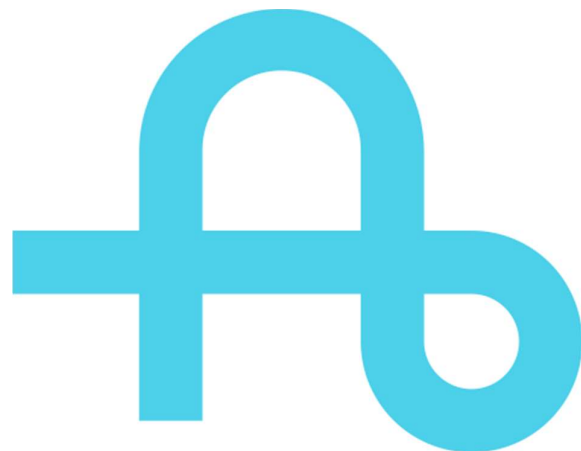# Policy Stakeholder Engagement Of the ASPI Group

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1. PREAMBLE AND OBJECTIVES OF THE POLICY

Autostrade per l'Italia Group ("the Group") has embarked on a path of transformation, in line with the Sustainable Development Goals set by the United Nations Agenda 2030, which integrates sustainability into its Business model and identifies it as a distinctive element of its Mission: "To make mobility increasingly sustainable, safe, innovative and efficient and to respond to the present and future needs of society and its communities."

The world of mobility is undergoing a revolution, and the Group is fully aware of its fundamental role in sustainable and innovative infrastructure development.

To this end, the Group works every day to achieve and ensure ever higher standards of safety for users and workers as well as to make the backbone of the country a model of quality, innovation and sustainability.

In light of this context, transparent inclusive and structured stakeholder dialogue and engagement is an essential commitment of the Group.

The Group operates in the full belief that environmental, social and governance goals, supported by technological innovation and digitalization, stimulate continuous improvement of business processes and results, fostering the creation of "shared value" for all stakeholders.

The Group's goal, therefore, is to create an integrated and inclusive community where the needs and expectations of various stakeholders are listened to, thus strengthening its positioning as an active and responsible leader in the industry.

In order to achieve the aforementioned objective and to promote sound and sustainable corporate governance, ASPI has decided to adopt this Stakeholder Engagement Policy (hereinafter "Policy"), which governs the constant dialogue and interaction with all stakeholders, further consolidating and strengthening the commitment and dialogue towards all stakeholders. The Group's Subsidiaries, while respecting their autonomy and independence, assess the applicability of this Policy by adopting its contents and adapting them, where necessary, to the peculiarities of their business, corporate governance and organizational structure, through a resolution of their respective Boards of Directors.

2. THE CONTEXT OF REFERENCE

2.1. External regulatory context

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

More specifically, this Policy is based on the European Sustainability Reporting Standards (ESRS 1 and ESRS 2) provided by the European Financial Reporting Advisory Group (EFRAG) in accordance with the Corporate Sustainable Reporting Directive (CSRD).

Specifically, ESRS 1 defines general reporting criteria, including the dual materiality analysis required to identify material issues for reporting and for which stakeholder involvement is necessary, while ESRS 2 requires companies to disclose key stakeholders, along with how they are to be involved and integrated into the definition of corporate strategy.

2.2. Internal regulatory context

ASPI and Group Subsidiaries have always recognized the importance of involving different categories of stakeholders in business processes.

Regarding the internal regulatory environment, this Policy is supplemented by the following documents:

- Corporate Bylaws;

- Group Code of Ethics;
- Chart of ESG Commitments;
- Organization, management and control model pursuant to Legislative Decree No. 231/2001;
- ASPI Group Integrated Management Systems Policy;
- HR Processes Policy;
- ASPI Group Anti-Corruption Guideline;
- ASPI Group Gender Equality & Inclusion Guideline;
- ASPI Group Principles of Control Process Procurement Guideline;
- ASPI Group Whistleblowing Management Guideline;
- ASPI Group Internal Control and Risk Management System (ICSRM) Guideline;
- ASPI Group Business Continuity Guideline;
- ASPI Group Enterprise Risk Management Guidelines;
- ASPI Group Internal Control System on Non-Financial Reporting Guideline;
- ASPI Group Information Security Guideline;
- ASPI Group Third Party Monitoring Guideline;
- ASPI Group Antitrust Compliance and Consumer Protection Guideline;
- Procedure Management of Customer Communications via the Web;
- Group Management Procedure Managing business interruption events and activating the Crisis Committee;
- Group Management Procedure corporate information to the market;
- ASPI Handbook of Integrated Management System for Quality, Road Safety, Environmental Protection, Labor Safety, Gender Equality, Anti-corruption, Information Security, Personal Data Protection and Cloud, Business Continuity and Energy.

Any additional documents of the company's regulatory system, where principles, methodologies and operating methods related to the interaction of ASPI and the Group's subsidiaries with the various stakeholders involved are hereby referred to.

3. SCOPE OF APPLICATION

This Policy applies to ASPI and the Group's direct and indirect subsidiaries, operating nationally and/or internationally, which are invited to adopt it by resolution of their respective Boards of Directors, respecting their prerogatives of autonomy and independence.

ASPI and the Group's subsidiaries undertake to disseminate the contents of this Policy and make it available to all stakeholders on the company intranet and on their respective institutional websites.

4. GENERAL PRINCIPLES

As established by the Group Code of Ethics, the Group works to maintain a constant and constructive dialogue with all stakeholders through:

- the promotion of sustainable business success and the creation of shared value;
- respect for the rights of people, communities and cultures;
- transparent, clear, timely, complete, and systematic communication about results, events, or circumstances relevant to investors and rating agencies (engagement with the financial community);
- transparent, traceable and impartial qualification and assessment processes through, among other initiatives, training, awareness and involvement of suppliers, contractors and subcontractors, in order to align their behaviour with the standards required by Autostrade per l'Italia, also integrating within the supply chain the principles of sustainability, improved performance and energy efficiency, evolving cyber threats and business continuity as well as the values of ethics and integrity. All this will also

allow for, establishing business relationships marked by the principles of loyalty, fairness, transparency and efficiency;

- constant innovation in activities with the goal of anticipating customer needs while adhering to high managerial and technical standards to ensure the security and integrity of infrastructure;
- compliance with current regulations on the protection of consumer interests and customer satisfaction;
- care of relations with representatives of institutions, safeguarding the integrity and reputation of the Group, in compliance with the principles of legality through a system of proxies and powers of attorney that identifies the corporate figures and functions in charge and authorized.

5. STAKEHOLDER INVOLVEMENT

5.1. Definition and objectives

In carrying out its activities, the Group relates to numerous categories of stakeholders such as all parties (internal and external) and institutions that are directly and/or indirectly affected by the organization's activities and results, or that actively influence the Companies' operations. Discussion and dialogue with stakeholders are of fundamental value to the Group, which, through various channels, guarantees the principles of transparency, fairness and good faith.

To ensure that stakeholder engagement is meaningful and effective, the Group is committed to ensuring that it is timely, accessible, appropriate, and safe for stakeholders by identifying and removing potential barriers to engagement for those stakeholders who are in positions of vulnerability or marginalization[1] .

The main categories of stakeholders are:

a. institutions;

b. investors and the financial community;

c. employees;

d. communities and territories;

e. customers;

f. providers.

With respect to each of the above categories, the Group is fully aware that the ability to listen, engage and respond effectively to their needs is an indispensable condition for success. This implies:

- improving the relationship with customers through an approach that reinforces their centrality with tangible investments in innovation and digitization;

- constant investment in the development and enhancement of internal resources, whose growth is critical to the excellence and resilience of the organization;

- The need to invest in an ethical and sustainable supply chain;

- the need to maintain active cooperation with agencies and institutions, extending efforts to local communities with specific projects as well.

In light of these considerations, the ultimate goal is to build an integrated community, where the needs and expectations of stakeholders are heard and met, both when these come through the tools provided by the Group and when they arise in connection with critical events or come from other channels.

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[1] See "OECD (2023), OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, OECD Publishing, Paris"; as well as "OECD (2018), OECD Guidance on Duty of Care for Responsible Business Conduct."

5.2. Engagement activities

For the management of engagement activities, the Group is committed to implementing an integrated approach, in governance and corporate strategy, to better strengthen the collaborative and trusting relationship with stakeholders. According to this approach, the different corporate structures dedicated to the analysis of instances are involved.

This approach consists of the following steps:

a. Stakeholder mapping;
b. Setting specific stakeholder engagement goals;
c. interaction with stakeholders.

5.2.1   Stakeholder mapping

The Group, in line with the reporting standards recalled in Section 2, updates its materiality analysis, identifying the most relevant material issues it has or could have on the economy, environment and people, including impacts on human rights.

The identification of the Group's list of material, priority, and representative issues is the result of a multi-step structured process that stems from a study of the context in which it operates, aimed at identifying the positive and negative impacts that affect it (actual) or could affect it (potential) along its value chain.

The following are the directions that define the context in which ASPI and Group Subsidiaries currently operate:

- **Socio - Cultural**: considers inputs of a value-based nature and related to the everyday life of all Stakeholders;

- **Scientific-Technological**: considers technical inputs in relation to changing trends in research and development;

- **Regulatory-Institutional**: considers legislative administrative and policy-making inputs;

- **Macroeconomic-Financial-Insurance**: considers economic-equity inputs;

- **Competitive-Market**: considers inputs from the availability of resources and skills in the market;

- **Corporate**: considers inputs related to organizational structure and everything related to operations and business;

- **Environmental-Territorial**: considers inputs related to environmental protection, including the Group's Net Zero strategy, the preservation of land and biodiversity, and community welfare.

With a view to effective planning of stakeholder engagement processes, the Group conducts, at least annually, a context analysis[2] in which it operates in order to update the mapping of stakeholders with whom to establish spaces for dialogue and listening.

Beyond these variables, Stakeholders are distinguished into:

a. internal: working for or participating in Group companies by exercising in its interest or even ensuring its day-to-day operations;

b. external: who, although not employed by the organization, are affected by its activities.

5.2.2   Modalities of dialogue and listening

The Group, recognizing the unique needs, interests and expectations of each category of stakeholders towards itself, is committed to identifying and analyzing priorities and expectations of each, customizing the related engagement processes.

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[2] The framework, where implemented, is formalized within the company's Integrated Management System Handbook.

This process fosters effective communication, careful information sharing and fruitful collaboration with strategic stakeholders.

Below, the main ways of involvement for each identified category are represented:

1. **_Institutions_**

   - collaborations and Memoranda of Understanding (*e.g.* INAIL, Legality Protocols, etc.);

   - joint working groups/participation in trade associations, cross-cutting all issues of sustainable mobility and infrastructure asset management;

   - Collaborations with universities, research centers, third-party companies;

   - Meetings with authorities, technical/institutional bodies, certification bodies;

   - meetings with institutions representatives at the European (Commission, EU Parliament), national (ministries, Parliament) and local (regions, municipalities) levels;

   - interlocutions with the Ministry of Infrastructure and Transport Grantor, including the National Agency for Safety of Railways and Road and Highway Infrastructure;

   - meetings with institutions, local community representatives, citizens, national and international industry associations (e.g., Confindustria, AISCAT, ASECAP, AIPCR, IBTTA, UNESCO, FIRE).

2. **_Investors and financial communities_**

   - *Price-sensitive* press releases and on periodic results;

   - Investor Relations structure dedicated to interacting with the financial community and investors and rating agencies through various channels (conference calls, meetings, road-shows, dedicated e-mail box, LinkedIn);

   - Dedicated section of the ASPI website also constantly updated with the publication of financial and non-financial reporting;

   - Interlocutions and business agreements with insurance companies;

3. **_Employees_**

   - performance management systems;

   - Organizational and HR systems aimed at active employee participation and value creation;
   - Training programs for the entire corporate population;

   - constantly updated digitized and inclusive communications channels (e.g., Intranext, Next TV, Autostrade informa, etc.);

   - negotiation and discussion tables with labor organizations;

   - reporting channels with guaranteed maximum protection for the reported person and the reporter (Ethics Office, Whistleblowing Platform);

   - reporting to supervisory bodies (e.g., Supervisory Board under Legislative Decree 231/2001);

   - audits and verifications.

4. **_Communities and Territories_**

   - conferences and press releases;

   - Internet sites and Social Network Partnerships with nonprofit associations, Foundation, NGOs in the area;

- Projects for the cultural and environmental enhancement of the area;

- Dedicated e-mail for noise discomfort reports from citizens;

- Environmental Observer websites with publication of environmental monitoring data.

5. ***Customers***

- service charter;

- Up-to-date, multichannel and inclusive viability information;

- call-center service and support;

- E-mail and web forms dedicated to customers for suggestions and complaints;

- single number for information and assistance;

- Social networks and websites (*e.g.,* Muovy);

- Internal structures assigned to customer management;

- Meeting committees and service charters;

- Dedicated apps for infoviability and accessibility services (Customer Centricity).

6. ***Suppliers***

- ANAC-certified procurement platform and also used as a communication channel of corporate initiatives to the supply chain;

- Supplier register platform for selection in competitive processes and qualification process;

- Open-es: Platform for engagement and monitoring of supply chain ESG performance through which supplier training and engagement initiatives are conducted (e.g. HS Workshop, Open-es Platform Training Workshop, Digital Vendor Day);

- Coordination and capacity building meetings (e.g., HSE Alliance);

- audits and verifications;

- Panel of suppliers selected for survey on sustainability issues;

- reporting channels with guaranteed maximum protection for the whistleblower and the reporter (Reporting Management Body, Whistleblowing Platform, voicemail box).

In addition to the activities listed above, interactions can also take place by stakeholder choice through the listening channels established by Group companies to report instances (e.g., complaints, whistleblowing) or to make proposals/comments.

The analysis of the results of stakeholder engagement activities and the insights gained for improvement enable the Group to optimize stakeholder engagement in line with its strategic objectives.

In order to build a relationship of trust with stakeholders, the Group constantly monitors the progress of its commitments to its stakeholders and verifies their quality in consultation with the parties involved.

5.2.3   Responsive engagement

Ongoing engagement with stakeholders should be two-way, conducted in good faith by participants on both sides and responsive to stakeholder opinions.

Should critical situations arise, stakeholder expectations and needs can change rapidly requiring a timely and targeted response to address their concerns and requests. In order to respond to specific issues raised in

critical situations and through channels other than institutional channels, a process of timely dialogue has been formalized, involving dedicated structures to resolve critical issues/reports that have arisen and any disputes also related to ESG ratings received by ASPI, with the aim of finding solutions that satisfy all stakeholders.

Identifying and using the most appropriate ways of responding to handle advanced instances, with particular reference to territories, investors, and ESG rating agencies, is the main objective of the responsive engagement process.

Below are some of the instances to which ASPI and the Group Subsidiaries are called upon to respond:

• objections/requests for explanations received for interventions and actions taken by ASPI and other Group companies;

• critical issues and emerging position calls in the press/social media to which you decide to respond;

• disputes attributed to ASPI and identified on the basis of publicly available information and data that could negatively impact ESG ratings.

If the application received highlights any of the above critical issues, a working table is initiated aimed at managing the risks and opportunities that have arisen.

The process of responsive engagement is embodied in the following steps:

1. Transposition and analysis of the instance in order to map:

    • the stakeholder category;

    • The subject matter of the petition and the merits of the petition;

    • The communication channel through which the application was received.

2. Identification of individuals, internal (in addition to the Risk Management Structure) and/or external, and Group Companies, if any, to be involved in the management of risks and opportunities related to the resolution of the instance.

3. Processing the response and sending it to the other party;

4. Possible formalization of additional channels of dialogue to prevent any further critical issues;

5. Archiving of documentation collected and produced with a view to traceability and transparency.

The above process and steps are adapted according to the specific needs and peculiarities of the submitted instances, with the aim of handling any critical situations in an effective and timely manner.

6. ROLES AND RESPONSIBILITIES

The roles and responsibilities of the various parties involved in the establishment of this Stakeholder Engagement Policy are outlined below, in line with the organizational system adopted by ASPI (including, the Articles of Association, the Board of Directors' Regulations and the regulations for the functioning of ASPI's Board's Internal Committees) and other Group Subisidiaries.

Board of Directors

With the support of ASPI's Environmental, Social and Governance & Health and Safety Committee, approve this document and any revisions to it of a non-formal nature, as well as any related repeal, and promote and support, as deemed appropriate, dialogue with the Company's stakeholders.

ASPI's Environmental, Social and Governance & Health and Safety Committee

Supports the Board of Directors in exercising the functions described above and, among other functions:

- examines and evaluates ESG guidelines and makes proposals to the Board of Directors that are useful for integrating ESG issues into the ASPI Group's business model, industrial plans and strategy, including through the analysis of related key performance indicators (KPIs);

- coordinates with each of ASPI's other Board's Internal Committees on issues of common interest;

- promotes and supports the dissemination of a culture of sustainability among employees, shareholders and, more broadly, stakeholders;

- monitors the alignment of the corporate governance system with legal regulations and national and international best practices on ESG and HS issues, making proposals to the Board of Directors;

- performs such additional duties as may be assigned to it by the Board consistent with the functions of the Committee.

ESG Management Committee

Makes any comments on this document and provides any useful guidance for the proper implementation of the stakeholder engagement process.

CEO of ASPI

- Proposes to the BOD the approval of this document, as well as any non-formal revisions to it and its possible repeal;

- It oversees the implementation on an ongoing basis of the provisions of this Policy, ensuring an organizational structure that is functional to the objective.

Institutional Affairs & Communication Department of ASPI

Ensures, in cooperation with ASPI's Legal Affairs and Compliance Department and Sustainability Structure, the definition of proposals for updating this Stakeholder Engagement Policy, guaranteeing specific awareness initiatives.

"CFO" Department - Sustainability Structure of ASPI

- Ensures, in collaboration with the relevant structures of ASPI's Institutional Affairs & Communication Department, relations with national and international Stakeholders, to promote and strengthen ESG identity and disseminate the initiatives implemented in the ESG area, coordinating the relevant structures on stakeholder engagement issues;

- Ensures the development of materiality analysis, consistent with corporate strategic objectives, regulatory developments and international standards, identifying areas of significance for the Company and Subsidiaries.

The roles and responsibilities described above are specific to the organs and functions of Autostrade per l'Italia S.p.A., while for subsidiaries reference is made to the relevant competent structures and organizational documents in force in the individual companies.

The Group's organization assigns the management of stakeholder relations to different corporate structures in relation to their area of responsibility.

Each structure is therefore responsible for the mode of engagement to be adopted depending on the context, the analysis of the instances received, and the evaluation of the results, in line with the principles and guidelines governed by this Policy.

In the event that the reference context requires a change in stakeholder engagement activities that are not in line with what is governed by this Policy, the structure in charge of stakeholder dialogue coordinates with the Institutional Affairs & Communication Department and/or ASPI's Sustainability Structure, with regard to

initiatives that have ESG impacts, thus ensuring a proper process that is in line with the requirements of monitoring, evaluating and coordinating activities at the Group level.

7. TRANSPARENCY AND ACCOUNTABILITY

The Group is aware of the importance of continuous and transparent dialogue with communities and key stakeholders directly and/or indirectly involved.

Transparency means internal and external reporting within and outside the Group with respect to opportunities for dialogue, discussion, initiatives, projects, and results achieved especially through the added value that the stakeholder engagement process has demonstrated so far.

To this end, the Group prepares a sustainability report integrated into the financial report in accordance with the CSRD.

The aforementioned document is prepared in accordance with the new European Sustainability Reporting Standards (ESRS), which require representing the impacts of business activities on sustainability from a dual materiality perspective, as well as the influence of these impacts on the business itself.

Transparency on engagement activities is also ensured through information posted on the website of ASPI and/or its subsidiaries, as well as through ad hoc events and webinars.

This document is published on the institutional website of ASPI and its subsidiaries, for the latter after evaluation according to the principle of "Comply or Explain" as described below in Section 8.

8. POLICY IMPLEMENTATION IN SUBSIDIARIES

The Subsidiaries, respecting their autonomy and independence, assess the applicability of this Policy in consideration of their own regulatory and organizational context, according to the principle of "Comply or Explain". Relevant communications are sent, stating the reasons, by the ICS Manager of the Subsidiary to ASPI's Business Integrity Structure and to the Group Internal Control System for the relevant fulfillment. In the case of *explain* for Policies approved by ASPI's Board of Directors, Group ICS makes communication to CCRAPC.

The Internal Control System (ICS) Manager is responsible for monitoring, with the support of the relevant Process Owner, the process of adoption and dissemination of this Policy within the Group Company to which it belongs.

Group Internal Control System (ICS) and Reporting of the Parent Company ensures that the dissemination of the Policy to the Subsidiaries is monitored.

The outline of the definition, implementation and monitoring of this Policy is given below:

Definition Policy	Execution	Monitoring	Follow-Up
ASPI	Subsidiary Company	ICS Manager Subsidiary Company with the support of the relevant Process Owner	Group Internal Control System (ICS) and Reporting of the parent company with the support of the relevant structures

9. HISTORY OF REVISION

Review	Notes	Date
00	*First issue*	7/11/2024

autostrade
per l'Italia