



ASTM GROUP

2022

SUSTAINABILITY REPORT

CONSOLIDATED NON-FINANCIAL
DISCLOSURE PREPARED PURSUANT
TO LEGISLATIVE DECREE 254/2016



#movingtothefuture

THE SUSTAINABILITY REPORT HAS BEEN TRANSLATED INTO ENGLISH SOLELY FOR THE CONVENIENCE OF THE INTERNATIONAL READER. IN THE EVENT OF CONFLICT OR INCONSISTENCY BETWEEN THE TERMS USED IN THE ITALIAN VERSION OF THE DOCUMENT AND THE ENGLISH VERSION, THE ITALIAN VERSION SHALL PREVAIL, AS THE ITALIAN VERSION CONSTITUTES THE OFFICIAL RECORD.

Cover photo: close-up of the Latte viaduct, A10 Savona-Ventimiglia, Italy

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LETTER TO STAKEHOLDERS



Dear Stakeholders,

The presentation of our Sustainability Report is an opportunity for me to reach out and take stock of the events of the previous year, describing - albeit in just a few lines - the commitment to sustainability adopted by every one of us at the ASTM Group as part of our daily work.

Sustainability has firmly taken root in our organisation both in Italy and abroad, representing a catalyst for growth, transformation and competitiveness.

This is the seventh edition of our Sustainability Report and we are continuing to add topics each year: from climate action to technological innovation, from diversity and inclusion to human rights, from environmental protection to corporate governance systems.

ASTM is a global player in the infrastructure sector with operations in Europe, Brazil and United States. We engage with a diverse range of stakeholders from across the world on a daily basis: employees and collaborators, suppliers, institutions, clients, motorway users and local communities.

And we feel a responsibility to each one of them to approach our business soundly and robustly. We are increasingly aware of the need to grow our responsibility to the community, and the actions we take to promote sustainable and inclusive development must meet the expectations of our stakeholders.

The economic and cultural evolution of modern society requires businesses that operate on the market to act not only as economic operators, but as a social institution. It is a new dimension, one that requires businesses to shoulder responsibility and drives us towards new horizons and increasingly ambitious targets. In response, we are investing in research to identify new technological solutions to improve transport and mobility, to develop increasingly green and sustainable infrastructure, and to play an active role in the modernisation of the countries in which we operate.

The pages that follow describe our activities and performance in 2022, with a view to representing the Group's commitment to an increasingly conscious and socially responsible approach to management.

In this regard, I'd like to highlight just some of the key elements that encapsulate our commitment. In particular, we continued our internal communication campaign aimed at engaging all of our employees on the topic of sustainability; we signed the Disability Agenda with the aim of promoting greater awareness of the issue and implementing

concrete initiatives to promote the inclusion of people with disabilities; when defining our emission reduction targets approved by the Science Based Targets Initiative (SBTi), we identified new initiatives to reduce Scope 1, 2 and 3 emissions; and finally, in 2022 ASTM was confirmed as a global leader in the fight against climate change by the Carbon Disclosure Project (CDP) in recognition of our actions to reduce emissions and mitigate climate risks.

These are just some of our achievements this year which, I hope, offer a clear representation of our way of doing business.

We want to create value. For the company and its shareholders, for employees and their families, for suppliers, for communities, for the regions in which we operate. To this end, we are constantly regenerating our approach to business, promoting an internal culture in which our actions are inspired by respect for people and the environment.

This is our aim. And it is this aim that we wish to be measured by, both with regard to ourselves and to our Stakeholders.

Umberto Tosoni

Chief Executive Officer

METHODOLOGICAL NOTE

This consolidated non-financial disclosure (“NFD” or “Sustainability Report”) of ASTM S.p.A. (“ASTM” or the “Company”) and its wholly consolidated subsidiaries (“ASTM Group” or “Group”) at 31 December 2022 in the Group’s Consolidated Financial Statements describes initiatives and main results in terms of sustainability performance relative to the period from 1 January to 31 December 2022 and complies with provisions in articles 3 and 4 of Italian Legislative Decree 254/2016 (the “Decree”). Any exceptions are expressly indicated in the text.

From 4 June 2021, the ordinary shares of ASTM are no longer traded on the market managed by Borsa Italiana. Nevertheless, ASTM, as an issuer of bonds traded on the Euronext Dublin, qualifies as an “entity of public interest” pursuant to art. 16 of Italian Legislative Decree 39/2010 and is subject to the obligation to prepare and publish the NFD pursuant to Italian Legislative Decree 254/2016.

As required by Article 5 of the Decree, this document is a separate report, as indicated, with specific wording referring to Consolidated Non-Financial Disclosure as required by law.

The NFD, to the extent necessary to ensure an understanding of a business’s activities, its performance, results and the impact it produces, covers environmental, social and personnel issues, respect for human rights, and the fight against active and passive corruption, which are significant for the company’s activities and characteristics, and for the expectations of its Stakeholders, as shown in the materiality matrix in this report in the section “Stakeholder Map and Materiality Analysis”.

Furthermore, this document includes information relating to climate change, the European Taxonomy (EU Regulation 2020/852, June 2020), the boundary and quality of data, and thematic areas considered of particular importance for the 2022 non-financial reporting by the European Securities and Markets Authority (ESMA) in the document “European common enforcement priorities for 2022 annual financial reports” published on 28 October 2022. With reference to the reporting obligations outlined by EU Regulation 2020/852 (the Taxonomy Regulation), please refer to the section “The European Regulation on the Taxonomy of

Sustainable Economy Activities” in this document.

This Sustainability Report has been prepared in accordance with the GRI Sustainability Reporting Standards, published by the Global Reporting Initiative (GRI) in 2021, based on the “in accordance” option. To provide more information on the financial impacts of sustainability issues, also for the benefit of investors, SASB (Sustainability Accounting Standards Board) standards and the framework of the International Integrated Reporting Council (IIRC) were also considered.

The “GRI Content Index” and the “Table of SASB indicators” are annexed to this document, with details of the respective indicators used. For the preparation of the Sustainability Report, reference was made to the “Ten Principles” of the United Nations Global Compact (UNGC), ISO 26000 (International Organization for Standardization) and Guidelines on Non-Financial Reporting of the European Commission.

Regarding the main changes to the scope of consolidation for the NFD as at 31 December 2022, the following is reported:

- during the year the two Brazilian companies EIL 05 S.A. and EIL 06 S.A. were established, in which the EcoRodovias Group holds 100% of the share capital;
- in May, the company Sinprosyst S.c.ar.l. was established, in which the subsidiary Sina S.p.A. holds a 60% stake in the share capital;
- following the conclusion of the liquidation process, the subsidiaries Sicurstrada S.c.ar.l. and Seranti S.c.ar.l. were removed from the companies register;
- during the year the two Brazilian companies ICCR-135 S.A. and ICCR-153 S.A. were established, both controlled by Itinera Construcoes Ltda;
- during the year the Joint Venture Halmar-Railworks, the vehicle through which Halmar International participates in the Penn Station Access project, was established.

The non-financial data and information reported in

this document relating to the companies that were introduced into the reporting boundary during the year, unless specified otherwise, refer to the period beginning on the date of acquisition of control of the company.

Please note that in the comparative analysis between the data for FY 2022 and FY 2021, the data for 2021 of the companies of the SITAF Group and the EcoRodovias Group refer to the period from the date of acquisition of control, i.e., from 1 April and 1 December respectively.

As regards the scope of consolidation of the ASTM Group, data on joint operations are reported in full without taking into consideration the percentage held, and also presented separately in order to allow for a wider understanding of the Group's activities, its performance, results and the impact it produces. Additionally, data relative to manual workers includes those associated with unions and on the payroll of the Halmar Group (Union Workers) at 31 December 2022, regardless of the number of hours worked during the reference period.

To compare data and information over time and assess the trend of Group operations, a comparison with the previous year has been made, where possible. Information on actions taken in previous years that still apply to Group operations is also included.

As provided for by the GRI Standards and in line with previous years, ASTM updated the materiality analysis, taking into consideration the topics provided for under article 3 of the Decree, with a view to identifying the so-called "material" sustainability topics. The results of the materiality analysis, examined beforehand by the Sustainability Committee and the Audit and Risk Committee, were presented to the Board of Directors on 23 November 2022.

It was also considered appropriate to compare the significant issues identified by the Group's materiality matrix with those identified by the main peers in the reference sectors in order to ensure a broader perspective.

Starting with the issues considered significant and considering the areas covered by the Decree, an analysis was carried out of the risks deriving from the Group's activity, services/products, including information about supply chain and subcontractors where relevant and available. As described in more depth in the section "Corporate Governance, Internal Audit and Risk Management System", to which reference is made for details, ASTM and its main operating subsidiaries have adopted a Risk Management System in line with best practices defined by the Enterprise Risk Management Integrated Framework (COSO ERM) and the ISO 31000 standard.

In 2021, ASTM strengthened its commitment to the fight against climate change by defining objectives and initiatives to reduce greenhouse gas emissions by 2030, approved by the Science-Based Targets initiative (SBTi) and integrated into its financial strategy, by publishing the first Sustainability-Linked Financing Framework. In this context, in November 2021, Sustainability-Linked Bonds were issued for € 3 billion.

The ASTM Group ratified the ESG commitments adopted in the 2022-2026 Sustainability Plan approved by the Board of Directors of ASTM S.p.A. in July 2022, the update to the first Sustainability Plan "Going Global Sustainably" 2017-2021. The actions taken by the Group with reference to various sustainability topics are summarised below.

¹ The main operating subsidiaries of ASTM S.p.A. include: A.T.I.V.A. S.p.A., Autostrada Asti-Cuneo S.p.A., Autostrada dei Fiori S.p.A., Società Autostrada Ligure Toscana p.A., S.A.T.A.P. S.p.A., S.A.V. S.p.A., S.I.T.A.F. S.p.A., Società di Progetto Autovia Padana S.p.A., Itinera S.p.A., EcoRodovias Infrastruttura e Logistica S.A., Euroimpianti S.p.A., Sinelec S.p.A., S.I.N.A. S.p.A.

GOVERNANCE AND THE FIGHT AGAINST ACTIVE AND PASSIVE CORRUPTION

With a zero-tolerance approach towards any form of active and passive corruption, ASTM and its main operating subsidiaries have adopted an anti-corruption policy in line with the applicable best practices and national and international standards, also activating a dedicated internal channel to report offences or irregularities identified during work activities (whistleblowing).

ASTM S.p.A., Itinera S.p.A., Sinelec S.p.A., Tubosider S.p.A., Ecorodovias Infraestrutura e Logística S.A. and Ecorodovias Concessões e Serviços S.A. have voluntarily implemented an anti-corruption management system certified in compliance with international standard ISO 37001.

ENVIRONMENT

The ASTM Group is committed to pursuing solutions that can guarantee protection of local areas, a responsible use of natural resources, efficient energy consumption, the management of atmospheric emissions and protection of biodiversity.

Since 2018, ASTM has been a member of the CDP Climate Change (former Carbon Disclosure Project) Programme and in 2022 it was confirmed to be a global leader in the fight against climate change, achieving a rating of A-.

To strengthen the Group's climate strategy, ASTM has aligned with Task Force on Climate-Related Financial Disclosures (TCFD) recommendations, providing clear and comparable information to stakeholders on risks and opportunities associated with climate change.

In the context of defining the emission reduction objectives approved by the Science-Based Targets initiative (SBTi), initiatives to reduce Scope 1, 2 and 3 emissions were identified. In particular, Group companies contribute to the protection and safeguarding of the environment by promoting the electrification of the motorway network, energy efficiency initiatives (use of work sites with a reduced environmental impact, efficient lighting systems on motorways through increased use of LED lighting), protecting biodiversity and noise abatement

plans for motorways, promoting the adoption of these policies also by subcontractors.

SOCIAL ASPECTS

Social issues have always been a key value and strategic objective of the ASTM Group, which is committed daily to ensuring, through its licensee companies, road safety and service quality, promoting solutions to improve motorway infrastructure and user satisfaction.

The quality, safety and environmental management systems are periodically updated, based on newly issued ISOs, maintaining all existing certifications, including ISO 39001 (Road Traffic Safety (RTS) Management).

The Group's concessionaires are continuing their investment plans for the resilience of the infrastructure and the safety of motorway users, including through the use of new technologies. The main licensee companies of the Group implemented a customer experience programme intended to improve services to users.

PERSONNEL

The ASTM Group has adopted policies and initiatives to empower its human capital, with a particular focus on employees' health and safety, company welfare, diversity and inclusion.

ASTM and its main operating subsidiaries have implemented a Diversity and Inclusion Policy. They have also launched a talent policy based on an integrated human capital management system and employee training and development programmes, in order to create a shared company culture based on expertise and innovation.

RESPECT FOR HUMAN RIGHTS

The Group recognises the intrinsic value of each person and endeavours to ensure that human rights are respected along the entire value chain, promoting equal opportunities without any type of discrimination and encouraging the accessibility of services for use by persons with reduced mobility.

To strengthen its commitment in this area, ASTM and its main operating subsidiaries have adopted a Human Rights Policy, which supplements the Group's Code of Ethics, Suppliers Code of Conduct and other sustainability policies.

ASTM S.p.A., Itinera S.p.A., Euroimpianti S.p.A., Tubosider S.p.A. and Ro.S.S S.p.A. implemented a Social Responsibility management system with SA 8000 certification.

Where possible, the use of estimates in this document has been limited and if present, estimates are indicated. Estimates are based on the best available information.

The reporting on the impact of Group operations on the local area and relative external factors in terms of value created and distributed, contained in the section "Impact Measurement" in this document, is not based on Global Reporting Initiative reporting standards, but on the use of an econometric input-output model. This model statistically analyses the interaction between a country's indus-

tries, making it possible to further understand the economic context in which a business operates.

The Board of Directors of ASTM S.p.A. approved this Sustainability Report on 23 March 2023.

This document was subject to a limited assurance engagement, as defined by ISAE 3000 Revised, by PriceWaterhouseCoopers S.p.A., the firm also appointed to audit the ASTM Group's Annual Financial Report. This engagement was carried out according to procedures in the "Independent Auditors' Report" included at the end of the document.

The Sustainability Report of the ASTM Group as at 31 December 2022 is available on the Company's website www.astm.it/en in the section "Sustainability".

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www.astm.it/sostenibilita

01



THE ASTM GROUP AND SUSTAINABILITY

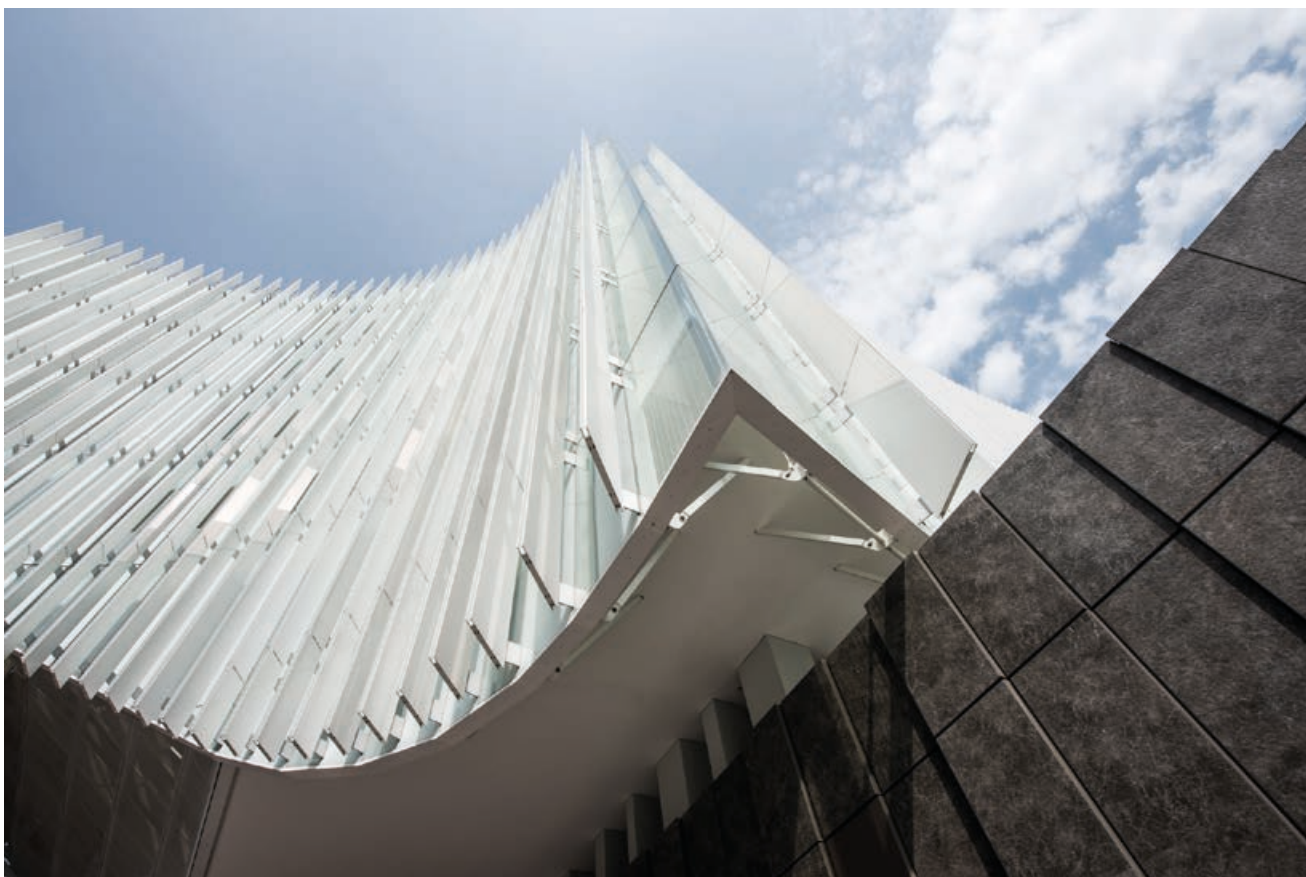
- 10 The ASTM Group
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THE ASTM GROUP

CORPORATE OWNERSHIP AT 31 DECEMBER 2022

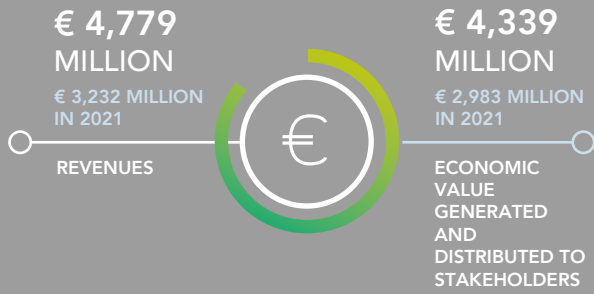
ASTM S.p.A. is a company with headquarters at Corso Regina Margherita 165, Turin.

As at 31 December 2022, Nuova Argo Finanziaria S.p.A. - Subsidiary of Aurelia (50.5%), holding company of the Gavio Group, and an investee company of Ardian (49.5 %) through Mercure Investment and Mercure Holding 2 - holds an equity investment equal to 85.40% in ASTM, while the remaining 14.60% is represented by treasury shares.



HIGHLIGHTS 2022 ASTM GROUP

OUR RESPONSIBILITY TOWARD LOCAL AREAS



€ 1,305 MILLION
 € 813 MILLION IN 2021
 EBITDA*

* Data from the ASTM Group 2022 Management Report

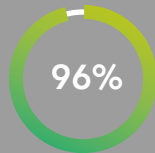
OUR RESPONSIBILITY TOWARDS THE ENVIRONMENT



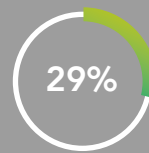
OUR RESPONSIBILITY TOWARDS PEOPLE

17,474
 EMPLOYEES AND OTHER COLLABORATORS
 16,975 IN 2021

13,072
 EMPLOYEES
 12,975 IN 2021



97% IN 2021
 EMPLOYEES WITH PERMANENT CONTRACTS



27% IN 2021
 FEMALE EMPLOYEES



OVER 119K IN 2021
 HOURS OF TRAINING FOR EMPLOYEES

SUSTAINABILITY INDICES AND RATINGS



Rating **A-**



Standard Ethics Rating **EE** (Strong)
 Outlook **EE+** (Very strong)



Rating **11.1**
 (Low risk)



Rating **A**
 (Average)

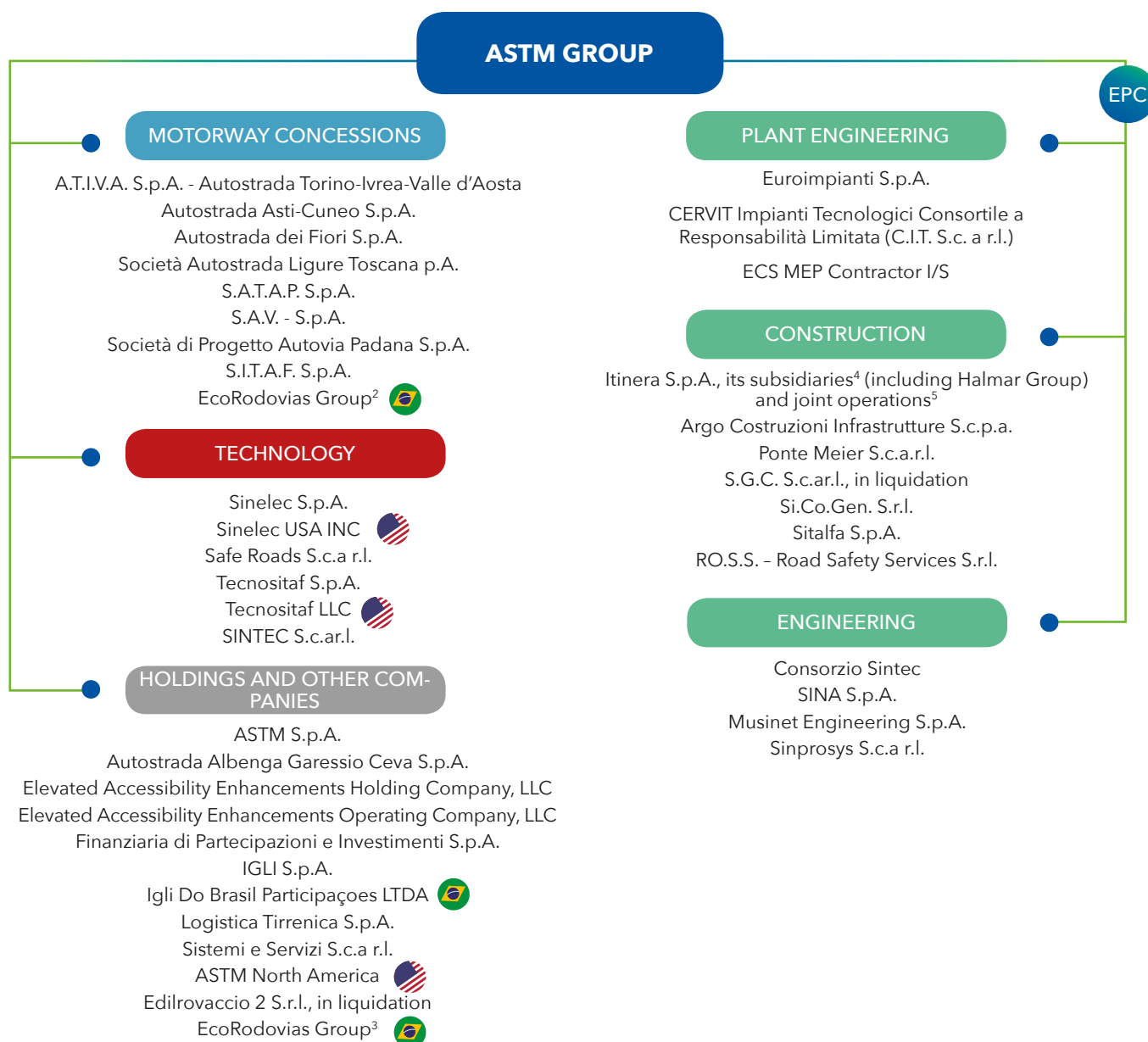
ASTM receives "MF Best ESG Rating Award"



[Read the news story](#)

GROUP STRUCTURE AND BUSINESS SEGMENTS AT 31 DECEMBER 2022

The companies consolidated on a line-by-line basis in the Consolidated Financial Statements of the ASTM Group at 31 December 2022 and included in the scope of NFD reporting are listed below.



² Concessionária das Rodovias Ayrton Senna e Carvalho Pinto S.A. – Ecopistas, Concessionária Ecovias do Araguaia S.A., Concessionária, Ecovias do Cerrado S.A., Concessionária Ecovias dos Imigrantes S.A., Concessionária Ponte Rio-Niteroi S.A. – Ecoponte, Eco050 – Concessionária de Rodovias S.A., ECO101 Concessionária de Rodovias S.A., Eco135 Concessionária de Rodovias S.A., Empresa Concessionária de Rodovias do Sul S.A. – Ecosul, RDC Concessões, EIL05 S.A, EIL06 S.A, Ecoriominas Concessionária de Rodovias S.A., CECM Concessões.

³ Anish Empreendimentos e Participações Ltda, Argovias Administracao e Participações S.A, Ecopatio Logistica Cubatao Ltda, Ecoporto Santos S.A., Ecorodovias Concessões e Serviços S.A., EcoRodovias Infraestrutura e Logística S.A., EIL 04 S.A., EIL01 Participações S.A., ELG 01 Participações Ltda, Holding do Araguaia S.A., Paquetá Participações Ltda, Termareis - Terminais Marítimos Especializados Ltda

⁴ Subsidiaries of Itinera S.p.A.: ITINERA CONSTRUÇÕES LTDA, ICCR 135 S.A., ICCR 153 S.A., ITINERA S.p.A., Agognate S.c.ar.l. in liquidation, BIANDRATE S.c.a r.l. in liquidation, Cornigliano 2009 S.c.a r.l., Crispi S.c.ar.l. with sole shareholder in liquidation, CRZ01 S.c.ar.l. in liquidation, Diga Alto Cedrina S.c.a r.l. in liquidation, Lambro S.c.a r.l., Marcallo S.c.a r.l., MAZZÈ S.c.a r.l., Ramonti S.c.a r.l. in liquidation, Società Attività Marittime S.p.A. (SAM S.p.A.) in liquidation, Sinergie S.c.ar.l. in liquidation, Taranto Logistica S.p.A., Torre di Isola S.c.a r.l., Urbantech S.r.l. with sole shareholder, SEA Segnaletica Stradale S.p.A., Lanzo S.c.a.r.l., ITINERA USA CORP, Halmar International LLC, HIC Insurance Company Inc., Halmar International Trucking Inc., Halmar Transportation System Llc, Halmar/A Servidone - B Anthony Llc, Atlantic Coast Foundations LLC, Halmar International LLC/LB Electric Co JV, Potomac Yard Constructors JV, HINNS JV, Storstroem Bridge JV I/S, Tubosider S.p.A., Roma Sud S.c.a r.l., Società di Progetto Concessioni del Tirreno S.p.A., Ashlar Structural LLC

⁵ Joint operations in which Itinera S.p.A. is an investee: JV Itinera Cimolai, Consorzio Baixada Santista, Consorzio Alças da Ponte, MG-135 Consortium, Odense HPT JV I/S, KØGE HPT I/S, Itinera Ghantoot JV, 3RD Track Constructors - Joint Operation, Cons. Binario Porto de Santos, Itinera-Agility JV, Consorzio BR-050, Consultoria - Eco 135, Consorzio SP-070, Consorzio PSG, Consorzio nn Engenharia e Consultoria, Consultoria - Novos Negócios, TELT SEP JV, Halmar/RailWorks, a Joint Venture

MOTORWAY CONCESSIONS

ASTM has long-standing experience in the development, funding, management and maintenance of road and motorway infrastructure. The Group is now the second operator in the world for toll-motorway management with around 6,200 km of network in Italy, Brazil and the United Kingdom. In particular, the Group manages a network of approximately 1,415 km in Italy and is the largest operator in the north-west of the country, one of Europe’s wealthiest areas per capita. Through EcoRodovias, one of Brazil’s main infrastructure players, the Group manages around 4,700 km of network in the country. Lastly, the Group operates in the United Kingdom through its equity investment in Road Link, which manages approximately 85 km of network between Newcastle and Carlisle.

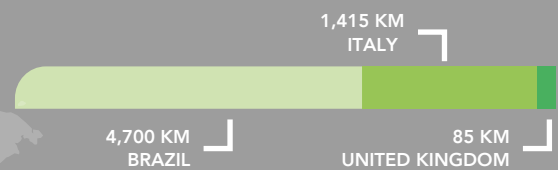
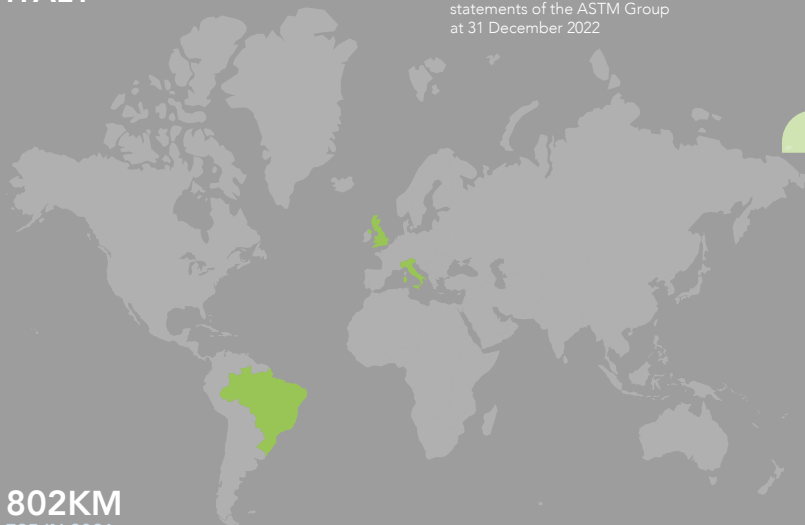
ONE OF THE LEADING PRIVATE INVESTORS IN TRANSPORT INFRASTRUCTURE IN ITALY

€ 3.5
BILLION
REVENUE IN 2022*
€2 BILLION IN 2021



*Source: Consolidated financial statements of the ASTM Group at 31 December 2022.

5,810
EMPLOYEES
5,569 IN 2021



6,200 KM⁶
MOTORWAY NETWORK
IN ITALY, BRAZIL AND THE
UNITED KINGDOM

802KM
795 IN 2021
OF DRAINING/SOUND-ABSORBING
ROAD SURFACES EQUAL TO
AROUND 62% OF THE MOTORWAY
NETWORK MANAGED IN ITALY

€ 1,304
MILLION

INVESTMENTS
IN MOTORWAY
ASSETS
2022



€ 608
MILLION
2021

165KM
157 IN 2021
OF NOISE BARRIERS

⁶ Motorway network entirely managed by ASTM through the subsidiaries, jointly held subsidiaries and associated companies

THE ITALIAN MOTORWAY NETWORK



THE ITALIAN MOTORWAY NETWORK

OUR MOTORWAY LICENSEE COMPANIES ⁷

S.A.T.A.P. S.p.A.

The motorway company S.A.T.A.P has the concession to manage the following motorway stretches:

- A4 Torino-Milano (130 km)
- A21 Torino-Piacenza (168 km).⁸

Autostrada dei Fiori S.p.A.

The company Autostrada dei Fiori has the concession to manage:

- the stretch of motorway from Savona to Ventimiglia (A10), with an overall length of 113 km⁸;
- the 131 km stretch of the Torino-Savona motorway (A6).

Società Autostrada Ligure Toscana - SALT p.A.

The motorway company SALT has the concession to manage the following motorway stretches:

- A12 Sestri Levante-Livorno; Viareggio-Lucca; Fornola-La Spezia for a total of 155 km⁸;
- A15 La Spezia-Parma for a total of 182 km, of which 81 km under construction.

Società Autostrade Valdostane - S.A.V. S.p.A.

The motorway company S.A.V. has the concession to manage the A5 motorway stretch from Quincinetto to Aosta Ovest and the A5 SS27 junction of the Gran San Bernardo road tunnel (A5) for a total 60 km.

Autostrada Asti-Cuneo S.p.A.

The company Autostrada Asti-Cuneo has the concession to manage the stretch of the Asti-Cuneo

motorway (A33), comprising two stretches totalling 70.6 km.

Autovia Padana S.p.A.

The company Autovia Padana has the concession to manage the Piacenza-Cremona-Brescia stretch of the A21 motorway, for approximately 100 km and a further 11.5 km under construction, as well as the Fiorenzuola d'Arda branch, which connects the A21 with the Milano-Bologna motorway (A1).

The company is also appointed to manage the Ospitaletto-Montichiari motorway link for a further 17 km, on a separate and temporary basis, on behalf of ANAS.

A.T.I.V.A. S.p.A.⁸

A.T.I.V.A. has the concession to manage the Torino-Quincetto and Ivrea-Santhià (A5) motorways, the Tangenziale di Torino (Torino bypass) and the Torino-Pinerolo motorway for a total 156 km. The company is also in charge of the planning, construction, management and operation of all potential related completions, forks and ring roads.

S.I.T.A.F. S.p.A.

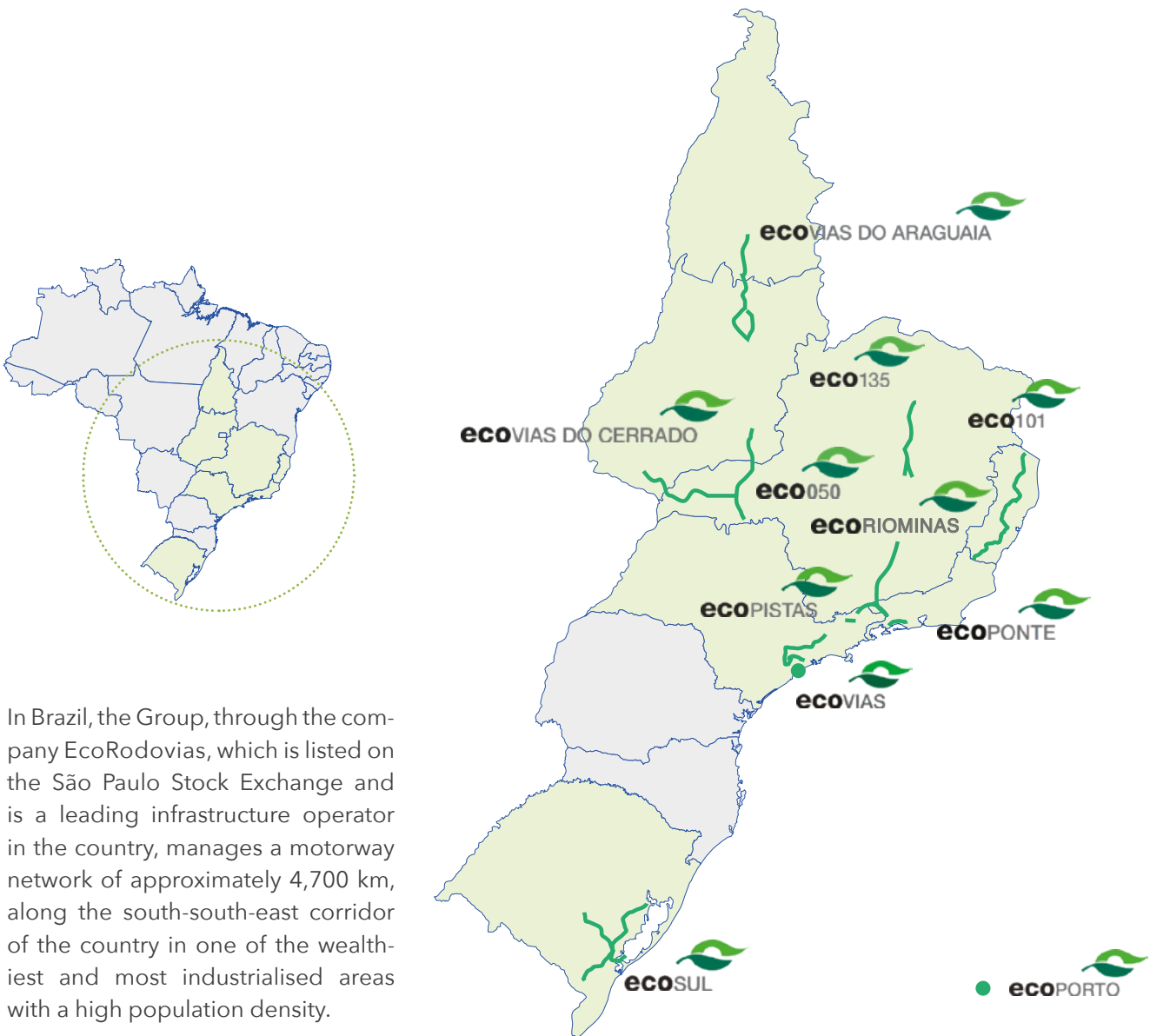
The company S.I.T.A.F. has the concession to manage the Torino-Bardonecchia motorways (A32) and Frejus Tunnel (T4) for a total 94 km.

ASTM also holds an interest in the following licensee companies: Tangenziale Esterna S.p.A., the company managing the Tangenziale Esterna di Milano (Milan bypass) (32 km), Società Italiana Traforo del Gran San Bernardo S.p.A. (13 km) and the Newcastle-Carlisle motorway section in the United Kingdom (84 km).

⁷ Directly controlled

⁸ A management "extension" has been granted, pending a new concessionaire. The A12 and A10 concession has been reassigned to an ASTM Group companies and will last 11 years and 6 months from the takeover date

THE BRAZILIAN MOTORWAY NETWORK

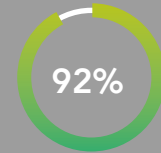
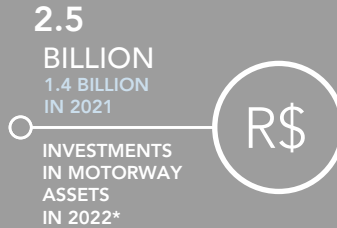
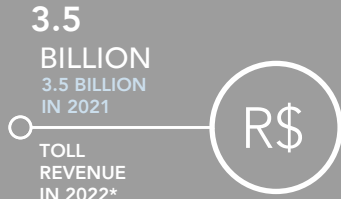


In Brazil, the Group, through the company EcoRodovias, which is listed on the São Paulo Stock Exchange and is a leading infrastructure operator in the country, manages a motorway network of approximately 4,700 km, along the south-south-east corridor of the country in one of the wealthiest and most industrialised areas with a high population density.

EcoRodovias controls the following licensee companies:

- Ecovias dos Imigrantes, which connects São Paulo to Porto de Santos (177 km)
- Ecopistas, which connects São Paulo to Vale do Rio Paraíba (144 km)
- Ecosul, which connects Pelotas, Porto Alegre and Porto Rio Grande (457 km)
- Ecoponte, which connects Rio de Janeiro and Niteroi (29 km)
- Eco050 (MGO), which connects Cristalina (Goiás) to Delta (Minas Gerais) (437 km)
- Eco135 Montes Claros (Minas Gerais) (364 km)
- Eco101, which crosses 25 municipalities in the State of Espírito Santo (479 km)
- Ecovias do Cerrado, which connects Jataí to Uberlândia (437 km)
- Ecovias do Araguaia, which connects Aliança do Tocantins to Anápolis (851 km)
- Noroeste Paulista, which connects São José do Rio Preto, Araraquara, São Carlos and Barretos (601km)
- EcoRioMinas, which connects Rio de Janeiro to Governador Valadares (727km)

ECORODOVIAS



EMPLOYEES TRAINED
ON BUSINESS ETHICS AND
ANTI-CORRUPTION PRACTICES

90.9% IN 2021

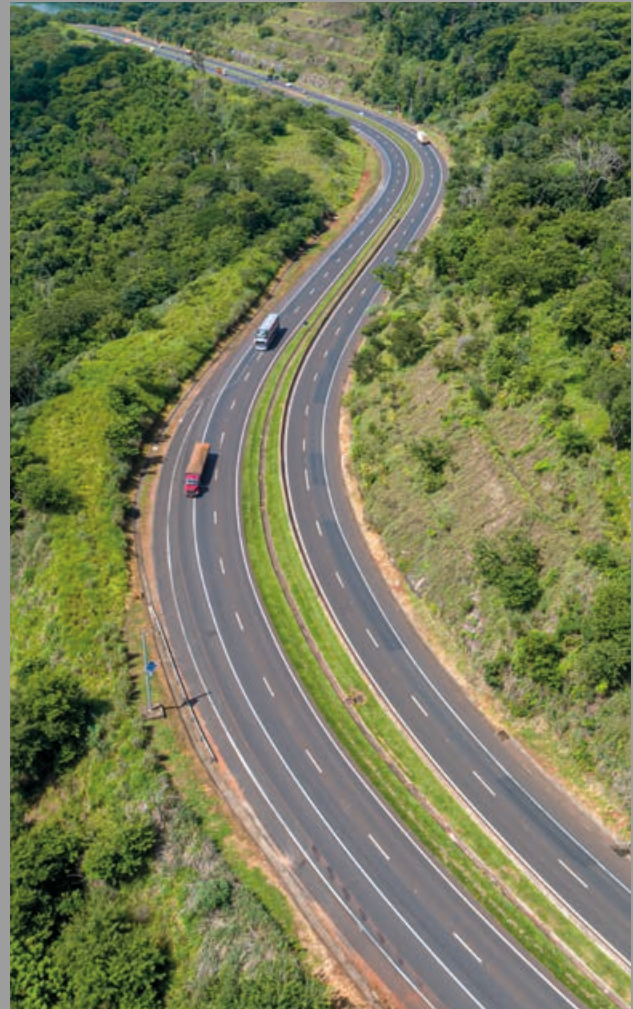
*FY 2022 Data from the ASTM Group 2022 Management Report

EcoRodovias, a company listed on San Paulo's B3 Novo Mercado, and leader in Brazil in the construction and management of motorway infrastructure. For the past several year the EcoRodovias Group has been publishing its own Sustainability Report that is certified by an independent auditor.

All the EcoRodovias Group's operating motorway concessions have obtained ISO 9001, ISO 14001, ISO 45001 and ISO 39001 certifications, except for Ecovias do Araguaia and EcoRioMinas.

Additionally, Ecorodovias Concessões e Serviços obtained ISO 37001 certification.

For further information please refer to the Company's website at www.ecorodovias.com.br



SUSTAINABILITY INDICES AND RATINGS



Score B



Score A



For the 12th
consecutive year



For the 2nd
consecutive year

EPC

In the Engineering, Procurement and Construction (EPC) sector, ASTM works through its subsidiaries Itinera, S.I.N.A. and Euroimpianti.

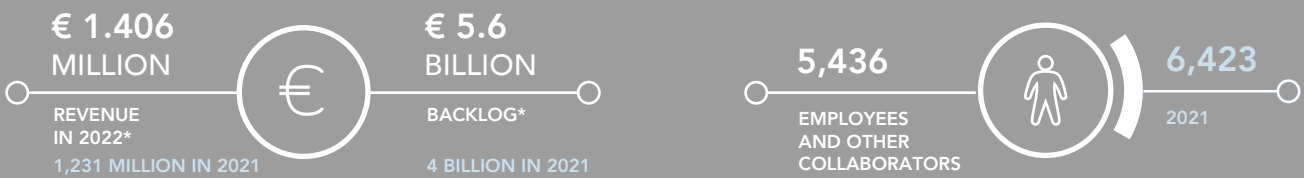


*Source: Consolidated financial statements of the ASTM Group at 31 December 2022

CONSTRUCTION

The ASTM Group operates in the construction sector through Itinera, an international developer of major infrastructure and civil and industrial engineering projects. Itinera is one of the largest Italian companies in the sector for its expertise, know-how, revenues and backlog and offers its global customers quality and innovative solutions. The Company operates all over the world (Europe, Africa, the Middle East, South America and the United States), in road and railway infrastructure, underground works, ports, airports, hospitals and motorway maintenance.

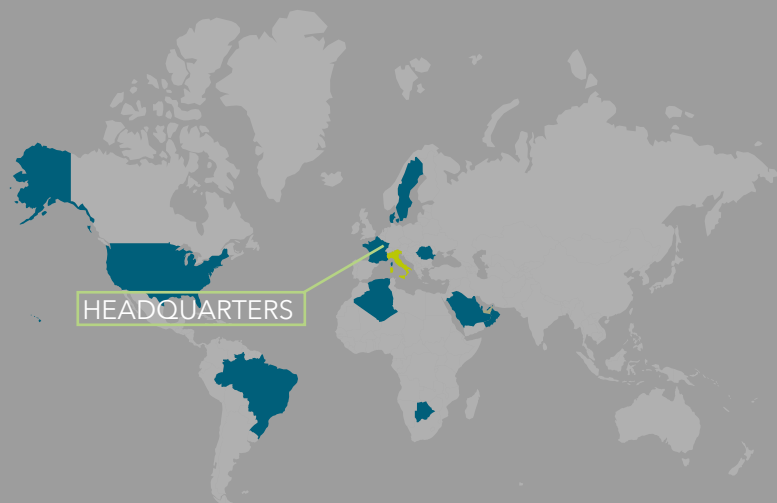
The Itinera Group



* Data from the ASTM Group 2022 Management Report

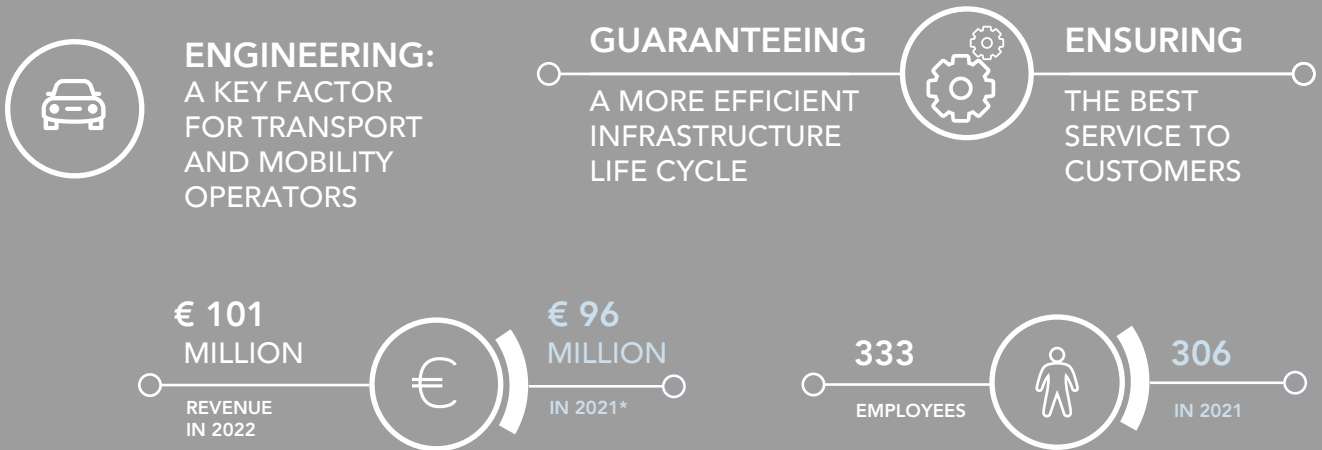
WHERE WE ARE IN THE WORLD:

- ABU DHABI
- SAUDI ARABIA
- BOTSWANA
- BRAZIL
- DENMARK
- DUBAI
- FRANCE
- ITALY
- KUWAIT
- OMAN
- ROMANIA
- SWEDEN
- USA



ENGINEERING

ASTM operates in the engineering sector through its subsidiary S.I.N.A., which boasts an international track record specialised in the auditing of tunnel safety and surveillance systems, the control and inspection of infrastructure of works, as well as environmental monitoring activities.



*IAS IFRS data at 31 December 2022 including intercompany relations

PLANTS

Euroimpianti is the Group company that manages plant engineering projects in captive and extra-captive markets. Its main activities involve the planning, development and maintenance of high technology systems.



* Data from the ASTM Group 2022 Management Report

TECHNOLOGY

ASTM operates in technology applied to mobility and road infrastructure through Sinelec, a company specialised in electronic tolls and Intelligent Transportation Systems (ITS). The company is a leader in the study, design, implementation and maintenance of advanced technology solutions for optimised and safe management of traffic and operations in the road ecosystem.



*IAS IFRS data at 31 December 2022 including intercompany relations

PURPOSE, MISSION AND VALUES

TO CONTRIBUTED TO THE **GROWTH, SUSTAINABILITY AND DEVELOPMENT** OF THE **REGIONS IN WHICH WE OPERATE OUR INFRASTRUCTURE**

OUR PURPOSE

MISSION

To provide the best possible service to our clients through safe and secure infrastructure and innovative, robust and sustainable solutions.

OUR VALUES

Our work is based on the respect of certain ethics that must inspire our every action and conduct. The Values that underpin our actions are rooted in the concepts of lawfulness, integrity, responsibility and transparency.



SUSTAINABILITY FOR THE GROUP

ASTM undertakes to operate responsibly and to integrate sustainability into its business model.

THE CORNERSTONES OF SUSTAINABILITY FOR THE GROUP ARE:



SPREADING A SUSTAINABILITY CULTURE

To support cultural change, involvement and the organisational well-being of employees, the internal communication process continued in 2022 with the aim of disseminating and fully making use of sustainability initiatives. Furthermore, to strengthen a corporate culture based on shared values and to promote the Group's pillars of strategic responsibility, the ASTM Sustainability Unit has promoted an employee training programme on important ESG topics and the relative policies adopted.

STAKEHOLDER MAP AND MATERIALITY ANALYSIS

The Group undertakes to identify and establish open and transparent dialogue with its Stakeholders, i.e., all parties of any kind that contribute to the Group's activities or are influenced by them. A section dedicated to Stakeholder Engagement was created on the ASTM website, which describes, among other things, the expectations and methods of engagement for each stakeholder and a number of completed projects. The figure shown below illustrates the Group's main stakeholders, identified by way of an analysis of the reference sector and discussion with the participants of the Group's materiality workshop.

To identify the material topics to be discussed in

the NFS, the Group updated its materiality analysis in line with international guidelines (Sustainable Development Goals, Global Compact, OECD Guidelines for Multinational Enterprises), reference standards and frameworks (AA1000 Stakeholder Engagement Standard, Reporting Principles of the GRI Standards, recommendations of the Task Force on Climate-related Financial Disclosures) and Italian Legislative Decree no. 254/2016), ASTM has defined its own materiality analysis. Through this analysis, the Group identified the material topics associated with the organisation's most significant impacts on the economy, the environment and people, including the impact on human rights.



As part of the materiality analysis, ASTM carried out the following actions:

- stakeholder identification based on previous data;
- identification of material topics for the reference sector. As there is not yet a specific GRI Sector Standard, in addition to the requirements of Italian Legislative Decree no. 254/2016 the Group also considered the SASB (Sustainability Accounting Standards Board) standards;
- in line with previous years, specific stakeholder engagement activities were carried out. Specifically, specific workshops were held on 20 and 27 September 2022, involving around 100 internal stakeholders representing all of the Group's business areas in Italy and abroad;
- an online survey aimed at a representative sample of all external stakeholder categories was held, involving representatives from the supply chain, employees and trade union associations, customers and clients, universities and research centres and the media. The survey was also sent to an extended sample of

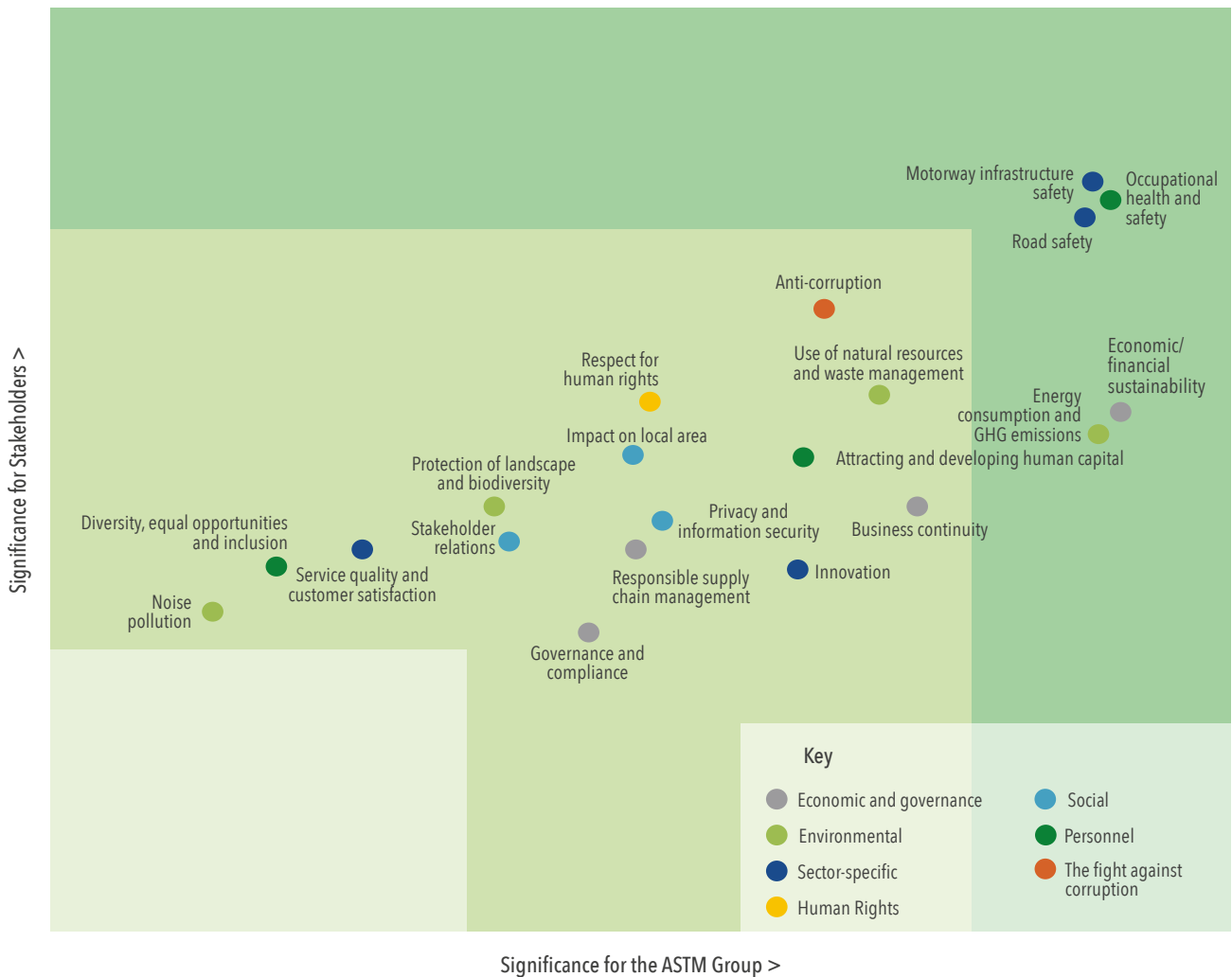
motorway users who gave their consent to be contacted. In total around 80 responses were received;

- identification and prioritisation of the main impacts associated with the material topics identified;
- prioritisation of sustainability topics based on the priorities assigned to the various impacts;
- updating of the materiality matrix.

The results enabled the materiality matrix to be updated, as presented below. The materiality analysis, examined beforehand by the Sustainability Committee and the Audit and Risk Committee, was presented to the Board of Directors on 23 November 2022.

This year road safety, motorway infrastructure safety, occupational health and safety and anti-corruption are once again some of the most important sustainability issues for the Group. Meanwhile, the use of natural resources, waste management, economic and financial sustainability, energy consumption and greenhouse gas emissions were afforded greater relevance.

THE ASTM GROUP'S MATERIALITY MATRIX



This year, the materiality analysis incorporated the concept of financial materiality (so-called “double materiality”) for the first time, adopting in advance the requirements of the Corporate Sustainability Reporting Directive (CSRD), which are due to become mandatory from 2024. Specifically, the following analyses were conducted:

- use of the SASB Materiality Map as a tool to identify the material topics of various sectors (the standards in the following areas are particularly applicable to the ASTM Group: Infrastructure - Engineering & Construction Services, Transportation - Road Transportation and Technology and Communications - Software & IT Services) to assess the topics that have a reasonable likelihood of financial impact;

- analysis of the correlation between sustainability materiality and the risks to which ASTM and its subsidiaries are exposed, enabling the financial topics associated with the greatest number of risks, and which therefore are considered more financially relevant, to be identified.

Both methodologies confirmed the materiality analysis and, in particular, identified the most relevant sector-specific topics.

For the most important material topics, some correlation tables referring to the areas defined under Italian Legislative Decree 254/2016, the Sustainable Development Goals (SDGs), the main associated sustainability risks and the main management and mitigation procedures implemented, are included in this document.

SUSTAINABILITY INDICES AND RATINGS

Sustainability indices and ratings assess companies based on their environmental, social and governance (ESG) performance.

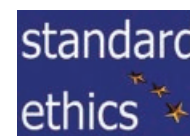
CDP CLIMATE CHANGE

In 2022, ASTM was confirmed to be a global leader in the fight against climate change by the Carbon Disclosure Project (CDP), a global non-profit environmental organisation, achieving an A- rating. The Group was assessed on the basis of the actions it introduced to reduce emissions, mitigate climate risks and develop a low-carbon emission economy. Of the some 15,000 companies that signed up to the initiative in 2022, 257 are Italian, 8% of which achieved a Leadership (A/A-) level.



STANDARD ETHICS RATING

Standard Ethics, an independent sustainability rating agency, confirmed ASTM's sustainability rating (Standard Ethics Rating) in 2022, with an EE rating ("Strong"), acknowledging that the Company had adopted ESG reporting models and sustainability strategies aligned with the international indications promoted by the UN, the OECD and the European Union, addressing environmental, social and safety issues. The outlook assigned to ASTM is "Positive" EE+ ("Very strong").



SUSTAINALYTICS

The ESG rating of Sustainalytics measures how companies manage environmental, social and governance matters. The rating provides an assessment of the ability of businesses to mitigate risks and exploit opportunities.

Sustainalytics assigned ASTM a Top-Rated score. The ESG Risk Rating attributed ASTM a score of 11.1 (Low); i.e. the economic value potentially at risk due to ESG factors not managed is low.



MSCI

ASTM achieved an MSCI ESG rating of A (Average). The MSCI ESG rating is designed to measure the resilience of a company to long-term environmental, social and governance (ESG) risks in the sector. The ESG ratings vary from leader (AAA, AA), average (A, BBB, BB) to laggard (B, CCC).



CORPORATE GOVERNANCE, INTERNAL AUDIT AND RISK MANAGEMENT SYSTEM

CORPORATE GOVERNANCE

ASTM's governance structure is based on the traditional organisational model, according to which the company is managed by a Board of Directors and monitored by a Board of Statutory Auditors. The Corporate Governance system is inspired by the highest standards of transparency and correctness and the Corporate Governance Code for listed companies in order to ensure compliance with the principles and ethical values to which ASTM aspires in relations with all stakeholders.

The Articles of Association of ASTM contain specific provisions on the composition of the company bodies so as to guarantee, in compliance with best practices, the respect for gender balance and, with particular reference to the Board of Directors, a sufficient number of independent directors, whose requirements of independence are assessed periodically.

The Board of Directors consists of 11 Directors, of whom 8 (73%) are men and 3 (27%) women. 3 (27%) are in the 30-50 age group, while 8 (73%) are in the over-50 age group. 4 Directors are considered independent pursuant to the Consolidated Law on Finance (TUF) and meet the independent requirements established in the Corporate Governance Code. The members of the Board of Directors periodically take part in induction sessions on ESG topics in order to remain cognizant of the company's impacts on sustainability and the main international developments in this area.

For further information on the Corporate Governance system of ASTM S.p.A. and the composition of its internal committees and the Board of Directors, see the "Report on Corporate Governance and Ownership Structure" available on the Company's website www.astm.it/en in the section "Governance".

GOVERNANCE OF SUSTAINABILITY

ASTM has defined the organisational structure of sustainability governance procedures by establishing roles and responsibilities for decision-making and overseeing the management of the organisation's impacts on the economy, the environment and people. ASTM's Board of Directors establishes strategic sustainability guidelines with a view to creating medium- to long-term value for all Stakeholders and approves the Sustainability Plan and Sustainability Report.

The ASTM Board of Directors has established a Sustainability Committee, consisting of three directors, which provides proposals and consulting to the Board with regards to sustainability matters. In particular, in assisting the Board of Directors, the Committee: a) offers supervision of sustainability issues linked to corporate activities and the impacts of the organisation on all Stakeholders, b) examines the Sustainability Plan before it is submitted for approval to the Board of Directors and monitors its implementation, c) examines the content of the periodic non-financial disclosure before it is submitted for approval to the Board of Directors.

The Audit and Risk Committee, consisting of three directors, does the following to assist the Board of Directors, among other things: a) assesses the suitability of the periodic non-financial disclosure in terms of adequately representing the Company's business model and strategies, the impact of its activities on the environment, the economy and people, and its performance, coordinating with the Sustainability Committee and b) examines the content of the periodic non-financial disclosure in terms of information on the internal audit system and risk management.

With a view to creating sustainable medium- to long-term value, the Sustainability Committee interacts with the Audit and Risk Committee and with the Remuneration Committee as fundamentally impor-

tant, in order to encourage each within its remit to increase the integration of sustainability into corporate governance.

Moreover, the Sustainability function, reporting directly to the Chief Executive Officer, contributes to establish the company sustainability strategies with a view to create medium- to long-term value for all Stakeholders, identifies and suggests to senior management the areas and projects for improvement in the Sustainability model, prepares the Sustainability Report, promotes and distributes the sustainability culture within the Group and ensures, through coordination with other departments, the identification and analysis of Stakeholders' expectations by encouraging dialogue with them.

GENDER BREAKDOWN OF THE BOARD OF DIRECTORS



4 Directors are considered independent pursuant to the Consolidated Law on Finance (TUF) and meet the independent requirements established in the Corporate Governance Code

AGE GROUPS OF THE BOARD OF DIRECTORS MEMBERS



MANAGEMENT OF CONFLICTS OF INTEREST

On 16 December 2021, the Board approved a new version of the procedure on transactions with related parties ("RPT Procedure") in order to take account of the delisting and, therefore, the non-application of the Regulation containing provisions on transactions with related parties approved by CONSOB with resolution no. 17221 of 12 March 2010, as subsequently amended and the provisions of the new articles of association approved by the Shareholders' Meeting.

Available on the Company's website www.astm.it in the "Governance" section and updated by the Board on 13 December 2022, the procedure sets out the rules governing the approval and management of related-party transactions carried out by ASTM, directly or through subsidiaries, in order to guarantee the transparency and procedural and substantive fairness of transactions.

RELATIONSHIP WITH SHAREHOLDERS AND THE MARKET

ASTM organises its activities according to rules that ensure management's reliability and a fair balance between the powers of management and the interests of shareholders and other stakeholders, as well as transparency and the market's knowledge of managerial decisions and corporate events that can significantly influence the development of the securities issued, in compliance with applicable regulations on market abuse (Regulation (EU) no. 596/2014), as well as procedures adopted by the Company to manage, process and communicate inside information.

PROCEDURE FOR DRAFTING, APPROVING AND PUBLISHING THE NON-FINANCIAL DISCLOSURE PURSUANT TO ITALIAN LEG. DECREE NO. 254/2016

In 2019, ASTM adopted an operating procedure "Procedure for Drafting, Approving and Publishing the Non-Financial Disclosure Pursuant to Italian Legislative Decree 254/2016", which defines the operating process for drafting, approving and publishing the NFD based on that established under Legislative Decree 254/2016 and the GRI Sustainability Reporting Standards.

In January 2023 ASTM updated its operating procedure to strengthen its controls and improve alignment to the best practices associated with the evolving context. Moreover, the main operating subsidiaries are preparing a procedure based on the one adopted by ASTM to ensure continuous improvement in the collection and processing of data.



THE SUSTAINABILITY PLAN

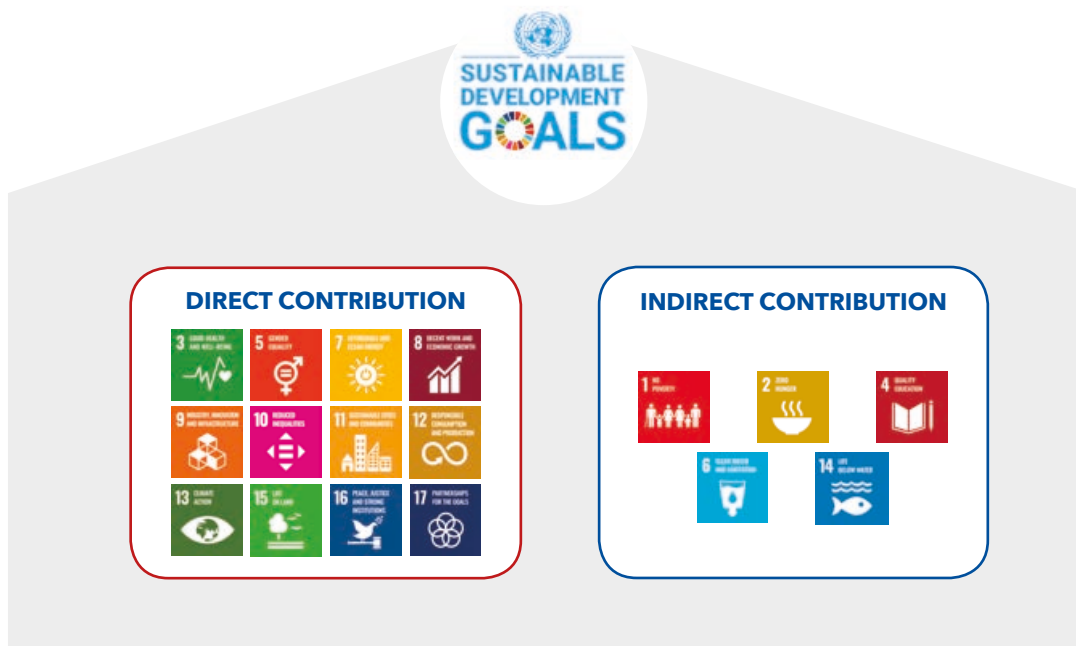
Sustainability is a key component of the Group's corporate strategy. The sustainability strategy of ASTM has involved analysis, integration and development of a number of elements, such as the "Ten Principles" of the United Nations Global Compact (UNGC), ISO 26000 Guidelines, the Group's materiality analysis and the 17 UN Sustainable Development Goals (SDGs) to be achieved by 2030, consistent with the Group's Strategic Plan.

ASTM has adopted a tangible, progressive and proactive approach over the years for implementation of its ambitions in the ESG sphere, which are comprehensively presented in the 2017-2021 Sus-

tainability Plan "Going Global Sustainably", the first holistic step taken by the company to incorporate sustainability aspects into its operations. Specifically, the Plan promotes the commitment to sustainability issues in the context of continuous improvement and in order to inform all its stakeholders of the Group's strategic directions in terms of sustainability, sharing goals, principles and values.

In 2021, ASTM strengthened its commitment to the fight against climate change by defining objectives and initiatives to reduce greenhouse gas emissions by 2030, approved by the Science-Based Targets initiative (SBTi) and integrated into its financial strategy, by publishing its first Sustainability-Linked Financing Framework (available on the Company website under the "Investor Centre" section), in the context of which 3 billion worth of Sustainability-Linked Bonds were issued in November.

In July 2022 the ASTM Board of Directors approved the new 2022-2026 Sustainability Plan, which categorises concrete goals into three areas - "People", "Planet" and "Prosperity". Among other things, the Plan includes science-based GHG emission reduction targets to 2030, updated to align with the 1.5 °C target, and includes the companies of the EcoRodovias Group and the SITAF Group, both acquired by ASTM in 2021, into the carbon footprint calculation.



Planet

- Reduction of **CO₂ emissions**
- Protection of **biodiversity**
- Development of **circular economy** projects

People

- Promotion of **diversity and inclusion**
- **Human capital** development
- Protection of **health and safety**
- Protection of **human rights**

Prosperity

- Support for **technological innovation**
- Contribution to the **development of local areas and communities**
- Protection of **road safety**

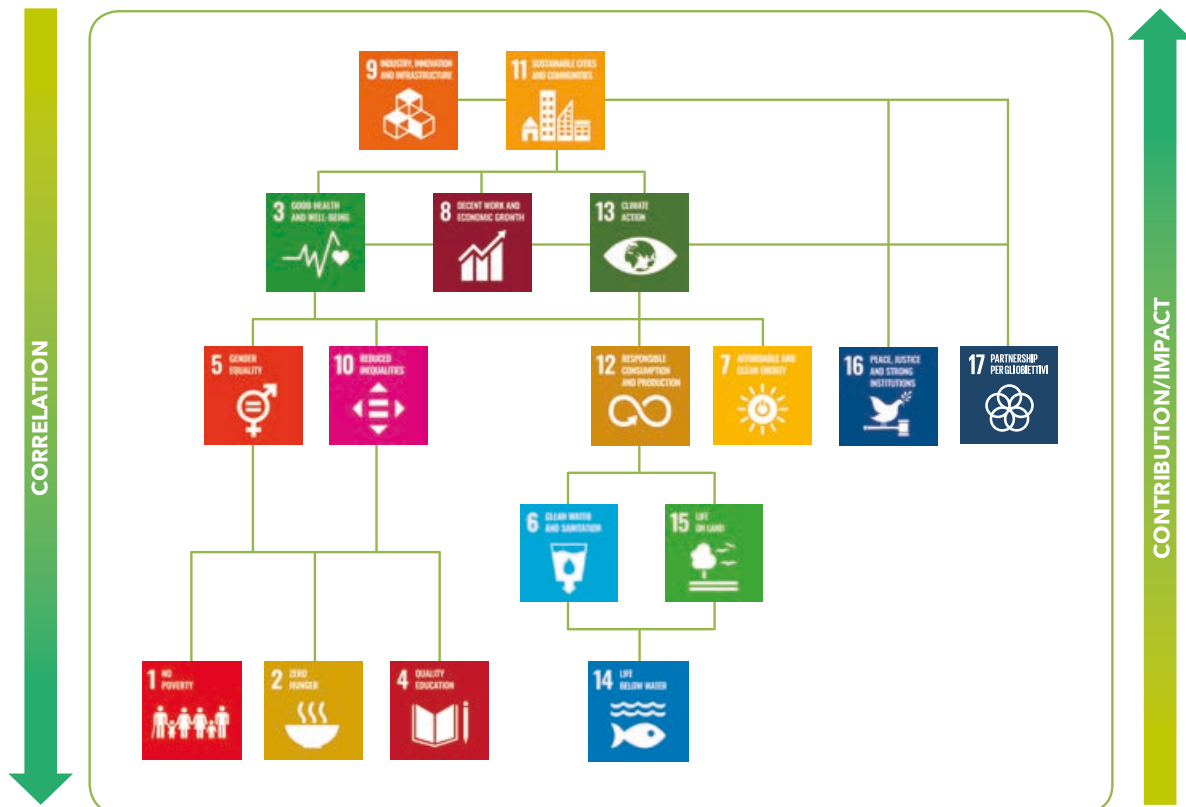
ROADMAP OF SDGs

In line with the guidelines published by the World Business Council for Sustainable Development (WBCSD), in 2019 ASTM defined a roadmap to improve the Group’s contribution to achieving the United Nations’ Sustainable Development Goals (SDGs) by 2030.

In particular, through an assessment of consistency, validity and application of the Sustainable Development Goals (SDGs) to the sustainability issues and policies of the Group, also taking into account the context and reference sector and the main impacts generated and experienced along the value chain, actions were identified to improve the performance and impact in relation to the SDGs.

The analysis made it possible to prioritise the SDGs based on the greater and lesser ability of the Group to contribute to achieving them through the impact generated along the value chain. A summary of the achieved results is shown below: the SDGs at the top are of greatest significance for ASTM in terms of contribution/impact. The lines shown in the chart show the existing connection between the development issues identified and represented by the SDGs. The analysis made it possible to identify targets of particular relevance and indicators used to improve the monitoring of the Group’s contribution to the targets. These indicators are monitored periodically and reported on annually in this document.

Of particular relevance were SDG 9 - Industry, innovation and infrastructure - given that ASTM is committed to developing quality, reliable, sustainable and resilient infrastructure - and SDG 11 - Sustainable cities and communities - which reflects the commitment to providing access to safe and sustainable transport systems and improving road safety.



ASTM AND MOBILITY OF THE FUTURE

ASTM is aware that, in addition to being complex works of engineering, infrastructure represents a strategic asset for economic growth and the well-being of citizens. Working on these projects, then, not only means changing the connective tissue of a territory, but also contributing to its development, creating connections between people, goods and ideas.

By integrating Sustainability Policies into its business strategy, by giving people and the environment a central role, ASTM intends to be a protagonist and to participate actively in the digital and ecological transformation of mobility, promoting technological innovation and ecological transition projects to make infrastructure even safer, smarter and more sustainable.

The A4 Torino-Milano motorway is at the centre of the first important modernisation plan promoted by ASTM, which involves high-technology interventions to make the infrastructure more resilient, sustainable and one of the most modern and cutting-edge in Europe and the world. The first part of these projects will be completed by 2024 on a 30-km pilot stretch between the Novara Est junction and the Milano Ghisolfia barrier, before being extended to the entire stretch managed - subject to the Ministry of Infrastructure and Transport (MIT) authorisation. By 2030, ASTM aims to create a model for the entire motorway system in Italy: safer infrastructure equipped with innovative solutions, designed with the aim of continuing and improving the travel experience and the quality of service for customers.

The envisaged works can be divided into three areas:

- road safety and assisted driving;
- infrastructure monitoring and maintenance;
- sustainability.

At the end of the works, the users of the A4 Torino-Milano will benefit, for example, from the introduction of hydrogen distributors, the increase in the infrastructure monitoring system, wrong way vehicle and hazardous goods detection systems, new asphalt surfaces obtained from recycled materials, anti-fog and vehicle-infrastructure communication systems (the latter being fundamental, in the short term, for improving the efficiency of traffic flows and, in the long term, for the introduction of self-driving vehicles, the arrival point of the "smart road"). In terms of connectivity, the A4 has a stretch that is already fully kitted out to allow for vehicle-infrastructure "dialogue".

The ecological and digital transition project of the A4 Torino-Milano motorway involves significant investments, which will have a positive impact on the territory, in terms of the economic contribution and employment generated along the entire value chain.



[Read the press release](#)

INTERNAL AUDIT AND RISK MANAGEMENT SYSTEM

The Internal Audit and Risk Management System is part of the organisational, administrative and accounting structure and more in general the corporate governance structure. It is inspired by best practices and the Corporate Governance Code of Borsa Italiana⁹.

The Board of Directors is responsible for the Internal audit and Risk Management System in relation to which, through the specific Committee, it defines the guidelines and periodically checks their adequacy and actual operation, ensuring that main company risks are identified and managed in line with the strategic objectives set.

The Internal Audit and Risk Management Model adopted by ASTM is in line with best practices defined by the Enterprise Risk Management Integrated Framework ("COSO ERM") and ISO 31000.

With support from dedicated internal functions, the

model adopted guarantees monitoring of risk associated with the attainment of strategic company objectives, including in terms of sustainability.

As an industrial holding, ASTM S.p.A. coordinates and develops its equity investments, identifies new investment opportunities and mainly manages financial and compliance risks related to its nature as a holding.

As part of their legal and operational autonomy, the subsidiaries are responsible for the autonomous management of the risks concerning the specific business activities.

During 2022, each company monitored/ revised the assessment of main risks generated or sustained, relating to business operations, including aspects concerning environmental, social aspects and personnel issues, respect for human rights, the fight against active and passive corruption.

In particular, the facing page describes the main risks concerning sustainability issues of ASTM and its subsidiaries.

SUSTAINABILITY POLICIES

To support its efforts in the ESG sector, ASTM has adopted specific policies on relevant sustainability issues which can be found on the Company's website, promoting their adoption also by the main operating subsidiaries which, taking into account their own operations and organisational structures, have adopted them through their relevant bodies.



ANTI-CORRUPTION POLICY



DIVERSITY AND INCLUSION POLICY



SUPPLIERS CODE OF CONDUCT



HUMAN RIGHTS POLICY



ENVIRONMENT MANIFESTO



BIODIVERSITY POLICY

⁹ For further information on the Internal Audit and Risk Management System, see ASTM's "Report on Corporate Governance and Ownership Structure" available on the company's website in the Governance/Corporate Governance Report section

MAIN RISKS CONCERNING SUSTAINABILITY ISSUES

RISKS OF OPERATIONAL DISRUPTION TO INFRASTRUCTURE

Risks related to the operational disruption to motorway infrastructure caused by unpredictable events outside the control of the licensees of the Group, such as extreme weather events, natural disasters or man-made disasters (accidents, fires, acts of terrorism), and risks related to inadequate monitoring of the safe condition of infrastructure.

RISKS RELATED TO THE MANAGEMENT OF EMERGENCY EVENTS AND MOTORWAY USER SERVICES

Risks related to the inadequate management of emergency events by the Group licensees in motorway operation and management of motorway services not in line with the standards defined in the services charter.

COMPLIANCE RISKS AND RISKS RELATED TO ETHICAL BEHAVIOUR

Risks related to non-compliance with environmental regulations by the Group companies, including those on climate change, occupational health and safety and the lack of integrity of management and employees that could result in unethical, unauthorised, unlawful or fraudulent behaviour, with particular reference to active and passive corruption, corruption between individuals and human rights.

RISKS RELATED TO THE SUPPLY CHAIN AND SUBCONTRACTING

Risks related to the conduct of suppliers and subcontractors and lack of monitoring of supplier practices, particularly in the construction sector, with particular reference to occupational health and safety issues, respect for human rights, anti-corruption and compliance with environmental regulations, including regulations on climate change.

RISKS RELATED TO PERSONNEL

Risks related to the ability to attract, hire, develop, motivate and retain qualified professionals within the Group companies while guaranteeing diversity and equal opportunities.

ENVIRONMENTAL COMPLIANCE RISKS

Risks related to environmental, legal and related regulations (in particular those on climate change) in Countries where the Group companies operate and that could affect the business activities.

“NIMBY” RISK

Risks related to NIMBY (Not In My Back Yard) campaigns, i.e. when local communities or trade associations protest against the development of large infrastructure and/or projects to improve road systems undertaken by the Group companies.

RISKS RELATED TO INNOVATION AND THE MARKET

Risks related to ecological/digital transition and technological innovation processes not in line with the strategic, sustainable development and market competitiveness objectives

BUSINESS CONTINUITY RISKS

Risks linked to temporary limitations or interruptions to company business and/or operation due to external events and/or factors which affect one or more operating subsidiaries of the Group.

THE GROUP'S RESPONSE TO RISK

ASTM and its main operating subsidiaries have adopted a Risk Management system conforming to the best practices identified by CoSo ERM and ISO 31000, defining the organisational structure and assigning clear roles and responsibilities in this regard. The strategic objectives and the associated risk profile, inspired by the principles of Governance, have been identified as the main strategic risk management tool. Specific processes to identify, monitor and mitigate main company risks have also been defined.

As regards the main risk mitigation activities, ASTM and its operating subsidiaries have adopted a Code of Ethics and Conduct and a Management Programme since 2004, pursuant to Italian Legislative Decree 231/01 (Model 231), also establishing the operating procedures and a disciplinary system.

Itinera S.p.A. also holds a certificate of conformity for its production cycle in relation to the provisions of ISO 31000 guidelines on risk analysis for activities carried out in Italy and overseas by work sites and branches.

The main policies adopted by ASTM and its subsidiaries, to mitigate identified sustainability risks, are described in this document, with particular reference to the "Ethics and Integrity" section.

ASTM and its main operating subsidiaries have implemented management systems in line with UNI ISO norms with reference to health, safety, environment and quality aspects. For more details, please see the dedicated sections.

In regards to whistleblowing legislation, ASTM and its main operating subsidiaries adopted a system in 2018 to report irregularities and potential offences committed by employees and third parties, to supplement the channels already set up for reporting to the Supervisory Body. EcoRododias introduced an "Ethics Channel" from 2018. This online platform allows employees, customers and third parties to report potential infringements of the Code of Ethics or any policy and procedure adopted by the Group, including anonymously. An

Ethics Committee was also established, with the task of investigating the reports received, with the support of the Compliance Team.

APPROACH TO RISK MANAGEMENT



CRISIS MANAGEMENT

ASTM and its main operating subsidiaries have adopted an interdepartmental procedure for crisis management.

In particular, the procedure identifies the types of possible crises, defines the organisational structure, processes and information flows in the event of a crisis.

The analysis of the various business segments of the Group identified the types of crises essentially attributable to safety issues (e.g. pollution or environmental disaster, serious injury at work, impediment of senior management) and to external factors (e.g. serious damage to works or infrastructure caused by external events, serious epidemics or infectious diseases, IT accidents, extreme weather events or natural disasters) and the criteria for assessing their severity on the basis of the event's specific characteristics.



In the event of a crisis assessed to be of maximum severity, the Crisis Manager (identified as the Chief Executive Officer) of the company affected can activate the Crisis Management Team, which will be responsible for the overall crisis management strategy. In relation to the type of crisis, the Crisis Manager may also involve external professionals and experts.

In the event that a crisis affects a subsidiary, in addition to initiating its own dedicated Crisis Management organisation, that company informs ASTM S.p.A., which provides an Advisory Committee to consult with the subsidiary's Crisis Manager.

Material topic:

BUSINESS CONTINUITY

Area of Leg. D. 254/2016:

ENVIRONMENTAL, SOCIAL, PERSONNEL, RESPECT FOR HUMAN RIGHTS, FIGHT AGAINST ACTIVE AND PASSIVE CORRUPTION



Main sustainability risks associated:

- Business continuity risks;

Summary of main management and mitigation actions:

- Interdepartmental Crisis Management operating procedure, which defines the organisational structure, processes and information flows in the case of a crisis
- Flexible organisational structure to be adopted in emergencies to guarantee continuity of business and of services in the public interest
- Adequate infrastructure and IT equipment
- Training and operating guidelines for the use of software, communication systems, connection methods
- Supplier Register to guarantee Business Continuity

ETHICS AND INTEGRITY

The Company's Code of Ethics and Conduct, in the version most recently adopted by the Board of Directors on 16 December 2021, was prepared in terms of the Group and, inspired by the ESG principles and values contained in the various sustainability policies adopted by ASTM and its main operating subsidiaries, summarises all the elements which serve as the foundation for the ASTM Group's identity and culture.

The Code of Ethics and Conduct, available on the Company's website, applies to ASTM S.p.A. and its Italian and foreign subsidiaries, and is binding for all employees and collaborators of said companies and for all those who, in any capacity and regardless of the type of contractual relationship, contribute to the attainment of the Group's targets and objectives, including members of company bodies.

In 2022 there were no violations relating to predicate crimes pursuant to Legislative Decree 231/01. For the sake of completeness, it is noted that five instances of employee conduct not in line with the general principles set out in the Code of Ethics were reported, which were handled in accordance with the operating procedures and disciplinary systems in force.

Material topic:

ANTI-CORRUPTION

Area of Leg. D. 254/2016:

THE FIGHT AGAINST ACTIVE AND PASSIVE CORRUPTION



Main sustainability risks associated:

- Compliance risks and risks related to ethical behaviour;

Summary of main management and mitigation actions:

Implementation of an integrated human capital management system, through:

- Anti-corruption policy in line with the applicable best practices and national and international standards;
- Anti-corruption management system certified to ISO 37001 for ASTM S.p.A., Itinera S.p.A., Sinelec S.p.A., Tubosider S.p.A., Ecorodovias Infraestrutura e Logística S.A. and Ecorodovias Concessões e Serviços S.A.;
- Anti-corruption officer;
- Internal channel to report offences or irregularities identified during work activities.

Training courses on corruption risks are held at regular intervals for executives and people most exposed to these risks.





ANTI-CORRUPTION

With a zero-tolerance approach, the Group repudiates and disincentives all types of corruption, whether in Italy or abroad, and is committed to actively fighting it by complying with the anti-corruption regulations in effect in all the countries in which it works, requiring its stakeholders to work honestly and with integrity.

To that end, inspired by the best practices of the anti-corruption Compliance program and the in-

ternational reference standards, such as UNI ISO 37001, ASTM and its main Italian operating subsidiaries have adopted a structured system of rules, controls and notification mechanisms with the aim of preventing crimes of corruption. In particular, the measures implemented to prevent corruption are governed by the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001 and the Anti-Corruption Policies of the main operating companies controlled by the Group who have adopted them.

ANTI-CORRUPTION MANAGEMENT SYSTEM CERTIFIED TO ISO 37001

ASTM S.p.A. and its subsidiaries Itinera S.p.A., Sinelec S.p.A., Tubosider S.p.A., EcoRodovias Infraestrutura e Logística S.A. and EcoRodovias Concessões e Serviços S.A have implemented an Anti-Corruption Management System, certified to UNI ISO 37001, for the Italian remit.

The UNI ISO 37001 Management System has been harmonised with the existing controls, contributing to the optimisation of the organisational structure and the decision-making and control processes aimed at the tangible implementation of the anti corruption Policy, with a view to the continuous improvement of the ISO standards. ASTM's Anti-Corruption Policy was most recently updated through a Board of Directors resolution on 13 November 2020.

As envisaged by the voluntary standard, an anti-corruption officer has been appointed, in the figure of the Internal Audit Function Manager, who has been allocated with tasks and responsibilities to oversee the implementation of the management system for corruption prevention, in compliance with the existing regulations and requirements of ISO 37001, and to communicate with senior management regarding the system's adequacy, highlighting any shortcomings or areas for improvement.

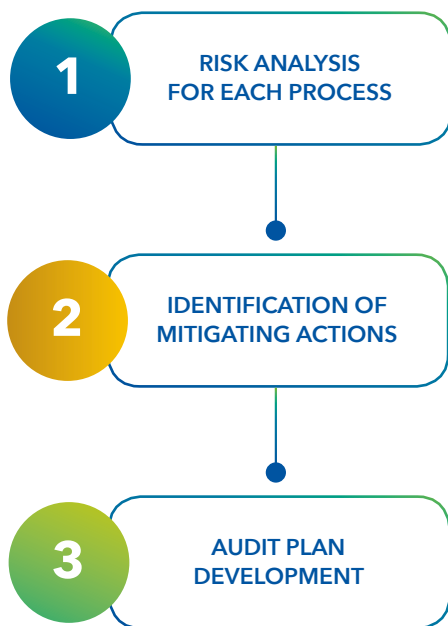
Training sessions are carried out periodically on the anti-corruption management System for all employees, with the objective of increasing awareness about each individual's contribution to promoting the culture of legality according to a zero-tolerance approach towards behaviours that do not meet the ethical principles adopted by the Company.

In accordance with the standard, specific internal audits are also carried out periodically on the compliance of the anti-corruption management System. The results of the monitoring activities and any reports are analysed systematically in order to assess the implementation of possible improvement actions.



INTERNAL AUDIT FUNCTION

ASTM and its main Italian operating subsidiaries have appointed a manager of the Internal Audit Function. This individual is in charge of verifying the operations and suitability of the internal audit and risk management System, through an audit plan approved by the Board of Directors, based on a structured process of analysis and prioritisation of the main corporate risks.



The Board of Directors of ASTM, with the support of the Audit and Risk Committee, approves the working plan annually prepared by the manager of the Internal Audit Function, having consulted the Board of Statutory Auditors and the Chief Executive Officer.

As the Manager of the compliance and corruption prevention function, ASTM's Internal Audit Function Manager carried out the necessary investigations and reported to the relevant bodies regarding the ISO 37001 Management system adopted by the Company.



WHISTLEBLOWING SYSTEM

To promote a culture of lawfulness with a zero tolerance policy for behaviour not in line with the ethical principles adopted by the Company and with current rules and regulations, ASTM and its operating Italian subsidiaries have implemented a notification (or "Whistleblowing") which, through the use of a digital platform managed by a specialised and independent third party, allows all stakeholders to anonymously report presumed or confirmed violations of laws, regulations, company procedures and policies or values set out by the Code of ethics.

With regard to the EcoRodovias Group, in 2022 there were 229 reports received through the Ethic Channel, of which 16 related to cases of corruption, 62 to crimes against the individual, 34 to conflicts of interest and 117 to antitrust issues. Furthermore, 2 reports of alleged breaches to company regulations at Itinera were received. All reports were investigated confidentially and independently by the competent bodies according to the established procedures.

With reference to the inquiries connected to events which occurred prior to the acquisition of control by the ASTM Group and which involved some EcoRodovias Group companies, please refer to the explanation in the paragraph "Other information" of the Explanatory Notes to the consolidated financial statements of the ASTM Group as at 31 December 2022.



PRIVACY

The Group continues to focus on protecting the personal data of its Stakeholders, aware that protecting the privacy of natural persons is a fundamental right, also recognised by the Charter of Fundamental Rights of the European Union.

In line with the provisions of EU Regulation 2016/679 ("GDPR" - General Data Protection Regulation), a data protection organisational and operational model has been implemented which requires: the definition of roles and responsibilities within the company, including the identification of a Data Privacy Officer (or "DPO"), a focal point (or "Data Protection Officer") and internal managers for functional areas (known as "Data Managers") who oversee personal data processing, also man-

aging relations with third parties; the adoption of a data privacy policy and specific data protection procedures and protocols; the implementation of a digital platform for the management and accountability of all data protection activities.

A coordinating body has also been established, formed of the Data Protection Officers of the individual companies (known as the "Data Protection

Officers Group"), with the role of raising collective awareness and connecting methodologies. Over the year, periodic meetings were held by the Officers Group and the DPO.

The Group pays particular attention to training company resources and raising employee awareness by organising training initiatives based on the corporate profiles of the participants.

GROUP CLIMATE STRATEGY

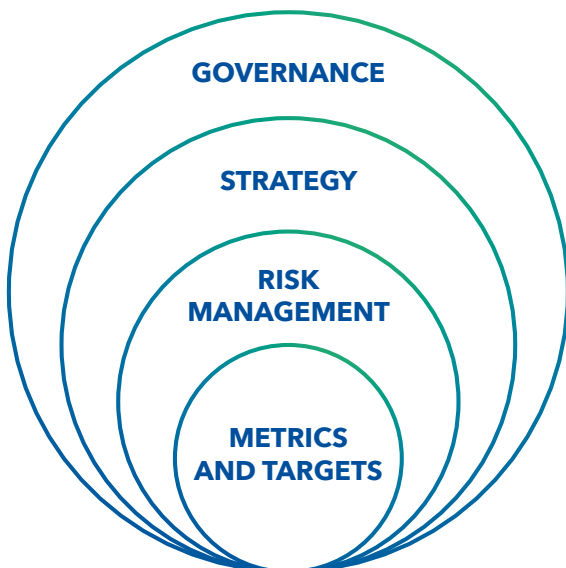
ASTM has implemented the Task Force on Climate-Related Financial Disclosures (TCFD) recommendations, in order to strengthen the Group's commitment relative to climate change and, in particular, help meet the objective of limiting the increase in the average global temperature in line with the Paris Agreement.

The main goal of the TCFD recommendations is to help companies to inform their stakeholders, clearly and in a comparable fashion, about risks and opportunities linked to climate change, with reference to four thematic areas representing the fundamental pillars of an organisation: Governance, Strategy, Risk Management, Metrics and Targets.

GOVERNANCE

To promote the sustainable success of the Group also through environmental performance monitoring and, in particular, of the impacts of climate change on the company's operation and financial results, the ASTM Group has created a governance model in line with ESG best practices which guarantees top management are involved in the definition of strategic sustainability guidelines, also with reference to climate change issues. Further, each company, based on their operations, considers the impacts of climate change in their risk management policies, financial planning, operating activities and investment planning, as well as in designing and

FUNDAMENTAL ELEMENTS IN TCFD REPORTING



GOVERNANCE

The organisation's governance with regards to climate-related risks and opportunities.

STRATEGY

The effective and potential impacts of climate-related risks and opportunities on an organisation's assets, strategy and financial planning.

RISK MANAGEMENT

The processes used by the organisation to identify, evaluate and manage climate-related risks.

METRICS AND TARGETS

The metrics and targets used to evaluate and manage climate-related opportunities and risks.

monitoring organisational performance objectives.

In 2022, ASTM was confirmed to be a global leader in the fight against climate change by the Carbon Disclosure Project (CDP), a global non-profit environmental organisation, achieving an A- rating.

STRATEGY

The medium/long-term planning, starting from the first Sustainability Plan "Going Global Sustainably", also takes account of the UN's 17 Sustainable Development Goals (SDG) for 2030, including target 13.1 "Strengthen resilience and adaptive capacity to climate related hazards and natural disasters in all countries". The Group's strategic guidelines include the promotion of energy efficiency policies, specifically through objectives and measurable actions for every area, over the medium/long term.

In 2020 ASTM introduced climate scenario analysis to its strategy to:

- assess how risks and opportunities linked to the climate impact all of the Group's business areas
- investigate the Group's resilience/robustness in the face of risks and opportunities linked to the climate
- identify a strategy to reduce the Group's emissions over the medium/long-term.

The scenarios used for analysis reflect various future possibilities, specifically the "Transition Scenarios", the technological and economic changes needed to mitigate climate change and, the "Physical Scenarios", how the Earth's climate reacts to changes in concentrations of greenhouse gases (GHG).

In compliance with TCFD recommendations, various scenarios were considered, including: one 2°C scenario and two much more ambitious ones (well below 2°C and 1.5°C); a scenario appropriate to the geographic context in which the organisation operates (Integrated National Energy and Climate Plan

(INECP), the expression of the Nationally Determined Contributions (NDC) for Italy); and a physical scenario used to anticipate possible climate effects which will impact the Group's activities in the future (RCP8.5).

From the physical scenarios, the International Panel on Climate Change (IPCC) RCP8.5 was selected in order to include the most significant impacts connected to physical climate variables (e.g. temperature increase, extreme precipitation) which could directly influence the Group's activities, in particular infrastructure safety and road safety.

The physical effects which over the long term have the highest probability of impacting ASTM's business in the geographic areas of greatest interest to the Group were extracted (Europe and Latin America):

- increased damages associated with floods and landslides, overflowing of rivers and coastal erosion
- increase in water scarcity and consequent restrictions on water use
- increase in damage due to extreme heat and forest fires.

Relative to the transition scenario applied to Group business, various scenarios were selected in compliance with TCFD recommendations: the scenarios "2DS", "Well Below 2°C" and "1.5°C" (designed by the Science Based Target initiative - SBTi¹⁰ and the International Energy Agency - IEA¹¹), used for target setting to assess the maximum available "carbon budget" and to obtain plausible emissions reduction trajectories, as well as the INECP-based scenario¹², used to assess regulatory and technological changes in the geographic area in which most of the ASTM Group's assets are located.

This analysis made it possible to assess the possibility of adopting a feasible Science Based Target and update the mapping of climate-linked risks and opportunities as described below.

¹⁰ <https://sciencebasedtargets.org/resources/legacy/2019/04/foundations-of-SBT-setting.pdf>

¹¹ <https://www.iea.org/reports/energy-technology-perspectives-2016>

¹² mise.gov.it/images/stories/documenti/PNIEC_finale_17012020.pdf

RISK MANAGEMENT

As part of its responsibilities regarding the Internal Audit and Risk Management System, the Board of Directors ensures that the main corporate risks are identified and managed in line with the strategic objectives identified. Management of ESG risks is integrated into the Risk Management System implemented by ASTM and its main operating subsidiaries. Risk mitigation actions also include opportunities for development which could lead to a competitive advantage over time.

Climate change and its effects on the economic activities represent a potential risk factor for the operations of the Group companies and the resilience of the infrastructure managed by ASTM. However, at the same time, the current ecological and technological innovation transition processes could create important opportunities for growth and development.

The risk assessment process considers both physical and transition risks. The first category includes the occurrence of extreme weather events (intense rain, flooding, landslides), caused by changes in climate conditions which could damage motorway infrastructure; the second includes changes in the market, increasingly sensitive to sustainability issues, or developments in environmental regulations, with the introduction of new minimum environmental requirements and new limitations on GHG emissions.

Group companies are implementing various actions to mitigate these physical and transition risks. With particular reference to the most vulnerable areas and works, the status of motorway infrastructure under concession is constantly monitored in order to guarantee, in compliance with the applicable laws, the safety of those infrastructure for the use of motorway traffic, in addition to a suitable maintenance work programme and planning. Along some stretches of the A6 Torino-Savona, the A5 Quincinetto-Aosta, and the A15 Parma-La Spezia motor-

ways, as regards the particular morphology of the local area, specific systems are in place to monitor landslide movements and mountainsides which, in some cases, require continuous measurement of pre-established parameters and the activation of alarms if the pre-set thresholds are exceeded.

The implementation of a specific methodology for monitoring the condition of the infrastructures, diagnostics and definition of the actions is necessary to ensure over time the safety, functionality, robustness and durability of the works on all of the infrastructures under concession.




Climate change and the associated policies and regulations adopted by the countries in which the Group operates also create new opportunities that could go on to impact the competitive mechanisms of the various sectors in which the Group operates.

For this reason, each company must be able to proactively identify and exploit the opportunities in order to maintain high levels of competitiveness. For example, with reference to motorway management, technological innovation plays an increasingly important role in guaranteeing safety and high user service standards through a gradual digital transformation of infrastructure able to communicate with next generation connected vehicles, to use automatic driving assistance systems and to mitigate and lighten traffic, reduce motorway accidents and monitor technical and climate-related parameters.

With regard to the EPC sector, there is growing customer demand for the design and implementation of infrastructure and civil and industrial engineering projects with a low environment impact and high LEED (Leadership in Energy and Environmental Design) rating, responding to the EU Taxonomy Regulation and, in Italy, the Guidelines for the construction of public works issued by the Ministry of Infrastructure and Transport (MIT).

The following tables present details of the main risks and opportunities related to climate change that impact the Group's business segments.

RISKS RELATED TO CLIMATE CHANGE

Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Acute environmental risk	Physical risk	Risks associated with unforeseeable events related to climate change and outside the control of the Group companies such as violent weather events and natural disasters that could cause operational disruption to the motorway infrastructure managed by the Group licensees.	 Short term	 As likely as it is unlikely	 High	The financial impact is linked to the operational disruption to the motorway infrastructure with a decrease in revenues, increase of maintenance costs, as well as additional expenses for the return to normal operations and direct and indirect compensation for damages to third parties.

Risk management methods

Within its own legal and operational autonomy, each Group licensee oversees and mitigates the risk through multiple structured engineering and operational initiatives. The extraordinary maintenance and investment programme envisages interventions such as:




- stabilisation of mountainsides superjacent to the motorway stretches with particular risk aspects, through containment works, surface and deep drainage, bolted and rockfall protection netting, soil bioengineering works;
- protection and reinforcement of bridge and viaduct foundations including parapets, weirs and hydraulic works;
- interventions aimed at the seismic improvement/upgrading of structures.

The motorway maintenance work programme is defined on the basis of specific and structured monitoring systems and models implemented through inspections, measurements and periodic surveys that allow each company to plan activities in order of priority, verified and approved also by external and independent experts.

For some motorway stretches (such as the A15 Parma-La Spezia, the A6 Torino-Savona and the A5 Quincinetto-Aosta), the licensees in collaboration with Institutions and Bodies have initiated specific systems to monitor landslide movements which in some cases require continuous measurements of parameters with the activation of alarm systems when certain thresholds are exceeded and consequent suspension of traffic. The monitoring activities are also extended, where necessary, to riverbanks to control the evolution of ongoing erosion.

In addition, the licensees have stipulated specific insurance policies to cover any damages to infrastructure, direct and indirect damages caused to third parties and lost revenue caused by the suspension of traffic.

The potential effects of climate change on infrastructure are considered in the design of new works and in the extraordinary maintenance of existing works. In infrastructure design decisions, and in particular for hydraulic works and the consolidation of mountainsides at hydrogeological risk, variables are assessed such as the return times of flooding events and the frequency of extreme weather events.

Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Chronic environmental risk	Physical risk	<p>Risks related to the inadequate management of emergency events by the Group licensees in motorway operation and management of motorway services not in line with the standards defined in the services charter.</p> <p>The increased frequency of weather phenomena – such as particularly heavy rainfall including of short duration, frozen rain (i.e. glaze), exceptional snowfall and prolonged periods of drought – could compromise the safety of traffic on the motorway stretches (e.g. reduced visibility, loss of grip, etc.), as well as cause damage to the motorway body and make a temporary traffic block necessary.</p>	 Short term	 More likely than not	 Medium to high	The financial impact is linked to a potential increase in the ordinary preventive maintenance costs to guarantee operation of the infrastructure and, in the event of temporary operational disruption, to any recovery costs and compensation to third parties, as well as decreased revenues.


Risk management methods

Within its own legal and operational autonomy, each Group licensee oversees and mitigates the risk through multiple structured engineering and operational initiatives.

The ordinary maintenance programme that each licensee company prepares annually provides for specific interventions such as cleaning ditches and gutters, culverts and the water collection and disposal systems in general in order to streamline their functioning in the event of particularly heavy rain. The banks, embankments and motorway areas in general are periodically mown and trimmed in order to avoid potential damage to traffic and infrastructure in the event of particularly adverse weather (e.g. wind, exceptional snowfall and frozen rain, fires).

Periodic interventions are carried out on the works, buildings and systems in order to mitigate the effects of frequent and cyclical events, and to prevent considerable damage to them with consequent potential hazards for traffic and the need for more significant maintenance interventions. Specific procedures have been adopted, especially along the “valico” (crossing) stretches, to manage snowy rainfall, and local governance bodies and police forces have been involved. In particularly serious cases, heavy vehicles may also be stopped from travelling and temporarily directed to pre-defined lay-bys.




The licensees have also stipulated specific insurance policies to cover potential damages to infrastructure, direct and indirect damages caused to third parties and lost revenue caused by the suspension of traffic.

Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Compliance risk	Transition risk	Risk related to non-compliance with the environmental regulation applicable to the business segments in which the Group companies operate	 Short term	 Highly unlikely	 The media	The financial impact is linked to the potential fines and/or lawsuits deriving from violations of the applicable environmental regulation, as well as the potential redevelopment costs required to recover the conditions envisaged by the regulation.

Risk management methods

Since 2004, ASTM and its main operating Italian subsidiaries have had a Compliance Programme, in compliance with Italian Legislative Decree 231/01, which defines, among other things, procedures, protocols and a disciplinary system in order to prevent damage and guarantee compliance with environmental regulations. In addition, some Group companies have adopted an Environmental Management System certified to ISO 14001, providing specific operating procedures for environmental issues management with a view to continuous improvement.




Lastly, the design of new works and the maintenance of existing works, overseen by the subsidiaries of ASTM, are developed in respect of the applicable technical and environmental regulations (including environmental impact assessments). Furthermore, ASTM constantly monitors the development of sustainability regulations (e.g., Regulation (EU) 2022/852 on the European Taxonomy and the Corporate Sustainability Reporting Directive (CSRD)).

Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Regulatory risk	Transition risk	Risk associated with changes to the environmental regulations in countries in which the Group companies operate with an impact on the business activities.	 Medium term	 As likely as it is unlikely	 Low	The financial impact is linked to the costs of upgrading to new regulations, as well as the potential fines and/or lawsuits deriving from violations of the new environmental regulation.

Risk management methods

Within its own business activity, each Group company constantly monitors the evolution of environmental regulations, including through dialogue and active participation in specific work groups.




In particular, S.I.N.A. has actively participated for over 30 years in the research programmes of the PIARC – World Road Association. It has also chaired the Italian National Technical Committee for 14 years, which deals with climate change, mitigation policies, conversion and the resilience of infrastructure.

Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Market/ technology risk - EPC and Technology	Transition risk	<p>Risk associated with the non-implementation of innovative solutions that reduce environmental impact and meet the expectations of the market, which is increasingly more aware of aspects pertaining to climate change.</p> <p>In particular, the construction sector is exposed to the risk associated with not meeting the requirements to participate in tenders that require specific environmental expertise, as well as the ability to operate in contexts with scarce water resources.</p>	 Medium term	 As likely as it is unlikely	 Low	The financial impact is linked to the failure to be awarded new potential contracts that require particular technical expertise with consequent loss of profits and revenues.

Risk management methods




The EPC and Technology sectors of the Group are constantly involved in implementing, maintaining or updating the environmental requirements and/or certifications and developing analyses and in-depth studies into the use of new technologies. The construction sector has developed expertise to design and develop transport infrastructure and civil and industrial buildings with a low environmental impact and a high LEED (Leadership in Energy and Environmental Design) classification, which involves, among other things, the reuse and recycling of water resources. The engineering sector also promotes the development of expertise in the Envision Sustainability Protocol, a ratings system for the assessment of sustainable infrastructure. In addition, expertise is being developed in order to undertake redevelopment, compliance and energy efficiency projects for lighting systems. To implement actions, initiatives and policies consistent with the goals of the UN 2030 Agenda, the EU Action Plans to fund sustainable growth and, in particular, Regulation (EU) 2022/852 (the Taxonomy Regulation), the "Group Strategic Planning Guideline to align operating activities (Turnover) and interventions (CapEx and OpEx) to the technical criteria of the EU Taxonomy and the criteria of the Envision protocol" was defined. This tool provides criteria and tools to be used during the design and implementation of new initiatives to contribute to the climate change mitigation and adaptation targets.



Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Market/ technology risk - Concessions	Transition risk	Risk associated with the non-implementation of innovative solutions that reduce environmental impact and meet the expectations of the market, which is increasingly more aware of aspects pertaining to climate change. With particular reference to the concessions sector, one of the main risks is that of not adapting the infrastructure to technology changes and the requirements of its users.	 Medium term	 As likely as it is unlikely	 The media	The financial impact is linked to a loss in profits and revenues (toll revenues and service area royalties) in the motorway concessions sector.

Risk management methods




The Group licensees promote dedicated work groups in order to identify innovative solutions for the management of infrastructure (i.e. smart infrastructure), including the involvement of the Group companies operating in the technology and engineering sectors. In addition, the licensees have launched a programme for the dissemination of alternative fuels within the service areas of the motorway stretches under concession. To implement actions, initiatives and policies consistent with the goals of the UN 2030 Agenda, the EU Action Plans to fund sustainable growth and, in particular, Regulation (EU) 2022/852 (the Taxonomy Regulation), the "Group Strategic Planning Guideline to align operating activities (Turnover) and interventions (CapEx and OpEx) to the technical criteria of the EU Taxonomy and the criteria of the Envision protocol" was defined. This tool provides criteria and tools to be used during the design and implementation of new initiatives to contribute to the climate change mitigation and adaptation targets.

Risk	Classification	Description	Time period	Probability	Magnitude of the financial impact	Financial impact
Reputation risk	Transition risk	Risk associated with the reputational effects occurring in the events described above.	 Short term	 Highly unlikely	 Low	Impact mainly linked to the indirect effects on the perceived competitiveness on the market and the market value of the bonds issued.

Risk management methods




The management of risks related to climate change is integrated into the Risk Management System implemented by ASTM and its main operating subsidiaries. Each risk is assessed for financial impact deriving from any non-compliance, as well as for reputational impact. Therefore, the organisational structure of each company and the related actions put in place to mitigate the various risks also contribute to the mitigation of reputation risk. Furthermore, the Investor Relations and Communication Unit defines the communication plans, prioritising periodic information flows with analysts, institutional investors, rating agencies and stakeholders.

OPPORTUNITIES RELATED TO CLIMATE CHANGE

Opportunity Scope	Time period	Probability	Magnitude of the financial impact	Financial impact	Execution costs
Market/ technology opportunities – EPC Products and services	 Medium term	 Highly likely	 Medium to high	The potential financial impact is connected to the increase in revenues and profits following the increase in customer demand for the design and construction of works with low energy impact.	The execution costs of the opportunities are mainly linked to training courses to develop internal expertise and knowledge about LEED requirements, the EU Taxonomy Regulation and the Envision Protocol.

Strategy




In order to seize new business opportunities related to the growing demand for buildings with low energy impact and, more generally, initiatives aligned with the EU Taxonomy Regulation, the Group companies operating in the EPC sector are promoting the development of internal expertise for the design and construction of infrastructural works and civil and industrial buildings with lower primary energy consumption through the use of technologies with low environmental impact (e.g. LEED and Envision Sustainability Protocol), aligned with the principles of the EU Taxonomy Regulation. Opportunities have also been highlighted for the development of energy production systems with photovoltaic technology, in addition to redevelopment, compliance and energy efficiency projects for lighting systems.

Opportunity Scope	Time period	Probability	Magnitude of the financial impact	Financial impact	Execution costs
Market/ technology opportunities – Concessions and Technology Products and services	 Short term	 More likely than not	 The media	The financial impact is linked to the increased demand for innovative and competitive services that could lead to an increase in revenues.	The execution costs of the opportunities are mainly linked to initiating the necessary partnerships.

Strategy

To support the market transition to electric vehicles, a specific plan to roll out charging services is underway, aimed at providing full coverage of the managed network by 2026. Moreover, a pilot project involving high-power electric charging stations has been launched.

In the context of new technologies applied to tolls, Sinelec, the Group's technology company, has developed the first open toll collection system in Italy in Free Flow Multilane mode, which enables users to pay tolls without having to transit through a toll station, thus reducing queues and consequent CO₂ emissions. In addition, the use of Artificial Intelligence (AI) is considered at research and development level as a potential assistance tool for identifying trends more quickly and operating more predictively with a view to continuously improve road safety.

Opportunity	Scope	Time period	Probability	Magnitude of the financial impact	Financial impact	Execution costs
Market/ technology opportunities - Concessions	Energy efficiency	 Medium term	 Highly likely	 The media	The estimate of the investment and economic return (i.e. reduced spending on electricity purchases) is assessed based on the specific lighting requirements of each motorway stretch within the remit of each concession agreement.	The execution costs are mainly related to the replacement of traditional lamps with LEDs and the preparation of the system.

Strategy

The use of LED technology to light the motorway stretches under concession, in particular tunnels, junctions and toll booths, along with energy saving policies and the development of energy production plants with photovoltaic technology, may contribute to reduce electricity consumption and the associated emissions.

For more information on the risks and opportunities related to climate change identified by the Group, please refer to the CDP Climate Change questionnaire available at www.cdp.net/en.

METRICS AND TARGETS

ASTM Group consumption and GHG emissions are monitored and certified annually by an independent external company in order to identify and assess any changes and, additionally, are used to calculate the Group’s carbon footprint in line with the guidelines contained in the GHG Protocol “Corporate Accounting and Reporting Standard” and the “Global Reporting Initiative Sustainability Reporting Standards” published by the Global Reporting Initiative (GRI).

To support this type of reporting, the Group has installed internal monitoring tools to identify where the greater impacts are concentrated in terms of GHG emissions, relative to emission sources, business areas and geographic areas.

For more information, please see the section “Our commitment to the environment” in this document.

ASTM is the first European motorway operator – and the largest in terms of km managed in the world – to

have set science-based emission reduction targets validated by the Science-Based Targets initiative (SBTi), in line with the reduction trajectories set out by the Paris Agreement.

In particular, ASTM set out a path to reduce its carbon footprint in the medium term, with different levels of ambition for different categories of emissions (Scope). This commitment led the Group to set ambitious emission reduction targets based on scientific criteria to help to combat climate change. The targets set were submitted and validated by the international initiative “Science Based Targets” and appear from October 2021 on the official list of “Companies Taking Action”.

To strengthen its commitment to the fight against climate change, the emission reduction targets have been integrated into the financial strategy through the formalisation of a Sustainability-Linked Financing Framework.

ASTM SCIENCE BASED TARGETS



SCIENCE
BASED
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

ASTM was the first European motorway operator – and the largest in terms of kilometres of network managed in the world – to have set science-based emission reduction targets validated by the Science-Based Targets initiative (SBTi) in October 2021, in line with the reduction trajectories set out by the Paris Agreement.

The ASTM Group is committed to reducing its Scope 1 and 2 GHG emissions by 25% by 2030, compared to 2020 levels. The Group is also committed to reducing Scope 3 GHG

emissions for goods and services purchased from third-parties by 13% in the same period.

To achieve the GHG emission reduction targets, the Group has defined an action plan that, as well as strengthening the governance on energy issues (e.g., appointment of the Group Energy Manager, implementation of the Energy Management System under ISO 50001:2018) includes, for scope 1 and 2 emissions, the following initiatives:

- progressive replacement of construction vehicles and the company fleet with more environmentally friendly models
- plan to replace lamps with LED technologies
- dynamic management systems to reduce energy consumption for lighting and HVAC by infrastructure and offices to a minimum
- self-generation and the purchase of renewable energy
- promotion of technologies and initiatives for energy efficiency, so as to reduce the carbon footprint of operations and properties
- research and innovation for the development of energy recovery technologies.

The initiatives identified to reduce Scope 3 emissions include:

- improving the efficiency of processes to reduce the demand for goods and services and promotion of green procurement policies that prioritise more sustainable suppliers and the purchase of products and services with a low carbon footprint
- engagement of suppliers to increase awareness about environmental issues and promote the transition towards green materials and technology
- technological innovation of materials, energy mixes, efficiency trends and electrification.

It should be noted that the Scope 3 emission reduction target represents an ambitious commitment to extend the ESG objectives to third parties that the ASTM Group does not control. The emission reduction targets of the 2022-2026 Sustainability Plan were updated to increase the ambition of the Scope 1 and 2 target to 1.5°C and to incorporate the companies of the EcoRodovias Group and SITAF Group, acquired in 2021, into the scope of the Plan.

SUSTAINABLE FINANCE

In November 2021, ASTM S.p.A. placed three Sustainability-Linked Bonds (SLB) for a total of €3 billion, receiving four times more requests than the offering. The operation represented the first Sustainability-Linked Bond (SLB) issued in the world by an infrastructure operator, incorporating the science-based targets of reducing emissions validated by the SBTi.

The bonds were issued in the scope of the Sustainable-Linked Finance Framework (SLFF), whereby the Group has further consolidated its commitment to fight climate change, by linking its financial strategy to significant and ambitious sustainability targets.

The Framework was structured so that it is aligned to the relevant market principles and contributes to achieving the United Nations Sustainable Development Goals. ASTM has identified two KPIs that cover 70% of the Group's carbon footprint, more specifically: Scope 1 and 2 emissions and Scope 3 emissions from purchased goods and services.

An independent external entity has confirmed that the Framework aligns with the relevant market principles, as well as the ambitious nature of the targets identified.

More information is available on the Company's website under the "Investor Centre/Sustainable finance" section.



THE EUROPEAN REGULATION ON THE TAXONOMY OF SUSTAINABLE ECONOMIC ACTIVITIES

REGULATION (EU) 2020/852: PURPOSE, LEGISLATIVE FRAMEWORK AND REPORTING OBLIGATIONS

Some time ago, the European Union defined a strategic framework for the implementation of political actions and initiatives in line with the UN's Agenda 2030 objectives and, in that context, in March 2018 the European Commission formalised for the first time an action plan to fund sustainable growth, with the declared objective of redirecting capital towards sustainable investments, integrating sustainability into risk management and promoting transparency and long-term vision, with the awareness of the important role that the financial sector may have in driving private investments that support sustainable development.

The European Union's commitment, also confirmed in the "Strategy for Financing the Transition to a Sustainable Economy" published in 2021, also includes Regulation (EU) 2020/852 (the "Taxonomy"), the goal of which is to provide investors and the market with a shared language of sustainability metrics which guarantees comparability between operators, reduce the risks of greenwashing and increase the quantity and quality of information about the environmental and social impacts of business, thus favouring more responsible investment decisions. This Regulation requires that as of 1 January 2022, the NFD information of companies subject to the obligation to publish non-financial information pursuant to article 19-bis or article 29-bis of Directive 2013/34/EU must include how and to what extent their activities (measured in terms of turnover, capital expenditure and operating expenses) are associated with sustainable economic activities pursuant to the Taxonomy. In the same way, participants of the financial market must report to what extent the financed activities and their investments meet the criteria of the Taxonomy.

In June 2021, the European Commission formally

adopted the Technical Delegated Acts (hereinafter, "Climate Delegated Acts") which define the list of sectors and economic activities currently included in the Taxonomy and the related technical screening criteria that make it possible to verify whether they contribute substantially to the environmental goals of climate change mitigation and climate change adaptation; in 2023 the publication of further delegated acts is expected with reference to the remaining four environmental goals (sustainable use and protection of water and marine resources; transition to a circular economy; pollution prevention and control; protection and restoration of biodiversity and ecosystems).

The process to verify the sustainability of an economic activity (so-called "alignment" with the Taxonomy) involves the following steps:

1. verification of the Technical Screening Criteria to assess the effective contribution of the economic activity to a certain environmental objective, in compliance with the principle of technology neutrality and taking account of the long and short-term impact of the economic activity;
2. verification of the "DNSH" (Do No Significant Harm) criteria to ensure that the economic activity does not cause significant harm to any of the other environmental objectives.

In addition, verification is also envisaged of compliance with Social Minimum Safeguards, intended to guarantee that the economic activities are conducted in compliance with the main guidelines and international treaties on human rights.

THE TAXONOMY FOR THE ASTM GROUP

As declared by the European Commission, the Taxonomy includes the sectors that could play the largest active role in meeting the challenges posed

by climate change to guide the EU's ecological transition, with the end goal of achieving climate neutrality by 2050. Of these sectors, the Climate Delegated Act has outlined specific economic activities dedicated to the construction, modernisation, maintenance and operation of infrastructure for road, rail, sea and air transport (as part of section "6. Transport") as well as the construction and renovation of buildings (as part of section "7. Construction and real estate activities"), recognising the importance of these sectors for the achievement of the objectives of climate change mitigation and climate change adaptation. In particular, according to information communicated by the European Commission, transport operations account for one third of total consumption of energy and around 23% of total direct greenhouse gas emissions in the EU, while construction, considering all sectors, is responsible for 40% of energy consumption and 36% of carbon emissions at European level.¹³

As a result, the ASTM Group is one of the economic operators that could most contribute to the environmental transition process promoted and encouraged by the European Union and it is expected that this circumstance will also be confirmed following publication of the additional delegated acts related to the remaining four environmental objectives (sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems).

Already in 2020, the ASTM Group had introduced an analysis of climate-linked scenarios into its strategy in order to assess how the risks and opportunities linked to climate change influence the operations of its business areas and launched numerous initiatives¹⁴ with a view to energy efficiency, emission reduction and management and monitoring of climate risks. The implementation of further strategic actions in response to the legislative requirements introduced by the Taxonomy will

therefore be part of the journey already undertaken by the Group to strengthen its commitment in terms of climate change.

FOREWORD

In 2021, the ASTM Group, understanding the relevance and innovative extent of the Taxonomy, launched dedicated actions to respond to legislative obligations and to promptly and effectively plan the preliminary activities for the reporting process as part of its consolidated non-financial disclosure.

Furthermore, on 13 December 2022 the Board of Directors approved the "Group Strategic Planning Guideline to align operating activities (Turnover) and interventions (CapEx and OpEx) to the technical criteria of the EU Taxonomy and the criteria of the Envision protocol" with a view to defining the guidelines and control principles of the Group's strategic planning process and to provide the criteria and tools to be used in planning processes, participation in tenders for the acquisition of new ventures, as well as in the planning of investments (including the Economic Financial Plans ("PEF") for the motorway concessions sector) and the purchase of assets for operational activities. According to the Guideline, each company must verify whether the economic activities it implements have the potential to contribute substantially to the achievement of the climate mitigation objective or the climate adaptation objective, i.e., whether they are "eligible", and whether they are carried out in compliance with the Technical Screening Criteria, the DNSH criteria and the minimum safeguards, and can therefore be considered "aligned".

In 2022 the aforesaid monitoring actions involved the organisation as a whole, requiring the proactive participation of the business structures for the identification of the Taxonomy "eligible" and "aligned" activities and for the management of data collection process at the Italian and foreign Group companies. In this regard, it should be noted that this reporting on the Taxonomy covers the entire scope of the companies included in the financial consolidation.

¹³ See Regulation (EU) 2021/2139, sec. 33 e 36

¹⁴ For example, the development of innovative solutions for infrastructure management (i.e. smart infrastructures), the high-power electric charging trial project to support the market's transition to electric vehicles and the commitment to implement, maintain or update the environmental requirements and/or certifications both in the construction of transport infrastructure (eNVISION Sustainability Protocol) and in civil and industrial construction works (mainly LEED).

The reporting process, as required by legislation, envisaged continuous discussions with the structures dedicated to financial reporting in order to guarantee consistency between the data examined. In this regard, it is noted that the calculation of the KPIs involved the following considerations:

- the balances were calculated on a consolidated basis, net of intercompany data, to avoid any potential risk of double counting;
- the accounting effects deriving from the application of IFRIC 12 were neutralised with reference to revenues and construction costs of non-compensated revertible assets (motorways).

Finally, the ASTM Group has always operated in accordance with the “minimum safeguards” established in the Regulation and, in particular, has adopted robust procedures on human rights, anti-corruption, tax management and competition practices. For more information on the policies adopted by the Group, the management model, the risk analyses and specific actions on the above topics, please see the “Corporate Governance, Internal Audit and Risk Management System” section.

ELIGIBLE AND ALIGNED ECONOMIC ACTIVITIES OF THE ASTM GROUP¹⁵

The three KPIs that represent the extent to which the activities of the ASTM Group are “eligible” and “aligned” under the Taxonomy Regulation are shown below. The standard reporting models provided for by Annex II to Delegated Regulation (EU) 2021/2178 are contained in the Annex “European Taxonomy: Model KPIs for non-financial undertakings”.

KPIs	
Portion of “eligible” turnover	95%
Portion of “eligible” CapEx	98%
Portion of “eligible” OpEx	93%

KPIs	
Portion of “aligned” turnover	27%
Portion of “aligned” CapEx	35%
Portion of “aligned” OpEx	37%

Turnover KPI

The turnover of the ASTM Group is considered almost entirely attributable to “eligible” economic activities; this area includes motorway management revenues, EPC sector revenues, technology sector revenues and a number of specific residual items accounted for among other revenues (KPI numerator). In particular:

- the “eligible” revenues from motorway management refer to proceeds from tolls and ancillary revenues that fall under the economic activity “6.15 Infrastructure enabling low-carbon road transport and public transport”¹⁶;
- the “eligible” EPC sector revenues are attributable to the following activities: i) construction of infrastructure, included associated engineering, planning and inspection activities (mainly infrastructure referring to economic activities “6.14 Infrastructure for rail transport”, “6.15 Infrastructure enabling low-carbon road transport and public transport” and “6.17 Low carbon airport infrastructure” of the Climate Delegated Act), and ii) construction of buildings (economic activities included in section “7. Construction and real estate activities” of the Climate Delegated Act). The “eligible” revenues in this context also

¹⁵With reference to the disclosure pursuant to Article 8, paragraphs 6 and 7 of Delegated Regulation (EU) 2021/2178, which provides for the use of the models provided in Annex XII for the reporting of nuclear energy and fossil gas activities, it should be noted that all such models have been omitted as they are not representative of the activities of the ASTM Group.

¹⁶The FAQs published by the European Commission on 2 February 2021 clarify that the wording “low carbon emissions” is not relevant for the purposes of the “eligibility” assessment but for the alignment checks (see FAQ 9).

¹⁷The FAQs published by the European Commission on 29 December 2022 clarify that “Intelligent transport system activities could be eligible engineering and technical consultancy services under Section 6.15 of Annex I, when they consist in systems enabling connected and automated multimodal mobility of passengers, traffic flow optimisation, congestion reduction, facilitation of energy efficiency in road transport, and/or electronic tolling systems” (ref. FAQ 101).

include those deriving from plant engineering and energy efficiency works;

- the “eligible” revenues from the technology sector, as specified in the clarifications published by the European Commission in December 2022,¹⁷ mainly fall within the scope of economic activity “6.15 Infrastructure enabling low-carbon road transport and public transport” of the Climate Delegated Act.

The compliance of each identified economic activity with the technical screening and DNSH criteria required in order to qualify as “aligned” was assessed. In general, the economic activities of the ASTM Group considered “eligible” but not “aligned” mainly relate to toll revenues associated with existing motorway stretches that in 2022 were not yet equipped with e-vehicle charging stations and, in the EPC sector, to revenues from participation in the construction of new infrastructures or buildings for which the technical screening criteria were not met or the information required by the regulations was not available for the purposes of the analysis, since the project was managed directly by the developer of the work. The KPI denominator is formed of the “Total turnover” reported in the Management Report under the paragraph “Financial highlights”, which represents the consolidated revenues for FY 2022 net of the fee/additional fee payable to ANAS and the reversal of the accounting effects of IFRIC12.

CapEx KPI

The proportion of “eligible” economic activities with reference to capital expenditure (KPI numerator) mainly refers to investments in the motorway in compliance with conventional obligations and with particular attention to the improvement of quality and safety standards. These investments, which for example refer to the construction of new infrastructure, paving and motorways, noise and safety barriers

and plant engineering, fall within the economic activity “6.15 Infrastructure enabling low-carbon road transport and public transport” since they are closely related to motorway management revenues. For more information, refer to the paragraph “Investments in motorway assets” of the Management Report and to section “Investments in safety” of the Sustainability Report. The KPI is also determined by additional investments of a lower amount referring to properties and vehicles owned or in leasing.

The compliance of each identified economic activity with the technical screening and DNSH criteria required in order to qualify as “aligned” was assessed. In general, the economic activities of the ASTM Group considered “eligible” but not “aligned” mainly relate to investments in maintenance aimed at safeguarding existing motorway stretches not yet equipped to facilitate the transit of e-vehicles and, in the EPC sector, to investments associated with the construction of new infrastructures or buildings for which the technical screening criteria were not met or the information required by the regulations was not available for the purposes of the analysis, since the project was managed directly by the developer of the work. The KPI denominator is formed of the sum of the gross increases accounted for in FY 2022 with reference to intangible assets (goodwill, other intangible assets and concessions – non-compensated revertible assets) and tangible assets, including rights of use, as shown in Note 1 and Note 2 of the Explanatory Notes to the Consolidated Financial Statements.

OpEx KPI

The operating expenses¹⁸ of the ASTM Group, as defined in the scope of Taxonomy, are considered almost entirely “eligible” (KPI numerator) since they are direct costs closely related to the “eligible” economic activities considered in the calculation of the turnover and investment KPIs. This area mainly includes concession fees, accounted for in “Oth-

¹⁸ It should be noted that the Climate Delegated Act states that the denominator of this KPI “shall cover direct non-capitalised costs that relate to research and development, building renovation measures, short-term lease, maintenance and repair, and any other direct expenditures relating to the day-to-day servicing of assets of property, plant and equipment by the undertaking or third party to whom activities are outsourced that are necessary to ensure the continued and effective functioning of such assets”. The FAQs published by the European Commission on 2 February 2021 further clarify this provision (ref. FAQ 12).

er costs" (Note 30 of the Explanatory Notes to the Consolidated Financial Statements), and the costs of maintenance of non-compensated revertible assets, accounted for in "Costs for services" (Note 28 of the Explanatory Notes to the Consolidated Financial Statements).

The compliance of each identified economic activity with the technical screening and DNSH criteria required in order to qualify as "aligned" was assessed. In general, the activities of the ASTM Group considered "eligible" but not "aligned" are mainly attributable to expenses related to investments for which the analysis did not meet the technical screening criteria as described in the previous paragraph.

FUTURE STRATEGIC AREAS

Through its business activities, the ASTM Group aims to contribute to the social and economic growth of the territories in which it operates, by putting people first and integrating sustainability policies into its business strategy.

The ASTM Group is committed to progressively aligning its activities to the EU Taxonomy, with a view to further strengthening its concrete commitment towards climate action and in acknowledgement of the fact that the underlying logic of the European Regulation is already becoming an integral

part of the Italian legislative and regulatory framework in which the Group operates. Furthermore, to take into account the highest standards in sustainability and to ensure respect for the ecosystem and improve the quality of life of the communities in which it operates, the companies of the ASTM Group incorporate the criteria of the Envision Protocol into their ventures, considering whether to make those of particular relevance subject to certification. In this regard, the aforementioned Guidelines will be the main tool used. Moreover, in order to ensure greater accountability of the indicators of the EU Taxonomy, the process of collecting data and qualitative information is being systematised in parallel, as well as implementing certain changes to the management and reporting systems to support this process.

Finally, as noted above, the Taxonomy Regulation is still evolving, and despite the clarifications provided to date by the European Commission, continues to present certain areas of interpretation that have not been clearly defined. In 2023 the ASTM Group will continue to focus on the EU Taxonomy and to promptly assess the impacts associated with the new regulations issued by the European Commission (particularly with regard to the other four environmental targets) or other methodological or interpretative guidelines published at all levels.



02



OUR RESPONSIBILITY TOWARD LOCAL AREAS

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ECONOMIC VALUE GENERATED AND DISTRIBUTED

The table showing the breakdown of economic value generated and distributed by the ASTM Group was based on reclassifying items in profit and loss of the Consolidated Financial Statements of ASTM at 31 December 2022.

In 2022, the Group's net global added value was 4,339 (2,983 million in 2021).

Most of this value, equal to 67% (62% in 2021), refers to "Supplier remuneration", in the amount of approximately € 2,905 million, consisting mainly of costs for services and raw materials. This is followed, in line with the previous year, by "Personnel remuneration" (15%, 17% in 2021), totalling € 651 million and mainly referring to salaries and social security contributions.

"Financial system remuneration" accounts for 9% (9% in 2021), for a value of around € 395 million.

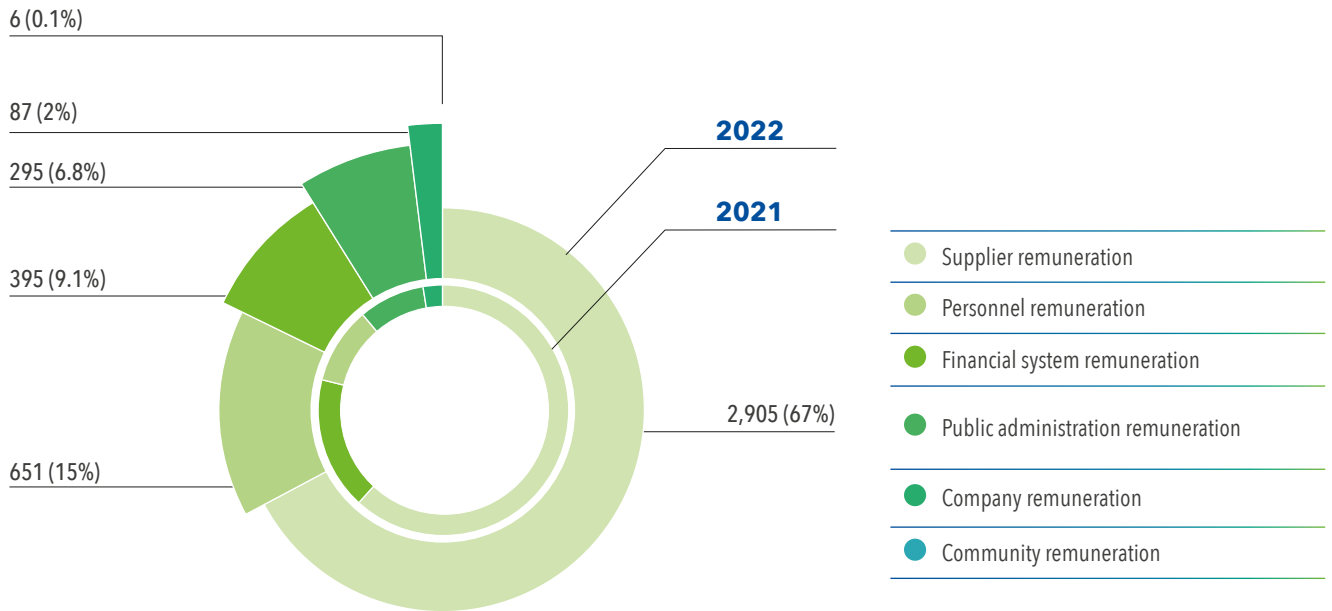
"Public administration remuneration" accounts for around 7% (10% in 2021) and amounts to around € 295 million. It essentially includes income taxes of € 134 million, plus concession fees totalling € 161 million.

"Company remuneration", representing around 2% of the total (2% in 2021), comes to € 87 million and includes the value retained by ASTM for the Group's future development.

Finally, community remuneration amounted to around € 6 million.



DISTRIBUTION OF ECONOMIC VALUE
(in millions of EUR)



GROUP TAXES

OUR APPROACH

As described in the previous section, the Group contributes to the creation and distribution of value, also by paying taxes.

ASTM is aware that taxes, although not currently classified among the most relevant sustainability issues, are important sources for public funds and are fundamental for fiscal policy and the macroeconomic stability of the countries in which it works.

The Group's companies carry out their business in compliance with the fiscal norms established in the legislation for the jurisdictions in which they operate, promoting the principle of integrity, meaning correctness, honesty, loyalty and good faith, in carrying out their company activities and in their relationships, both internal and external. In line with that defined in the Code of Ethics, the values and ethical principles which inspire tax governance with an eye to creating medium/long-term value for stakeholders and protecting its reputation are:

- **Legality and compliance:** respect for the laws and regulations in force in the countries in which the Group operates.
- **Transparency and correctness:** attention to the needs and expectations of Stakeholders, including tax authorities, guaranteeing completeness, reliability, uniformity and promptness in disclosures and avoiding misleading communication, in compliance with the law and best market practices, so as to guarantee full understanding of events underlying the application of tax norms.
- **Sustainability:** creation of sustainable value over time for all Stakeholders, contributing to the economies of the countries in which the Group operates.

FISCAL GOVERNANCE, CONTROL AND RISK MANAGEMENT

The principles which guide tax management are intended to mitigate potential reputation and financial risks relative to corporate tax practices, included as part of the wider internal audit and risk management systems defined by each Group company.

Management of fiscal risks, including compliance risks and those linked to uncertainty about tax positions and changes in legislation are integrated in the Risk Management System, as well as the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, of the main operating Italian subsidiaries, who have adopted them.

ASTM has implemented administrative-accounting procedures which identify responsibilities, roles, processes and types of controls, in compliance with Legislative Decree 231/2001 and Law 262/2005, assigning responsibility for managing fiscal issues to the head of the Administration and Budget function who, in exercising these responsibilities, also makes use of specialised external consultants.

When evaluating extraordinary transactions in line with the Group's strategy, if necessary making use of specialised external consultants, any relevant fiscal issues are also assessed in compliance with applicable regulations, to be submitted for examination by the relevant decision making body. In managing business carried out in foreign jurisdictions, local tax professionals are involved to guarantee better monitoring of local applicable norms, as well as to provide support in relations with the tax authorities in the various countries in which the Group operates.

Company structures responsible for handling tax issues constantly monitor legislative developments in this area, also through participation on specific working groups organised by experts. Note that the ASTM Model 231 was most recently updated on 16 December 2021, to include, among other things, the predicate offences regarding taxes introduced by Italian Law 157 of 19 December 2019.

In the context of the internal audit and risk management system, activities to verify the efficacy of controls implemented to mitigate fiscal risks were carried out by Internal Audit pursuant to the Model 262/2005 by the appointed manager and to Model 231/2001 by the Supervisory Board, also with the support of qualified external consultants.

Through the whistleblowing management system implemented by ASTM and its main operating Italian subsidiaries, all Stakeholders can provide information about problems linked to unethical or illegal behaviours and organisational integrity also for fiscal aspects. EcoRodovias also introduced an "Ethics Channel" from 2018. This online platform allows employees, customers and third parties to report potential infringements of the Code of Ethics or any policy and procedure adopted by the Group, including anonymously.

STAKEHOLDER ENGAGEMENT AND MANAGEMENT OF TAX WORRIES

In managing fiscal issues, ASTM promotes cooperative and transparent professional relationships with the relevant authorities, recognising that resolving risks in advance is in the best interest of both the Group and the tax authorities, through the use of tax clearance application process. In the case of disagreement with a fiscal interpretation or decision, companies begin formal disputes only after having attempted to resolve all problems through proactive and transparent discussions and negotiations with the financial authorities.

Tax audits and any tax disputes are managed by the appropriate company functions, with the assistance of external tax consultants if hired. At 31 December 2022 there were no significant tax disputes and, for more information, please see that reported in the ASTM Group's consolidated financial statements at 31 December 2022, audited by PricewaterhouseCoopers.

COUNTRY BY COUNTRY REPORTING

The ASTM Group complies with the obligations imposed by Italian Law 208 of 28 December 2015 regarding the Country by Country Report established by the OECD as part of the "Base erosion and profit shifting - BEPS" project (see Action 13). To that end, Aurelia S.r.l. was identified as the ultimate parent entity, to which ASTM S.p.A. and its subsidiaries provide the information and data needed to comply with current regulations.

As required by Disclosure GRI 207-4, the table on the next page provides information for each tax jurisdiction.



Tax Jurisdiction	Resident entities
Algeria	Tecnositaf S.p.A. (Permanent Establishment - Algeria)
Angola	Itinera S.p.A. Angola (Branch)
Saudi Arabia	Itinera S.p.A. Saudi Arabia (Branch)
Austria	Itinera S.p.A. Austria (Branch)
Botswana	Itinera/Cimolai JV, Itinera S.p.A. Botswana (Branch)
Brazil	Concessionaria das Rodovias Ayrton Senna e Carvalho Pinto S.A. - Ecopistas; Ecoriominas Concessionaria de Rodovias S.A.; CECM Concessões S.A.; Concessionaria Ecovias dos Imigrantes S.A.; Concessionaria Ponte Rio-Niteroi S.A. - Ecoponte; ECO101 Concessionaria de Rodovias S.A.; Eco050 - Concessionária de Rodovias S.A.; Eco135 Concessionaria de Rodovias S.A.; Ecoporto Santos S.A.; Ecorodovias Concessões e Serviços S.A.; EIL 01 Participações S.A.; ELG 01 Participações Ltda; Empresa Concessionaria de Rodovias do Sul S.A. - Ecosul; RDC Concessões S.A.; Termas - Terminais Marítimos Especializados Ltda; Holding do Araguaia S.A.; EIL 04 S.A.; Concessionaria Ecovias do Cerrado S.A.; Ecopatio Logística Cubatao Ltda; Concessionária Ecovias do Araguaia S.A.; Itinera Construcoes Ltda; ICCR 135 S.A.; ICCR 153 S.A.; EcoRodovias Infraestrutura e Logística S.A.; Igli do Brasil Participacoes Ltda; Argovias Administracao e Participacoes S.A.; Paquetà Participacoes Ltda; Anish Empreendimentos e Participacoes Ltda; Consortium Baixada Santista; Cons. Binario Porto de Santos; MG-135 Consortium; Alcas da Ponte Consortium; CONSORCIO BR-050;Consortio SP-070; Consultoria - ECO135;Consultoria - Novos Negócios; Consortio PSG;
Denmark	Storstroem Bridge JV I/S; ECS MEP Contractor I/S; Itinera S.p.A. Denmark (Branch); I/S Koge Hospital; I/S Odense Hospital; Euroimpianti S.p.A. Denmark (Branch)
United Arab Emirates	Itinera S.p.A. Abu Dhabi (Branch); Itinera - Ghantoot JV; Itinera Agility JV; Sinelec S.p.A. Abu Dhabi (Branch)
France	Itinera S.p.A. France (Branch); TELT JV
Italy	Autostrada Albenga-Geressio-Ceva S.p.A.; Società Autostrade Valdostane S.A.V. - S.p.A.; Società di Progetto Autovia Padana S.p.A.; Autostrada dei Fiori S.p.A.; Società Autostrada Ligure Toscana p.A.; Società Italiana Traforo Autostradale del Frejus S.p.A. - S.I.T.A.F. S.p.A.; Autostrada Asti-Cuneo S.p.A.; Società di Progetto Concessioni del Tirreno S.p.A.; A.T.I.V.A. S.p.A. - Autostrada Torino-Ivrea-Valle d'Aosta; SATAP S.p.A.; Crispi S.c.a r.l. sole shareholder company, in liquidation; Marcallo S.c.a r.l.; Carisio S.c.a r.l. in liquidation; SEA Segnaletica Stradale S.p.A.; Agognate S.c.a r.l. in liquidation; Biandrate S.c.a r.l. in liquidation; Argo Costruzioni Infrastrutture S.c.p.a.; Edilrovaccio 2 S.r.l. in liquidation; Sinergie S.c.a r.l. in liquidation; Si.Co.Gen. S.r.l.; S.G.C. S.c.ar.l. in liquidation; Ramonti S.c.a r.l. in liquidation; CRZO1 S.c.ar.l. in liquidation; Lambro S.c.a r.l. in liquidation; Ponte Meier S.c. a r.l.; Torre di Isola S.c. a r.l.; MAZZE' S.c.a r.l.; Tubosider S.p.A.; Urbantech S.r.l.; Società Attività Marittime S.p.A. in liquidation(SAM S.p.A. in liquidation); Lanzo S.c. a r.l.; Logistica Tirrenica S.p.A.; Taranto Logistica S.p.A.; S.I.N.A. S.p.A.; Consorzio Sintec; Musinet Engineering S.p.A.; Sitalfa S.p.A.; Tecnositaf S.p.A. in liquidation; Sinprosys S.c.a r.l.; Finanziaria di Partecipazioni e Investimenti S.p.A.; Diga Alto Cedrino S.c. a r.l. in liquidation; ASTM S.p.A.; Igli S.p.A.; Euroimpianti S.p.A.; Sinelec S.p.A.; RO.S.S. - Road Safety Services S.r.l.; CERVIT Impianti Tecnologici Consortile a Responsabilità Limitata (C.I.T. S.c. a r.l.); Safe Roads S.c.a r.l.; SINTEC Scarl; Cornigliano 2009 S.c. a r.l.; Partecipazione Roma Sud Scarl; Itinera S.p.A.
Kuwait	Itinera S.p.A. Kuwait (Branch)
Romania	Itinera S.p.A. Sucursala Cluj Napoca (Branch), Euroimpianti S.p.A. Cluj Napoca (Branch)
Russia	Tecnositaf L.L.C.
South Africa	Itinera S.p.A. South Africa (Branch)
Sweden	Itinera S.p.A. Sweden (Branch)
USA	Itinera USA CORP; Halmar International LLC; HIC Insurance Company Inc.; Halmar International Trucking Inc; Halmar Transportation System LLC; Halmar/A Servidone - B Anthony Llc; Atlantic Coast Foundations Llc; Halmar International LLC/LB Electric Co JV; Potomac Yard Constructors JV; ASTM North America Inc.; HINNS JV; Ashlar Structural LLC; Sinelec USA Inc; 3rd Track Constructors
Zambia	Itinera S.p.A. Zambia (Branch)
TOTAL	

Main Activities	Number of employees	Intragroup revenues in the same tax jurisdiction	Sum of intragroup revenues in other tax jurisdictions	Revenues from sales to third parties	Profit/loss before taxes	Tangible assets other than cash and cash equivalents	Income taxes paid based on the cash criterion	Income taxes accrued on profits/losses
Technology		-	-	-	(899)	1	-	-
EPC	-	-	-	-	-	-	-	-
EPC	1	-	-	-	(51)	-	-	-
EPC	1	-	13	34	(1,776)	5	-	-
EPC	19	-	-	10,114	(1,081)	1,012	-	-
EPC, Motorway and Services/Holdings	5,811	144,013	-	1,199,951	18,540	94,746	56,563	(61,554)
EPC	476	17,245	1,171	119,106	(201,806)	43,543	-	-
EPC	794	15,164	259	118,628	(36,400)	3,531	-	-
EPC	1	294	-	9,604	611	149	-	-
EPC, Motorway, Technology and Services/ Holdings	4,800	868,676	31,185	2,788,558	475,804	131,962	94,382	(196,119)
EPC	4	-	15	47,597	(35)	4	-	-
EPC	39	474	-	35,284	(2,638)	310	-	-
Technology	9	-	-	(504)	(179)	-	-	-
EPC	-	-	-	28	(13)	5	-	-
EPC	91	-	-	54,435	(2,253)	8,333	-	-
EPC, Technology and Services/Holdings	1,026	9,049	-	396,490	(25,048)	27,287	2,577	(1,801)
EPC	-	-	-	-	()	-	-	-
	13,072	1,054,915	32,644	4,779,325*	222,776*	310,888*	153,522*	(259,474)*

* Total as in the ASTM Group's consolidated financial statements at 31 December 2022

The total amount of "taxes" for 2022 is € 134.4 million and includes current taxes of € 259.5 million (of which corporate income tax (IRES) of € 161.0 million, regional production tax (IRAP) of € 35.1 million and international taxes of € 63.4 million), tax assets of € 123.9 million and taxes related to prior years of € 1.2 million.

These tax disclosures, together with the reconciliation of effective and "theoretical" taxes, are found in the ASTM Group's consolidated financial statements at 31 December 2022, audited by Pricewa-

terhouseCoopers, to which the reader is referred for further information. Taxes are paid almost entirely in Italy, where the Group contributes to the economic and social development of the areas in which most of its operations occurs, with an eye to creating sustainable value over the medium/long-term.

Additionally, note that in the ASTM 2022 consolidated financial statements, subsidies, contributions and other public aid are listed, received by the Italian subsidiaries of the ASTM Group. In financial year 2022 these totalled € 15.1 million.

IMPACT MEASUREMENT

The business segments in which the Group operates, and in particular concessions and construction, are fundamentally important for the economy.

As regards motorway concessions, numerous studies have demonstrated the strong correlation between an area's infrastructure and its rate of development. The economic growth of a nation is in fact related to an increase in passenger and goods mobility in its territory¹⁹.

Moreover, the construction industry is the driving sector of the domestic economy and purchases goods and services from 90% of economic sectors²⁰.

The estimate of the economic impact makes it possible to measure the incremental wealth generated by an investment in the relative sector and therefore relate the business activity to other economic variables such as the economic value produced and employment.

For this reason, the ASTM Group, aware of the economic and social impact of its business operations, has a developed - and refined over the years - a calculation model to quantify the direct, indirect

and related contributions generated by its own business.

The analysis is based on the use of an input-output model²¹ which statistically analyses interactions between a country's industries, to obtain a profound understanding of the economic context in which a business operates.

The total economic impact generated is € 13.1 billion. Of this, € 4.3 billion is a direct effect, € 3.7 billion is an indirect effect occurring along the value chain and € 5.1 billion derives from related employment generated by spending by those employed. The total economic impact is around € 3.1 exchanged for each Euro spent. The total employment impact generated is 87 thousand jobs. Of these, 35 thousand are generated directly, 23 thousand are indirect along the value chain and 29 thousand are positions activated as related employment, through service and consumption spending by those employed. Jobs activated directly, indirectly and in related employment amount to around 21 for every € 1 million spent by ASTM.

¹⁹Source: "Processing an economic impact indicator for developing new linear transport infrastructure" - CRMT (Transport and Infrastructure Research Centre) - Unioncamere Lombardia

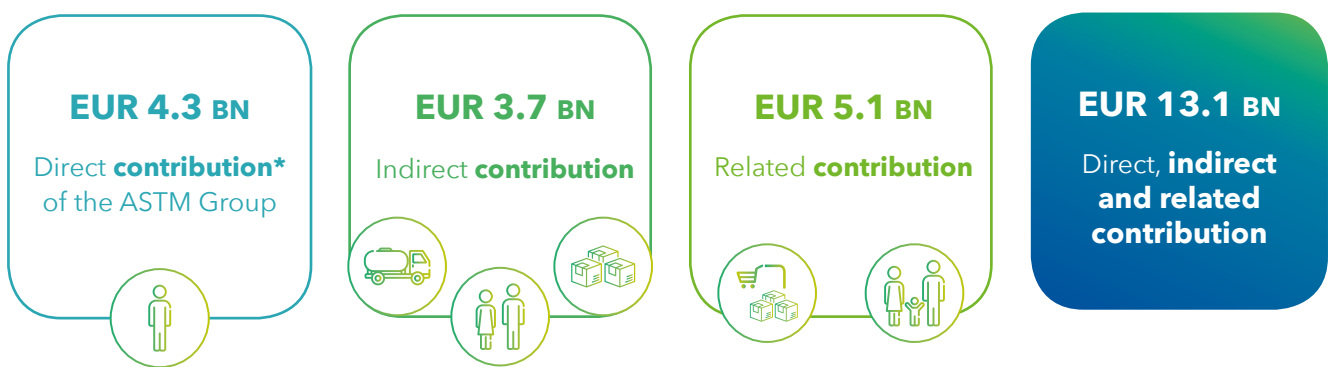
²⁰Source: "The construction industry: structure, sector interdependence and economic growth" by the Economic Affairs Department and Research Centre, ANCE (Italian Association of private construction contractors)

²¹Model developed by Wassily Leontief, the world-famous economist and scientist, winner of the Nobel Prize for Economics in 1973 and inventor of the input-output system

DIRECT: Economic and employment contribution directly connected to business activities.

INDIRECT: Economic and employment contribution indirectly connected to business activities, consisting of the value generated by the Group's partners throughout the value chain activated.

RELATED: economic and employment contribution linked to business levels at the larger level, consisting of value generated through the demand for goods and services coming from personnel employed throughout the value chain activated.



*The direct contribution is equal to the economic value generated and distributed without considering "Company remuneration"



**Includes direct employees (13,072) and jobs created with Group suppliers through the purchase of goods and services

Source for multipliers for input/output analysis is based on Eurostat databases, especially "Symmetric input-output table at basic prices (industry by industry)", "National accounts employment data by industry" and "Household saving rate"

SUPPLY CHAIN

The ASTM Group recognises the importance of guaranteeing a transparent procurement cycle and of regulating social and environmental impact in order to safeguard its Stakeholders. To that end, each company undertakes to select suppliers and manage relations with them according to criteria of transparency, fairness and impartiality, avoiding conflicts of interest, even potential.

The choice of suppliers is based on assessments that aim to identify and select parties of proven quality, professionalism, integrity and reliability with the necessary legal requirements, as well as the best standards in terms of human rights, working conditions, ethics and respect for the environment.

As part of the internal audit system, each company formalises roles and responsibilities, criteria and operating methods for the monitoring and management of the procurement process.

ASTM S.p.A. has adopted specific policies and procedures to guarantee a sustainable management of its supply chain and, among other things, in 2020 implemented a Supplier Register which, among other things, verifies reputation checks carried out in part through the use of databases.

ASTM and its main operating subsidiaries have adopted a Suppliers Code of Conduct which applies together with current regulations, complementing the Code of Ethics, the Anti-Corruption Policy and other company policies and procedures, defining the standards of behaviour that suppliers, partners, business agents and distributors shall adopt, as well as the procedures for disseminating the code and recruiting suppliers. The document reinforces the commitment of the Group companies to applying international standards such as the Ten Principles of the United Nations Global Compact (UNGC), the Universal Declaration of Human Rights and the Fundamental Conventions of the International Labour Organization (ILO). Through the introduction of specific clauses in contracts signed with suppliers, the latter undertake to observe - on penalty of contract termination and without prejudice to compensation for damages - the behavioural principles and rules established under the

Code of Ethics, Model 231, Anti-Corruption Policy and other company policies adopted.

In particular, for all **Italian licensee companies**, the transparency of the process to award works for motorway construction is guaranteed by legal provisions that the licensees must observe when assigning works. In addition, all the licensees have a Suppliers List, which is managed and updated by the Department of Purchases, Contracts and Quality. As regards the execution of works and services for the construction of new works or the maintenance of the motorway structures under management, the Group companies operate in line with the official ANAS price list, which is used to determine the "threshold" prices of the works to be carried out. Costs are subject to periodic checks by the Italian Ministry of Infrastructure and Transport ("MIT" or "Granting Body").

For the **Brazilian licensee companies**, supplier management is coordinated by the Purchasing Department, which is connected to the Corporate functions, and follows financial and social quality and compliance criteria. Through the use of its own system, the Department guarantees the traceability and documentation of each supplier, which must adopt the standards of the Company Code of Conduct. The Supplier Management Programme assesses the degree of compliance of suppliers with the EcoRodovias standards, including aspects linked to ESG topics. After finalising the contract with suppliers, they are assessed by three complementary initiatives:

- assessment by the Purchasing Office: legal aspects and quality of service are taken into consideration. This assessment considers the strategic suppliers.
- PAF (Program of Suppliers Assessment): the compliance of suppliers is evaluated in terms of health and safety and environmental aspects. All service suppliers are covered by this programme.
- programme of social and environmental assessment and engagement of strategic suppliers: in this programme, strategic suppliers

answer a questionnaire with 5 aspects (Governance, Administrative, Technical, Social and Environmental).

Aspects pertaining to human rights, such as the fight against child labour and forced labour, are regulated by the Suppliers Code of Conduct.

These practices guarantee a satisfactory selection of new suppliers, compliance with current laws and the promotion of good practices, while reducing risks related to the supply chain.

The supply chain occupies a strategic position in the **construction sector**. These companies operate in work sites for the construction of civil engineering and infrastructure works. A significant quota of the works is subcontracted to third parties. When recruiting subcontractors, the characteristics of the contracted companies in relation to the work to carry out and relevance for environmental issues are assessed. Special attention is paid to excavation and earth moving works, environmental clean-ups and specialist works such as special foundation works, waterproofing and asphaltting.

The sustainability parameters are part of the assessment procedure for offers for goods, framework agreements and professional agreements and shall be extended to the assessment of the Suppliers List.

The supply chain in the **engineering** sector is also managed so as to allow complete traceability of suppliers and, where present, any subcontractors. The checks are intended to guarantee the high quality of services and, through contractual clauses and specific requirements for insertion in the Suppliers list, to ensure the ethical nature of the

suppliers network. In order to guarantee a satisfactory performance standard, the standard contractual format now includes a special clause linked to the fulfilment of obligations concerning the maintenance of specific quality and performance standards. To guarantee the ethical conduct of third parties, the contractual template includes a specific clause that requires third parties to comply with the Supplier Code of Conduct, the Anti-Corruption Policy and the Code of Ethics; this commitment applies to the entire supply chain and is a necessary requirement for the continuation of the contractual relationship. A specific contractual clause was also introduced which renders the efficacy of the contract subordinate to registration of the third party in the Suppliers list. By virtue of the principle of continuous improvement, and in the aim of guaranteeing the traceability of the chain, the clause related to subcontractors has been amended, requiring that the Company's prior approval must also be given in relation to sub-suppliers and not limited to subcontractors. This way, it is possible to verify compliance with the principles by any party in the chain in advance. Finally, the entire supply chain, including any third party subcontractor, is subject to administrative document checks to verify the ethical conduct and professional standing of the third party.

In line with that established in the Suppliers Code of Conduct, the best standards in supply chain management are also adopted for the **technology** sector.

During 2022, approximately 97% of Group purchases were sourced from local suppliers²². The chart below shows the percentage of local purchases, by geographic area.

²² In relation to the Significant Locations of Operations: Italy, Rest of Europe, United States, Latin America, South Africa, Middle East. The data refers to the purchase of main materials, the quantities of which are shown on the following page

EXTERNAL AUDITS ON ITINERA S.p.A. SUPPLIERS

In 2022 Itinera conducted supplier audits on a sample of suppliers, considering the following criteria:

- the type and critical aspects of the supply;
- work site feedback;
- particular needs, such as the existence of harmful conditions for Safety, the Environment and Quality of supplied products/services or information reported from work sites.

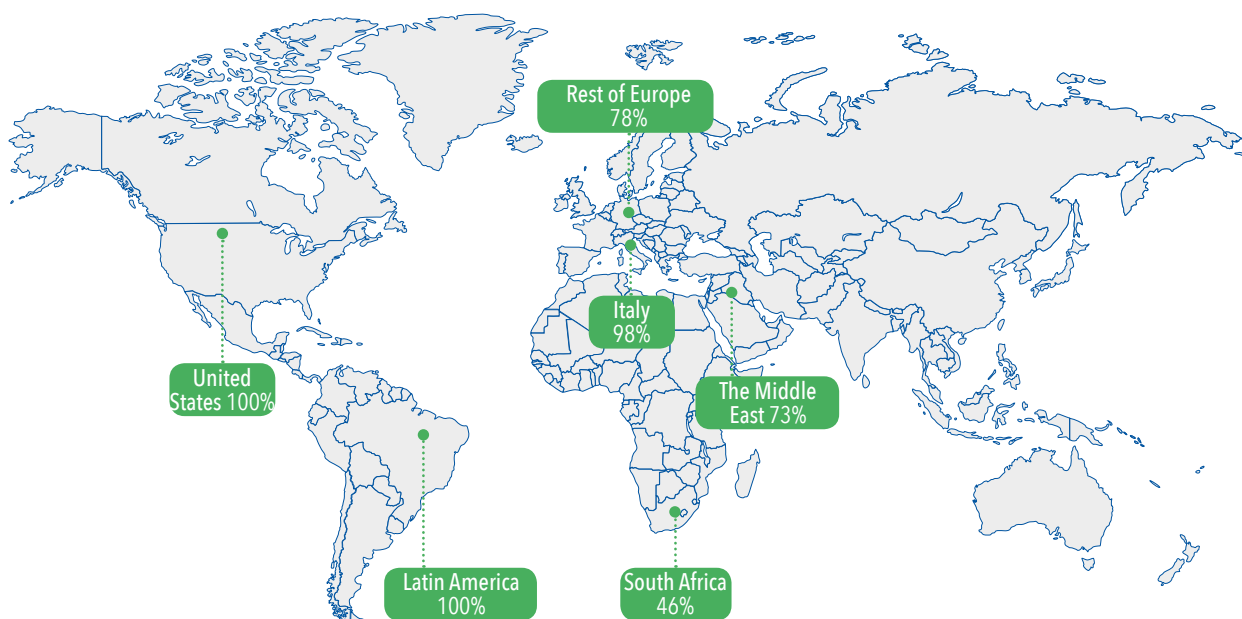
Any cases of non-compliance identified are managed in accordance with the management system procedures and involve the definition of improvement plans and the performance of follow-up checks to ensure their verification. The involvement of subcontractors in such aspects also includes periodic coordination meetings.

In any case, the findings did not reveal any critical issues that would result in a change to the certification of the audited suppliers: the recommendations highlighted the need for verification of operational control and regulatory compliance, but specified that such checks should be implemented without difficulty by the suppliers.

The audits also identified some suggestions for improvement, which were shared with the suppliers. Their implementation will be monitored in the context of the follow-up activities.

LOCAL PURCHASES

(% of expenditure on local suppliers)



The main non-renewable materials purchased by the Group during 2022 are broken down as follows, by reference category.

MAIN MATERIALS PURCHASED²³

	2021	2022
Oil products [litres]	63,141,103	45,853,437
Concrete [m3]	323,584	734,914
Quarry material [m3]	495,942	2,645,756
Bituminous mixes [ton]	560,726	603,040
Road barriers [ml]	59,825	177,129
Cement and other binding agents [ton]	124,552	65,819
Iron and steel [ton]	106,208	48,767
Bitumen [ton]	13,776	80,969
Chlorides [ton]	29,136	27,379
Prefabricated cement products [m3]	4,689	5,227

SUPPLIER SCREENING AND ASSESSMENT

Supplier screening and assessment mainly takes place through monitoring supplier conformity to applicable laws and specific labour and environmental requirements.

In the **motorway concessions** sector, the services and works contracts of the licensee companies specifically refer to applicable laws and collective bargaining agreements in use, with particular reference to occupational health and safety, and insurance, welfare and salary conditions. In compliance with management systems adopted, suppliers used are generally assessed by the Procurement

Function of each Group company, assisted by relevant Technical Managers and competent company functions. If examination of the documentation produced were to show any irregularities compared to the contract, the termination clauses envisaged in each order and contract would be used.

Regarding the **construction** industry, suppliers are screened – as part of criteria concerning work practices – according to whether activities are to be carried out in Italy, the EU or the rest of the world. For Italy and EU countries, documents on personnel to use for activities to carry out are examined beforehand. For non-EU partners, a special focus is also placed on child labour (regarding subcontractors directly at the work site and external manufacturers of materials which are then used at work sites), and on living conditions at base camps (accommodation, board, leisure and recreational facilities, transport to and from the home country). In the case of suppliers operating at external production units, specific audits may be directly conducted at the units concerned. As regards environmental issues, when recruiting subcontractors, the characteristics of individual companies in relation to the work to carry out and relevance for environmental topics are normally assessed, requesting information on environmental certification and registration with applicable registers.

The criteria concerning work practices, used for screening in the **engineering sector**, vary according to the countries analysed. In Italy and the European Union, specific references to the current legislation and the collective agreements applied are taken into consideration. In the other countries, in addition to the above criteria, compliance with the UN Convention on the Rights of the Child (Articles 31-40) is also considered, and contractual obligations are included on the maintenance of workers on site and their treatment.

²³ The figure is the result of estimates made in consideration of the total cost and average unit cost incurred for the materials listed above

ACTIONS TO MITIGATE MAIN RISKS REGARDING CHILD LABOUR

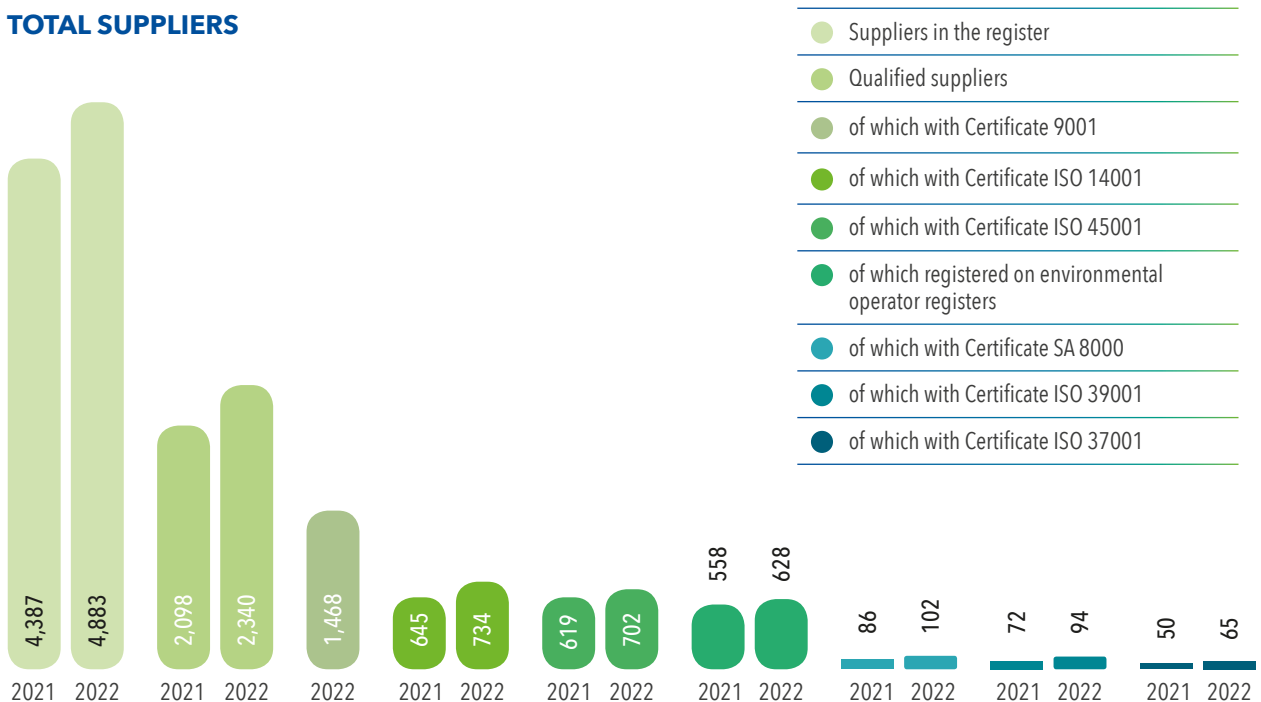
Considering the specific nature of its business and geographic scope of its operations, in the world, the main risks identified for the Group regarding child and forced labour concern construction sites, with particular reference to the responsible management of the supply chain in Africa and the

Middle East. Specifically, Itinera requests a statement of compliance with the UN Convention on the Rights of the Child, Articles 31-40, in relation to activities and main suppliers, both Italian and foreign, with a greater risk of the use of child labour. At the Botswana work site, the Human Resources and Health, Safety and Environment departments carry out controls. At the Abu Dhabi work site, work visas are checked before personnel can enter the site. As regards activities and main suppliers with a

ITINERA SUPPLIERS LIST

Itinera has implemented an on-line platform for the prior assessment (pre-qualification) of its suppliers of goods and services worth more than € 10 thousand per year. In particular, the process is divided into two phases: (i) qualification of headquarters' staff (prior assessment - pre-qualification) and (ii) monitoring of the qualified supplier during its activity in the work site by competent Project Managers and Site Directors (direct assessment - work site feedback) and through specific audits. Having qualified suppliers meets the requirement to operate with reliable suppliers in quality, technical and organisational terms, the protection of health and safety and the environment, which guarantee the provision of the service requested in full compliance with the contractual requirements. In addition to the certifications achieved, some accident indicators in terms of health and safety have been inserted as a preferred criterion for awarding contracts. At the end of 2022, out of the 2340 suppliers recorded on Itinera's supplier register, 218 new suppliers were certified.

TOTAL SUPPLIERS



considerable risk of the use of forced labour, workers selected on a random sample are interviewed during internal audits on human rights and any unlawful situations, in accordance with requirements

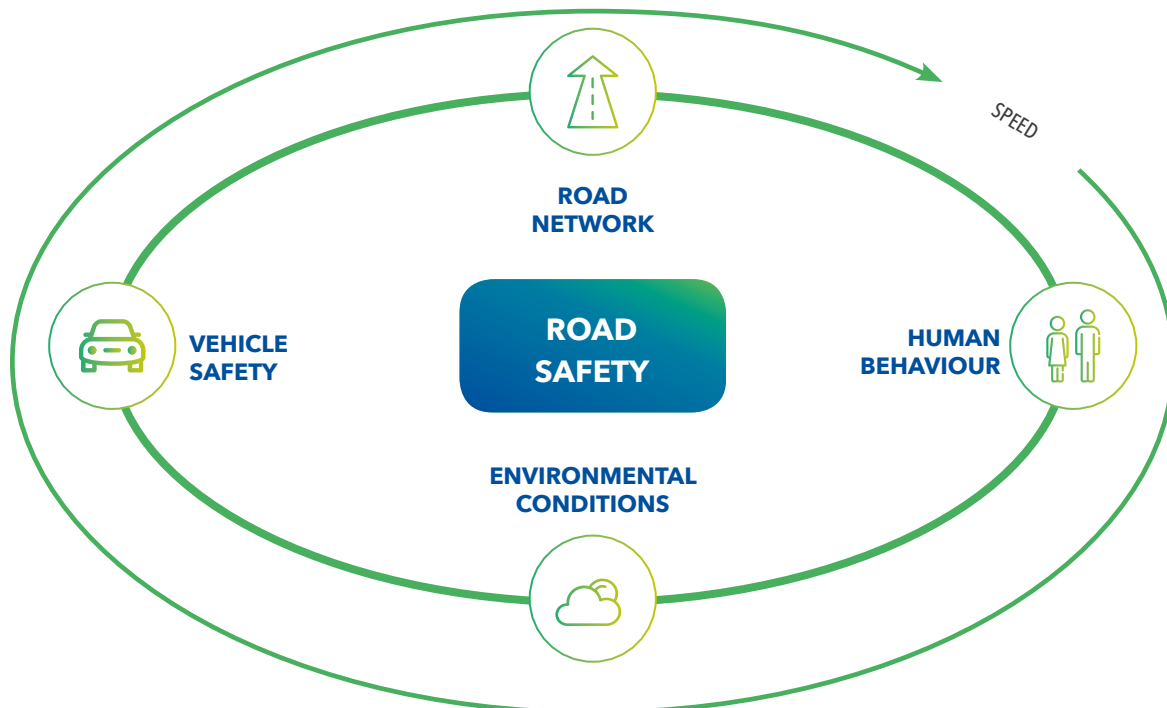
of SA 8000 and Corporate Accountability. Boxes are provided at foreign work sites to post anonymous reporting of any breaches.

MOTORWAY INFRASTRUCTURE MANAGEMENT

OUR COMMITMENT TO ROAD SAFETY

The roads designed, built and managed by ASTM Group licensees aim to fulfil the need for the safe transit of people and goods. The complex and regulated road system calls for formal compliance with sector regulations, which is a qualifying element of

the planning and management process, but still only one part. In fact, for some time the ASTM Group licensee companies have understood the need for a multi-factor approach to road safety management, choosing to integrate the aspects usually considered with criteria that can be used to assess and compare road user behaviour, traffic flows and the condition of infrastructure in an integrated manner.



These criteria mean:

- Design and construction choices geared towards safety, as part of a cycle of technical and administrative efficiency, with measures that target the development and adaptation of the roads that are devised to incorporate the human factor in design criteria, in order to prevent accidents and mitigate consequences for people.
- careful maintenance of infrastructure. inspection technologies and methods adopted tend to establish the consistency and safety of the work and foresee its future deterioration, referring this to the conditions of use of the infrastructure which the work is a part of. Activities comprise inspections and checks, controls and monitoring of works and the overall management of road infrastructure.
- safe management of infrastructure, with careful monitoring of events on the network and use of feedback relating to managed motorways.
- public notices and promotion of safety through the Autostradafacendo safe driving campaign.

THE ROLE OF PREVENTION

In managing safety policies, prevention plays a central role. The technical departments of the ASTM licensee companies are supported by EPC sector companies to develop a multitude of actions for prevention and to improve infrastructure. Additionally, to improve the motorway infrastructure management process, all Italian Group licensee companies have launched an accident analysis process, following a shared methodological approach.

Material topic:

ROAD SAFETY

Area of Leg. D. 254/2016:
ENVIRONMENTAL, SOCIAL



Main sustainability risks associated:

- risk of operational disruption to infrastructure
- risks related to the management of emergency events and motorway services;

Summary of main management and mitigation actions:

- management qualification and personnel training, including through drills
- operating procedures for timely and coordinated traffic and emergency management
- continual planning and monitoring of maintenance
- memorandums of understanding with neighbouring licensees and authorities (the police, civil protection, prefectures, etc.);
- service contracts with third parties (e.g. winter services);
- grantor monitoring plan
- systems to identify customer satisfaction.

All Group licensees have an operating unit that users may contact in the event of emergencies, and SOS points along the entire motorway network.

Autostrada dei Fiori S.p.A., for the A10 Savona-Ventimiglia and A6 Torino-Savona sections, S.A.V. S.p.A. - SOCIETA' AUTOSTRADALE VAL-DOSTANE, S.A.T.A.P. S.p.A, for the A4 Torino-Milano and A21 Torino-Piacenza sections, Autovia Padana S.p.A. for the Piacenza-Cremona-Brescia stretch of the A21; SALT S.p.A., for the A12 and A15 sections within its remit and Asti Cuneo S.p.A. for the A33 stretch, A.T.I.V.A. S.p.A. for the Torino-Quincinetto and Ivrea-Santhià (A5) stretches and Tangenziale di Torino and Torino-Pinerolo (A55), Concessionaria das Rodovias Ayrton Senna e Carvalho Pinto S.A. – Ecopistas, Concessionaria Ecovias dos Imigrantes S.A., Concessionaria Ponte Rio-Niteroi SA – Ecoponte, Eco050 – Concessionária de Rodovias S.A., ECO101 Concessionaria de Rodovias S.A., Eco135 Concessioanria de Rodovias S.A., Empresa Concessionaria de Rodovias do Sul S.A. – Ecosul e Concessionaria Ecovias do Cerado S.A. .have obtained ISO 39001 certification.

MONITORING THE CONDITIONS OF MOTORWAY INFRASTRUCTURE

The ASTM Group's licensees have defined and adopted a method – formalised in the Action Plan for Maintaining Infrastructure efficiency – for the integrated process which monitors the conditions of infrastructure, provides diagnostics and defines necessary measures, to ensure the safety, functionality, robustness and durability of works over time.

The process is based on specific procedures that target the acquisition of information about the conditions of the infrastructure and developments over time, in order to understand the “current” conditions of works, reasonably predict future conditions and thus promptly and effectively plan necessary measures.

In addition to the ordinary checks required by the concession agreements, there are additional checks managed by the internal structure and external professionals, which provide the Technical Departments of the Group licensees with all results, making it possible to define which measures to undertake, the type and the planning of interventions.

The methodology adopted also envisages specific checks and validations by third-party and independent experts.

After priorities for actions and the planning are defined, the projects are prepared (OpEx and CapEx) and, as provided for by applicable regulations, are validated by a competent person; capex activities are also approved by the Granting Body or other competent organisations.

In close connection with this monitoring process, the Group is developing an industrial project to define a standard for the safety of infrastructure which, thanks to a combination of the most advanced techniques and civil engineering plus applied mathematics, as well as innovative monitoring

technologies and advanced cognitive cloud computing systems, will improve the quality and safety of works, extending their useful life and reducing management costs.

The methodology is therefore characterised by an integrated approach which is also innovative. This is because establishing values and specific indexes for infrastructure conditions is difficult, and so mathematical models and specific algorithms are used to measure any inefficiencies, to enable the consequent planning of actions to ensure safety and sustainability over time.

More specifically, the system will automate data collection and processing in order to standardise inspections and identify any critical aspects. To this

Material topic:

MOTORWAY INFRASTRUCTURE SAFETY

Area of Leg. D. 254/2016:
ENVIRONMENTAL, SOCIAL



Main sustainability risks associated:

- risk of operational disruption to infrastructure;
- compliance risk and risks related to ethical behaviour.

Summary of main management and mitigation actions:

- monitoring and planning of maintenance to check and guarantee the safety status of motorway infrastructure
- the seismic and hydrogeological monitoring plan;
- grantor monitoring of infrastructure
- the “Code of Ethics and Conduct” and “Compliance Programme” 231/01 (hereafter “Model 231”) adopted by ASTM and its operating subsidiaries, including specific operating procedures monitoring environmental offences and occupational health and safety;
- environmental and occupational health and safety management systems in line with applicable best practices

end, SHM (structural health monitoring) systems are used comprising high-quality installed sensors to monitor significant structural parameters, connected to the cloud, for data acquisition, processing and storage. Real-time measurements of main structural parameters are compared with expected results, calculated using the structure mathematical model, to promptly identify any critical aspects of works.

Considering the importance of the development of methodologies and technologies described above regarding the infrastructure under concession, and considering the opportunities of the project in the safety industry, the Group will put its experience and skills to use in the civil engineering sector.

Lastly, project partners include world leaders in the sectors of materials, components, systems and IT, as well as major universities.

ASTM supports the new PhD programme of the University of Pisa on the analysis and control of structures and infrastructural works



[Read the news story](#)

INVESTMENTS IN SAFETY

The Group's licensees continue investing constantly in their own motorway network, with particular attention to improving quality and safety standards, in compliance not only with conventional obligations but, mostly, with the industrial approach to business that has always distinguished the Group.

Investments in motorway assets in FY 2022 totalled around €1,304 million (€608 million in 2021). In particular, investments in motorway assets from Italian

SPENDING FOR INVESTMENTS AND MAINTENANCE

(amounts in EUR/million)

	2021		2022	
	Ordinary maintenance	Investments	Ordinary maintenance	Investments
A4 Torino-Milano	33.4	19.7	34.6	29.0
A21 Torino-Piacenza	33.9	57.0	33.4	68.5
A6 Torino-Savona	25.4	83.0	17.9	104.4
A12 Livorno-Sestri Levante	32.8	96.6	30.9	114.3
A15 Parma-La Spezia	27.8	93.7	21.0	86.7
A33 Asti-Cuneo	8.7	19.8	11.7	99.4
A10 Savona-Ventimiglia	24.4	73.0	26.0	98.6
A5 Quincinetto-Aosta Ovest	16.2	12.1	11.6	20.7
A21 Piacenza-Cremona-Brescia	14.0	43.2	13.9	68.1
A5 Torino -Quincinetto e Ivrea-Sanità	25.5	30.6	33.3	56.8
A55 Tangenziale di Torino & Torino-Pinerolo				
A32 Torino-Bardonecchia	27.0	54.9	34.0	100.1
T4 Frejus Tunnel*				
Total Italian concessions	269.1	583.6	268.3	846.6
EcoRodovias**	18.1	24.5	232.0	457.5
Total	287.2	608.1	500.3	1,304.2

* Wholly consolidated from 1 April 2021

** Wholly consolidated from 1 December 2021

concession holder companies amounted to € 847 million, an increase of 45% compared to the same period the previous year, reflecting the Group's commitment to guarantee high safety standard on all the sections managed.

Investments carried out by the Brazilian investee companies in 2022 amounted to €547 million (€25 million in December 2021 alone).

Most of the investments in motorway assets made during the year relate to investments to improve the safety of the network (€841 million), including upgrading of tunnels to comply with EU directives, work on bridges, viaducts, overpasses and the upgrading of safety and noise barriers. Investments in the development of new infrastructure amounted to €432 million, of which €190 million refer to the Brazilian network, €98 million to the Asti-Cuneo Motorway, €47 million to the Tyrrhenian-Brenner multi-modal corridor (TIBRE) and €45 million to the Autovia Padana "Corda Molle" project. Finally, around €31 million relate to investments in innovative technology projects across the Group's motorway network.

MANAGING EMERGENCIES

The Group is committed to managing all types of risks and emergencies as efficiently as possible, to ensure transit on its managed motorway stretches in all situations and in the case of any type of event. Main emergency situations refer to snow, flooding, fire and landslides. In 2022, a total of 63 snow events lasting a total of approximately 505 hours (111 snow events lasting approximately 787 hours in 2021) were managed, using 1,655 vehicles and around 21 thousand tonnes of fluxing agents (salt and chlorides, approximately 28 thousand tonnes of fluxing agents in 2021). During 2022, 187 flooding events were also managed, using 23 items of equipment. All Group licensees have an operating unit that users may contact in the event of emergencies, and 2,976 SOS points along the entire motorway network. The increased amount of data on flooding, landslides and fires is mainly due to the entry into the scope of consolidation of the Brazilian licensees of the EcoRodavias Group for the entire year.



APPROXIMATELY **802 KM**

**OF DRAINING/SOUND-ABSORBING
ROAD SURFACES EQUAL TO AROUND
62% OF THE MOTORWAY
NETWORK MANAGED**

EMERGENCY SITUATIONS ON GROUP STRETCHES

TYPE OF EVENT	2021	2022
	no. of events/duration	no. of events/duration
Snow events (hours of snow)	787	505
Flooding (no. of events)	43	187
Landslides (no. of events)	5	52
Fires (no. of events)	120	3,001

SAFE INFRASTRUCTURE MANAGEMENT

During 2022, development continued on the project to implement an ISO 39001 compliant road traffic safety management system by motorway companies, with the aim of decreasing the number of accidents on sections managed through application and continuous improvement of the system, specifically in terms of cases involving serious consequences for those involved.

Safe infrastructure management starts from careful attention to usage conditions, circulation features and information on accidents: these elements represent an extraordinarily rich knowledge base to work towards progressive improvement in travel conditions on the road network. In 2022, the licensees perfected their methods of collecting, cataloguing and assessing these information assets by improving a detailed system that supports decision making, able to integrate various data sources. The ADAM® (Accidents Data Analyser Module) platform, now used through the ASTM Group's Italian network, makes it possible to:

- create a descriptive road database, indicating the technical and geometric features of interest obtained from field measurements (e.g., viaducts, tunnels, turns, lengths, slopes, pavement features);
- acquire dynamic information from the manager of interest for processing (e.g., traffic, accidents);
- use the above data to create a wide number of indicators (e.g. accident rate, severity index, social cost);

- calculate indicators based on various types of road segmentation (automatic segmentation algorithm, guided by the indicators, or fixed);
- create infrastructure “models” based on the technical/geometric characteristics of sections to as to make homogeneous comparisons between indicators for arteries (e.g. compare only indicators in areas in which traffic is disturbed by junctions);
- compare the same motorway section over intervals of various times, to verify whether or not safety measures implemented are effective.

The aforesaid action represents a useful tool for implementing a virtuous process of improvement in road safety and the operating measures implemented for such purposes, namely to choose measures that, on the basis of feedback on the operating experience, are objectively targeted to reduce the accident rate on the network.

All licensee companies of the Group have Services Charters, which report the quality indicators and related reference standards with which compliance is assured. Updated annually, the Services Charters represent an opportunity to review the service and the value of the information for motorway customers. The Group, in compliance with the objectives of the quality and road safety policy, is also committed to monitoring quality perceived by users of its own motorway infrastructure. To this end, the licensee companies carry out customer surveys on a regular basis and the results are analysed and used internally to identify strengths and weaknesses, plan improvement actions and follow them up.

ACCIDENT RATE ON THE GROUP'S ITALIAN NETWORK

The graph shows the rate of fatal accidents and the mortality rate on the network managed by the Group in Italy. The strong decrease in rates reflects the efforts to continually improve safety on its managed infrastructure.

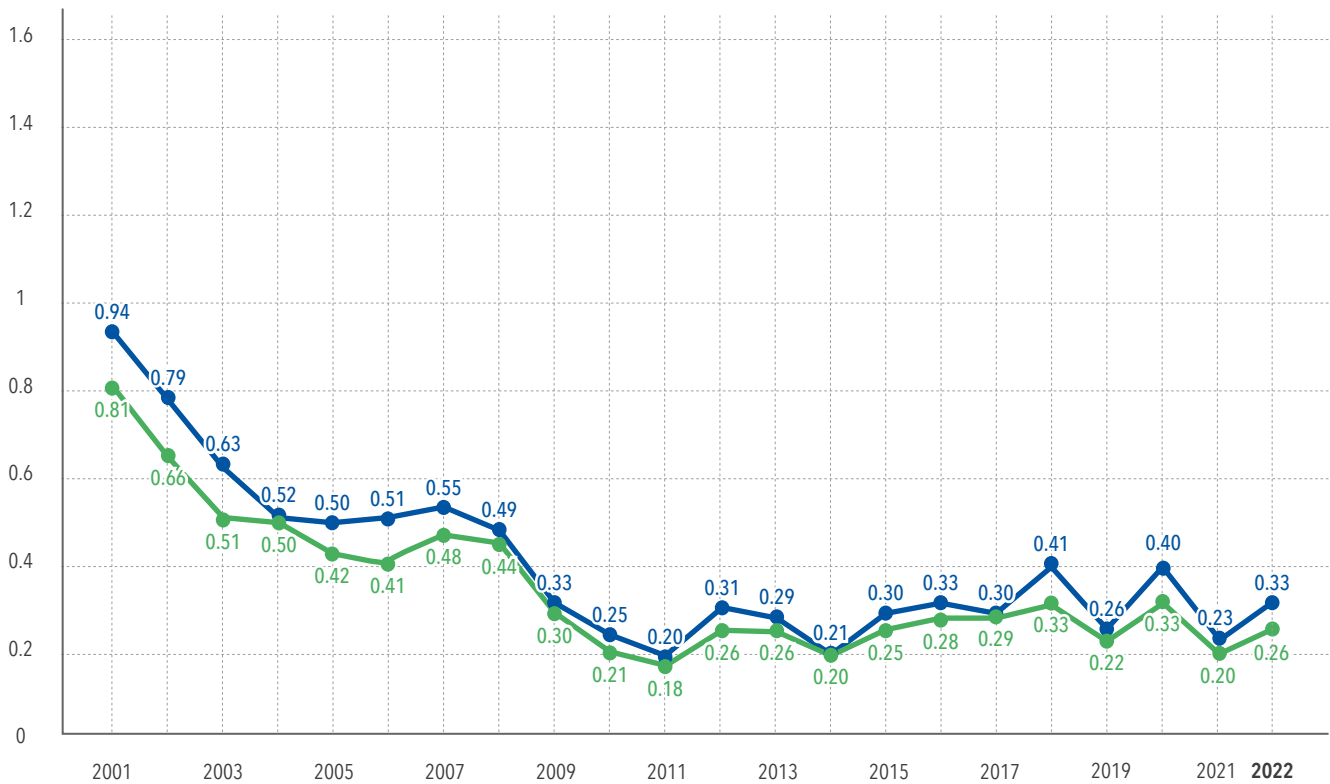
In 2022, there were a total of 3,945 accidents on this infrastructure (3,380 in 2021), of which 34 were fatal accidents (23 in 2021), with 1,637 injuries (1,235 in 2021) and 43 deaths (27 in 2021).

FATAL ACCIDENT RATE

(Rate for the years 1998-2022, no. of fatal accidents/mileage in millions of vehicles/km*100)

MORTALITY RATE

(Rate for the years 1998-2022, no. of deaths due to road accidents/mileage in millions of vehicles/km*100)



62% of vehicles involved in accidents are light vehicles (63% in 2021), the remainder heavy vehicles.

-55% Fatal accidents since 2001

The following elements contributed:

Technical improvement to infrastructure

Completion of operational capacity

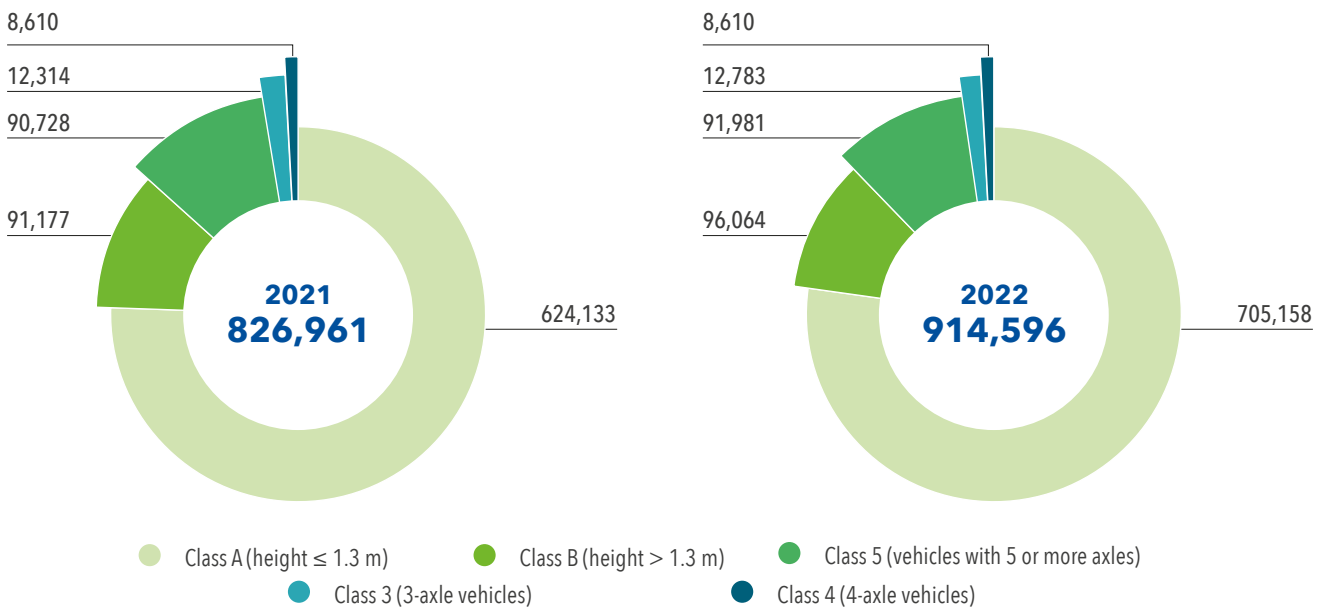
Development of the road safety campaign Autostradafacendo

TRAFFIC DATA ON THE GROUP'S ITALIAN NETWORK

74% of journeys assessed in vehicles/km²⁴ are light vehicles (72% in 2021), the remainder heavy vehicles.

Graphs and data on traffic served daily by the Group's motorway licensee companies in Italy are shown below, indicating services provided to the public.

AVERAGE ACTUAL DAILY VEHICLES BY TYPE OF VEHICLE ²⁵



²⁴ Includes paying vehicles, vehicles subject to paying and exempt vehicles. The definition of vehicles/km refers to total km travelled by vehicles joining the motorway, in particular between the start and end of the stretch, and makes a distinction between actual vehicles, which are the number of all vehicle units, regardless of the category, joining the motorway and regardless of the km travelled.

²⁵ Includes paying vehicles, vehicles subject to paying and exempt vehicles

ACCIDENT RATE ON THE GROUP'S BRAZILIAN NETWORK

In 2022, for the licensee companies of the EcoRodovias Group, a fatal accident rate of 1.50 is recorded (1.63 in 2021) and a mortality rate of 1.68 (1.90 in 2021). The indices are calculated as number of events each 100 millions vehicle/km travelled²⁶. The accident rate on Brazilian motorways is higher compared to Italian motorways in relation to the differences in vehicle fleets and traffic patterns characteristic of the two countries. This discrepancy is general and also confirmed, for the entire national networks, by the World Health Organisation's 2018 report, according to which Brazil has more than 3.5 times as many road accidents per 100,000 inhabitants as the corresponding figure for Italy.

TRAFFIC DATA ON THE GROUP'S BRAZILIAN NETWORK

For the licensee companies of the EcoRodovias Group, there were 227,530 thousand equivalent paying light vehicles (237,825 in 2021) and 175,182

thousand equivalent paying heavy vehicles (173,420 in 2021).

Traffic performance for EcoRodovias in 2022 shows, as a whole, a 2.1% decrease in traffic volume compared to the previous year (+1.0% light vehicles, -4.3% heavy vehicles), mainly due to the expiration at the end of 2021 of the Ecovia Caminho do Mar and Caminho do Mar ed Ecocataratas concessions, which reduced the scope of business in 2022, not fully offset by the start of tolling in the fourth quarter on the new concessions EcoRioMinas and Ecovias do Araguaia.

The traffic increase of light vehicles is mainly due to the progress during 2022 of the vaccination programmes and campaigns intended to tackle the Covid-19 pandemic, which allowed for an easing in the social distancing and travel restriction measures adopted by the Brazilian authorities.

Heavy traffic, in terms of the areas managed by the licensee companies of the EcoRodovias Group, also benefited from the recovery of industrial production, growth of agricultural exports and imports of fertilisers.



²⁶ 2021 figures for the fatal accident rate and the fatality rate have been restated for a more transparent evolutionary comparison with the 2022 figure.

LOCAL PROJECTS IMPLEMENTED

Accident rate studies

In application of Italian Legislative Decree 35/2011 on motorway infrastructure safety management, S.I.N.A. carries out widespread accident rate analysis on the motorway network managed, contributing to evaluating safety developments on the stretches of the individual licensee companies.

Group licensee companies implement progressive safety improvement measures also on the basis of these assessments. After these measures, accident rate studies also serve to verify the actual efficacy of the measures implemented. After identifying the type of action, the period in which it was executed and the date in which the work was completed, it is possible to do subsequent analysis to determine whether accident rates have effectively fallen over time after execution.

AUTOSTRADAFACENDO

One of the fundamental elements for road safety is represented by the human factor. Aware of the

importance of this aspect, the Group seeks to raise its users' awareness through the road safety campaign, Autostradafacendo. It seeks to influence the human factor through user communication on virtuous behaviours and misuse.

ICARO Project

The ICARO project is a road safety campaign aimed at young people in lower and upper level secondary schools in every Italian province. Its aim is to disseminate the importance of following the rules and laws through correct road user behaviour. Participation is not open to individuals, but to classes located throughout Italy.

Through S.I.N.A., the ASTM Group contributes to the work of the Icaro project alongside the Italian Traffic Police and other illustrious partners who seek to educate young people, and future drivers, about road safety culture. In the second half of the year, new criteria were established for the next competition aimed at young people in 2023, and the awards ceremony for the winning classes of the 2022 campaign was organised for the end of the year.



COOPERATION WITH EUROPEAN INSTITUTIONS

The mobility system has always had a large influence on local and global socio-economic growth. In recent years, technological developments are demonstrating potential which could favour further acceleration of the same.

It is then easy to understand why mobility is one of Europe's priorities, as it recognises that technology is absolutely necessary for positive changes in the transport system. For this reason, it has invested billions of euros in developing the Intelligent Transport System (ITS), which integrates digital knowledge with transport engineering. The aim is to improve driving safety, protecting people, vehicles and goods, while improving both the quality and efficiency of the systems used to transport passengers and goods, optimising the use of natural resources and respecting the environment. Moreover, given the major programmes and commitments aimed at the ecological and digital transition adopted by the ASTM Group, these topics are becoming more relevant on both a subjective and objective level.

PANEUROPEAN COOPERATION TO IMPLEMENT NEW TECHNOLOGIES

The work of the European road technology forum comes to fruition in the NAPCORE projects, an intentional coordination on the exchange of traffic data, and the ITS Corridors (MedTIS 3, URSA MAJOR neo and CROCODILE 3) which are currently coming to an end, as well as in the MERIDIAN project (the latter officially started on 21 October 2022). The platform represents a space where the Ministries, national road authorities, motorway operators and public and private sector partners coming from almost all European Union member states and bordering countries can cooperate. Interested operators cooperate to promote, accelerate, harmonise and optimise current and future developments in the implement of

road technologies on the Trans-European Network. The European platform for Intelligent Transport Systems (ITS) was established and is co-financed by the European Commission. It is managed by European institutions through the European Climate, Infrastructure and Environment Executive Agency (CINEA) with the general coordination of the Ministry of Infrastructures and transport (MIT).

These projects unite most European Stakeholders with the goal of cooperation, through an open forum able to provide a helpful contribution to future strategies, as well as providing recommendations for new European policies intended to improve development and more widely implement technological services throughout the European road corridors. The Group provided the project management of the initiatives throughout 2022 and has drafted a future proposal in response to the new European CEF2 call.

COOPERATION WITH NATIONAL COMMITTEES

SINA - THE PRESIDENCY OF THE PIARC NATIONAL COMMITTEE ON "ROAD SAFETY POLICIES AND PROGRAMMES" FOR THE 2021-2024 FOUR-YEAR PERIOD

In 2022 three meetings of the PIARC national committee on "Road safety policies and programmes" were held. S.I.N.A. will chair the committee for the 2021-2024 four-year period. The Committee's chair, acting on behalf of the ASTM Group, was an active presence at the meetings, which were attended by leading Italian experts including representatives of the Ministry of the Interior, the Ministry of Infrastructures and Transport (MIT) and local government officials.

In 2022 the Committee organised two seminars: one international event involving countries from the Balkan-Danubian region, and one ANAS-PIARC event that formed a key element of the conference held to mark the Day of Remembrance of Road Traffic Victims. In addition, work was carried out to draft the Technical Committee Report.

SAFETY MANAGEMENT SYSTEMS OF ITALIAN CONCESSION HOLDERS AND NEW ANSFISA GUIDELINES

Over time, the motorway concession holders of the ASTM Group have adopted a road safety management system that complies with standard ISO 39001.

After the first goals achieved initially by Autostrada dei Fiori S.p.A., which developed the pilot project and obtained certification in September 2019 for the A10 Savona-Ventimiglia and A6 Torino-Savona sections, and then, in the last quarter of 2020, by S.A.T.A.P. S.p.A. for the A4 Torino-Milano and A21 Torino-Piacenza sections, followed in 2021 by Autovia Padana S.p.A. (Piacenza-Cremona-Brescia stretch of the A21), SALT S.p.A. (A12 and A15 sections), Asti Cuneo S.p.A. (A33 stretch), A.T.I.V.A. S.p.A. (Torino-Quincinetto and Ivrea-Santhià sections (A5) and Tangenziale di Torino and Torino-Pinerolo (A55), in July 2022 SAV S.p.A. also achieved the same goal for the A5 Quincinetto - Aosta section.

After the audits carried out in 2021 by ANSFISA - National Agency for the Safety of Railways and Road and Motorway Infrastructure (the agency responsible, among other things, for certifying maintenance procedures, surveys and infrastructure controls) on the A10 section managed by ADF S.p.A., in 2022 inspections were also carried out on the A6 section managed by ADF as well as on other licensees of the Group such as SALT, SATAP and ATIVA.

The audits, which regarded aspects of the management system such as the organisational context and corporate structure, the safety policy, duties and responsibilities, and HR and appointment of safety officers, as well as aspects related to operations such as infrastructure surveys, maintenance and modernisations, were successfully concluded.

Following the work of the Technical Round Table established by ANSFISA in 2021 with the aim of providing a space for consultation among the relevant parties and collecting the relative suggestions, in which the Group was an active participant, in May 2022 the "Guidelines for the implementation, certification and evaluation of the performance of Safety Management Systems (SMS) for the verification and maintenance of road and motorway infrastructure" were issued.

Meanwhile, in consideration of the voluntary management systems already adopted by ASTM, the Group welcomed the proposal of ANSFISA and confirmed its intention to launch a specific project to ensure the adoption of a security management system to certify the correct maintenance of motorway infrastructure in line with the guidelines among its licensees.

CUSTOMER SATISFACTION

The Group, in compliance with the objectives of the quality and road safety policy, is committed to monitoring the level of quality perceived by its key clients - the users of its motorway infrastructure.

To this end, the licensee companies carry out customer surveys on a regular basis and the results are analysed and used internally to identify strengths and weaknesses, plan improvement actions and

follow them up.

In April 2022, with Resolution no. 59/22, ART - the Italian Transport Regulatory Authority - launched a fact-finding survey aimed at implementing a procedure to define the minimum content of the specific rights that road users may exercise against licensees and motorway service area operators.

ART also invited motorway concession holders to submit observations and proposals on the various areas considered by the survey.

CONTRIBUTION OF S.I.N.A. TO INFRASTRUCTURE SAFETY

With reference to infrastructure safety, a key material sustainability topic for the ASTM Group, as regards the development and implementation of road restraint systems, S.I.N.A. has consolidated its know-how since the 1960s through the engineering and full-scale testing of its own-design safety barriers, partnering with the most important and highly qualified research centres and laboratories over the years.

In this field, it uses specific operating procedures to study the most appropriate and advanced technical and design solutions for restraint systems, which are tested using calculation and numerical simulation models. The operation process culminates in crash tests on the device prototype. The purpose of these tests is to certify the designed system, so it may receive the CE conformity mark from a Notified Body.

On this basis, S.I.N.A. restraint products and systems, all with CE marking, have been developed and continually implemented, with a different performance class depending on the intended use. There are more than twenty products currently available, including solutions combining safety barriers with sound-absorbing panels for bridge/viaducts, certified, with the addition of specific reach for LED lighting fixtures, as an optimal solution including in terms of environmental sustainability.

With the publication in 2022 of the approval of the "Guidelines for risk classification and management, safety assessment and monitoring of existing bridges and tunnels" in the Official Journal, S.I.N.A. has become even more involved in the ongoing activities to assess and monitor the works managed by the ASTM Group.

Specifically, working in collaboration with the Group's technology companies and as part of its efforts to continually monitor works using remote sensor technology, S.I.N.A. launched a technologically advanced

All of the Group's motorway licensees responded within the required deadlines, contributing information on current procedures and practises, and suggesting possible improvements.

One such suggestion was to optimise travel time data to enable motorway users to make better route decisions and thereby improve comfort and safety.

In brief, this involves the development of a system that detects travel times for primary routes (toll

booth-toll booth) of the motorway stretches in concession, showing details of any traffic disruption or roadworks on an interactive map that can be accessed on the company website or from a mobile device.

The test phase is currently ongoing; once complete, travel times will be displayed by the Group's licensee companies via variable message boards and other available channels of communication.

and innovative project aimed at defining a Group monitoring system complete with data exchange and analysis platforms. In this context, S.I.N.A. helped concession holders to define the monitoring plans for the funds made available by the NRRP through the MIT.

The bridge and viaduct assessment activities are repeated annually and take into account the evolving condition of the structures as recorded during the year as a result of the surveys and the monitoring systems installed.

S.I.N.A., also in synergy with Group companies operating in the technology sector, developed a project for the standardised automation of operating processes for tunnels and the management of systems through the definition of specific emergency management algorithms. Through this project, tunnel safety is improved thanks to the application of automated strategies that consider scenarios ranging from the presence of roadworks to the most severe scenario of a fire involving heavy vehicles. An automated management system is gradually being rolled out to all tunnels present on the managed motorway network.

In summary, the technologies being implemented in tunnels associated with the innovative equipment management system will make it possible to improve safety and energy efficiency, also thanks to the monitoring of the equipment present. In particular, to promote energy saving an innovative lighting management system is currently being calibrated, which aims to optimise use by enabling the adjustment of lighting systems to reduce energy consumption.

The skills and professionalism of S.I.N.A. acquired during the planning and development of new works, tunnel safety and surveillance and infrastructure control and inspection systems, as well as environmental monitoring activities, were also placed at the disposal of the Group companies in order to build even safer and more resilient works, infrastructure and systems.

THE ASTM GROUP'S COMMITMENT TO THE ECOLOGICAL AND DIGITAL TRANSITION TOWARDS THE MOBILITY OF TOMORROW

PROJECTS TO SUPPORT SUSTAINABLE MOBILITY: BY 2026 THE ENTIRE NETWORK WILL BE ELECTRIFIED

In the context of sustainable mobility, the ASTM Group, in order to contribute to the decarbonisation goals and facilitate the dissemination of electric mobility including on motorways, launched initiatives a few years ago that reduce environmental impact and contribute to meeting the market's expectations. In particular, within the perimeter defined by the EU Directives and national legislation for the dissemination of electric mobility on motorways, the Group has prepared through its licensee companies specific Dissemination plans for charging services.

The implementation of the aforesaid plans, based on compliance with the principles of technology neutrality and market openness, is still ongoing also thanks to the commitment of the operators active in service areas.

As at 31/12/2022, along the motorway network managed by the Italian licensee companies of the ASTM Group, and in particular along the Tyrrhenian-Brenner (A12-A15) corridor, along the stretches connecting with France and Switzerland (A10 and A5) and at the gates to Milan (A4), 14 charging stations were activated, with a total of 65 charging units (including 55 ultrafast charging units) and 71 charging points. These include the stations installed at the Versilia Est and Versilia Ovest service areas, located along the A12 motorway under concession to SALT p.A., which are particularly significant due to the region's pronounced tourism industry.

The Les Îles de Brissogne Nord service area and the area of the former disused barrier opposite it, along the A5 motorway stretch (Quincinetto - Aosta) of the licensee company S.A.V., have been identified as optimal areas for the development of a trial project consisting of the installation of high-power fast charging points. The service within the Les Îles de Brissogne Nord area is active. The station in the former barrier

area, which will be the first exclusively dedicated to an electric charging service, is under construction. The position has strategic significance. In fact, the motorway stretch managed by S.A.V. S.p.A. through the concession connects the national major road system with France and Switzerland, through the Monte Bianco and Gran San Bernardo tunnels and the Piccolo and Gran San Bernardo passes, serving as an access point to numerous and important Alpine tourism areas.

Through different implementing methods and considering the evolution of the market, technology and compliance with the indications of the Granting Body, the Ministry of Infrastructure and Transport (MIT) and the competent authorities, the number of charging stations at service areas will be progressively increased in 2023 (over 20 new stations with over 50 charging points) and the coming years. The medium and long-term strategy of the ASTM Group, organised into subsequent phases in order to guarantee a number of stations and an interdistance between them that is adequate for changes in demand, aims to disseminate electric charging services in all Service Areas of its network in Italy by 2026.

With regard to the Brazilian licensees, while the country has not yet adopted electrification targets or binding regulations for the car industry or for the implementation of charging stations, the progressive penetration of e-vehicles on the market is nonetheless foreseeable, albeit likely with a hybrid component. Currently only 0.03% of vehicles are electric or plug-in hybrids. Of these, 39% are located in the State of São Paulo and most are located in the state capitals.

In line with the strategic framework adopted by ASTM and in confirmation of its commitment to the ecological and digital transition, EcoRodovias is nonetheless implementing a plan to install charging stations across its network which will mean that users will never have to travel more than 60 km between charging points. Given the evolution of the market and the characteristics of the energy production and distribution systems, the charging stations will have the standard output capacity. As at 31 December 2022 there were 21 charging stations in operation, with complete coverage of the managed network planned by 2026.



Electric charging stations active at 31 December 2022

Methane gas (CNG) distribution service

²⁷Trial project launched

SINELEC, CREATIVE TECHNOLOGY FOR THE MOBILITY OF TOMORROW

Sinelec is the technological player of the ASTM Group. It accumulates its expertise in intelligent transportation systems (ITS) and electronic tolls. Specialising in the development, implementation and maintenance of innovative solutions for safe and smart traffic management, and with over 20 years of experience in the motorway sector, Sinelec is actively involved in the process to digitalise Italy's transport infrastructure, aimed at enabling road operators to tackle the challenge of providing more sustainable and connected mobility in the future. Sinelec connects and manages the devices and technological systems installed across over 1,400 km of motorway. Furthermore, thanks to a fibre optic network extending for some 2,000 km, it also operates on the telecommunications infrastructure market.

TOLL COLLECTION SYSTEMS

Sinelec offers complete systems for toll collection: lane devices, data acquisition systems, station control platforms and financial information processing and reconciliation systems. Installed at over 900 points, Sinelec's system has been designed to manage users of the European Electronic Toll System (EETS).

Already a leader in traditional toll collection, Sinelec developed the "free flow" system S*GATE, based on artificial intelligence, machine learning technologies and 3D tracking. The "free flow" system makes it possible to identify and classify the vehicle passing under the sensor without it having to stop at the collection booth, improving traffic management and delivering environment benefits by reducing emission. The use of cutting-edge technologies increase the accuracy of the collection process, while reducing the use of electronics on site, with a consequent reduction in costs during the acquisition, installation and maintenance stages.

INTELLIGENT TRANSPORTATION SYSTEMS (ITS)

For Sinelec, the roads of the future are characterised by a new management paradigm which involves a multi-level technological and operating transformation process, to be applied gradually to the entire infrastructure system. Smart roads include multiple areas such as connectivity, cybersecurity, real-time traffic monitoring and infrastructure status, with the short/medium-term objective of enabling a safer mobility, and with one long-term goal: the introduction of self-driving connected vehicles.

In this context, Sinelec offers operators valid tools to support their roadmap towards digital roads, providing diverse solutions to guarantee an increasingly high level of safety and more effective traffic management.

SINCRO is an integrated system that monitors motorway stretches, manages information and coordinates infrastructure intervention and maintenance activities. SINCRO guarantees the complete and functional integration of different systems used in ITS (e.g. cameras, variable message signs and SCADA systems) and simplifies their coordination by collecting data in a single complete and intuitive interface. In addition, the system acts as a Decision Support System (DSS) by providing operators, operating managers and maintenance staff with tools to effectively manage daily operations and emergencies, optimising response times and coordination with third parties, such as law enforcement and emergency services. SINCRO has been adopted at 14 operating centres in Italy which manage more than 1,400 km of motorway network.

LIBRA/S is the Sinelec solution for Weigh-In-Motion (WIM). Weigh-in-motion systems were created from the need to govern the phenomenon of overloaded vehicles in the context of road transportation. There are multiple negative externalities caused by these vehicles: in addition to reducing the life expectancy of road infrastructure, causing further deterioration to the paving and works such as bridges or viaducts, they

have an impact on safety and environmental pollution. The LIBRA/S platform consists of an on-site component (weighing stations) and a central control system, which uses diagnostic, data analysis and reporting instruments to allow the monitoring and overview of the network of weighing stations, supporting customers in the optimisation of day-to-day management and the processing of predictive maintenance models related to the circulation of heavy traffic.

Sinelec has recently integrated its portfolio by introducing EMERAS, a platform for C-ITS (Cooperative-Intelligent Transportation Systems) services. The digitalisation of transport infrastructure is driving us towards a new smart and connected mobility. The creation of a system that supports vehicle-infrastructure dialogue is therefore an essential step for cooperative scenario openness, where operators and users have the possibility to exchange information to optimise journeys, thus reducing accidents, congestion and polluting emissions. EMERAS enables the real-time two-directional communication between vehicles and infrastructure and guarantees integration with both ITS on the road and with traffic control centres. In addition, by collecting and aggregating information related to the current scenario, the platform immediately activates dedicated response plans taking account of the risk factors, disseminating geolocalised messages addressed to enabled vehicles. Furthermore, EMERAS manages complex critical situations, thus assisting road operators in the achievement of their safety objectives.

ROADS OF THE FUTURE

The development of innovative solutions for the safe and intelligent management of traffic and transport infrastructure is one of the key priorities of Sinelec which, in line with the strategies of the ASTM Group, considers the creation of a sustainable mobility model to be a key condition for Italy's growth and the wellbeing of its citizens.

This approach is consolidated in the A4 Torino-Milano technological innovation and ecological transition project, which will transform the stretch into a digital, resilient and sustainable motorway and one of the most advanced sections in Italy and Europe. The initiative represents a veritable test bench for the ecological and digital transition projects that the ASTM Group hopes to roll out progressively across the entire motorway network under its management in Italy. The project will involve the extension of the V2X vehicle-infrastructure dialogue system, the application of traffic monitoring systems, the use of a Multilane Free Flow system, the expansion of the infrastructure sensor system, the use of dynamic weight control systems for heavy traffic, and detection systems for wrong-way vehicles, weather conditions and hazardous loads. This will increase the resilience and sustainability of the infrastructure, guaranteeing greater durability over time, increasingly its ability to respond to climate change and lowering maintenance costs, benefiting the entire system.

Furthermore, Sinelec is not only involved in the "digital transformation" project of the A4 Torino-Milano motorway, which is being developed on a stretch managed by the ASTM Group, but is also involved in other initiatives outside of the Group. For example, Sinelec has been instructed on the construction of smart road systems on the A2 Salerno-Reggio Calabria motorway, various projects on the A90 (Grande Raccordo Anulare) and the A91 Roma-Fiumicino, as well as the design and implementation of the Smart Road and dynamic monitoring systems on the A24 Roma-L'Aquila and A25 Torano-Pescara motorways. Sinelec will also construct a new traffic management operating centre and a mobility platform connected to the A4 Brescia-Padova and A31 Valdastico motorway stretches.

The involvement of Sinelec as a technological partner in these major infrastructure digitalisation projects is a clear demonstration of the company's leadership in the development and implementation of advanced motorway solutions that will lead us into the future.

DONATIONS AND SPONSORSHIPS

The ASTM Group is aware that relations with local communities are an important driver in creating shared value, and promotes initiatives that help the economic, social and cultural development of local areas. With this in mind, the Group fosters relationships based on trust and cooperation with local communities, contributing directly or indirectly to supporting and/or funding projects and initiatives with a significant impact on the areas where it operates.

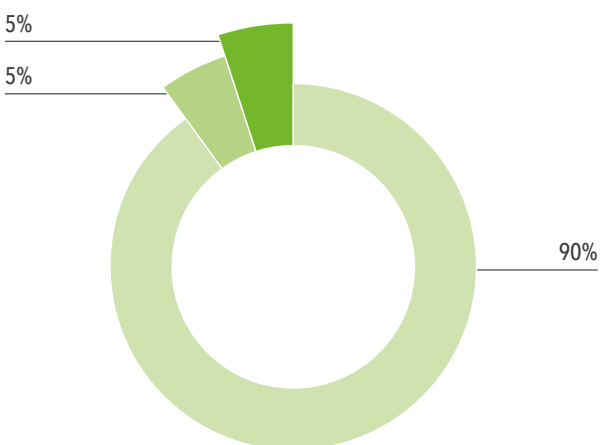
ASTM has defined principles and methods for offering donations and sponsorships in the internal procedures forming part of the Anti-Corruption System, certified in accordance with ISO 37001, as guarantee that the interventions are carried out in accordance with the approved budget and only following the positive outcome of certain checks on the validity of the purpose and the intentions of the payment, and on the credibility and moral integrity of the potential beneficiary.

In particular, through donations the Group companies promote humanitarian and social initiatives in

order to contribute to the development of the social fabric in which they operate; the sponsorships are instead used as a communication instrument through which each company supports cultural, artistic, sport, social or technological initiatives, with the aim of increasing its popularity and promoting its reputation positively.

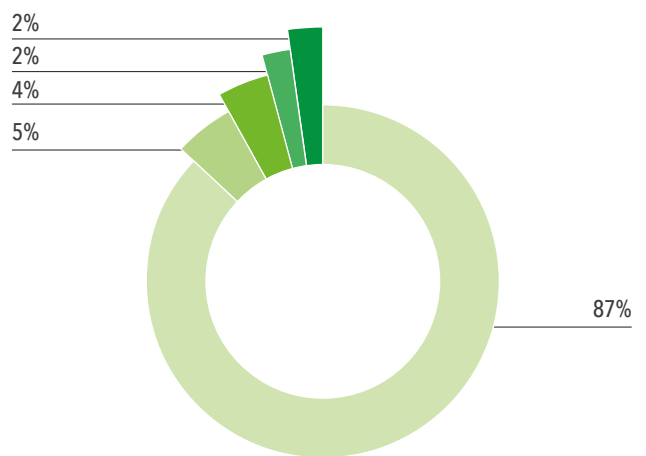
In 2022, the Group made donations of around € 318 thousand (€ 269 thousand in 2021) and sponsorships for around € 6,083 thousand (€ 2,477 thousand in 2021). As part of the sponsorships, in particular, the Group allocated around € 2,304 thousand to community initiatives with a commercial impact (€ 837 thousand in 2021) and invested around € 173 thousand in the community (€ 36 thousand in 2021). ASTM considers community relations as a vital part of its business. This is why it establishes long-lasting relations, setting up initiatives and projects that can benefit local areas from both a social and cultural standpoint. In particular, it considers sport an important way to encourage the growth of local communities and the development of young people.

TYPE OF INITIATIVE



- Community initiatives with a commercial impact
- Donations
- Community investments

TARGET SECTOR



- Sport
- Other
- Welfare
- Health
- Economic development

ASTM FOR SPORT

ASTM invests in sport and the values it represents, aware of the role that it plays in the training of people, in particular of young people, in the local areas where the Group operates.

In basketball, the Group has for many years supported Derthona Basket, the historic team from the city of Tortona. ASTM sponsored the team for the 2022-2023 season. Derthona, with its first team, currently participates in the Italian Serie A basketball championship, representing absolute excellence at national level.

In 2022, works continued on the Cittadella dello Sport in Tortona, the new sports centre for the city. The new infrastructure on the one hand will be tangible proof of the Company's sports journey, and on the other, will represent an opportunity for the territory, linked to sport and much more.

As well as an awareness of the important role of sport, the Group's sponsorship activity also has an entrepreneurial aspect. Investments are made in people and in infrastructure, too, equipping Tortona with a Sports "Citadel" open to everyone and destined to last over time, a building that will change the face of the city itself, becoming a distinctive element of it. The "Citadel" will include poly-functional sports installations, ample green spaces and of course the indoor sports stadium that hosts up to 5,000 people.

FAI (FONDO AMBIENTE ITALIANO - ITALIAN ENVIRONMENTAL FUND)

During 2020, the ASTM Group became part of the "FAI 200", a group of patrons and companies established in 1987 to support the Foundation and its work to protect culture, art and nature.

For over 40 years, the Foundation has worked every day, together with its members, to maintain the special places of Italy for present and future generations. Today, FAI protects some 70 sites, including castles, villas, monasteries, parks and forests.

THE ECOVIVER SOCIAL PROGRAMME OF ECORODOVIAS

EcoRodovias has implemented various social projects in the communities where it operates. Developed by environmentalists and educators, Ecoviver is an educational and artistic project that aims to promote environmental awareness among community residents and primary school pupils.

03



OUR RESPONSIBILITY TOWARDS PEOPLE

- 95 People
- 103 Diversity and inclusion
- 109 Remuneration and benefits
- 113 Human Capital Development
- 118 Health and safety



PEOPLE

ASTM considers its employees as the most important resource it has in order to create value within the organisation and also lay the foundations for its success.

ASTM's human resources management policies promote stable, long-lasting working relationships, which include part-time, that can meet employees' needs for a more flexible, dynamic approach.

"We believe in our people and invest in them, developing their skills. We support the protection of human rights, recognising the equal dignity of all people and diversity as essential resources for the development of humanity. We promote the health and safety of our people and the creation of an ethical working environment."

The Code of Ethics

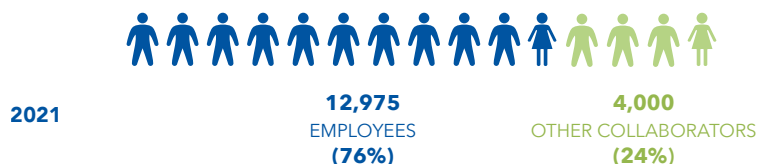


17,474
EMPLOYEES AND
OTHER COLLABORATORS



96%
EMPLOYEES WITH
PERMANENT CONTRACTS

GROUP PERSONNEL



EMPLOYEES AND OTHER COLLABORATORS BY GENDER

NO. OF PEOPLE	AT 31 DECEMBER 2021			AT 31 DECEMBER 2022		
	Men	Women	Total	Men	Women	Total
Employees	9,437	3,538	12,975	9,280	3,792	13,072
<i>of which joint operations</i>	656	73	729	525	57	582
Other collaborators	3,925	75	4,000	4,359	43	4,402
<i>of which joint operations</i>	1,771	40	1,811	1,047	15	1,062
Total	13,362	3,613	16,975	13,639	3,835	17,474

The Group's overall work force at 31 December 2022 totalled 17,474 people (16,975 in 2021), of whom 13,072 were employees (12,975 in 2021) and 4,402 other collaborators (4,000 in 2021).

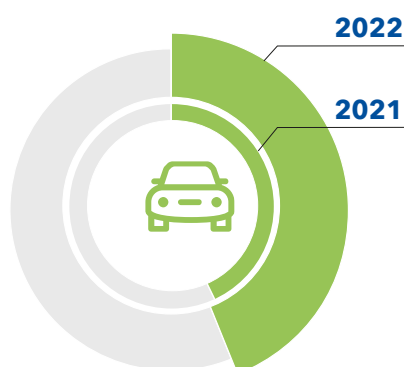
The item "Other collaborators" (4,402 in 2022 and 4,000 in 2021) effectively refers to temporary workers deployed at operating sites in the following areas: 3,006 in Latin America, 933 in the Middle East, 319 in Italy, 130 in the rest of Europe and 14 in the United States.

The change in the number of collaborators is due to the combined effect of the increase in the concessions sector (particularly across the Group's network in Brazil, which recorded a 50% increase) and the reduction related to the completion of works at the Reem Mall site in Abu Dhabi. In 2022, around 71% of employees were male, and nearly all other collaborators were male.

GROUP EMPLOYEES BY BUSINESS SEGMENT

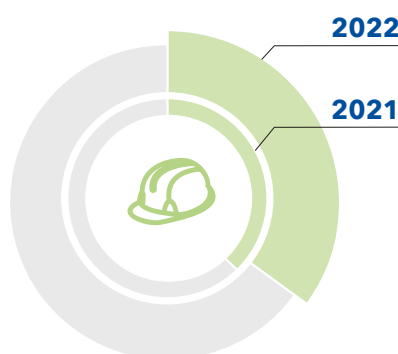
MOTORWAY CONCESSIONS

44%



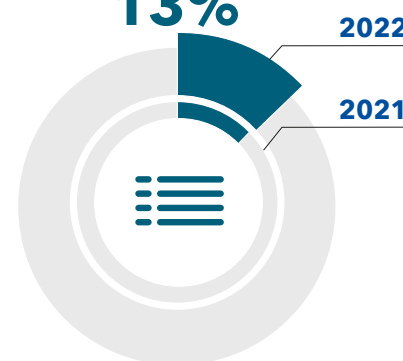
CONSTRUCTION

35%



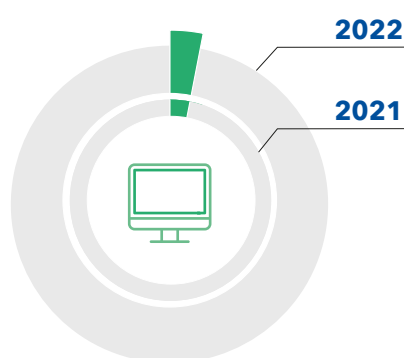
HOLDINGS AND OTHER MINOR COMPANIES

13%



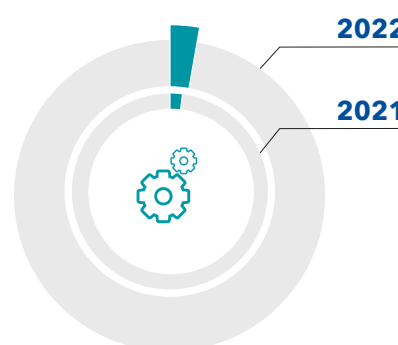
TECHNOLOGY

3%



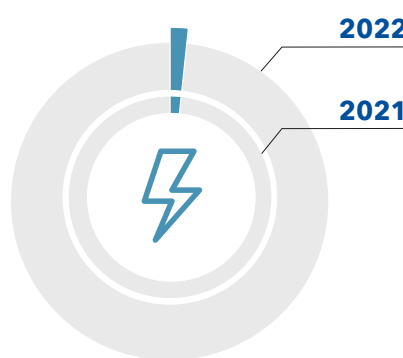
ENGINEERING

3%



PLANTS

2%



Looking at the breakdown of personnel by business segment, approximately 44% (43% in 2021) work in the motorway concessions sector, approximately 41% (42% in 2021) in the EPC sector, of which 35% (38% in 2021) in the construction sector, 3% (2% in 2021) in engineering and 2% (2% in 2021) in plant engineering, whereas business, technology and other sectors employ the residual 16% of resources (15% in 2021).

GROUP EMPLOYEES BY GENDER AND TYPE OF CONTRACT (PERMANENT, TEMPORARY)

NO. OF PEOPLE	AT 31 DECEMBER 2021			AT 31 DECEMBER 2022		
	Men	Women	Total	Men	Women	Total
Temporary	279	132	411	317	227	544
<i>of which joint operations</i>	78	23	101	13	6	19
Permanent	9,158	3,406	12,564	8,963	3,565	12,528
<i>of which joint operations</i>	578	50	628	512	51	563
Total	9,437	3,538	12,975	9,280	3,792	13,072

As proof of the Group's commitment to promoting stable, long-lasting working relationships, around 96% of employees have permanent contracts. This percentage is another excellent result regarding the current macro-economic context in which the Group operates.

Employees on permanent contracts totalled 5,635 in Latin America (5,379 in 2021), 4,539 in Italy (4,477 in 2021), 1,026 in the United States (1,212 in 2021), 799 in the Middle East (987 in 2021), 528 in the rest of Europe (508 in 2021) and 1 in South Africa (1 in 2021). Employees with temporary contracts totalled 261 in Italy (242 in 2021), 176 in Latin America, 89 in the Rest of Europe (69 in 2021) and 18 in South Africa (101 in 2021).

GROUP EMPLOYEES BY GENDER AND PROFESSION (FULL-TIME, PART-TIME)

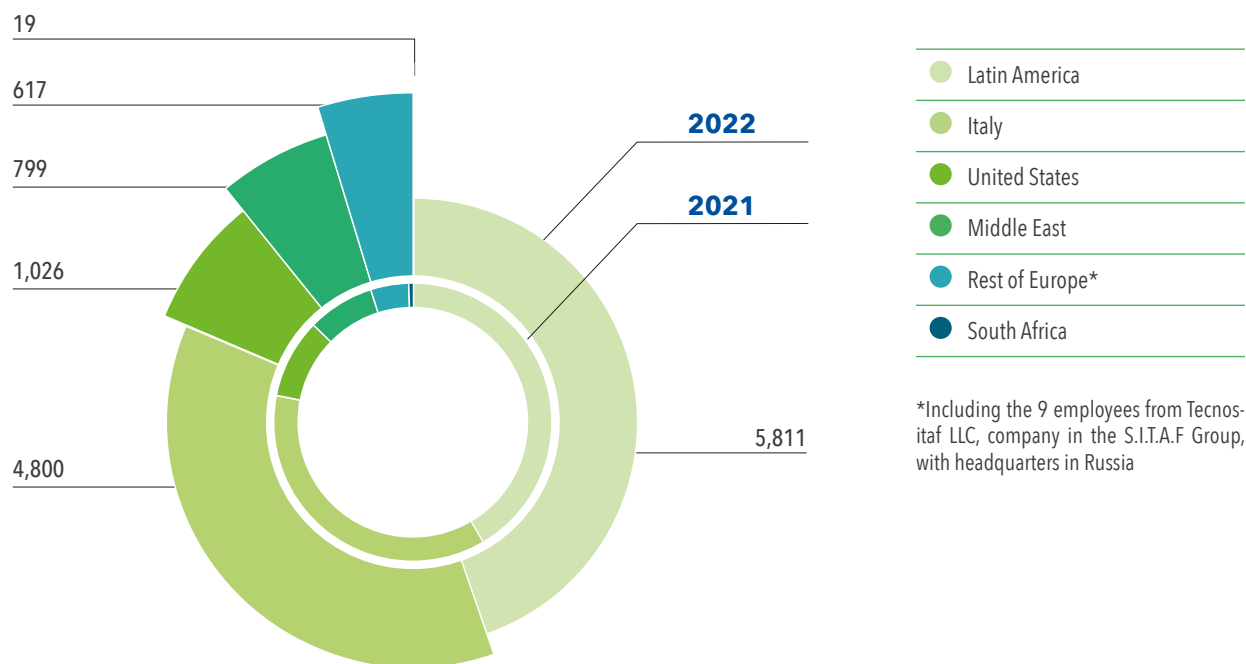
NO. OF PEOPLE	AT 31 DECEMBER 2021			AT 31 DECEMBER 2022		
	Men	Women	Total	Men	Women	Total
Full-time	9,031	3,132	12,163	8,863	3,359	12,222
<i>of which joint operations</i>	655	72	727	523	47	570
Part-time	406	406	812	417	433	850
<i>of which joint operations</i>	1	1	2	2	10	12
Total	9,437	3,538	12,975	9,280	3,792	13,072

In 2022, 850 (812 in 2021) employees have part-time contracts, approximately 7% of all employees (6% in 2021). These are equally distributed between men and women.

GROUP EMPLOYEES BY GEOGRAPHIC AREA

NO. OF PEOPLE	AT 31 DECEMBER 2021			AT 31 DECEMBER 2022		
	Men	Women	Total	Men	Women	Total
Italy	3,702	1,017	4,719	3,753	1,047	4,800
Latin America	3,072	2,307	5,379	3,260	2,551	5,811
Middle East	967	20	987	782	17	799
South Africa	79	23	102	15	4	19
United States	1,146	66	1,212	956	70	1,026
Rest of Europe	471	105	576	514	103	617
Total	9,437	3,538	12,975	9,280	3,792	13,072

GROUP EMPLOYEES BY GEOGRAPHIC AREA



In 2022, approximately 37% of Group employees were based in Italy (36% in 2021), around 44% in Latin America (42% in 2021), around 8% in the United States (9% in 2021), around 6% in the Middle East (8% in 2019), 5% in the Rest of Europe (4% in 2021) and around 0.15% in South Africa (1% in 2021).

NEW HIRES BY GENDER AND AGE GROUP

GENDER	AGE	2021		2022	
		no. of people	Turnover %	no. of people	Turnover %
Women	<30 years	1,007	100.60%	353	33.40%
	30-50 years	1,526	78.10%	394	18.77%
	>50 years	195	33.45%	90	14.15%
Total women		2,728	77.11%	837	22.07%
Men	<30 years	1,092	71.14%	1,012	74.58%
	30-50 years	3,588	71.99%	1,862	38.27%
	>50 years	744	25.50%	670	21.92%
Total men		5,424	57.48%	3,544	38.19%
Total		8,152	62.83%	4,381	33.51%

In 2022, 4,381 people joined the ASTM Group (8,152 in 2021), with a turnover rate (new hires) equal to around 33.51% (around 62.83% in 2021).

In particular, in Italy, the number of new hires in 2022 amounted to 877, in Latin America 3,164, in the Middle East 33, in South Africa 3, in the United States 19 and in the Rest of Europe 285. The turnover rate for new hires at 31 December 2022 was 18% in Italy, 54% in Latin America, 4% in the Middle East, 16% in South Africa, 2% in the United States and 46% in the Rest of Europe.

With a view to the sustainable development of skills and human resources, the Group tries to recruit candidates from areas where it operates, that preferably meet the professional profiles necessary for it to achieve its objectives.

In 2022, around 92% of Group executives were working in their home country (96% in 2021).

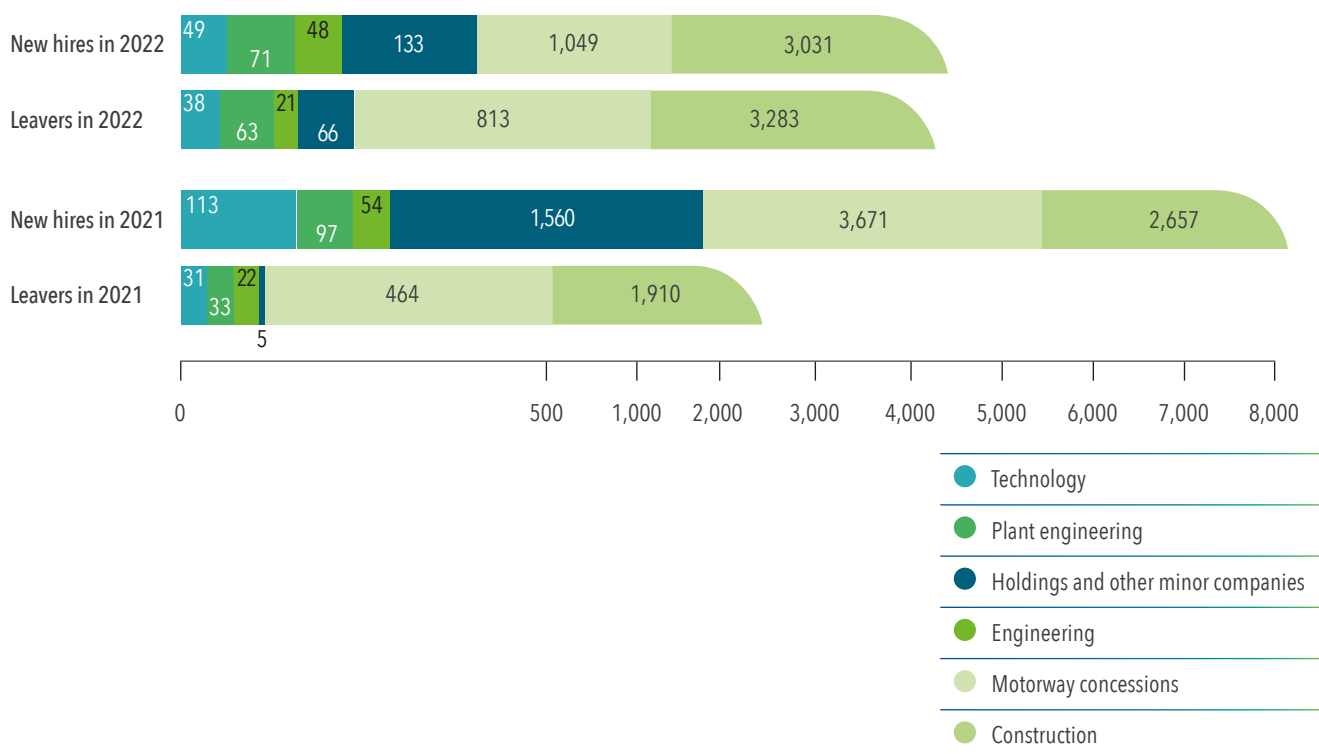
LEAVERS BY GENDER AND AGE GROUP

GENDER	AGE	2021		2022	
		no. of people	Turnover %	no. of people	Turnover %
Women	<30 years	118	11.79%	257	24.31%
	30-50 years	173	8.85%	249	11.86%
	>50 years	79	13.55%	77	12.11%
Total women		370	10.46%	583	15.37%
Men	<30 years	298	19.41%	1,040	76.64%
	30-50 years	1,351	27.11%	1,929	39.64%
	>50 years	446	15.28%	732	23.95%
Total men		2,095	22.20%	3,701	39.88%
Total		2,465	19.00%	4,284	32.77%

The turnover rate (leavers) at 31 December 2022 was equal to around 32.77% (around 19% in 2021). During the year, a total of 4,284 people left the company (2,465 in 2021), of whom 583 were women and 3,701 men, mainly in the 30-50 age group. Leavers in Italy totalled 796, in Latin America 2,732, in the Middle East 221, in South Africa 86, in the United States 205 and in the Rest of Europe 244.

The turnover rate for leavers as at 31 December 2022 was 17% in Italy, 47% in Latin America, 28% in the Middle East, 453% in South Africa (resulting from a sharp reduction in the number of employees due to reduced operators), 20% in the United States and 40% in the rest of Europe.

TURNOVER FOR NEW HIRES AND LEAVERS BY BUSINESS SECTOR



69% of new hires and around 77% of leavers are in the construction sector, with 3,031 new hires and 3,283 leavers in 2022. The concessions sector recorded 1,049 (24%) new hires and 813 (19%) leavers.

In addition, the concessions sector, as a result of some unique aspects particularly related to staffing motorway toll booths, is characterised by a high number of seasonal employees.

ASTM and its operating subsidiaries are defining, through their internal policies and procedures, the responsibilities, criteria and methods followed for personnel employment: from planning and identifying profiles for candidates for specific operating segments to identifying the employment category and salary package.

These activities are inspired by impartiality, transparency, autonomy and independent judgement criteria. In particular, favouritism of any kind is prohibited, and a policy is pursued that recognises expertise, ability and professionalism and ensures inclusion.

INDUSTRIAL RELATIONS

The operations of ASTM Group Italian companies are extensive, and are covered by a large number of collective bargaining agreements and consequently a considerable number of second-level company and/or local contracts.

100% of employees in Italy are covered by collective bargaining agreements and the most representative, in terms of number of employees are: the building industry and local-level agreements, the engineering industry, motorways and road tunnels, items manufactured in concrete and senior management in industry.

Italian Law 300/70 (Workers’ Statute) which forms the basis for all labour laws and national and local bargaining agreements, and for all trade union negotiations, is the reference legal framework for companies to manage industrial relations. Companies acknowledge that the trade union organisations who are signatories of national and local collective bargaining agreements are the “natural” parties to deal and negotiate with regarding financial and legal aspects of redundancy procedures.

Given the high number of contracts in place, industrial relations play an important role in human resources management, also considering the ramifications at a geographic level of the Group's operations in Italy and abroad. As part of its strategies, which target growth and the optimisation of work, including safety and quality levels in human resources management, ASTM Group companies focus first and foremost on empowering work, professional qualifications and improving employee satisfaction levels as part of provisions established by law and by contracts. The involvement of trade unions in an industrial relations system that is more functional to achieving results for both companies and employees is strategic to reach objectives.

In the context of industrial relations, the companies have therefore strengthened regional solutions

through innovative tools such as welfare measures and supplementary healthcare schemes. Industrial relations also cover all bargaining for the professional training of resources, involving both trade union representatives and workers in order to maintain high professional standards. The companies again confirmed their commitments to the Fondimpresa/Fondirigenti/Fonte training fund and consider it a valid tool in preparing training programmes and in providing supplementary funding for training costs.

Take-up among employees for supplementary pension and healthcare schemes is very high.

Regarding staff employed abroad, local regulations concerning industrial relations, salaries, insurance and welfare are complied with in full, in accordance with laws in effect in countries where the Group operates.

DIVERSITY AND INCLUSION

“Empowering human capital based on meritocracy, professional competencies, appropriate behaviour, honesty and trust, and promoting a working environment that is inclusive and open to diversity, are the cornerstones of the ASTM Group’s human resources policies.”

Diversity and Inclusion Policy

ASTM recognises the diversity of its employees as a success factor and seeks to maximise their experience, capabilities and qualities. ASTM believes that diversity, in all its forms, is a strategic benefit as it enhances cultural initiatives, promoting a work environment that is inclusive and focused on cooperation and innovation. The Group is careful to avoid all forms of discrimination concerning employment and work, and does not tolerate any form of discrimination based on ethnic or racial origin, skin colour, gender, sexual orientation, religious beliefs, nationality, age, political opinions, trade union representation, marital status, health, and any other social or personal conditions.

These principles are set out in the Diversity and Inclusion Policy adopted by ASTM which all personnel shall comply with in relations with colleagues, customers, suppliers and all people they come into contact with while carrying out activities.

Confirming its commitment to eliminate all forms of discrimination and obstacles to inclusion, in 2020 ASTM subscribed the Women’s Empowerment Principles (WEPs), promoted by the United Nations Global Compact to guide companies towards gen-



der parity in employment, on the market and in the community.

With “The Right Words”, ASTM supports the Disability Agenda



[Read the news story](#)

GROUP EMPLOYEES BY EMPLOYMENT CATEGORY AND GENDER

NO. OF PEOPLE	AT 31 DECEMBER 2021			AT 31 DECEMBER 2022		
	Men	Women	Total	Men	Women	Total
Executives	179	22	201	184	18	202
Middle managers	471	134	605	514	148	662
Office workers	3,670	1,810	5,480	3,494	1,773	5,267
Manual workers	5,117	1,572	6,689	5,088	1,853	6,941
Total	9,437	3,538	12,975	9,280	3,792	13,072
<i>of which joint operations</i>	656	73	729	525	57	582

Employees must adopt conduct that respects the rights and individual nature of colleagues, collaborators and third parties, regardless of their position within the Group's hierarchy.

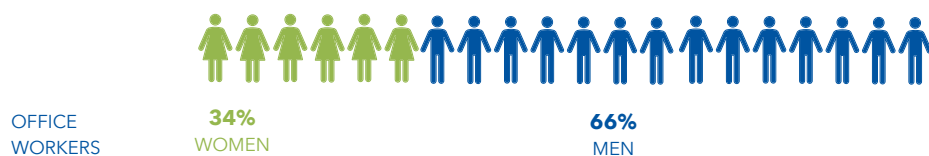
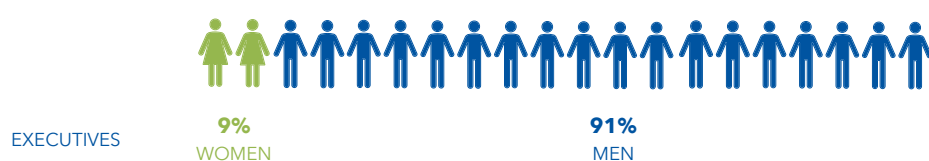
53% of Group employees are manual workers (52% in 2021), 40% are office workers (42% in 2021) and the remainder are middle managers (5%) and senior executives (2%).

Additionally, data relative to manual workers includes those associated with unions and on the payroll of the Halmar Group (Union Workers) at 31 December 2022, regardless of the number of hours worked during the

reference period. This choice is in line with the features of the US labour market which has different regulations and incentivises obtaining workers through unions.

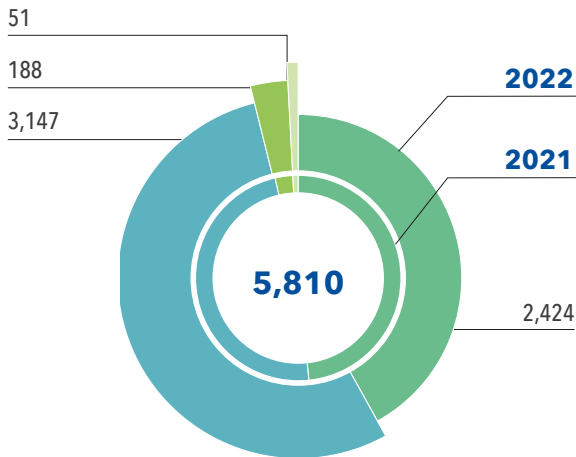
In 2022, approximately 29% of employees were female (27% in 2021). Around 48% are manual workers (44% in 2021), 47% are office workers (51% in 2021), 4% are middle managers (4% in 2021), while 18 women hold managerial positions (22 in 2021). The presence of women at ASTM is an important factor in the Group's development and growth.

BREAKDOWN BY GENDER

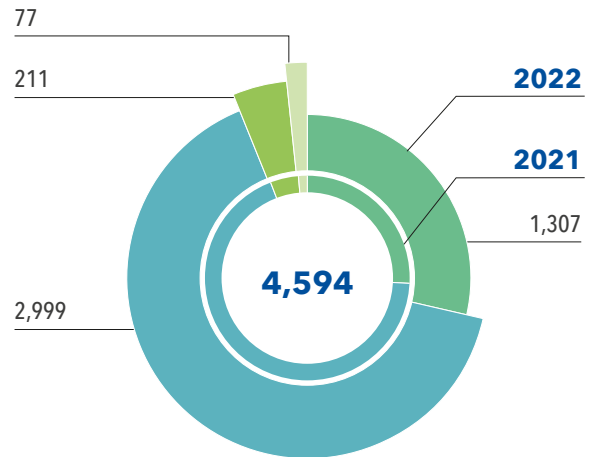


GROUP EMPLOYEES BY EMPLOYMENT CATEGORY AND BUSINESS SEGMENT

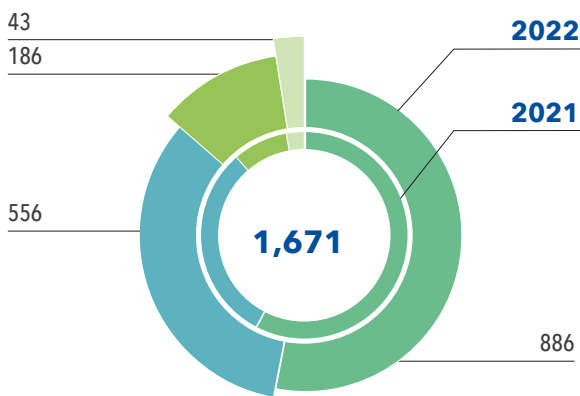
MOTORWAY CONCESSIONS



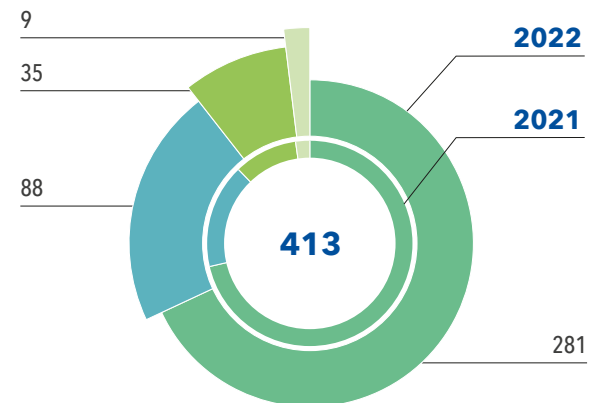
CONSTRUCTION



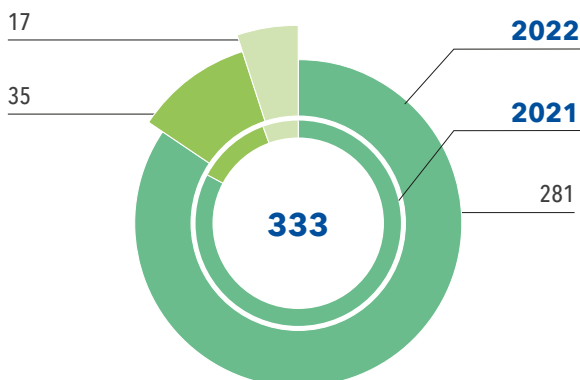
HOLDINGS AND OTHER MINOR COMPANIES



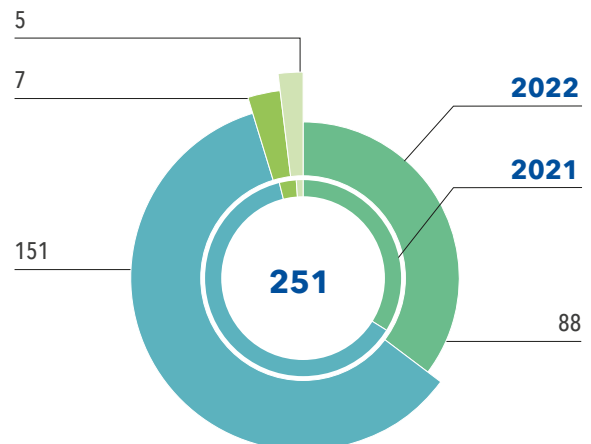
TECHNOLOGY



ENGINEERING

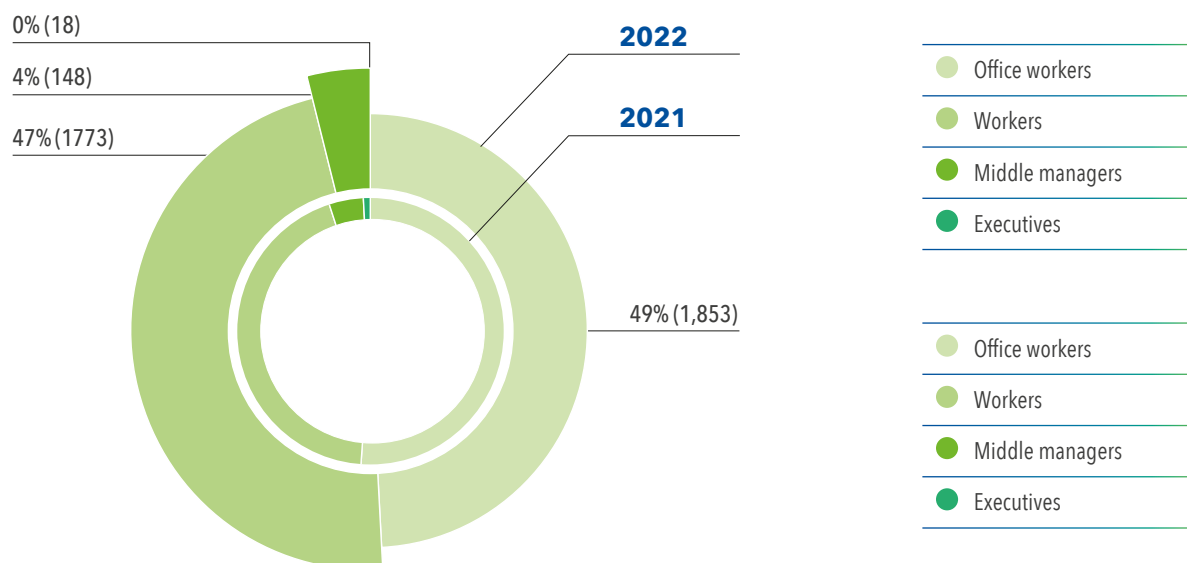


PLANTS



● Executives ● Middle managers ● Office workers ● Workers

GROUP FEMALE EMPLOYEES BY EMPLOYMENT CATEGORY



GROUP EMPLOYEES BY EMPLOYMENT CATEGORY AND AGE GROUP

NO. OF PEOPLE	AT 31 DECEMBER 2021				AT 31 DECEMBER 2022			
	<30	30-50	>50	Total	<30	30-50	>50	Total
Executives	-	62	139	201	-	62	140	202
Middle managers	10	355	240	605	15	391	256	662
Office workers	831	2,905	1,744	5,480	764	2,718	1,785	5,267
Manual workers	1,695	3,616	1,378	6,689	1,635	3,794	1,512	6,941
Total	2,536	6,938	3,501	12,975	2,414	6,965	3,693	13,072
<i>of which joint operations</i>	261	402	66	729	152	319	111	582

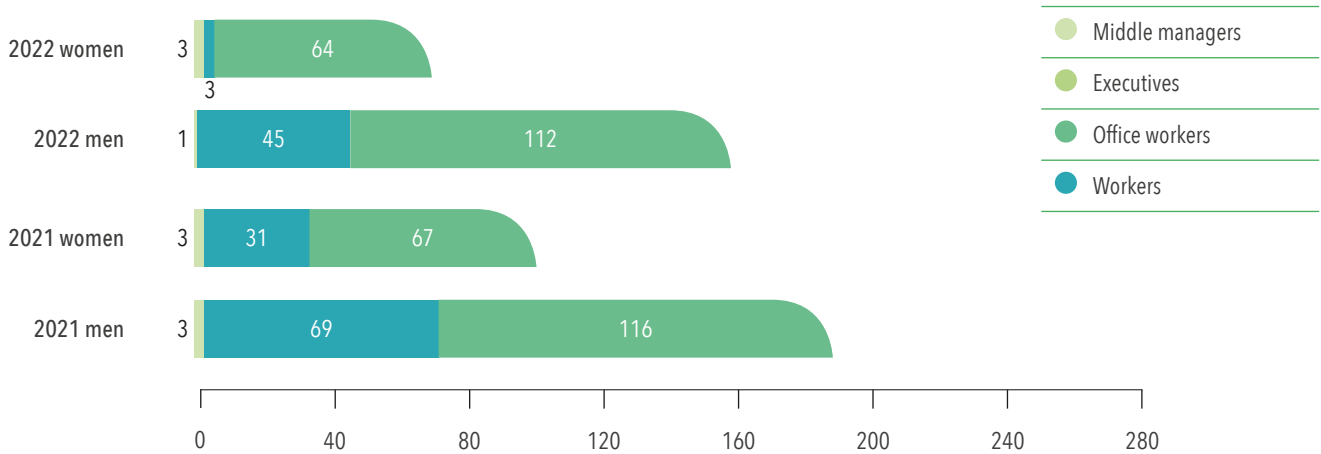
53% of employees are in the 30-50 age group (53% in 2021), 28% in the over-50 group (27% in 2021), 18% in the under-30 group (20% in 2021).

The average age of employees is 41 years, the same as in the previous year. Employees in the engineering and technology sector have the highest average age at around 45, while employees in the plants and other minor companies sector have the lowest average age at 32.



41 YEARS
AVERAGE AGE

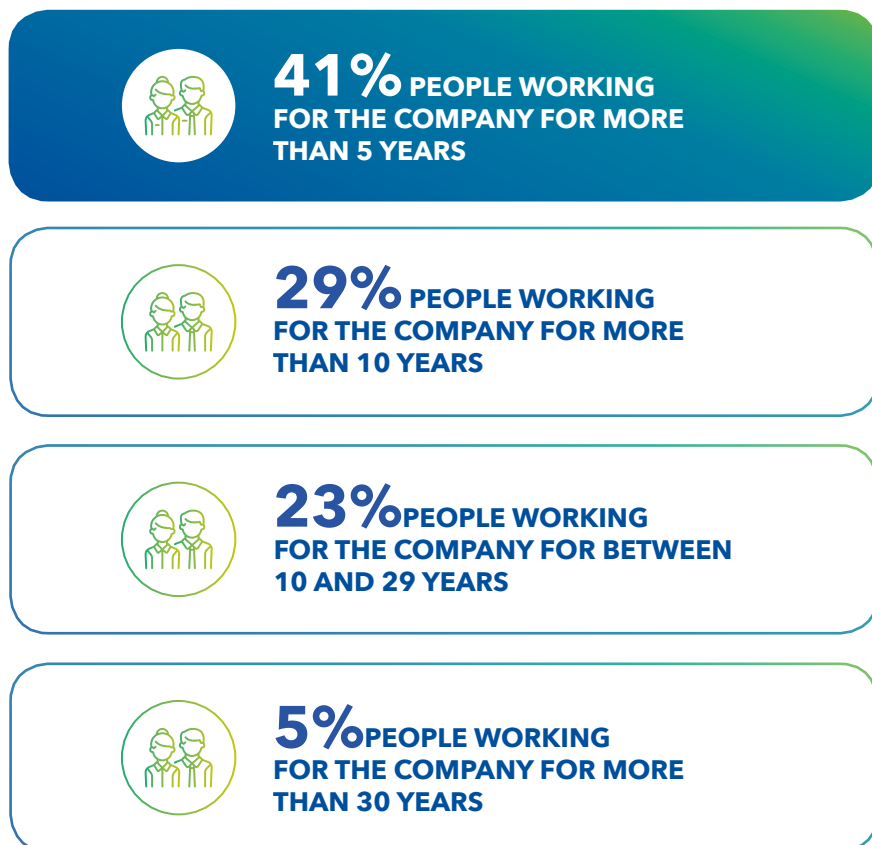
GROUP EMPLOYEES IN PROTECTED CATEGORIES



At 31 December 2022, the Group had 228 employees in protected categories (289 in 2021), of whom 70 women and 158 men.

3,820 employees or 29% have been with the company for over 10 years (3,835 employees or 30% in 2021), 3,088 employees or 23% for between 10 and 29 years (3,146 employees or 24% in 2021) and 732 employees or 5% for over 30 years (689 employees or 5% in 2021). These figures confirm the Group’s commitment to long-lasting, solid relationships and investments in its employees.

GROUP EMPLOYEES BY LENGTH OF SERVICE



INITIATIVES FOR ECORODOVIAS EMPLOYEES

- Programmes and Committees centred around the promotion of diversity and inclusion (e.g. gender equality, disability, ethnicity, sexual orientation and gender);
- signing of the United Nations “Free and Equal Pact”, which targets respect for the human rights of employees, customers and members of the LGBT+ community, also removing barriers and supporting its LGBT+ employees in their working environments;
- an internal survey on diversity, based on statements given by employees on a voluntary basis and aimed at understanding the demographics and designing strategies for a sustainable growth in the diversity of the work force within an inclusive environment;
- structured committees for health and safety, focused on the quality of life and safety of employees and suppliers, intended to support and monitor actions that seek to reduce the number of accidents at work and increase everyone’s quality of life;
- award of certification ISO 45001 (Health and Safety Management System) for each licensee.



REMUNERATION AND BENEFITS

ASTM's salary system recognises each person's skills, role and responsibilities within the Group. Salary policies aim to attract and reward new hires with outstanding professional profiles and talent and are designed to increase employee motivation.

Special attention is paid to career paths and appropriate contract categories, with some Group companies also using various salary parameters of national collective bargaining agreements, for example in the motorway concessions sector, to assess employee performance.

Senior management reviews the positions and results of the resources on an annual basis, and consequently, the improvement plans with an impact on contract employment categories and relative changes in salary levels, as part of a wide-ranging, extensive bonus programme.

Since 2017, a variable annual MBO (Management By Objectives) incentive system has been in place. This system establishes objectives to be achieved and rewards individual performance, valuing a sense of belonging to the Group and the contribution of each person in developing its strategy.

In compliance with national collective bargaining agreements adopted by Group companies, supplementary packages are provided that often anticipate existing welfare regulations and supplement provisions recognised by law. These benefits, offered to employees on both full-time and part-time contracts, include:

- supplementary pension policies, which also replace contractual funds;
- policies reimbursing medical expenses for employees and their family members, also in addition to that included under the relative national collective bargaining agreement;
- Long-Term Care ("LTC");
- special conditions for company microloans, to assist employees with unexpected expenses;

- policies and schemes in addition to law and employment contracts (e.g., life and accident insurance policies);
- agreements with trade union organisations for advances/loans to employees at special conditions.

For personnel under the "Motorways and road tunnels" contract, an update was made to the Welfare and Flexible Benefits in light of the updates that will be introduced during the renewal of the national collective bargaining agreement and its second-level derivations.

The aim of the Remuneration Policy of directors with specific roles and key management personnel is to:

- define salary packages that can: (i) acknowledge the managerial value of persons involved and their contribution to company growth, in relation to their duties and functions; (ii) attract, retain and motivate people with the professional skills and abilities that meet the company's needs;
- align the interests of the executive directors with the priority of creating medium/long-term value for shareholders;
- ensure a connection between managers' remuneration and actual Company performance;
- promote sustainability in the medium to long term, with a particular focus on the interests of all Stakeholders.

In line with the above, short and long term incentive schemes have been established, to promote the attainment of the Company's qualitative and quantitative objectives, thus promoting the loyalty and engagement of resources. Sustainability goals have been introduced to the incentive schemes, also in response to the increasing focus of institutional investors on these topics and in line with the strategic importance of ESG policies.

OBLIGATIONS FOR COMPANIES APPLYING THE NATIONAL COLLECTIVE BARGAINING AGREEMENT FOR CONSTRUCTION WORKERS

The National Collective Bargaining Agreement for staff of Industrial Construction Companies and Similar requires registration with the Construction Workers Fund. This Fund is a joint association bringing together workers' trade unions and employers, set up under collective bargaining for construction industry workers, providing benefits and allowances.

Under Italian Leg. Decree no. 276/2003 as amended, the Fund has public functions, such as the certification of welfare contributions paid by its member companies and verification of the adequacy of labour costs on contracts.

HEALTHCARE SCHEMES

The national collective bargaining agreements applied to employees of the ASTM Group call for the registering of personnel in healthcare funds which supplement the national healthcare system.

ASTM complies with the provisions of these contracts with the firm belief that the services provided by these funds offer a concrete and effective response to employee requirements, complementary to corporate welfare.

FLEXIBLE BENEFITS

The 2016 Stability Law increased tax incentives for companies that provide company welfare services for their employees. At the same time, it re-introduced non-taxation of production bonuses and salary items related to increased performance.

This financial manoeuvre introduced various measures intended to incentivise corporate welfare. The flexible benefits plan covers areas relevant to employees: education (reimbursement of education fees, school fees, study holidays, school books) family care mortgages and loans culture and free time (gyms and sports' associations, baby sitting, vouchers).

WAGE RATIO BY GENDER

For each geographic area and each professional category, the ratio between the base salary (or remuneration) for women and men is calculated as the ratio between (i) the arithmetic average of the base salary (or remuneration) for women and (ii) the arithmetic average of the base salary (or remuneration) for men. When calculating the total ratio, professional categories which do not include members of both genders have been excluded, as they would have rendered the ratio algebraically null.

Finally, note that the total ratio may be greater than the ratio for each geographic area/professional category in relation to the gender composition of the various professional categories; for example, in Latin America the total ratio is influenced by a high percentage of men in the manual workers category relative to women who are for the most part office workers, with average salaries higher than those paid to manual workers.

The following tables highlight the ratio between the basic salary of women and men by category and gender²⁸.

²⁸ In order to improve comparability between the information collected by geographic area, before being compared, the values in local currency were translated to USD at purchasing power parities according to the World Bank

RATIO BETWEEN BASIC SALARY²⁹ OF WOMEN AND MEN BY EMPLOYMENT CATEGORY

	2021					2022				
	Executives	Middle managers	Office workers	Manual workers	Total	Executives	Middle managers	Office workers	Manual workers	Total
Italy	0.86	0.88	0.88	1.14	0.91	0.93	0.87	0.88	1.14	0.91
Latin America	0.88	0.87	0.83	0.52	0.59	0.86	1.04	0.89	0.65	0.65
United States	0.81	0.65	0.61	0.86	1.10	-	0.51	0.81	0.71	1.02
South Africa	-	-	0.55	0.29	0.36	-	-	0.43	0.54	0.53
Rest of Europe	-	0.72	0.76	0.59	0.90	-	0.62	0.80	0.39	0.76
Middle East	-	-	0.91	-	0.91	-	-	0.84	-	0.84

The ratio between the basic salary of women and men is higher than 1 for the United States, just under 1 for Italy, the Middle East and the Rest of Europe, and significantly lower than 1 for Latin America and South Africa.

RATIO BETWEEN THE REMUNERATION³⁰ OF WOMEN AND MEN BY EMPLOYMENT CATEGORY

	2021					2022				
	Executives	Middle managers	Office workers	Manual workers	Total	Executives	Middle managers	Office workers	Manual workers	Total
Italy	0.83	0.90	0.86	1.12	0.87	0.90	0.90	0.86	1.09	0.88
Latin America	0.93	0.87	0.83	0.52	0.57	1.44	0.98	0.82	0.54	0.57
United States	0.82	0.65	0.61	0.82	0.96	-	0.51	0.81	0.68	0.85
South Africa	-	-	0.53	0.24	0.31	-	-	0.62	0.52	0.60
Rest of Europe	-	0.69	0.77	0.66	0.91	-	0.90	0.90	0.69	0.94
Middle East	-	-	0.99	-	0.99	-	-	0.83	-	0.83

The ratio between the remuneration of women and men is just under 1 for Italy, the United States, the Rest of Europe and the Middle East, and significantly lower than 1 for Latin America and South Africa.

²⁹ Basic salary is the fixed minimum amount paid to an employee for the execution of his/her functions

³⁰ Remuneration is the basic salary increased by additional amounts, with reference to MBO and one-off bonuses/awards and any other benefits.

MILLENNIALS FOR INNOVATION

To support the sharing of ideas, experiences and expectations of Millennials in the Group with regards to work, sustainability and opportunities for improving daily life within the company, the “Millennials for Innovation” forum was created on the intranet #Agorà.

The Forum has four sections:

- **Innovation:** an area in which to discuss innovative ideas for business and processes
- **Sharing:** intended for the sharing of thoughts on initiatives the company could implement to increase its attraction and retention levels
- **Millennials for social:** used to share charitable initiatives promoted by members
- **Team building:** used to plan team building events

ASTM at Politecnico di Torino’s Career Day



[Read the news story](#)



HUMAN CAPITAL DEVELOPMENT

The ASTM Group believes strongly in training for personnel growth and is committed to providing programmes to build up the professional skills and managerial, technical and professional competencies of its employees.

Group companies also adopt programmes for managing competencies. In this framework, each organization has already been mapping the competencies of its employees for several years, requesting employees to compile questionnaires on professional skills with reference to their professional background, including training with previous employees and educational background, as well as specific qualifications certified by training organisations. This mapping, which is reviewed at regular intervals, can be used to immediately identify company positions required, within the broader context of the Group.

Training offered by the various companies differs based on specific activities carried out by various company areas and is attributable to the following areas:

- **quality:** promote the necessary skills to achieve, maintain and improve quality standards defined by each company;
- **health and safety:** develop the skills to manage safety in the workplace;
- **technical/professional:** acquire and/or reinforce innovation of technical/professional skills pertaining to the management of the various business segments;
- **broad-ranging:** develop skills shared by various organisational levels and professional categories (foreign language courses, IT skills, legal updates, soft skills).



HOURS OF TOTAL AND PER CAPITA TRAINING FOR GROUP EMPLOYEES BY EMPLOYMENT CATEGORY AND GENDER

	2021					
	MEN		WOMEN		TOTAL	
	Training hours	Per capita	Training hours	Per capita	Training hours	Per capita
Executives	1,557	8.7	262	11.9	1,819	9.0
Middle managers	2,829	6.0	267	2.0	3,096	5.1
Office workers	27,037	7.4	16,693	9.2	43,730	8.0
Manual workers	66,990	13.1	3,930	2.5	70,920	10.6
Total	98,413	10.4	21,152	6.0	119,565	9.2

	2022					
	MEN		WOMEN		TOTAL	
	Training hours	Per capita	Training hours	Per capita	Training hours	Per capita
Executives	2,004	10.9	465	25.8	2,469	12.2
Middle managers	8,834	17.2	2,218	15.0	11,052	16.7
Office workers	73,105	20.9	19,587	11.0	92,692	17.6
Manual workers	106,956	21.0	24,148	13.0	131,104	18.9
Total	190,899	20.6	46,418	12.2	237,317	18.2

In 2022, the Group provided over 252 thousand total hours of training for employees and collaborators (192 thousand hours in 2021), of which around 52% was focused on issues regarding health and safety.

Over 237 thousand hours of training were provided to employees (over 119 thousand in 2021, +98%) with a per capita value of 18.2, of which 116,009 in the area of health and safety (75,943 in 2021, +53%).

Over 14 thousand training hours were provided to Group collaborators, most of which were provided in the Itinera Ghantoot and Itinera Agility JV joint operations on health and safety.

HUMAN CAPITAL DEVELOPMENT: PROMOTING A RESULTS DRIVEN ORGANIZATION AND EXTENDING THE PERFORMANCE APPRAISAL PROCESS

In 2022 the Performance Appraisal model was created to extend the current performance assessment perimeter.

Specifically, the project aims to achieved the following: be a Results Driven Organisation, adopt shared systems and approaches that promote the growth and development of human capital and aim to guarantee inclusion, and adopt systems to promote business sustainability and optimise the Group's future-proofing capabilities.

Moreover, by adopting a common performance appraisal model for the ASTM Group, the project aims to raise awareness and deliver alignment on ASTM's strategic skills and related expected behaviours, support the evolution of leadership models, structure and formalise growth paths and facilitate talent development.

SUSTAINABILITY TRAINING

ASTM promoted training for Group personnel on ESG topics - including the protection of human rights, the fight against active and passive corruption - focusing particularly on the policies adopted, presenting the reference macro-trends in relation to specific issues.

During 2022, the Sustainability function organised e-learning training courses on "Sustainability, a shared route", aimed at over 3,400 Group employees in Italy, with training received by a total of 1,767 employees.

HUMAN RIGHTS

ASTM endeavours to ensure that human rights are respected along the entire value chain. To consolidate its commitment to human rights, also considering the Group's international development, ASTM and the main operating subsidiaries adopted a Human Rights Policy, inspired by international standards such as the Universal Declaration of Human Rights and the Fundamental Conventions of the ILO (International Labour Organization), the ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up, the Guiding Principles on Business and Human Rights of the United Nations, the Principles of the United Nations Global Compact and the OECD Guidelines for Multinational Enterprises.

In 2020 the CEO of ASTM signed the Italian version of the CEO Guide for Human Rights issued by the World Business Council for Sustainable Development (WBCSD).

ASTM S.p.A., Itinera S.p.A., Euroimpianti S.p.A., Tubosider S.p.A. and Ro.ss S.p.A. implemented a management system with SA8000 certification, a voluntary verifiable standard based on the Universal Declaration of Human Rights, ILO documents and other domestic and international norms on human and employment rights, to develop and protect individuals following under the control and influence of the organisation.

PUBLICATION OF A HUMAN RIGHTS REPORT ACCORDING TO INTERNATIONAL GUIDELINES

In 2022, a Human Rights Report was developed for Itinera according to the international UN Guiding Principles, with a view to mapping the Group's impact on the various aspects related to the respect and protection of human rights, such as irregular, forced or compulsory labour and child labour.

The Group has always paid the utmost attention to the respect of human rights throughout its value chain. Operating in an international context, and given that the infrastructure and construction market represents a supply chain with a risk of human rights violations, it is crucial for the Group to prevent and mitigate such violations in the various countries in which it operates, which are often subject to different levels of human rights protection based on specific local regulations or different cultural norms.

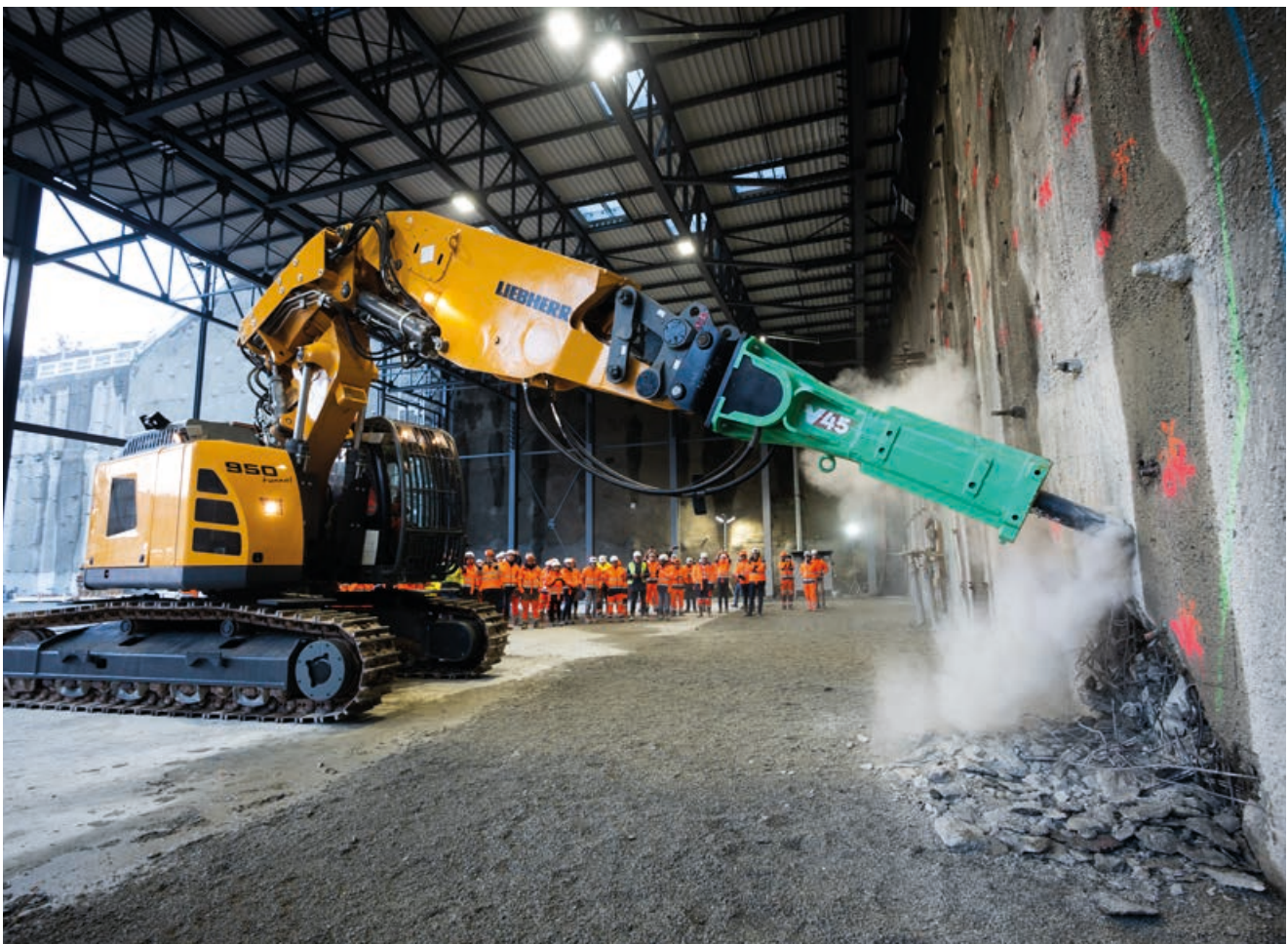
In fact, the first report on human rights published by Itinera stems from its desire to share its commitment to promoting the proper management of human rights among its stakeholders to enable the adoption of an increasingly structured due diligence process across the value chain.

S.I.N.A. HIGHER EDUCATION SCHOOL

In 2022, the activities continued by the “S.I.N.A. - ASTM Group Higher Education School for Infrastructure Engineering”. The activities implemented in collaboration with the Milan Order of Engineers (FOIM) involved training initiatives for S.I.N.A. and ASTM Group personnel on highly current topics for the sector of engineering and road infrastructure.

Specifically, five training days that focused on aspects of the road infrastructure sector (e.g., tunnel safety, static capacity of motorway bridges, motorway infrastructure innovation, etc.) were held, involving a broad audience. To promote interest in the initiatives, contributions were made by professionals from ministries and universities, as well as the world of motorways. In total, 2,297 hours of training were delivered to the ASTM Group alone.

Furthermore, in 2022 S.I.N.A. decided to promote periodic meetings called “Dialoghi professionali” (“Professional conversations”), during which experts from various disciplines and project managers had the opportunity to share their expertise with interested colleagues. The topics, which were chosen from suggestions provided by employees, were environmental monitoring, management of materials, tunnel surveillance and participation in tenders.



HEALTH AND SAFETY

The material issues of primary importance for the ASTM Group include the health and safety of workers, which is protected by all Group companies with the aim not only of respecting laws, but of undertaking at all times to improve working conditions.

This commitment has resulted in Policies and occupational health and safety management systems being adopted to ensure that each employee is in a suitable working environment, which does not pose hazards and provides conditions that respect the individual. In particular, 65% of Group employees are covered by an Occupational Health and Safety Management System certified to ISO 45001. The remaining 35% are covered by Health and Safety Management Systems that are not certified or are in the process of being certified.

In addition, employees are protected by spreading a culture of safety, encouraging responsible behaviour, as well as monitoring and assessing hazardous situations.

A considerable number of solutions have been adopted in the construction sector to ensure the health and safety of employees, as they are more exposed to risks in their day-to-day activities.

Itinera's accident and near miss management procedure makes it possible to collect useful data for protecting the health and safety of employees and subcontractors.

The data refer to cases of:

- **Near misses:** events that have no consequences on people or objects but have the potential to cause an accident;
- **First Aid:** health intervention that does not require equipment or particular training (first aid officer). In this case, no working days are lost;
- **Medical Treatment:** health intervention by qualified healthcare personnel (doctor, nurse, paramedic). In this case, no working days are lost;
- **Restricted workdays:** any event that translates to a person's inability to carry out his/her normal job and that leads to the employee's assignment to a temporarily lighter workload. In this case, no working days are lost (not applicable in Italy);
- **Injuries with serious consequences:** an injury from which the worker cannot or is not expected to fully recover to his/her pre-injury state of health within 6 months.

In relation to the processes intended to facilitate workers' participation in the Occupational Health and Safety Management Systems and in order to provide access and communicate relevant information in this respect for the concessions sector a specific course named "Occupational Health and Safety Management System" was inserted into the usual training projects involving all personnel, and in particular workers in the collection and traffic department. Through various topics, the course covers policy, manual and procedures relating to the activities of the learners, reporting modules and the importance of reporting any accidents or near misses.

As part of the 45001 Management System, a specific reporting module was established for the engineering sector, through which each worker can communicate/report information about health and safety in the workplace, participating in the implementation/application of the system.

In relation to the existence of formal joint management-employee committees for health and safety, for the concessions sector specific committees were planned and established during the year. The committees include: the coordinator, appointed by the Employer, the Safety Manager (RSPP), the Safety Officers, the Workers' Safety Representatives (RLSs) and the Emergency Team Manager (RSE). The meetings are organised in order to assess and determine any interventions/activities that may be necessary to improve the safety standards.

There are no formal joint management-employee committees for the other sectors. However, the provisions of the law in relation to the activities of Workers' Safety Representatives (RLSs) are put in

place and constant periodic dialogue takes place between the Safety Manager and the Workers' Representatives.

INJURIES AND OCCUPATIONAL DISEASES INVOLVING GROUP EMPLOYEES BY GENDER

NO. OF CASES	2021			2022		
	Men	Women	Total	Men	Women	Total
Occupational diseases	2	-	2	-	-	-
Injuries	122	17	139	158	68	226
<i>of which with prognosis > 6 months</i>	1	1	2	3	1	4
<i>of which fatal</i>	1	-	1	1	-	1

TYPE OF ACCIDENTS INVOLVING GROUP EMPLOYEES BY GENDER

NO. OF CASES	2021			2022		
	Men	Women	Total	Men	Women	Total
Work-related injuries	111	12	123	137	54	191
Injuries while commuting to and from work ³² using company vehicles	6	-	6	2	-	2
Total	117	12	129	139	54	193

In 2022, 226 injuries were reported (191 occurring at the workplace, 2 while commuting to and from work using company vehicles, and 33 while commuting to and from work using own vehicles, of which one has a prognosis greater than 6 months; 139 in 2021, of which 123 at the workplace, 6 injuries while commuting to and from work using company vehicles and 10 using own vehicles).

4 injuries with a prognosis greater than 6 months were recorded for 2022, and one fatal injury referring to a worker in Brazil who fell from a vehicle and sustained a head injury on collision with the asphalt while travelling between construction sites.

10 cases of medical treatment for Group employees, 74 first aid injuries and 233 near misses were also recorded, 28 first aid injuries, 3 near misses were recorded for Group collaborators.

As for collaborators, 9 workplace accidents for male (3 in 2021, including 1 while commuting to and from work using own vehicle), 0 for women (0 in 2021), of which none with a prognosis greater than six months and/or fatal, and 3 accidents while commuting to and from work using own vehicles, were also recorded.

³¹ Including accidents while commuting to and from work using own vehicles.

³² Accidents while travelling to and from work are those sustained by an employee during their normal commute between home and work, or during their normal journey between two workplaces if the employee has multiple employment relationships.

ABSENCES³³ AND LOST DAYS³⁴ OF GROUP EMPLOYEES BY GENDER

NO. OF DAYS	2021			2022		
	Men	Women	Total	Men	Women	Total
Absences	46,157	17,566	63,723	77,873	37,631	115,503
<i>of which joint operations</i>	792	147	939	3,897	303	4,200
Lost days	2,266	294	2,560	3,947	767	4,714
<i>of which joint operations</i>	240	-	240	720	-	720

Days of absence went from 63,723 in 2021 to 115,503 in 2022. In 2022, 30,249 thousand hours were worked by Group employees (15,899 thousand hours in 2021), of which 21,789 thousand hours by men (13,402 thousand hours in 2021) and 8,460 thousand hours by women (2,497 thousand hours in 2021). In 2022, 9,366 thousand hours were worked by collaborators (8,265 thousand hours in 2021), of which 9,286 thousand hours by men (8,156 thousand hours in 2021) and 80 thousand hours by women (109 thousand hours in 2021).

GROUP EMPLOYEE HEALTH AND SAFETY INDICATORS BY GENDER

	2021			2022		
	Men	Women	Total	Men	Women	Total
Lost day rate ³⁵	0.16	0.11	0.15	0.19	0.09	0.16
Occupational disease rate ³⁶	0.03	-	0.03	-	-	-
Absentee rate ³⁷	2.72	5.46	3.15	3.12	3.91	3.34

	2021			2022		
	Men	Women	Total	Men	Women	Total
Rate of fatalities as a result of work-related injury ³⁸	0.07	-	0.06	0.05	-	0.03
High-consequence work-related injury rate ³⁹	0.07	0.40	0.13	0.14	0.12	0.13
Recordable workplace injury rate ⁴⁰	8.73	4.81	8.11	6.38	6.38	6.38

³³ Absence means the days when the worker was absent, not only due to illness or an accident. Days of absence do not include agreed on leave such as holidays, study leave, maternity or paternity leave

³⁴ Lost days mean days when work was not carried out due to the worker not being able to carry out his/her usual work because of an injury in the work place or an occupational disease. Resuming work with limited or alternative duties carried out for the same organisation is not considered a lost day

³⁵ The lost day rate for injuries is the ratio between the total number of lost days through occupational injuries and diseases and the total number of hours that could be worked in the same period, multiplied by 1,000 (GRI 403 (2016))

³⁶ The Occupational disease rate is the ratio between the total number of cases of occupational disease and the total of hours worked in the same period, multiplied by 200,000 (GRI 403-2 (2016))

³⁷ The Absentee rate is the ratio between the total days of absence and the total working days in the same period, multiplied by 100 (GRI 403-2 (2016))

³⁸ The rate of fatalities as a result of work related injuries is the ratio between the number of deaths resulting from injuries at work and the number of hours worked, multiplied by 1,000,000 (GRI 403-9 (2018))

³⁹ The high-consequence work-related injury rate (excluding deaths) is the ratio between the number of injuries at work with serious consequences (excluding deaths) and the number of hours worked, multiplied by 1,000,000 (GRI 403-9 (2018))

⁴⁰ The recordable work-related injuries rate is the ratio between the number of recordable injuries at work, excluding injuries while travelling to and from work using own vehicles, and the number of hours worked, multiplied by 1,000,000 (GRI 403-9 (2018))

GROUP COLLABORATOR HEALTH AND SAFETY INDICATORS BY GENDER

	2021			2022		
	Men	Women	Total	Men	Women	Total
Rate of fatalities as a result of work-related injury	-	-	-	-	-	-
High-consequence work-related injury rate	-	-	-	-	-	-
Recordable work-related injuries rate	0.37	-	0.36	0.10	-	0.10

Material topic:

OCCUPATIONAL HEALTH AND SAFETY

Area of Leg. D. 254/2016:
EMPLOYEE RELATED THEMES



Main sustainability risks associated:

- compliance risk and risks related to ethical behaviour;
- risks related to the supply chain and subcontracting.

Summary of main management and mitigation actions:

- the “Code of Ethics and Conduct” and “Compliance Programme” 231/01” (hereafter “Model 231”) adopted by ASTM and its significant operating subsidiaries, including specific operating procedures monitoring compliance with the provisions in the Consolidated Health and Safety at Work Act (Italian Legislative Decree no. 81/08);
- occupational health and safety management systems in line with applicable best practices
- specific health and safety training and prevention programmes, to reduce accidents, guarantee a safe working environment, and promote and encourage virtuous behaviour in the workplace
- Suppliers’ Code of Conduct that establishes the behaviour to adopt in dealings with suppliers and business partners.

With a view to continual improvement, the Group promotes the harmonisation of occupational health and safety policies within each business segment, also through the adoption of an Integrated Quality, Safety and Environmental Management System, in line with applicable international standards.



TRANSPARENCY IN THE SUPPLY CHAIN: SUBCONTRACTORS

The health and safety information required by the reporting standards used by the Group, GRI Standards, refers to all workers, employees or otherwise, whose work and/or workplace is controlled by the organisation.

With a view to continuous improvement and in order to provide more information about the value chain, Itinera has implemented, on a voluntary basis, a system to collect information about subcontractors regardless of whether the organisation controls the work and/or workplace.

The data reported in this Report refer to the subcontractors of Itinera S.p.A. in Italy and at foreign branches.

Information such as the number of workers employed, the number of hours worked, the number of injuries and the hours of training provided, is collected to guarantee Itinera increased monitoring over the working standards of the subcontractors.

As at 31 December 2022, 1,382 workers of subcontractor firms, of which 1,361 men and 21 women, worked at the Itinera work sites. The overall hours worked totalled 3.35 million.

Details of subcontractor injuries are shown below:

NO. OF SUBCONTRACTOR CASES	2021			2022		
	Men	Women	Total	Men	Women	Total
Work-related injuries	13	-	13	18	-	18
Injuries while commuting to and from work using company vehicles	-	-	-	-	-	-
High-consequence injuries	1	-	1	-	-	-
Medical treatment	7	-	7	-	-	-
First aid injuries	20	-	20	-	-	-
Near misses	53	-	53	41	-	41

There were no fatal injuries. In 2022, 13 thousand hours of training were provided to the subcontractors.

COVID-19 PANDEMIC

In the context of the Covid-19 epidemic, in 2022 the Group companies continued to monitor the evolution of the external and internal context, and to apply rigorously and, where necessary, to update all measures adopted previously, in accordance with the measures of the relevant authorities and institutions, as well as the recommendations, indications and guidelines distributed by the parent company.

In order to protect the health and safety of workers and external parties, appropriately updated regulations and protective guidelines were promoted at all Group companies; in particular, the work contexts in which FFP2 masks were important were highlighted and the measures adopted previously were substantially confirmed.

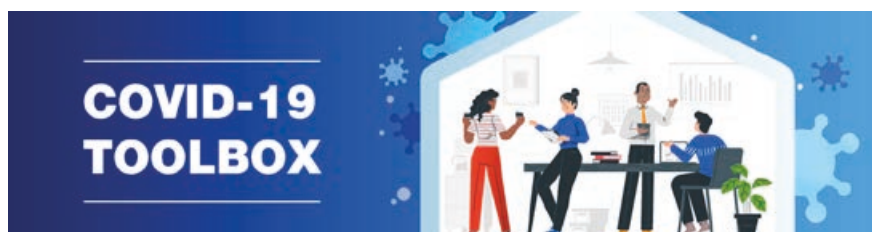
Regulatory provisions on administrative, tax, fiscal, social security and assistance issued during the period and applicable to the company continued to be constantly monitored and consequently complied with.

The operations of ASTM and its subsidiaries, including essential public services, were not interrupted. In particular, with regards to management of the motorway network granted in concession, all user services relative to the road network were guaranteed, and actions relative to maintenance and investment activities also continued, aimed at continuously increasing the safety standards for infrastructure and operation. In the EPC sector, activities to carry out work projects in the order portfolio continued regularly.

In order to protect the health and safety of its employees and collaborators, the Group continued its activities to monitor and control, and focused its efforts on identifying and implementing all possible measures to contain the impact of the health crisis on its economic, financial and ESG results. Particular efforts were made to safeguard the Group's financial soundness and cash availability, so as to keep both aspects fit for and consistent with existing commitments and operating programmes, with the goal of ensuring the maintenance of absolute levels of efficiency in the service provided to users and the safety of the managed infrastructure.

COVID-19 TOOL BOX

From the start of the epidemiological emergency, a specific section was created on the #Agora intranet to promptly and effectively communicate with Group personnel. It was constantly updated and documents and information were made available to all employees.



More specifically, all the Group's Protocols and instructions were made available, as well as videos, informational material and institutional links. Additionally, awareness was increased about the use of the company intranet which offers, among other things, numerous initiatives aimed at employees.



WORK SITE SAFETY

Itinera has developed and gradually adopted an Integrated Management system with a specific focus on controlling safety at all operating sites (work sites, head offices, warehouses and plants).

Moreover, the Management Systems Department conducts inspections and audits of operating areas, on a regular basis, in order to analyse the implementation and application status of the Management System, as well as the implementation status of actions to manage non-conformities concerning safety, environment and quality issues. The results of these audits are recorded in audit reports and system records, and any findings (non-conformities, observations and comments) are managed through documented action plans.

In 2022, 22 internal System Management audits were carried out in Italy, of which: 14 at operating units and 8 at management offices, as well as 36 inspections/training meetings. As a consequence of these activities, no cases of non-compliance were recorded, while 7 observations and 77 recommendations were recorded.

Meanwhile, audits were performed for renewal/maintenance of certifications by ICMQ for the Arab Emirates branch and, in the context of activity for renewal/maintenance of Itinera S.p.A. certifications, the certification body visited the site of the Skurusund bridge project in Sweden.

Operating control and regulatory control are highly relevant in Italy. Overseas, on the other hand, the focus is mainly on monitoring the application of the Integrated Management System on a voluntary basis, as well as on compliance with local law and, in cases where this is less robust than Italian legislation, Italian law.

In the current year, supervisory bodies (local health authority - ASL, national labour inspectorate - ITL, specifically) conducted 27 health and occupational safety inspections in the Italian work sites (construction and motorway maintenance), with inspection reports issued, with five sanctions issued against Itinera.

In addition, in the Storstrøm Bridge project, the contract requires that quality audits be performed on the main suppliers. In order to ensure effective and efficient monitoring, these audits are also extended to environment and safety aspects.

PROMOTION OF WORKER HEALTH

As part of health monitoring for the concessions sector, the companies - in agreement with the workers' safety representatives - have decided to promote, using benefits in line with previous years, an awareness and prevention campaign for a number of significant illnesses. In addition, the licensee companies, through the external company that oversees the workers' health monitoring activities, provide all their employees, including their household with spouses and dependent children, the possibility to receive diagnostic and instrumental outpatient healthcare services, with short waiting times and subsidised prices, at multiple partner structures.

The engineering sector has a healthcare policy for all personnel which provides for the reimbursement of medical expenses.

For the construction and technology sectors, there are currently no ways to subsidise workers' access to medical and healthcare assistance services unrelated to work, above and beyond those required by law.

04



OUR RESPONSIBILITY TOWARDS THE ENVIRONMENT

- 129 Management of Environmental Issues
- 130 Use of Resources
- 138 Waste
- 140 Noise management
- 141 Protection of the local area, reduction of land use and protection of biodiversity



MANAGEMENT OF ENVIRONMENTAL ISSUES

ASTM and its main operating italiana subsidiaries have adopted a Model 231 and implemented operational controls to guarantee conformity to applicable environmental regulations.

With a view to continuous improvement, various companies, joint operations and branches have implemented an Environmental Management System with ISO 14001 certification. This system establishes specific management procedures for the continual improvement of company performance.

Group companies operating in the technology sector and construction industry have also developed an integrated management system to guarantee that all applicable safety, health and environmental laws have been identified and evaluated and that all necessary measures to guarantee the legal compliance of all operating units have been taken.



29 COMPANIES
2 ITINERA BRANCHES OVERSEAS
CERTIFICATION ISO 14001

Itinera's certifications also cover the branches and JOs, net of the ASTM North America remit.

COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

One significant fine was recorded in 2022; this amounted to approximately €18 thousand and concerned a bad smell detected on a Ecoporto Santos cargo ship.

SIGNIFICANT SPILLS

In 2022, four significant spills were reported. The first, relating to Conc. das Rodovias Ayrton Senna e Carvalho Pinto S.A.- Ecopistas, concerned 400 kg of ethyl alcohol and synthetic paint on the SP070 motorway. The second, relating to Eco135 Concessionaria de Rodovias S.A., concerned 19 thousand cubic metres of activated carbon, lubricating oil and corrosive liquid on the BR-135 motorway. The third, relating to Concessionaria Ecovias do Araguaia S.A., concerned 27 cubic metres of water-based paint, hydrochloric acid and vegetable fat. The fourth, relating to Ecoporto Santos, concerned high-severity spillages of hydraulic and diesel oil.

The companies involved promptly activated company procedures in force aimed at remediation works.

USE OF RESOURCES

ENERGY CONSUMPTION

In 2022, the energy consumption of the ASTM Group totalled over 1,783 thousand GJ (1,382 thousand GJ in 2021), up by 29% compared to the previous year. In particular, electricity consumption is equal to around 561 thousand GJ (505 thousand GJ in 2021), diesel fuel over 839 thousand GJ (625 thousand GJ in 2021) and natural gas around 78 thousand GJ (93 thousand GJ in 2021). In 2022, consumption of gas oil used to produce electricity from generators also

totalled around 141 thousand GJ (56 thousand GJ in 2021), petrol around 63 thousand GJ (52 thousand GJ in 2021), heating fuel around 21 thousand GJ (30 thousand GJ in 2021) and fuel oil around 10 GJ (122 thousand GJ in 2021). Consumption of self-produced electricity from renewable sources, net of the share sold and fed to the grid, was equal to 2,933 GJ (8,794 thousand GJ in 2021), LPG around 15 thousand GJ (4 thousand GJ in 2021) and, lastly, 60 thousand GJ of ethanol were consumed (7,331 GJ in 2021).

ENERGY CONSUMPTION OF THE GROUP⁴¹

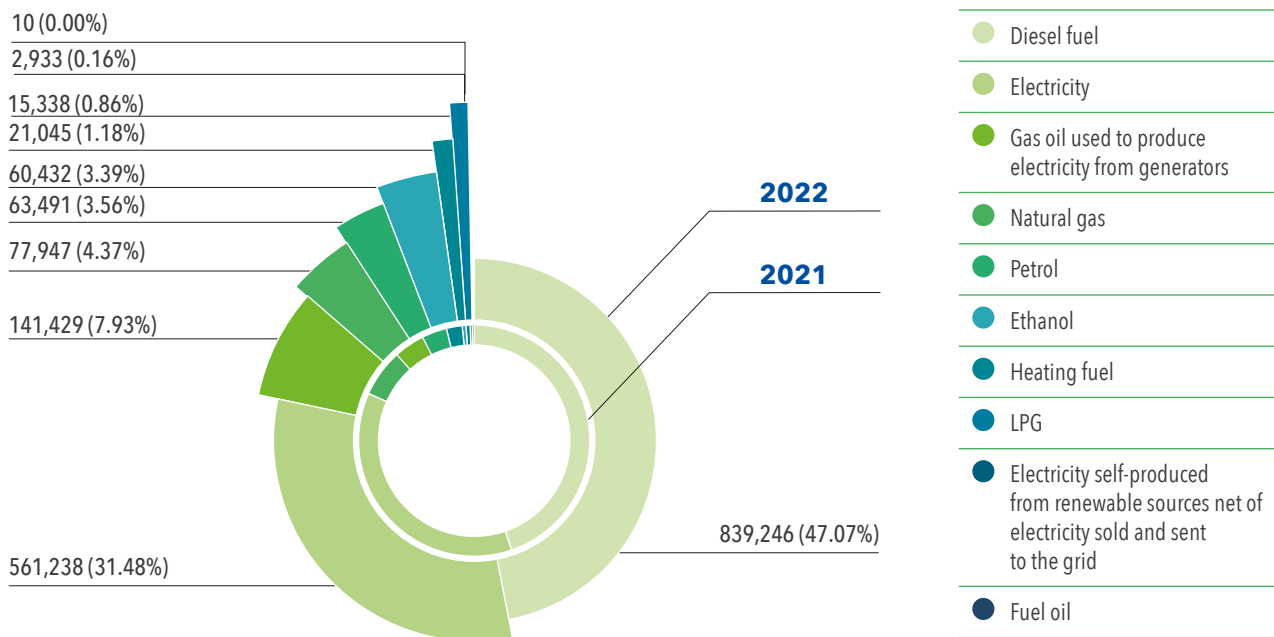
ENERGY SOURCE	2021	2022
	Total	Total
Electricity purchased	140,321	157,920
<i>Electricity purchased from renewable sources [kWh/000]</i>	108,646	108,989
<i>Electricity purchased from non-renewable sources [kWh/000]</i>	31,675	48,932
Electricity self-produced from renewable sources [kWh/000]	2,734	1,572
Electricity sold and put on the grid [kWh/000]	292	2,778
Natural gas (m ³ /000)	2,584	2,172
Heating fuel (l/000)	834	585
Diesel fuel (l/000)	17,304	23,270
Gas oil used to produce electricity from generators [l/000]	1,539	3,934
Fuel oil (l/000)	3	0.3
Petrol (l/000)	1,564	1,917
LPG (l/000)	176	630
Ethanol [l/000]	225	1,861

Total electricity used is equal to over 157,929 thousand kWh. Electricity used from renewable sources is equal to 109,804 thousand kWh, of which 108,989 thousand kWh purchased from renewable sources and 815 thousand kWh self-produced from renewable sources net of the energy sold and fed to the grid.

⁴¹ Some data related to energy consumption are the result of estimates

ENERGY CONSUMPTION OF THE GROUP BY SOURCE

(figures in GJ)



ENERGY SAVING AS PART OF UPGRADING PUBLIC LIGHTING

Environmental stewardship and protection is also achieved through a rational use of resources and this is why actions to rationalise the energy consumption of public lighting systems is an important measure. Euroimpianti is the Group company that manages plant engineering projects in captive and extra-captive markets. Its main activities involve the planning, development and maintenance of high technology systems. In this context, Euroimpianti has developed a number of activities as part of Energy Saving projects to re-qualify public lighting systems in order to reduce energy consumption, light pollution and improve performance thanks to LED lighting.

Moreover, actions will include:

- the use of latest technologies applied to public lighting to increase system use through remote management and integration with the network of IT services for users, CCTV and Wi-Fi (Smart City);
- the development of energy efficiency projects as an ESCo (Energy Service Company), resulting in lower primary energy consumption for the same final services. In the ESCo sphere, the concession contracts for the management and maintenance of the public lighting systems - including the supply of energy vectors - of the municipalities of Piosasco and Giaveno, both in the province of Turin, were continued in the year 2022, and the energy diagnosis and efficiency upgrading activities of the lighting systems of the Cuneo Est junction of the A33 Asti-Cuneo motorway were completed.
- the development of competencies for the planning and construction of buildings with a reduced primary energy consumption, using low environmental impact technologies, also with LEED (Leadership in Energy and Environmental Design) classification.

- In 2022 the construction works of the technology systems at the Nuovo Ospedale Galeazzi in Milan were completed, in compliance with the requirements of the LEED protocol for the award of the LEED GOLD certification.



ENERGY EFFICIENCY PLAN ON ITALIAN MOTORWAY STRETCHES

With reference to the motorway sector, all Italian licensee companies of the Group are continuing to implement the energy efficiency plan through the adoption of new generation technologies on par with the most advanced sustainability performances.

In this regard, throughout 2022, works to modernise the lighting systems located in the motorway areas continued, mainly in the tunnels, parking lay-bys, junctions and toll booths, transitioning from SAP systems to LED technology. The process of adjusting to the standards established under Italian Legislative Decree 264/06 continued for 49 tunnels of over 500 meters located through the areas managed by the Group and included under the European Transport Network (TEN).

The "Tunnel System Automation" project, which concerns all tunnels over 500 metres in length operated by the Group's licensee companies, was brought to an end and the implementation of the new system is under way, which to date is being introduced for the management of the fully adapted tunnels of SAV (3), SALT A12 section (13), SALT A15 section (4) and AdF

A6 section (2 of 7).

The coordinated management of several systems will allow for a significant improvement in the efficiency of energy consumption monitoring. For lighting systems, with the launch of the system, optimised regulation is also in place of the lighting levels to be adopted for the reduction of energy consumption based on variable operating conditions.

The company S.I.N.A. is also involved in projects to adjust the lighting systems for tunnels not falling under the scope of Italian Legislative Decree 264/06 for motorway junctions, service areas and toll stations. These adjustments have the main objectives of complying with regulations and improving energy efficiency.

In general, for lighting in the motorway areas, efficiency is obtained through installation of LED lighting which consumes less energy, as well as allowing the installation of radio-wave regulation systems. By requiring a management method which aims for use only when lighting is effectively needed in the design, an additional advantage is obtained through the reduction of energy consumption, in combination with the already lower consumption deriving from the use of lighting which consumes less energy.

EMISSIONS

In 2022, the direct emissions of CO₂e (Scope 1⁴²) were equal to around 85,879 tonnes (62,435 tonnes in 2021), indirect Scope 2 emissions⁴³ were equal

to around 10,081 tonnes of CO₂ (market-based, 15,237 tonnes in 2021) and around 41.563 tonnes of CO₂ (location-based, 47,818 tonnes in 2021) and Scope 3⁴⁴ indirect emissions were equal to 2,314,537 CO₂e tonnes (1,975,763 tonnes in 2021).

TOTAL DIRECT EMISSIONS (SCOPE1) [tCO₂e] AND INDIRECT (SCOPE 2) [tCO₂] AND INDIRECT SCOPE 3 [tCO₂e] ⁴⁵

	2021	2022
Scope 1	62,435	85,879
Scope 2 (market-based)	15,237	10,081
Total Scope 1 and Scope 2 (market based)	77,672	95,960
Scope 2 (location-based)	47,818	41,563
Scope 3	1,975,763	2,314,537
Purchased goods and services	1,872,530	2,180,218
Capital goods	15,923	40,587
Fuel-and-energy-related activities	27,413	28,619
Upstream transportation and distribution	15,240	16,897
Waste generated in operations	2,799	2,399
Employee commuting	20,400	22,222
Investment	21,459	23,595
Total Scope 1 and Scope 2 (market based) and Scope 3	2,053,435	2,410,497

Total Scope 1 and Scope 2 (market based) emissions increased by 24% due to the consolidation of the annual data of the EcoRodovias Group and SITAF Group companies. The increase in Scope 3 emissions refers mainly to the increase in the cat-

egory of Purchased goods and services relating to the purchase of raw materials with high emission levels, such as iron and steel and bituminous mixes and the consolidation of the annual data of the EcoRodovias Group and SITAF Group companies.

⁴² Scope 1 (direct emissions): this category includes emissions from own sources or sources controlled by the organisation

⁴³ Scope 2 (indirect emissions): this category includes emissions inferred from purchased electricity use. Scope 2 emissions are expressed in tonnes of CO₂, however the % of natural gas and nitrous oxide had a negligible effect on total greenhouse gas emissions (CO₂ equivalent) as may be inferred from the technical literature

⁴⁴ Scope 3 (indirect emissions): this category includes the emissions arising from company activities that include emission sources not under the direct control of the company, but where the emissions are indirectly attributable to company activities

⁴⁵ Source of conversion factors used: DEFRA 2022. Source of conversion factors used: TERNA 2020 and AIB 2021

SCOPE 3 EMISSIONS

In addition to the Scope 1 and Scope 2 emissions, ASTM has also calculated or estimate the Scope 3 indirect emissions, selecting from the categories deemed relevant for the Group.

Specifically, the following categories of emissions were calculated: Purchased goods and services (partially calculated, partially estimated using the Scope 3 screening tool, Quantis - "The Scope 3 Evaluator"), Fuel-and-energy-related activities (not included in Scope 1 or 2) and Waste generated in operations. In addition, the Group estimate the following categories GHG Scope 3 emissions identified on the basis of the GHG Protocol guidelines using the Scope 3 screening tool Quantis - "The Scope 3 Evaluator", issued by the GHG Protocol in collaboration with Quantis: Purchased goods and services (partially calculated, partially estimated using the Scope 3 screening tool, Quantis - "The Scope 3 Evaluator"), Capital goods, Upstream transportation and distribution, Employee commuting and Investment.

The other emission categories included in the GHG Protocol Scope 3 Standard were deemed not applicable or insignificant.



2022 ENERGY SAVING INITIATIVES

The main energy saving initiatives adopted by the Group companies during 2022 include energy efficiency upgrades to the lighting systems on the S.A.T.A.P. A4 motorway which produced an annual energy saving of 423 MWh.

PROMOTION OF GREEN PROCUREMENT POLICIES AND SUPPLIER ENGAGEMENT ACTIVITIES TO REDUCE SCOPE 3 EMISSIONS

With a view to ensuring continuous improvement, in 2022 a programme was launched to change the IT platform used to certify suppliers of Itinera S.p.A.

In this context, considering the Group's commitment to climate action and, in particular, to monitor and reduce emissions across the value chain, around 40 of Itinera's main suppliers were invited to sign up to Carbon Tracker, a specific emissions tracking platform. The platform enables suppliers to share the data necessary to calculating Scope 3 indirect emissions deriving from purchased goods and services.



WATER CONSUMPTION

In 2022, the companies of the ASTM Group consumed a total of around 999 thousand megalitres (ML) of water (688 ML in 2021).

In particular, around 57 % (59% in 2021) of water use refers to third party water⁴⁶, 11% (11% in 2021) to surface water, around 32 % (30% in 2021) to ground water, and around 0% to sea water (0.1% in 2021).

WATER CONSUMPTION ⁴⁷ OF THE GROUP

(figures in ML)

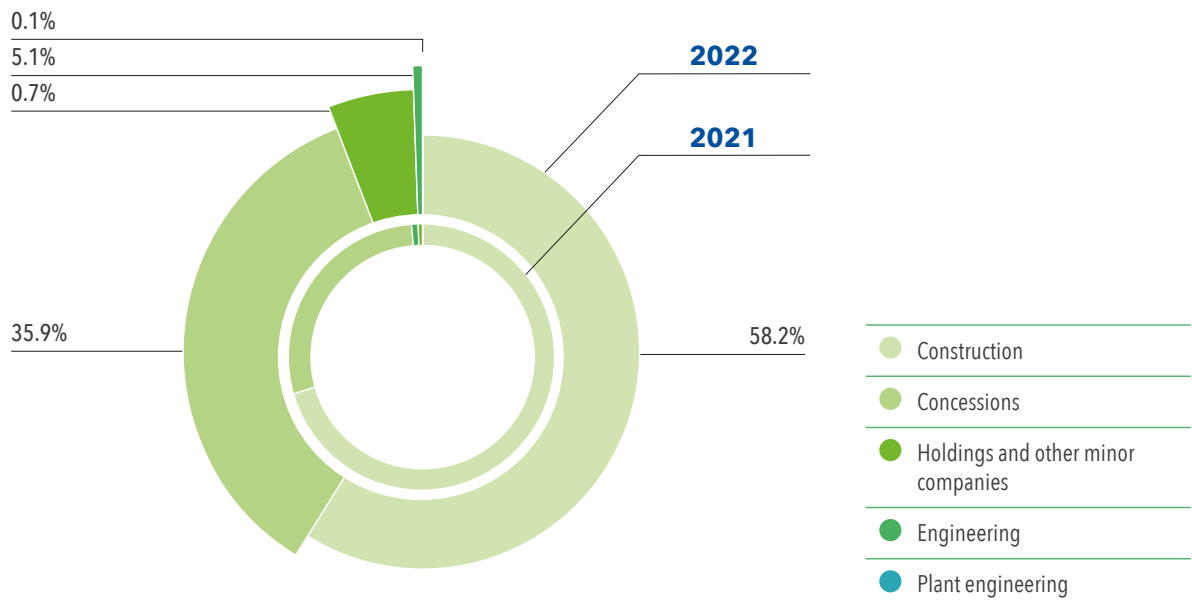
	2021		2022	
	All areas	Areas with water stress	All areas	Areas with water stress
Surface water	73	59	113	16
<i>fresh water</i>	71	56	113	16
<i>other types of water</i>	2	2	-	-
Ground water	206	164	317	118
<i>fresh water</i>	74	32	257	58
<i>other types of water</i>	133	132	60	60
Sea water	1	1	-	-
<i>fresh water</i>	-	-	-	-
<i>other types of water</i>	1	1	-	-
Water produced	-	-	-	-
<i>fresh water</i>	-	-	-	-
<i>other types of water</i>	-	-	-	-
Third party water	408	334	569	403
<i>fresh water</i>	339	269	485	318
<i>other types of water</i>	69	66	85	85
Total third-party water withdrawal by withdrawal source		334		403
<i>surface water</i>		143		186
<i>ground water</i>		130		73
<i>sea water</i>		62		144
<i>water produced</i>		-		-
Total water	688	558	999	537
<i>of which joint operations</i>	337	314	268	258

⁴⁶ "Third party water" means water supplied from water mains, municipal wastewater treatment plants, public or private services and other organisations involved in the supply, transportation, treatment, disposal or use of water and effluents.

⁴⁷ Some data related to water consumption are the result of estimates

WATER CONSUMPTION OF THE GROUP BY BUSINESS SEGMENT

(percentages in ML)



As shown in the graph, 58% of water consumption refers to the construction sector (70% in 2021). In particular, water is mainly used at work sites, with a consumption equal to 581 ML (486 ML in 2021).

Regarding the concessions sector, water consumption at maintenance work sites was equal to 357 ML (192 ML in 2021), accounting for approximately 36% of the Group’s total consumption (28% in 2021).

On the other hand, water use for the engineering, technology and other sectors is significantly lower at 59 ML, equal to 6% of the Group’s total consumption (10 ML, equal to 2% of the Group’s total consumption in 2021), mainly intended for use at the operating sites.



WASTE

In line with the Group's policies, waste produced is recycled where possible, otherwise it is disposed of at the most suitable sites depending on the type of waste. The Group's policy on waste management aims to guarantee sustainable waste management, while increasing the percentage of recycled waste and ensuring a responsible management of hazardous waste.

The type of waste produced varies, due to the different nature of the Group's business segments.

Most waste is produced by the construction sector (91% of the total), followed by the concessions sectors at around 8%, and finally engineering, technology, plants and holdings at less 1% collectively. The percentage of waste attributable to the concession holder companies' sector is higher than the previous year due to the entry into the scope of consolidation of the licensee companies of the Ecorodovias Group,

which directly disposes of considerable quantities of milled asphalt.

Waste rose from over 870 thousand tonnes in 2021 to over 1,601 thousand tonnes in 2022 with an increase of 84%.

In 2022, most of the waste produced by the Group was recycled and reused (94%, 79% in 2021), while around 6% was sent to landfill, incinerated or disposed of in another way. Waste disposal is managed through municipal service companies and specialist firms. Almost all waste (99%) falls into the category of non-hazardous waste and the majority of hazardous waste (877 tonnes) is from the Storstrøm bridge worksite and originates from handling of materials already present on the site at the start of the project and owned/produced by the Port Authority.

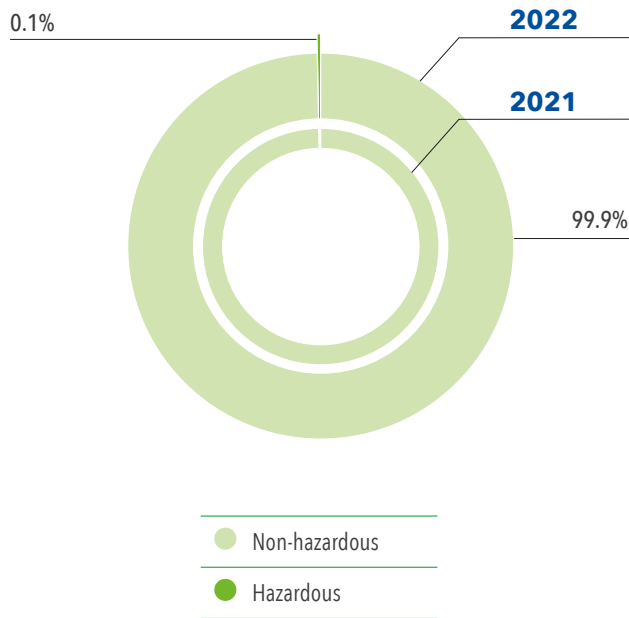
GROUP WASTE BY DISPOSAL METHOD

(figures in tonnes)

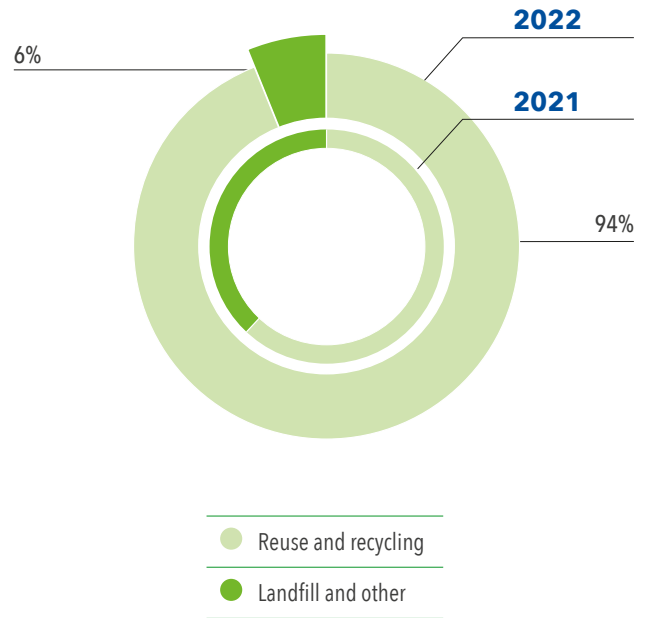
DISPOSAL METHOD	2021				2022			
	Hazardous	Non-hazardous	Total	Total (%)	Hazardous	Non-hazardous	Total	Total (%)
Reuse [t]	2	129,112	129,114	10.8%	0	295,865	295,865	18.47%
Recycling [t]	76	883,550 ⁴⁸	883,626	73.9%	372	1,211,471	1,211,843	75.65%
Energy recovery [t]	48	524	572	0.0%	106	492	598	0.04%
Incineration [t]	13	655	668	0.1%	26	377	403	0.03%
Landfill [t]	124	90,980	91,104	7.6%	617	55,682	56,299	3.51%
Other [t]	1,658	88,415	90,073	7.5%	941	35,969	36,910	2.30%
Total	1,921	1,193,236	1,195,157	100.0%	2,062	1,599,856	1,601,918	100%
<i>of which joint operations</i>	30	652,325	652,355	54.6%	56	735,584	735,640	45.92%

⁴⁸The 2021 data on non-hazardous waste was restated to enable a more accurate comparison with 2022 data.

GROUP WASTE BY TYPE



GROUP WASTE BY DISPOSAL METHOD



NOISE MANAGEMENT

Noise management is particularly important in the concessions and construction sectors.

Transport infrastructure and their related motorway traffic are a widespread and significant source of noise pollution for the local areas. Nevertheless, the impact for the community and the perception of noise are notably affected by the location of the infrastructure with respect to inhabited areas.

Aware of the importance of mitigating the potential negative effects on communities, the Group licensee continuously monitor the level of noise pollution through measurement and impact studies, planning and the construction of mitigation works launched in previous years. In 2022, according to the commitments defined in the financial plans of each licensee, activities to plan, develop and test mitigation measures continued, as provided for in the implementing sections of the Noise Abatement Plans pursuant to the Decree of 29 November 2000 of the Italian Ministry of the Environment and Energy Security (MaSE). In particular, the Noise Abatement Plans require that following the issue of the legislation (2007) and approval of the Plan by the Ministry, the licensee companies must complete the interventions within 15 years.

As at 31 December 2022, around a total 165 km of noise barriers were installed along the Group's motorway stretches, of which around 9 km installed in 2022.

The table below provides details for each individual concession holder company in Italy.

NOISE BARRIERS ON THE ITALIAN NETWORK (figures in km)

	2021 (LENGTH IN KM)	2022 (LENGTH IN KM)
A4 Torino-Milano	26.6	27.9
A21 Torino-Piacenza	15.5	15.5
A6 Torino-Savona	7.7	7.7
A12 Livorno-Sestri Levante	26.3	31.3
A15 Parma-La Spezia	9.0	9.0
A33 Asti-Cuneo	8.4	8.4
A10 Savona-Ventimiglia	10.5	10.7
A5 Quincinetto-Aosta Ovest	2.1	2.5
A21 Piacenza-Cremona-Brescia	11.1	12.9
A5 Torino -Quincinetto e Ivrea-Santhià A55 Tangenziale di Torino & Torino -Pinerolo	28.4	28.4
A32 Torino-Bardonecchia T4 Frejus Tunnel	11.2	11.2
Total	156.8	165.5

On the motorway stretches managed by the Italian licensee companies of the Group, a draining surface has been used whenever the characteristics of the stretch allowed. It is noted that for safety reasons, this paving cannot be laid in tunnels, nor is it recommended on the stretches subject to frequent snowy rainfall in winter months. Noise abatement draining paving is currently present on around 62% of the total kilometres managed by the licensees of the Group in Italy, which represents nearly all of the motorway stretches where this type of asphalt can be used.

In the construction sector, the environmental aspect of noise generated by operations at work sites (e.g. excavation and earth moving works, assembly, concrete mixers, handling operating equipment) is managed based on the location of the work site, as per specific operating instructions.

BIODIVERSITY POLICY

In November 2020, the ASTM Board of Directors approved the Biodiversity Policy.

ASTM and its subsidiaries are committed to the conservation and protection of biodiversity and ecosystem services. In this context, the Policy defines the Group's commitment in relation to protecting biodiversity.

In carrying out its business, the Group interacts with various ecosystems, landscapes and animal species. Therefore, ASTM is committed to promoting biodiversity in ecosystems, developing new projects in a sustainable manner, protecting and promoting the development and growth of natural assets. These commitments are made and promoted through the Policy, so that the various levels of the organisation and other Group companies might continue developing methods of analysis and action for the conservation of biodiversity when planning and undertaking their activities. The end goal is to integrate biodiversity conservation into the Group's strategy, considering it when making decisions about construction, management and dismantling of all infrastructure.

PROTECTION OF THE LOCAL AREA, REDUCTION IN LAND USE AND PROTECTION OF BIODIVERSITY

Group activities are carried out with a focus on protecting the environment, seeing it as an asset to protect and value. The aim is therefore to adapt the environment's characteristics to the needs of communities and standards of institutions in its motorway network maintenance and updating projects, as well as for the construction of new stretches.

Local areas have always been considered as a fundamental asset to protect. With this in mind, the Group carries out its activities with a view to protecting the environment and safeguarding historical and cultural heritage.

In 2022, the activities planned under the Environmental Monitoring Plans, defined during the design stage, mainly involved the motorway stretches of the A4 Torino-Milano, the A12 Livorno-Sestri Levante, and the and the SP357R Bypass under construction near the town of Noceto (Tangen-

ziale di Noceto) In particular, in line with the development of the infrastructure modernisation works along the stretch between Pero and Milan, the monitoring of in-process works was continued and completed during the year, while the in-process works along the Interconnection between the A12 Sestri Levante-Livorno and the A15 Parma-La Spezia continued. With reference to the Tangenziale di Noceto, the monitoring of the pre-works phase was concluded and the in-progress monitoring was started. Environmental auditing, which is essential to verifying the environmental repercussions generated by the work activities within the boundaries of the work site, was also launched.

Monitoring also continued in relation to the Ti.Bre. (Tirreno Brennero, Corridoio plurimodale Tirreno-Brennero) also continued, with subsequent validation and publication on the Local Information System of the measurement data sheets related

to the individual natural components potentially impacted by the works; considering the progress of the works, particular interest was also paid to the vegetation and wildlife falling under the green works.

As part of the legally mandated upgrading of tunnels longer than 500 metres, the construction of a water drainage system is also planned. These works enable the spread of toxic or flammable liquids across a road surface spilled by an accident or vehicle breakdown to be controlled, thus helping to limit the consequences of an accident. The spilled liquids are collected in a specific tank of an appropriate size, made of reinforced concrete and internally impermeable, to prevent them from contaminating the surrounding environment. Along the Group's motorway sections, 32 of the 59 planned tanks have already been constructed.

In October 2022, along the A4 Torino-Milano motorway, and more precisely at Biandrate-Vicolungo, the construction of a six-thousand cubic metre rainwater storage tank was launched. The system is designed to collect and regulate water resources by allowing water to flow into storage tanks for future use, including internal use (e.g. washing of photovoltaic panels, inertial thermal energy of low-temperature air conditioning systems, etc.).



[Read the news story](#)

MANAGEMENT OF HYDROGEOLOGICAL RISK

The Group also focused heavily on the hydrogeological context of motorways, developing numerous initiatives in 2022.

The Group's Italian licensee companies have an Action Plan for Maintaining Infrastructure Efficiency (APMI), which, in particular for "Mountain Sides and Monitoring Works", provides instructions on how to manage the monitoring and maintenance of the works and on checks including: support works (e.g., reinforced terrain, gabion walls), passive defence works (e.g., rockfall barriers, bolted nettings), surface draining works (e.g., ditches,

gutters), deep draining works (e.g., sub-horizontal drains, draining trenches, draining wells).

Some of the specific initiatives include the continuation in 2022 of an advanced integrated monitoring system for mountainside landslides, located in the Municipality of Quincinetto, Chiappetti district by the licensee S.A.V., in collaboration with the Civil Defence System at Florence University. Similarly, using technical round tables, the licensee company continued dialogue with Local Organisations, National Civil Defence and all players affected by the phenomenon. In this context, the Conference of Services on the protection of the motorway section affected by the rockfall was successfully concluded in 2022, and the executive plan aimed at the rapid execution of the works was launched.

Again for the licensee company S.A.V., the management of hydraulic and hydrogeologic risks associated with exceptional weather events continues, through the hydrometric and solid material movement monitoring network near certain critical overpass sections of motorway infrastructure near water features, with technical and scientific support from the Civil Defence System at Florence University.

Since the early 2000s, SALT's hydrogeological risk studies have made it possible to identify, record and monitor over 100 landslide events affecting the motorway stretch of the A15 Motorway Parma-La Spezia. In 2022, all planned surveys for each hydrogeological instability were carried out according to the defined and scheduled schedules, with the aim of monitoring the evolutionary trend. In addition, numerous field checks were conducted to assess both the progress of specific works and the condition of the monitoring equipment. The landslide events considered most at risk are inspected annually, and additional tests are also carried out using specific instruments that have been installed on the structures to guarantee continual monitoring of the landslide, including during critical events, and to offer the possibility of remote control through a dedicated website. Annual or twice yearly topographic surveys are also carried out by specialist technicians from the licensee company SALT, in association with Parma University, for checks on the station and guidance points. In 2022, the surveys also focused on

a number of regionally important hydrogeological instability issues involving underground infrastructure. Solutions to control ground water aimed at ascertaining the response of the geological gravitational movements and, therefore, the infrastructure itself were assessed, and are currently still in the practical testing phase. In other cases (e.g., bridges and viaducts), solutions that consider the geomorphology and the condition (such as the weather and climate) of the sites were assessed, aimed at avoiding particularly direct interferences that could, in the short term, diminish the lifespan of the infrastructure.

Finally, by monitoring landslide events it is possible to plan specific actions with varying levels of intervention. In 2022, in-depth studies were carried out to improve the characterisation and definition of landslide movements. In general, the devices installed during studies and projects to monitor natural phenomena that can interfere with infrastructure are constantly monitored.

Following the completion of the works to repair and consolidate the slope in the Madonna del Monte area in the first part of 2022, the activities implemented by Autostrada dei Fiori after the notorious landslide in 2019, which led to the partial collapse of the Madonna del Monte viaduct located between the Savona and Altare junctions on the Turin direction carriageway, came to an end. The activities were aimed at monitoring the evolution of the landslide risk in that area.

In the year 2022, evaluations were launched to calculate the hydraulic and landslide warning categories for all motorway network works over 6 metres, as required by the "Guidelines for risk classification and management, safety assessment and monitoring of existing bridges". This project led to the adoption of a standardised hydrogeological risk assessment framework for all works belonging to the Group's licensee companies.

PROTECTION OF BIODIVERSITY

The Group is committed to protecting biodiversity through planning, subsequent development and post-construction verification of environmental mitigation work, involving careful study of poten-

tial vegetation for operating areas and native flora.

In particular, during 2022 and as part of ten-year agreements stipulated by SATAP with the University of Turin for the Torino-Milano motorway stretch, activities to develop trial systems for green areas continued, to redevelop the landscape and re-naturalise degraded areas affected by work sites for motorway modernisation in several municipalities.

In the trial site of Vicolungo, during the fifth growing season, management and monitoring activities were carried out on the trial reforestation completed in the spring of 2018. At the end of the season, the trees and shrubs had grown in line with the growth recorded from second year after planting onwards. The height of the reforested area is around twelve metres and the shade generated by the tree canopy offers better survival and development conditions for the saplings that will be planted later. Again during this growing season various traces of the passage of animals were seen, including small rodents, amphibians, boars, buzzards and other birds which nested among the plants: this makes it possible to state that the system is becoming naturalised, another indication that the design was done well.

The ecological permeability of infrastructure for fauna is an increasingly important topic in planning, with specific defragmentation measures studied, as applicable.

For example, six large pass-through items (measuring 3 m by 2 m) were installed for the passage of fauna in the area of the Torino-Milano motorway (A4) which crosses the Ticino Park. These items are specifically monitored with camera traps that demonstrate effectiveness, recording a moderate number of small and medium-sized fauna passing through.

In addition to areas below viaducts and secondary roads, the Group's infrastructure has over 600 items that, due to their size and location, serve for the fauna to pass through. One example are the large culverts (1.5 m x 1.5 m) in areas with high biodiversity levels which enable animals to pass.

As part of the investments aimed at improving the motorway system and offering greater environmental protection, major works to upgrade the motorway fencing networks were launched, with

IMPACT OF THE GROUP ON BIODIVERSITY

The ASTM Group has mapped the impacts of its operational activities at 31 December 2022 on biodiversity in terms of the motorway network under management and worksites. This analysis was carried out with support from the Integrated Biodiversity Assessment Tool (IBAT), a multi-institutional work programme involving BirdLife International, Conservation International, IUCN (International Union for Conservation of Nature) and UNEP-WCMC (United Nations Environment Programme -World Conservation Monitoring Centre). In particular, to increase the transparency and inclusion of issues related to biodiversity in the annual sustainability report, a Multi-site Report was prepared. The Report makes it possible to evaluate the biodiversity characteristics of the operating sites for disclosure at aggregate level. For each operating site chosen, the following details related to biodiversity are provided:

- the protected areas and the key areas for biodiversity within a 3 km radius deemed significant by the Group;
- the species on the IUCN Red List classed as Critically Endangered, Endangered or Vulnerable which are potentially found within a 50 km radius from the operating sites considered.

In particular, 70% of the Group's operating sites are within 3 km of a protected area and 24% are within 3 km of a key area for biodiversity.

The operating sites with the highest number of species from the IUCN Red List potentially found within a 50 km radius include: Autostrada dei Fiori S.p.A. (A10) with a total of 187 species, of which 22 Critically Endangered, 60 Endangered and 105 Vulnerable; Società Autostrada Ligure Toscana - SALT p.A. (A15) with a total of 150 species, of which 22 Critically Endangered, 47 Endangered and 81 Vulnerable; ECO101 Concessionaria de Rodovias S.A. with a total of 289 species, of which 35 Critically Endangered, 124 Endangered and 130 Vulnerable and Concessionaria Ponte Rio-Niteroi SA - Ecofonte with a total of 233 species, of which 32 Critically Endangered, 99 Endangered and 102 Vulnerable.

The ASTM Group companies use this analysis to assess the biodiversity initiatives to be implemented.

the aim of adapting the protective fencing along the sections most exposed to the potential encroachment by wild animals, and consequently increasing the safety of road users. Currently, along the A6 Torino-Savona section of the motorway, work is in progress to develop approximately 100 km of fencing, of which 20 km will be completed in 2022, while along the A10 Savona-Ventimiglia section, work is in progress to develop approximately 40 km, of which 14 km will be completed in 2022.

In relation to the activities associated with the construction of the TI.BRE., in 2022 artificial nests in-

stalled the previous year were monitored, to encourage the development of the red-footed falcon colony that has settled near the work site. These nest boxes again this year guaranteed that nesting pairs had greater protection from predators and helped to support the survival of new chicks. The results of the checks carried out on all the nests used for the species were added to measurement data sheets included on the SIT (Local Information System) and accessible to the public. Meanwhile, other birds and wildlife, as well as a number of particularly important fish species, were monitored at the sites.

REDUCTION IN LAND USE AND REUSE OF MATERIALS

Regarding the reduction in land use and general drive at the European level to reuse resources, considered a preferable alternative to the use of non-renewable raw materials, the maximum reuse of excavation materials is considered both during planning and operation.

In particular, after testing the geotechnical and chemical characteristics, in order to limit as far as possible the use of natural quarry materials at extraction sites, new works are designed and developed by re-using the natural excavated terrain where the new infrastructure will be located. In the same way, the reuse of recycled aggregates from authorised and certified external plants and from internal processes was promoted. Furthermore, where direct re-use was not possible, the transport of excavated materials to alternative sites (e.g. backfills, environmental restoration sites) or to authorised recovery providers was preferred as opposed to final disposal, which is always considered as a last resort. In general, in 2022, after a careful study of the budgets and geology of the sites, the best solutions for each project were evaluated in terms of reuse, aimed not only at reducing the impact of the works on the landscape but also to promote a circular economy model at all levels.

To guarantee sustainable development during the construction of new motorways and in the maintenance and restoration of existing ones, the Group is also committed to promoting the use of innovative raw materials with a reduced environmental impact and, specifically, to prioritising the reuse of material from road surface milling.

REUSE OF RECLAIMED ASPHALT PAVEMENT

The application of the regulations that declassify bituminous conglomerate asphalt as waste enabled the ASTM Group to undertake new initiatives in 2022, prioritising the reuse of this material and engaging external suppliers to produce new bituminous mixtures and aggregates as part of projects that promote the circular economy.

Moreover, in 2021 the ASTM Group activated a research contract through S.I.N.A. with the Civil, Chemical, Environmental and Materials Engineering Department at the University of Bologna on the potential use of recycled asphalt and special chemical additives in road surfacing aimed at the development of more sustainable highways infrastructure. The use of recycled asphalt in the new applications would make it possible to reduce the quantities of material for landfill disposal and the demand for new virgin natural resources.

The study involved the most advanced methodologies and technologies on the market for the reuse of reclaimed asphalt pavement (RAP) and Special Polymer Compounds (SPC) in the production of bituminous mixes, verifying whether performance was maintained in terms of safety, useful life and user comfort, and expressing the appropriate economic and environmental evaluations through Life Cycle Analysis (LCA) and Life Cycle Costing approaches. According to the study, these innovative road surface layers are more durable than commonly adopted solutions, while the use of greater quantities of recycled and/or recovered materials leads to a significant reduction in CO₂ equivalent emissions during the bitumen mixture production cycle.

This new initiative complements the usual recycling activities carried out by the ASTM Group, including the cold recycling of RAP in the creation of the road superstructure of the Torino-Milano Motorway Modernisation project (with the use of around 1 million cubic metres of RAP), and the in-situ base layer recovery using the foamed bitumen technique for various maintenance works conducted in 2022.

MINIMUM ENVIRONMENTAL CRITERIA (MEC)

In 2022, S.I.N.A. continued its participation on the technical round tables set up by the Italian Ministry of Environment and Energy Security (MaSE), which oversees the definition of the "Minimum Environmental Criteria (MEC) for the planning and works pertaining to the construction and maintenance of road infrastructure", in implementation of the National Action Plan for Green Public Procurement - NAP GPP.

These criteria are the environmental requirements defined for the various stages of the acquisition process, intended to identify the best design solution, product or service with regard to the environment through the life cycle: once they take effect – with their adoption in a specific decree –

they will be used by the contracting stations for the achievement of the environmental objectives set out by the NAP GPP, in the context of tender procedures, as provided for by Italian Legislative Decree 50/2016.

A4 TORINO-MILANO: FIRST HIGH-TECH GREEN ASPHALT MOTORWAY IN EUROPE

On the A4 motorway section (Turin-Milan), the ASTM Group will use Gipave, an asphalt technology that uses a patented, innovative process, the result of six years of research by Iterchimica, an Italian company operating in over 90 countries and a leader in the production and development of products and technologies for sustainable asphalts, in collaboration with G.Eco (A2A Group), the University of Milan-Bicocca and Directa Plus. The works will involve both directions of travel for a total of 250 km.

The resurfacing works will make the A4 the first motorway in Europe to use high-tech green asphalt thanks to the use of graphene and 70% recycled asphalt. The activity is part of the ASTM Group's "Smart Roads" project. In particular, the use of the Gipave technology will offer greater sustainability and resistance performance, increasing the durability of the road surface by up to 75% compared to the alternatives currently available on the market. This solution will reduce energy consumption by around 90 million kWh (-30%), corresponding to the annual demand of approximately 30,000 households, and will offset around 18,350,000 kg of CO₂eq emissions (-38.5%), equal to the absorption of about 115,000 trees.

Furthermore, compared to conventional road surfaces, around 1.5 million kg of hard plastics will be re-used, roughly equivalent to the weight of more than 1,200 cars, saving almost 23 million kg of bitumen and around 480 million kg of raw materials extracted from quarries (-40% non-renewable materials used compared to traditional technologies).

The project, which proceeded at a slower pace than in previous years, was intended to provide technical contributions and suggestions for the issue of a document that responds to the fundamental requirement of environmental protection, indicating methods to manage the planning phases and works, which can be implemented and achieved by the various parties involved and which are therefore truly effective.

Pending definition of the specific MEC for the road sector, attention has nevertheless been on

minimising, throughout the entire life cycle of the road, the use of resources for the production of construction materials, the conservation of habitats and water resources, and the reduction of noise and atmosphere emissions. To this end, S.I.N.A. conducted a study to characterise the noise emission of road surfaces on certain motorway sections managed by the Group, using the CPX (Close Proximity Method) technique. The aim of this project is to progressively create a complete mapping of the acoustic characteristics of the motorway network managed by the Group

SINA AND ENVIRONMENTAL PROTECTION

Relative to the issue of environmental protection, S.I.N.A. has invested since 2018 to acquire skills in the context of the Envision Sustainability Protocol, a rating certification system to assess sustainable infrastructure, providing training courses each year and providing updates for its personnel certified as Envision Sustainability Professionals, i.e. professional figures qualifying for the certification of projects according to the protocol.

Envision rates the development of the infrastructure in a holistic manner, from the design and development stages to its sustainability and end of life.

In 2022, a partnership with ICMQ for the Envision pre-assessment evaluation was launched with a view to certifying some of the Group's projects. In particular, an assessment was carried out for the "Pilot project for the resilient, digital and sustainable modernisation/transformation of the A4 Torino-Milano motorway", based on the metrics of the Envision Protocol and considering the impacts and benefits of the entire project based on the existing elements of the project, while also identifying the potential level of satisfaction in relation to the topics considered by the protocol.

S.I.N.A. also launched a process to define specific guidelines for the progressive integration of the principles of the Envision Protocol in planning processes.

Again with regards to environmental issues, and in particular relative to protection of local areas, biodiversity and reduction of soil consumption, the company has strengthened its qualifications and skills through the execution of environmental impact studies, including the prior verification of archaeological interest, and the design of works for environmental mitigation, conservation and compensation. Additionally, the company is an expert in noise pollution studies (supporting the Group's licensee companies for over 20 years), in managing excavated dirt and rocks and in carrying out environmental audits at construction sites.

S.I.N.A. also has specific and specialist expertise in environmental monitoring and in the design and organisation of databases and territorial information systems for the data management of various environmental matrices.

For over 30 years, it has actively participated in the research programmes of the World Road Association (PIARC) and, for 15 years, has chaired the National Technical Committee which oversees climate change, mitigation and adaptation policies and infrastructure resilience. In particular, in the current four-year research period (2020-2023), S.I.N.A. is chair of the National Committee 1.4 "Climate Change and Resilience of Road Infrastructure" within the strategic topic of "Road Concessions Management". Specifically, the Committee oversees in-depth analyses of topics related to the impact on roads of climate change and other risks, how to assess and increase the resilience of infrastructure and identify the socio-economic impacts that such events could have on road users and all stakeholders in general. As part of its activities, the Committee evaluates and updates the PIARC Climate Change Adaptation Framework.

over a number of years, monitoring the noise impact of road surfaces over time to assess their condition and ageing.

For application of already approved MECs, the

ASTM Group licensee companies began to call for their insertion in the Special Tender Specifications and Evaluation Criteria for the Most Economically Advantageous Tenders.

TECHNOLOGICAL INNOVATION FOR THE ECOLOGICAL TRANSITION

Through its subsidiary licensees, the ASTM Group has confirmed its commitment to provide the best possible service to its customers through safe infrastructure and the use of innovative, resilient and sustainable solutions. In this context, in 2022 the Group entrusted S.I.N.A. with the development of the "Technological Innovation for the Ecological Transition" project on a 30-km pilot section of the A4 Torino-Milano motorway, from the Novara Est junction to the Milano Ghisolfa barrier.

The adopted approach will enable the development of the new motorway system, with the following benefits:

- reduced environmental impact with the continuous evolution of the relational system over time;
- improved road safety;
- shared value with all stakeholders;
- increased activities generated by relations within the system;
- more operators involved in the activities.

The primary objectives of the project can be divided into three main areas:

Environmental Sustainability Target:

- Rainwater recovery: introduction of a rainwater recovery system to be stored and returned to the water system for industrial and internal use, e.g., to wash future photovoltaic panel systems and as thermal energy for air conditioning systems.
- Graphene asphalt mixed with currently unrecyclable plastic waste: construction of a section of road surface using a bituminous-polymer compound containing graphene and selected recovered plastics. Thanks to the materials used, this surface will ensure better durability (+50%) with a significant reduction in direct costs (maintenance costs, environmental mitigation costs) and indirect costs

(CO₂ production by users, disposal costs for non-recyclable plastics).

- Ultrafast and conventional electric charging stations: construction of 8 charging stations for electric vehicles for use by licensee company personnel.

Road Safety and Assisted Driving Target (Smart Transportation):

- Traffic detection and monitoring: installation of devices able to provide information on vehicle class, numbers, speed, traffic jams.
- Real-time communication: continuous coverage of the road axis with an IoT connection service and routing to the data communication network to signal hazards (accidents, traffic jams) and other elements to improve traffic flow (road surface condition, weather), information on fuel stations including fuel types, the presence of SOS units, speed limits and recommended speeds on various motorway sections displayed to users in real time.
- Wrong way vehicle detection system: Installation of an automatic system that detects wrong-way traffic in the exit lanes of the Chivasso Ovest junction and effectively alerts drivers of the error.
- Dynamic and static truck weighing system (weigh in motion, WIM): construction of 2 dynamic truck weighing stations and 1 static station in the Villarboit Sud service area. The measured weight of passing heavy vehicles and the monitoring of the structures can be correlated in order to conduct structural surveillance of the infrastructure along the motorway route.
- Average speed detection and control.
- Detection of hazardous loads: Installation of four detection stations to intercept these vehicles in real time, in order to signal the real-time location of accidents, traffic jams or major delays and to also be able to notify emergency vehicles of any special need for intervention.

Infrastructure Monitoring and Maintenance Target:

- Predictive infrastructure maintenance based on sensor data to predict and carry out any necessary restoration works as soon as the first signs of deterioration are detected.
- Installation of sensors on road surfaces, bridges, junctions and barriers: implementation of

a system to monitor deep road surface layers in order to detect structural failures, and monitoring of structures with a system of specific sensors installed at significant and/or critical points.

Weather sensors: Installation of a weather station to support existing weather monitoring systems.



05



ANNEXES

- 152** European Taxonomy: Model KPIs for non-financial undertakings
- 164** Table of the boundary of material topics for the ASTM Group
- 166** GRI Content Index
- 174** Table of SASB indicators

EUROPEAN TAXONOMY: MODEL KPIS FOR NON-FINANCIAL UNDERTAKINGS

MODEL - TURNOVER DERIVED FROM PRODUCTS OR SERVICES THAT ARE TAXONOMY-ALIGNED - DISCLOSURE FOR FY 2022

				Criteria for substantial contribution								
Economic activities (1)	Code(s) (2)	Turnover (3)	Portion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)		
												€/M

A. TAXONOMY-ALIGNED ACTIVITIES

A.1 Environmentally sustainable activities (taxonomy-aligned)

Infrastructure enabling low-carbon road transport and public transport	6.15	856.89	25.41%	25.41%	0.00%						
Construction of new buildings	7.1	51.54	1.53%	1.53%	0.00%						
Installation, maintenance and repair of energy efficiency equipment	7.3	7.61	0.23%	0.23%	0.00%						
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	7.5	3.04	0.09%	0.09%	0.00%						
Installation, maintenance and repair of renewable energy technologies	7.6	3.62	0.11%	0.11%	0.00%						
Turnover of environmentally sustainable activities (Taxonomy-aligned) (A.1)		922.69	27.36%	27.36%	0.00%						

Criteria for "Do No Significant Harm"									
Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Net turnover derived from products or services that are taxonomy-aligned, FY 2022 (18)	"(Enabling activity) category (20)"	"(Transition activity) category (21)"	
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	PERCENTAGE	A	T	

Y	Y	Y	Y	Y	Y	25.41%	A	
Y	Y	Y	Y	Y	Y	1.53%		
Y			Y		Y	0.23%	A	
Y					Y	0.09%	A	
Y					Y	0.11%	A	
						27.36%		

				Criteria for substantial contribution							
Economic activities (1)	Code(s) (2)	Turnover (3)	Portion of turnover (4)	Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	
				%	%	%	%	%	%	%	Y/N

A.2 Taxonomy-eligible activities that are not environmentally sustainable (not Taxonomy-aligned)

Infrastructure for rail transport	6.14	343.04	10.17%							
Infrastructure enabling low-carbon road transport and public transport	6.15	1,762.23	52.25%							
Infrastructure enabling low carbon water transport	6.16	79.96	2.37%							
Low carbon airport infrastructure	6.17	7.19	0.21%							
Construction of new buildings	7.1	78.83	2.34%							
Installation, maintenance and repair of energy efficiency equipment	7.3	4.47	0.13%							
Turnover of Taxonomy-eligible activities that are not environmentally sustainable (not Taxonomy-aligned) (A.2)		2,275.73	67.47%							
Total (A.1 + A.2)		3,198.42	94.83%							
B. ACTIVITIES THAT ARE NOT TAXONOMY-ELIGIBLE										
Turnover of activities that are not Taxonomy-eligible (B)		174.35	5.17%							
Total (A + B)		3,372.77	100.00%							

Criteria for "Do No Significant Harm"									
Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Net turnover derived from products or services that are taxonomy-aligned, FY 2022 (18)	"(Enabling activity) category (20)"	"(Transition activity) category (21)"	
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	PERCENTAGE	A	T	
Y	Y	Y	Y	Y	Y	27.67%	A		
	Y	Y	Y	Y	Y	7.09%			
Y	Y	Y	Y	Y	Y	0.08%			
Y			Y		Y	0.01%	A		
Y					Y	0.07%	A		
						34.92%			

Criteria for "Do No Significant Harm"									
Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Net turnover derived from products or services that are taxonomy-aligned, FY 2022 (18)	"(Enabling activity) category (20)"	"(Transition activity) category (21)"	
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	PERCENTAGE	A	T	
Y	Y	Y	Y	Y	Y	34.21%	A		
Y	Y	Y	Y	Y	Y	0.32%			
Y			Y		Y	1.19%	A		
Y					Y	0.47%	A		
Y					Y	0.71%	A		
						36.90%			

Criteria for "Do No Significant Harm"									
Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)	Minimum safeguards (17)	Net turnover derived from products or services that are taxonomy-aligned, FY 2022 (18)	"(Enabling activity) category (20)"	"(Transition activity) category (21)"	
Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	PERCENTAGE	A	T	

TABLE OF THE BOUNDARY OF MATERIAL TOPICS FOR THE ASTM GROUP

MATERIAL TOPICS	RECONCILIATION WITH GRI STANDARDS	SDGs	BOUNDARY OF IMPACTS	ASTM'S ROLE	SUSTAINABILITY RISKS
Economic/ financial sustainability	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 201: Economic Performance (2016) 	• 8	• ASTM Group	• Direct - Caused by the ASTM Group	• risk of operational disruption to infrastructure
Governance and compliance	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 307: Environmental Compliance (2016) 	• 9, 16	• ASTM Group	• Direct - Caused by the ASTM Group	• compliance risk and risks related to ethical behaviour
Responsible supply chain management	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 204: Procurement practices (2016) 	• 9	• ASTM Group	• Direct - Caused by the ASTM Group	• risks related to the supply chain and subcontracting
Anti-corruption	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 205: Anti-corruption (2016) 	• 16	• ASTM Group	• Direct - Caused by the ASTM Group	• compliance risk and risks related to ethical behaviour
Energy consumption and GHG emissions	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 302: Energy (2016) • GRI 305: Emissions (2016) 	• 7, 11, 12, 13	<ul style="list-style-type: none"> • ASTM Group • Electricity suppliers 	<ul style="list-style-type: none"> • Direct - Caused by the ASTM Group • Indirect - Related to ASTM Group activities through business relations 	• Environmental compliance risks
Use of natural resources and waste management	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 301: Materials (2016) • GRI 303: Water (2018) • GRI 306: Effluents and waste (2016) • GRI 306: Waste (2020) 	• 7, 11, 12, 13	• ASTM Group	• Direct - Caused by the ASTM Group	• Environmental compliance risks
Motorway infrastructure safety	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 3, 11	• ASTM Group	• Direct - Caused by the ASTM Group	<ul style="list-style-type: none"> • Risks related to the management of emergency events and motorway services • risk of operational disruption to infrastructure
Occupational health and safety	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 403: Occupational health and safety (2018) 	• 3, 8	• ASTM Group	• Direct - Caused by the ASTM Group	• Risks related to personnel
Diversity, equal opportunities and inclusion	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 402: Labour/management relations (2016) • GRI 405: Diversity and equal opportunity (2016) • GRI 406: Non-discrimination (2016) 	• 5, 8, 10, 16	• ASTM Group	• Direct - Caused by the ASTM Group	• Risks related to personnel

MATERIAL TOPICS	RECONCILIATION WITH GRI STANDARDS	SDGs	BOUNDARY OF IMPACTS	ASTM'S ROLE	SUSTAINABILITY RISKS
Attracting and developing human capital	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 401: Employment (2016) • GRI 404: Training and education (2016) 	• 4, 8	• ASTM Group	• Direct - Caused by the ASTM Group	• Risks related to personnel
Respect for human rights	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 408: Child labour (2016) • GRI 409: Forced or compulsory labour (2016) 	• 8, 16	<ul style="list-style-type: none"> • ASTM Group • Suppliers 	<ul style="list-style-type: none"> • Direct - Caused by the ASTM Group • Indirect - Related to ASTM Group activities through business relations 	<ul style="list-style-type: none"> • Risks related to personnel • risks related to the supply chain and subcontracting
Stakeholder relations	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 413: Local communities (2016) 	• 11, 17	• ASTM Group	• Direct - Caused by the ASTM Group	• All risks
Impact on local area	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 202: Market Presence (2016) • GRI 203: Indirect Economic Impacts (2016) 	• 8, 9, 11	• ASTM Group	• Direct - Caused by the ASTM Group	<ul style="list-style-type: none"> • "NIMBY" risk • Risks related to innovation and the market
Road safety	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 3, 11	<ul style="list-style-type: none"> • ASTM Group • Motorway users, with reference to driving behaviour 	<ul style="list-style-type: none"> • Direct - Caused by the ASTM Group • Indirect - Related to ASTM Group activities 	<ul style="list-style-type: none"> • Risks related to the management of emergency events and motorway services • risk of operational disruption to infrastructure
Protection of landscape and biodiversity	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 11, 12	• ASTM Group	• Direct - Caused by the ASTM Group	• Environmental compliance risks
Privacy and information security	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) • GRI 418: Customer privacy (2016) 	• 16	• ASTM Group	• Direct - Caused by the ASTM Group	• compliance risk and risks related to ethical behaviour
Innovation	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 9	<ul style="list-style-type: none"> • ASTM Group • Universities and research centres 	<ul style="list-style-type: none"> • Direct - Caused by the ASTM Group • Indirect - Related to ASTM Group activities through business relations 	• Risks related to innovation and the market
Service quality and customer satisfaction	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 9, 17	• ASTM Group	• Direct - Caused by the ASTM Group	• Risks related to the management of emergency events and motorway services
Noise pollution	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 9, 11	• ASTM Group	• Direct - Caused by the ASTM Group	• Environmental compliance risks
Business continuity	<ul style="list-style-type: none"> • GRI 3: Material topics (2021) 	• 8, 9, 11	• ASTM Group	• Direct - Caused by the ASTM Group	• Business continuity risk

GRI CONTENT INDEX

GRI Standard	Description of General Standard Disclosures	Page	Notes/Omissions
GRI 2: General disclosures (2021)			
The organisation and its reporting practices			
2-1	Organisational details	4; 10; 13	
2-2	Entities included in the organisation's sustainability reporting	4; 12	
2-3	Reporting period, frequency and contact point	4; 7	The NFD is published annually
2-4	Restatements of information	138 -80	
2-5	External assurance	176	
Activities and workers			
2-6	Activities, value chain and other business relationships	12-19; 67-68; 122	
2-7	Employees	11; 96-99; 104-106	
2-8	Workers who are not employees	96	
Corporate Governance			
2-9	Governance structure and composition	26-27	
2-10	Nomination and selection of the highest governance body	26	
2-11	Chair of the highest governance body		Please refer to the "Executive Directors" section of the "Report on corporate governance and ownership structure"
2-12	Role of the highest governance body in overseeing the management of impacts	26	
2-13	Delegation of responsibility for managing impacts	26-27	
2-14	Role of the highest governance body in sustainability reporting	26	
2-15	Conflicts of Interest	27	
2-16	Communication of critical concerns	36-38	
2-17	Collective knowledge of the highest governance body	26-27	
2-18	Evaluation of the performance of the highest governance body		N/A
2-19	Remuneration policies	109	
2-20	Process to determine remuneration	27; 109	
2-21	Annual total compensation ratio		The annual total compensation ratio is omitted for confidentiality purposes

GRI Standard	Description of General Standard Disclosures	Page	Notes/Omissions
GRI 2: General disclosures (2021)			
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2-22	Statement on sustainable development strategy	2	
2-23	Policy commitments	32-35, 20-21, 36-39; 67; 116	
2-24	Embedding policy commitments	69	
2-25	Processes to remediate negative impacts	36-39; 42-48	
2-26	Mechanisms for seeking advice and raising concerns	36-39	
2-27	Compliance with laws and regulations	129; 174-175	
2-28	Membership associations	82; 91	
Stakeholder engagement			
2-29	Approach to stakeholder engagement	22-24	
2-30	Collective bargaining agreements	101-102	

GRI Standard	Description of Specific Standard Disclosures	Page	Notes/Omissions
Material Topics			
GRI 3: MATERIAL TOPICS (2021)			
3-1	Process of determining material topics	4-5; 22-24; 164-165	
3-2	List of material topics	4; 24; 164-165	
Economic/financial sustainability			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Material topics management	4-7; 32-35; 42-48; 164-165	
GRI 201: ECONOMIC PERFORMANCE (2016)			
201-1	Direct economic value generated and distributed	11; 58-59	
Impact on local area			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 65-66; 90-91; 164-165	
GRI 202: MARKET PRESENCE (2016)			
202-2	Proportion of senior management hired from the local community	58-59	
GRI 203: INDIRECT ECONOMIC IMPACTS (2016)			
203-2	Significant indirect economic impacts	58-59	
Responsible supply chain management			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 67-72; 164-165	
GRI 204: PROCUREMENT PRACTICES (2016)			
204-1	Proportion of spending on local suppliers	68-69	
Anti-corruption			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 36-37; 42-48; 164-165	
GRI 205: ANTI-CORRUPTION (2016)			
205-3	Confirmed incidents of corruption and actions taken	38	No incidents of corruption were recorded in 2022
GRI 207: TAXES (2019)			
207-1	Approach to tax	60	
207-2	Tax governance, control and risk management	60-61	
207-3	Stakeholder engagement and management of tax worries	61	
207-4	Country by Country Reporting	61-63	

GRI Standard	Description of Specific Standard Disclosures	Page	Notes/Omissions
Energy consumption and GHG emissions			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 129-135; 146-147; 164-165	
GRI 302: ENERGY (2016)			
302-1	Energy consumption within the organisation	130-131	
302-4	Reduction of energy consumption	131-132; 135	
GRI 305: EMISSIONS (2016)			
305-1	Direct (Scope 1) GHG emissions	133	
305-2	Energy indirect (Scope 2) GHG emissions	133	
305-3	Other indirect GHG emissions (Scope 3)	133-134	
Use of natural resources and waste management			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 138-139; 164-165	
GRI 301: MATERIALS (2016)			
301-1	Materials used by weight or volume	70	
GRI 303: WATER 2018			
303-1	Interactions with water as a shared resource	136-137	
303-2	Management of water discharge-related impacts	136-137	
303-3	Water withdrawal	136-137	
GRI 306: WASTE (2020)			
306-1	Production of waste and significant impacts related to waste	138-139	
306-2	Management of significant waste-related impacts	138-139	
306-3	Waste generated	138-139	
306-4	Waste diverted from disposal	138-139	
306-5	Waste directed to disposal	138-139	
GRI 306: WASTE (2016)			
306-3	Significant spills	129	

GRI Standard	Description of Specific Standard Disclosures	Page	Notes/Omissions
Attracting and developing human capital			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 101; 109-110; 164-165	
GRI 401: EMPLOYMENT (2016)			
401-1	New employee hires and employee turnover	99-101	
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	109-110	
GRI 404: TRAINING AND EDUCATION (2016)			
404-1	Average hours of training per year per employee	114	
Occupational health and safety			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 118- 119; 121; 125; 164-165	
GRI 403: OCCUPATIONAL HEALTH AND SAFETY (2018)			
403-1	Occupational health and safety management system	118	
403-2	Hazard identification, risk assessment, and incident investigation	118-119; 125	
403-3	Occupational health services	118	
403-4	Worker participation, consultation, and communication on occupational health and safety	118	
403-5	Worker training on occupational health and safety	113-114	
403-6	Promotion of worker health	125	
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	125	
403-9	Work-related injuries	119-121	
Diversity, equal opportunities and inclusion			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 103- 104; 107; 110; 164-165	

GRI Standard	Description of Specific Standard Disclosures	Page	Notes/Omissions
GRI 402: LABOUR/MANAGEMENT RELATIONS (2016)			
402-1	Minimum notice periods regarding operational changes		The minimum notice period for workers and their representatives regarding organisational changes that could significantly impact them is established in compliance with laws applicable in the country where the group operates and, where applicable, with National Collective Bargaining Agreements
GRI 405: DIVERSITY AND EQUAL OPPORTUNITY (2016)			
405-1	Diversity of governance bodies and employees	27; 103-107	
405-2	Ratio of basic salary and remuneration of women to men	110-111	
GRI 406: NON-DISCRIMINATION (2016)			
406-1	Incidents of discrimination and corrective actions taken		Five cases of discrimination were recorded in 2022. All five cases were analysed and action plans were prepared, which are currently being implemented.
Respect for human rights			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 67-68; 116; 164-165	
GRI 408: CHILD LABOR (2016)			
408-1	Operations and suppliers at significant risk for incidents of child labour	71-72	
GRI 409: FORCED OR COMPULSORY LABOUR (2016)			
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	67-72	
Stakeholder relations			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 22-24; 42-48; 164-165	
GRI 413: LOCAL COMMUNITIES (2016)			
413-2	Operations with significant actual and potential negative impacts on local communities		No operations with significant actual and potential negative impacts on local communities were reported

GRI Standard	Description of Specific Standard Disclosures	Page	Notes/Omissions
Privacy and information security			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 40-48; 164-165	
GRI 418: CUSTOMER PRIVACY (2016)			
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data		Two complaints regarding the breach of customer privacy by external parties were received by companies of the EcoRodovias Group. Sinelec recorded two data breaches. All reports were managed in compliance with the applicable procedures.
Material topics not directly linked to GRI disclosures			
Road safety			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 72-85; 164-165	
Governance and compliance			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 26-27; 42-48; 164-165	
Protection of landscape and biodiversity			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 141; 164-165	
Innovation			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 31; 42-48; 86-59; 164-165	
Service quality and customer satisfaction			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 94; 164-165	
Motorway infrastructure safety			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 72-85; 164-165	

GRI Standard	Description of Specific Standard Disclosures	Page	Notes/Omissions
Noise pollution			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 42-48; 140; 164-165	
Business continuity			
GRI 3: MATERIAL TOPICS (2021)			
3-3	Management of material topics	4-7; 32-35; 42-48; 164-165	

TABLE OF SASB INDICATORS

GRI (Global Reporting Initiative) and SASB (Sustainability Accounting Standards Board) represent the most recognised standards at international level for sustainability reporting. Considering the growing importance of SASB reporting for investors, the following table contains the indicators integrated into the 2022 Sustainability Report.

SASB indicator	Description	Section/ Notes	Material topic	ASTM GRI Standard
SECTOR: INFRASTRUCTURE - ACTIVITY: ENGINEERING & CONSTRUCTION SERVICES				
Activity Metrics	Number of active projects	There are 124 active projects (excluding intercompany)	N/A	N/A
Activity Metrics	Number of commissioned projects	There are 54 commissioned projects (excluding intercompany)	N/A	N/A
Activity Metrics	Total backlog	The backlog is equal to around € 6,114 million	N/A	N/A
IF-EN-160a.1	Number of incidents of non-compliance with environmental permits, standards and regulations	Management of environmental issues	Governance and compliance	GRI 307-1
IF-EN-250a.2	Total amount of monetary losses as a result of legal proceedings associated with defect- and safety-related incidents	In 2022 the monetary losses sustained as a result of legal proceedings associated with defect- and safety-related incidents amounted to €32,000 for the company Koge Hospital Project Team I/S, €22,000 for the company Odense HPT JV I/S, and €58,000 for the company Storstroem Bridge.	Governance and compliance	N/A
IF-EN-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for: (a) direct employees and (b) contract workers	Health and safety The total recordable incident rate (TRIR) is equal to 1.28 for direct employees and 0.19 for contract workers. The mortality rate is equal to 0.01 for direct employees and 0 for contract workers.	Occupational health and safety	GRI 403-9
IF-EN-410a.1	Number of (1) commissioned projects certified to a third-party multi-attribute sustainability standard and (2) active projects seeking such certification	Two commissioned projects (excluding intercompany projects) are certified to sustainability standards. There were 7 active projects (excluding intercompany projects) requiring certification	Energy consumption and GHG emissions	N/A
IF-EN-510a.2	Total amount of monetary losses as a result of legal proceedings associated with charges of (1) bribery or corruption and (2) anticompetitive practices	No fine was paid. For the sake of completeness, please note that an appeal is currently pending before the Lazio Regional Administrative Court in relation to a fine applied to Itinera as part of an anti-trust proceeding. For more information, see the 2022 Annual Financial Report of the Itinera Group.	Governance and compliance Anti-corruption	GRI 205 GRI 206

SASB indicator	Description	Section/ Notes	Material topic	ASTM GRI Standard
IF-EN-510a.3	Description of policies and practices for prevention of (1) bribery and corruption, and (2) anti-competitive behaviour in the project bidding processes	No fine was paid	Governance and compliance Anti-corruption	GRI 205 GRI 206
SECTOR: TRANSPORTATION - ACTIVITY: ROAD TRANSPORTATION				
TR-RO-110a.1	Gross global Scope 1 emissions	Emissions	Energy consumption and GHG emissions	GRI 305-1
TR-RO-320a.1	(1) Total recordable incident rate (TRIR) and (2) fatality rate for: (a) direct employees and (b) contract workers	Health and safety The total recordable incident rate (TRIR) is equal to 1.28 for direct employees and 0.19 for contract workers. The mortality rate is equal to 0.01 for direct employees and 0 for contract workers.	Occupational health and safety	GRI 403-9
TR-RO-540a.3	(1) Number and (2) aggregate volume of spills and releases to the environment	In 2022, four significant spills were reported.	Use of natural resources and waste management	GRI 306-3
SECTOR: TECHNOLOGY & COMMUNICATIONS SECTOR - ACTIVITY: SOFTWARE & IT SERVICES				
TC-SI-130a.1	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Energy consumption	Energy consumption and GHG emissions	GRI 302-1
TC-SI-130a.2	(1) Total water withdrawn, (2) Total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Water consumption	Use of natural resources and waste management	GRI 303-3
TC-SI-230a.1	(1) number of data breaches, (2) percentage involve personally identifiable information (PII), (3) number of users affected	Two complaints regarding the breach of customer privacy by external parties were received by companies of the EcoRodovias Group. Sinelec recorded two data breaches. All reports were managed in compliance with the applicable procedures.	Privacy and information security	GRI 418-1
TC-SI-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behaviour regulations	No monetary loss as a result of legal proceedings associated with anticompetitive behaviour regulations	Governance and compliance	GRI 206-1



ASTM SPA

**INDEPENDENT AUDITOR'S REPORT ON THE
CONSOLIDATED NON-FINANCIAL STATEMENT PURSUANT
TO ARTICLE 3, PARAGRAPH 10, OF LEGISLATIVE DECREE
NO. 254/2016 AND ARTICLE 5 OF CONSOB REGULATION
NO. 20267 ADOPTED BY RESOLUTION OF 18 JANUARY 2018**

YEAR ENDED 31 DECEMBER 2022



Independent auditor's report on the consolidated non-financial statement

pursuant to article 3, paragraph 10, of Legislative Decree No. 254/2016 and article 5 of CONSOB Regulation No. 20267 adopted by Resolution of 18 January 2018

To the Board of Directors of
ASTM SpA

Pursuant to article 3, paragraph 10, of Legislative Decree No. 254 of 30 December 2016 (the "Decree") and article 5 of CONSOB Regulation No. 20267/2018, we have undertaken a limited assurance engagement on the consolidated non-financial statement of ASTM SpA and its subsidiaries (hereafter the "ASTM Group" or the "Group") for the year ended 31 December 2022 prepared in accordance with article 4 of the Decree and approved by the Board of Directors on 23 March 2023 (the "NFS").

Our review does not extend to the information set out in the paragraph "The European Regulation on the Taxonomy of Sustainable Economic Activities" and in the related annex "European Taxonomy: Model KPIs for non-financial undertakings" of the NFS, required by article 8 of European Regulation 2020/852.

Responsibilities of the Directors and the Board of Statutory Auditors for the NFS

The Directors are responsible for the preparation of the NFS in accordance with articles 3 and 4 of the Decree and with the "Global Reporting Initiative Sustainability Reporting Standards" defined in 2021 by the GRI - Global Reporting Initiative (the "GRI Standards"), identified by them as the reporting standard.

The Directors are also responsible, in the terms prescribed by law, for such internal control as they determine is necessary to enable the preparation of NFS that is free from material misstatement, whether due to fraud or error.

Moreover, the Directors are responsible for identifying the content of the NFS, within the matters mentioned in article 3, paragraph 1, of the Decree, considering the activities and characteristics of the Group and to the extent necessary to ensure an understanding of the Group's activities, its performance, its results and related impacts.

Finally, the Directors are responsible for defining the business and organisational model of the Group and, with reference to the matters identified and reported in the NFS, for the policies adopted by the Group and for the identification and management of risks generated or faced by the Group.

The Board of Statutory Auditors is responsible for overseeing, in the terms prescribed by law, compliance with the Decree.

PricewaterhouseCoopers SpA

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Auditor's Independence and Quality Control

We are independent in accordance with the principles of ethics and independence set out in the Code of Ethics for Professional Accountants published by the International Ethics Standards Board for Accountants, which are based on the fundamental principles of integrity, objectivity, competence and professional diligence, confidentiality and professional behaviour. Our audit firm adopts International Standard on Quality Control 1 (ISQC Italia 1) and, accordingly, maintains an overall quality control system which includes processes and procedures for compliance with ethical and professional principles and with applicable laws and regulations.

Auditor's responsibilities

We are responsible for expressing a conclusion, on the basis of the work performed, regarding the compliance of the NFS with the Decree and with the GRI Standards. We conducted our work in accordance with International Standard on Assurance Engagements 3000 (Revised) – Assurance Engagements Other than Audits or Reviews of Historical Financial Information (“ISAE 3000 Revised”), issued by the International Auditing and Assurance Standards Board (IAASB) for limited assurance engagements. The standard requires that we plan and apply procedures in order to obtain limited assurance that the NFS is free of material misstatement. The procedures performed in a limited assurance engagement are less in scope than those performed in a reasonable assurance engagement in accordance with ISAE 3000 Revised, and, therefore, do not provide us with a sufficient level of assurance that we have become aware of all significant facts and circumstances that might be identified in a reasonable assurance engagement.

The procedures performed on the NFS were based on our professional judgement and consisted in interviews, primarily of company personnel responsible for the preparation of the information presented in the NFS, analyses of documents, recalculations and other procedures designed to obtain evidence considered useful.

In detail, we performed the following procedures:

1. analysis of the relevant matters reported in the NFS relating to the activities and characteristics of the Group, in order to assess the reasonableness of the selection process used, in accordance with article 3 of the Decree and with the reporting standard adopted;
2. analysis and assessment of the criteria used to identify the consolidation area, in order to assess their compliance with the Decree;
3. comparison of the financial information reported in the NFS with the information reported in the ASTM Group's consolidated financial statements;
4. understanding of the following matters:
 - business and organisational model of the Group with reference to the management of the matters specified by article 3 of the Decree;
 - policies adopted by the Group with reference to the matters specified in article 3 of the Decree, actual results and related key performance indicators;
 - key risks generated and/or faced by the Group with reference to the matters specified in article 3 of the Decree.

With reference to those matters, we compared the information obtained with the information presented in the NFS and carried out the procedures described under point 5 a) below;



5. understanding of the processes underlying the preparation, collection and management of the significant qualitative and quantitative information included in the NFS. In detail, we held interviews and discussions with the management of ASTM SpA and we performed limited analyses of documentary evidence, to gather information about the processes and procedures for the collection, consolidation, processing and submission of the non-financial information to the function responsible for the preparation of the NFS.

Moreover, for material information, considering the activities and characteristics of the Group:

- at Group level,
 - a) with reference to the qualitative information included in the NFS, and in particular to the business model, the policies adopted and the main risks, we carried out interviews and acquired supporting documentation to verify its consistency with available evidence;
 - b) with reference to quantitative information, we performed analytical procedures as well as limited tests, in order to assess, on a sample basis, the accuracy of consolidation of the information;
- for the following companies, ASTM SpA, Itinera SpA, Società Autostrada Ligure Toscana pA, ECO101 Concessionária de Rodovias SA, Itinera Construções Ltda, which were selected on the basis of their activities, their contribution to the performance indicators at a consolidated level and their location, we gathered supporting documentation regarding the correct application of the procedures and calculation methods used for the key performance indicators.

Conclusion

Based on the work performed, nothing has come to our attention that causes us to believe that the NFS of the ASTM Group as of 31 December 2022 is not prepared, in all material respects, in accordance with articles 3 and 4 of the Decree and with the GRI Standards.

Our conclusions on the NFS of the ASTM Group do not extend to the information set out in the paragraph “The European Regulation on the Taxonomy of Sustainable Economic Activities” and in the related annex “European Taxonomy: Model KPIs for non-financial undertakings” of the NFS, required by article 8 of European Regulation 2020/852.

Turin, 11 April 2023

PricewaterhouseCoopers SpA

Signed by

Piero De Lorenzi
(Partner)

Signed by

Paolo Bersani
(Authorised signatory)

This report has been translated from the Italian original solely for the convenience of international readers. We have not performed any control on the NFS 2022 translation.

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