Annex to the guarantee request from **Sustainability Proofing Summary**	
Identification of the project	
Overview	Project Name: **Improvement programme Italian highway network** Country: Italy Project Description: Modernisation programme aiming at improving resilience, security and safety of the motorway network managed by ASPI (total length of 2,855 km). The main objectives are to upgrade, maintain or improve road safety, to develop ITS services or to guarantee infrastructure integrity and standards, to develop recharging and refuelling stations for alternative fuels.
Project total cost (exclusive of VAT):	☐ below EUR 10 million ☒ equal to or higher than EUR 10 million
Based on the threshold, the project is not exempted from screening/proofing.	
EIA Directive	
	2014 EIA Directive applicable ☐ Yes ☒ No ☐ Annex I projects (EIA required) ☐ Annex II projects (screening) ☐ EIA required (project screened in) ☐ EIA not required (project screened out)
	None of the project's components are included in the categories of works listed in Annexes II, III and IV, as set out in Article 6 limb 6 of the Italian Environmental Body of Laws (Testo Unico Ambiente - TUA) D.Lgs 152/06 which transposes into Italian Law the Environmental Impact Assessment (EIA) Directive 2011/92/EU, as amended by 2014/52/EU, and therefore are not subject to an EIA procedure. Some of the project components under the category of works "rehabilitation of bridges and viaducts" and "installation of noise barriers" were subject to assessments (Valutazione di Incidenza Ambientale - VINCA) in accordance with article 6.3 of the Habitats directive 92/43/EEC and with the Italian national guidelines (2019).
Sustainability proofing process	☒ **Climate** ☐ **Environmental** ☐ **Social**
Climate Dimension	
Legal framework	The acts adopted at international level which specifically focus on the topic of adaptation to climate change are:

	• The United Nations Framework Convention on Climate Change (UNFCCC) - Rio de Janeiro from 3 to 14 June 1992 • The Kyoto Protocol and the Doha Amendment - entered into force on 16 February 2005 • The Paris Agreement - adopted in Paris on 12 December 2015 at COP-21 • The 2030 Agenda and the Sustainable Development Goals - global action program for people, the planet, prosperity, peace and partnership (so-called 5P) approved with United Nations Resolution of 25 September 2015 • The Sendai Framework for Disaster Risk Reduction - adopted in Sendai on 18 March 2015 at the Third United Nations World Conference on Disaster Risk Reduction (WCDRR), Sendai Framework for Disaster Risk Reduction 2015- 2030), and approved by the United Nations General Assembly on 25 June 2015 (UN Doc. A/RES/69/284), provides a significant contribution to the discipline relating to disaster risk - both natural and man-made • National Strategy for Adaptation to Climate Change (SNAC) - the act expressly aimed at addressing the issue of adaptation at a national level. It was adopted in Italy with Directorial Decree of 16 June 2015, n. 86, issued by the Director General of the former DG Climate and Energy of the Ministry of the Environment and Protection of Land and Sea (now the Ministry of Ecological Transition). • Environment Body of Laws (Legislative Decree 3 April 2006, no. 152) • National Strategy for Sustainable Development (presented to the Council of Ministers on 2 October 2017 and adopted with CIPE Resolution 22 December 2017, no. 108, and its 2022 amendment); • the Protect Italy Plan for the three-year period 2019-2021 (National plan against hydrogeological instability, for land protection and for risk prevention works, 27 February 2019); • the Climate Decree (Legislative Decree 14 October 2019, n. 111) which introduced provisions aimed, mainly, at the definition of a national strategic policy to contrast climate change and improve air quality; • the National Integrated Plan for Energy and Climate (PNIEC) prepared pursuant to Regulation (EU) 2018/1999 on the governance of the Energy Union and presented in December 2019, on which the European Commission expressed its opinion on 14 October 2020 (SWD(2020)911 final); • the National Recovery and Resilience Plan (PNRR), presented on the basis of the Recovery and Resilience Mechanism (in the framework of the Next Generation EU) and approved on 13 July 2021 with Implementing Decision no. 10160/21 of the ECOFIN Council.
Climate dimension (screening)	Adaptation: Describe the basis for not undertaking the climate risk assessment based on the results of the climate vulnerability assessment. Please refer to Section "*Climate adaptation (proofing)*" below. Mitigation: Is the project recommended to undergo Carbon footprint as per Chapter 2.2 of the sustainability proofing guidance? ☒ Yes ☐ No In line with the technical guidance on sustainability proofing for the InvestEU Fund, a screening of the operation regarding GHG emissions has been conducted to judge whether the proposed project has to undergo a carbon footprint assessment. A carbon footprint calculation has been undertaken to assess where the project lies with regards to the following threshold:

	• Absolute & Relative emissions > 20.000 tonnes CO_{2eq}/year (positive or negative). With reference to Table 1 of SPG, GHG emissions estimates for the project are respectively: • Absolute emissions (average): 13,3 million tonCO_{2eq}/year; • Relative emissions avoided (average): 13.141 tonCO_{2eq}/year related to charging stations, including emissions for energy generation; and additional 5.805 tonCO_{2eq}/year related to additional energy efficiency measures. Relative emissions saved amount in total to an estimated 18.946 ton$C0_{2eq}$/year.
Climate adaptation (proofing), as applicable	CDP Risk Management, in collaboration with an independent advisor, have performed an assessment related to the climate resilience/adaptation dimension for the modernization project aiming to upgrade the highway network operated and managed by Autostrade per l'Italia – ASPI (the project). The following data sources have been reviewed: i) the technical documents provided by ASPI; ii) interviews on specific technical details conducted by AECOM team, iii) screening and review of public databases and tools on climate-related hazard and iv) expert judgment. Due to the complexity of the project covering the whole Italian territory, the analysis has been performed for each type of intervention separately and by identifying six homogeneous climatic areas[1]. For each couple (intervention, area) the analysis consists of two phases as described below: ***Phase 1*:** the screening phase aims to identify the climate-related risks that may affect the Improvement Programme of Italian Highway Network over its expected lifetime. Climate risks to be screened are those reported in the Delegated Act 2021/2139, Annex 1, Appendix A (European Commission, 2021). In this regard, the vulnerability to climate hazards is determined by a combination of two aspects: (i) how sensitive the project's components are to climate hazards in general (sensitivity); and (ii) the probability of these hazards occurring at the project location now and in the future (exposure). ***Phase 2*:** the Risk Assessment phase further investigates the climate-related hazards identified in Phase 1, by defining the likelihood of each event occurring and their impact on assets, the environment, social aspects, financial aspects, and reputational aspects. For this purpose, climate scenario analysis have been included by using the

[1] The zones, resulting from the overlap of the Climate Macro-Regions (CMR) with homogeneous clusters of climatic variations according to the CMCC-CM climate model (Scoccimarro et al., 2011) area the following: Alpine foothills and northern Apennines (CMR1); Po Valley, upper Adriatic, and coastal areas of central and southern Italy (CMR2); South-central Apennines and some limited areas in northwestern Italy (CMR3); Alpine areas (CMR4); Northern Italy (CMR5); Island areas and the far south of Italy (CMR6). Although Climate estimates are extended to macro areas and are not specific to the exact location of the intervention. However, we consider this approach capable of assessing how climate change is likely to affect ASPI infrastructure.

COSMO-CLM climate model[2]. By combining the likelihood and impact analyses, the hazards with extreme risk levels for each type of intervention are identified:

Type of intervention	N1 - Regulatory upgrading of works of art and interventions on highway body (BUIR & BUOP)		N2 - Redevelopment of safety barriers prior to DM 223/92 -Safety Barriers and Noise Barriers		N4 - Interventions on Tunnels BUIR and BUOP		N5 - Upgrading of the highways network in terms of technological furnishings – Installation & IT Station		N6 - EV charging stations	
Risk factor	Climatic zone[3]	Risk	Climatic zone	Risk	Climatic zone	Risk	Climatic zone	Risk	Climatic zone	Risk
Flood	1,2,3,4,5,6	4 (Extreme)	1,2,3,4,5,6	1 (Low)	1,2,3,4,5,6	4 (Extreme)	2,6	1 (Low)	2	1 (Low)
Landslide	1,2,3,4,5,6	4 (Extreme)	1,2,3,4,5	2 (Medium)	1,2,3,4,5,6	4 (Extreme)	5	2 (Medium)	NA	NA
Avalanche	1,3,4	1 (Low)	4	2 (Medium)	1,3,4	1 (Low)	NA	NA	NA	NA
Wildfire	1,4,6	3 (High)	1, 4,6	1 (Low)	1,4,6	3 (High)	6	2 (Medium)	6	1 (Low)
Heat wave	1,2,3,5,6	2 (Medium)	1,2,3,5	1 (Low)	1,3,5,6	2 (Medium)	6	2 (Medium)	NA	NA
Changing temperature	2,6	2 (Medium)	2,6	1 (Low)	2,6	2 (Medium)	2,6	2 (Medium)	2,6	1 (Low)
Heat stress	2,6	3 (High)	2,6	1 (Low)	2,6	3 (High)	2,6	1 (Low)	2,6	1 (Low)
Heavy precipitation	3	4 (Extreme)	3	1 (Low)	3	4 (Extreme)	3	1 (Low)	3	1 (Low)
Cold wave	4,5	1 (Low)	4,5	1 (Low)	4,5	1 (Low)	NA	NA	NA	NA

The analysis also aimed to evaluate the adaptation measures designed in the project by assessing their capability to mitigate the identified potential climate-related risks. Where no project-specific information was provided, it can be expected that mitigation procedures and measures are going to be performed and systems are going to be

[2] The COSMO-CLM climate model, forced by the CMCC-CM climate model at an 80 km resolution (Scoccimarro et al., 2011), was used. This model was driven by the RCP 4.5 and RCP 8.5 scenarios (Meinshausen et al., 2011; Moss et al., 2008), which correspond to two of the four Representative Concentration Pathways (RCP) selected by the international scientific community (IPCC 2013a) to represent the future evolution of greenhouse gas concentrations on our planet.

	installed at "state-of-art", following best practices, therefore considering adjustments to prevent/reduce extreme events. Specifically, for each type of intervention, key takeaways are summarized here below: • **N1- Regulatory upgrading of works of art and interventions on highway infrastructure.** This intervention faces extreme climate risks such as landslides, floods, and heavy precipitation. To mitigate these risks, ASPI aligns with NTC2018 and conducts structural analysis according to the reference standards. Recommended steps include hydraulic analysis and flood risk assessment, scour protection, cathodic protection, increased concrete cover thickness, improved concrete quality, protective coatings, stainless steel or galvanized reinforcement, and corrosion inhibitors. Additionally, it involves checking rain pattern evolution and ensuring effective risk mitigation and operating plans for landslides. • **N2 - Redevelopment of safety barriers prior to DM 223/92** Noise and safety barriers are exposed to medium-level risks of floods and landslides, leading to erosion and subsidence of their bases. Water pressure deforms the barriers, compromising their structural integrity and impact resistance. Additionally, water infiltration can compromise sound-absorbing materials, diminishing their effectiveness. The mitigation is guaranteed by ASPI alignment with best practices (NTC2018, CNR-DT 207/2008, UNI EN 1794). • **N4 - Interventions on Tunnels BUIR and BUOP** Tunnels face extreme climate risks such as landslides, floods, and heavy precipitation, resulting in water ingress, traffic disruption, infrastructure damage, compromised safety, and significant repair costs, potentially isolating remote communities. Recommended measures include flood relief structures or flood gates near the tunnel, designing tunnel portals to accommodate higher water levels, planning for greater storm surges, and efficiently sealing tunnel walls and floors to reduce seepage. • **N5 - Upgrading of the highways network in terms of technological furnishings** Installation & IT Stations face medium climate risks, primarily from high or extreme temperatures such as wildfires and heat waves. These conditions can damage sensitive electronic components, causing malfunctions, structural damage, data loss, service interruptions, material degradation, overheating of network components. Since there are no existing technical guidelines to mitigate these effects, it is recommended to design infrastructure with non-fire-propagating components, materials that do not emit corrosive gases or produce toxic smoke, and to construct buildings with high resistance and thermal inertia to withstand environmental stresses. Furthermore, technological buildings should be constructed with materials and features that have high resistance to environmental conditions, high strength, and thermal inertia to better withstand such stresses. • **N6 - EV charging stations** The risk associated to the N6 type of intervention were evaluated into the CCRA phase with low vulnerability and low level of impact, thus a risk level negligible. Overall, considering the adaptation measures described in the CRVA, as well as the assumption that new or refurbished systems will follow best practices to be resilient to extreme climate-related events, project design should be adequate to mitigate the potential climate risks identified. In conclusion, the project is affected only by a few residual climate-related risks, which are estimated to be acceptable as long as adaptation measures are carried out.
Climate mitigation (proofing), as applicable	Project boundaries are the same with and without Project: ASPI's motorway network (2855 km). The baseline is the third parties forecast emissions, in absence of the Project, on the existing network, only within the boundary defined above. Forecast values reflect operational assumptions on traffic, traffic growth, speed/flow, infrastructure capacity and fuel consumption.

	The calculation of GHG emissions, related to ASPI's project of enhancing the existing motorway network under management to bring it up to European and National standards, has been conducted according to EIB Carbon Footprint Methodology, in line with the technical guidance on sustainability proofing for the InvestEU Fund. In particular, the calculation has been conducted according to chapter §2.2.5.2 Carbon footprinting and monetisation of GHG emission, which in turn refers to i) EIB Carbon Footprint Methodology and ii) EIB Group Climate Bank Roadmap 2021-2025 document. A direct connection has been assumed between energy supplied by charging stations and number of km that can be travelled by electric vehicles, re-proportioned for km of motorway, in order to avoid counting environmental benefits for km travelled once exiting the motorway. Therefore, the estimated amount of kilometres travelled by Battery Electric Vehicles (BEV) on motorways has been calculated based on the energy supplied by charging stations (calculated on the basis of installed power and an average utilization rate at a European level) and on the evolution of electricity consumption by BEV. In order to make an estimate of the emissions, the overall registered vehicles in circulation have been divided by Euro class (from 0 to 6) and fuel. Natural turnover due to end of service life, regulatory limits on circulation and, substitution effects, linked to the second-hand market, were taken into account. The corresponding INEMAR FET2 emission factor was then associated to each vehicle. This way it has been possible to estimate the evolution of vehicles in circulation, year by year, and calculate the percentage of each type of vehicle in circulation – divided by euro class and fuel - so to calculate emissions of a "typical" vehicle, associate such emissions to their corresponding emission factors and compare them with a km travelled by electric vehicles. In order to complete the calculation of estimated saved CO_2, a weight was assigned to km travelled on motorways to compare them with the km travelled by electric vehicles. To do this, it was conducted an analysis on the traffic curves received by the counterparty to which a growth rate of 1.6% was applied. The Project was assessed in accordance with the policies set out in the Climate Bank Roadmap (“CBR”). The Project is considered aligned with the low carbon goal as it consists of investments in rehabilitation of existing roads, including measures that will improve road safety, and installing charging stations for BEV.
Voluntary measures (Positive agenda checklist)	Although a positive agenda has not been drawn up, ASPI's new highway modernization plan is capable of generating positive climate impacts, both reducing GHG emissions through installation of charging stations for BEV and bringing energy efficiency to the entire network through installation of LED lighting throughout the network. Additionally, ASPI is installing photovoltaic panels to cater for the energy needs of gas stations on the network. Deviations from planned interventions might have an impact on the estimated value of 13,3 million tonCO2eq/year for absolute emissions (average) and of 18.946 tonC02eq/year for relative emissions avoided (average). Deviations might include delays in the implementation of the plan, postponing the materialisation of the expected benefits, as well as rescheduling of works, that might cause a high number of road works on the network to bring the programme back on track, resulting in an increase of congestion. However, the maintenance programme is part of the commitments that Aspi has undertaken within the current 5 years period of the concession contract, which has been widely publicised and included in recent end of year reports, which should prove a strong motivation to perform according to the plan.
Environmental Dimension	
Legal framework	This regulatory framework takes into account the main environmental regulations, further references to Directive/ Decree/Guidelines have been reported into the dedicated part of the checklist: **Surface waters - European legislation:**

- EU Decision 229/2018: Establishes classification values for monitoring systems as per Directive 2000/60/EC.
- Directive 2009/90/EC: Specifies technical requirements for chemical analysis and water monitoring.
- Directive 2008/105/EC: Sets environmental quality standards in water policy.
- Directive 2007/60/EEC: Concerns flood risk assessment and management.
- Directive 2006/44/EEC: Addresses the quality of fresh waters for fish life.
- Decision 2001/2455/EC: Establishes a list of priority substances and amends Directive 2000/60/EC.
- Directive 2000/60/EC: Framework for community action in water policy.
- Directive 91/676/EEC: Protects waters from nitrate pollution from agricultural sources.

Surface waters - National Regulations:

- Legislative Decree 172/2015: Implements Directive 2013/39/EU regarding priority substances in water policy.
- Guidelines for Environmental Monitoring Project (PMA): Methodological guidelines for water environment as per Legislative Decrees 152/2006 and 163/2006.
- Prime Ministerial Decree 21/11/2013: Approves the hydrogeological structure plan for specific river basins.
- Legislative Decree 219/2010: Implements Directive 2008/105/EC on environmental quality standards.
- Legislative decree 205/2010: Implementation of Directive 2008/98/EC. Amendments to Part IV of Legislative Decree 152/2006.
- Ministerial Decrees (various): Provide technical criteria for water monitoring, characterization, and management as per Legislative Decree 152/2006.

Groundwater - European legislation:

- Directive 2014/80/EC: Updates Directive 2006/118/EC on groundwater protection.
- Directive 2000/60/EC: Framework for community action in water policy.

Groundwater - National Regulations:

- Ministerial Decree 260/2016: Technical criteria for the classification of surface water bodies.
- Legislative Decree 30/2009: Implements Directive 2006/118/EC on groundwater protection.
- Legislative Decree 152/2006: Comprehensive environmental regulations

Atmosphere

In recent years, Italian legislation relating to air pollution has undergone changes aimed at making it compliant with the provisions of the European Union directives on the subject.

The current regulatory framework mainly consists of:

- Legislative Decree 171/2004: Implements Directive 2001/81/EC on national emission limits.
- Legislative Decree 152/2006: Environmental regulations, including air protection and emission reduction.
- Legislative Decree 30/2013: Implements Directive 2009/29/EC on greenhouse gas emission trading.

Soil and subsoil - National standard:

	• Legislative Decree 116/2020: Amends regulations on waste management under the Circular Economy Package. • Legislative Decree 121/2020: Implements Directive 2018/850 on waste landfills. • Presidential Decree 120/2017: Regulations for managing excavated earth and rocks. **Noise and vibrations - national regulations:** • Prime Ministerial Decree 1/3/1991: Establishes maximum noise exposure limits. • Law 447/1995: Framework law on noise pollution. • Legislative Decree 42/2017: Harmonizes national legislation on noise pollution. **Technical standards:** • UNI 9884 Acoustic characterization of the territory through description of environmental noise; • ISO STANDARDS 1996-1, 1996-2 and 1996-3; • ISO 10012, ANSI S1.40-1983, IEC 651-1979- Type 1, IEC 804-1985- Type 1, IEC 1260-1995 Class 1, Ansi s1.11-1986 Type 1D Unlike noise, regulated at national level by Law no. 447/95, there is currently no law that establishes quantitative limits for exposure to vibrations. However, there are numerous technical standards, issued nationally and internationally, which constitute a useful reference for assessing disturbance in buildings affected by vibrations. • UNI 9614:2017, UNI 9916, UNI ISO 8727:2016, UNI ISO 18431-1:2016, UNI ISO 8727:2016 and UNI ISO 2631-1:2014; • ISO 8041:2017, ISO 2631 parts 1 and 2, ISO 4866, ISO 5347, ISO 5348 and ISO 2017-3:2015 **Vegetation, flora and fauna - European legislation:** • Decision 2010/79/EC Decision of the Community Commission, of 19. Directive 2009/147/EC: Conservation of wild birds. • Directive 92/43/EEC: Conservation of natural habitats and wild fauna and flora. **National legislation:** • Legislative Decree 128/2010: Amendments to environmental regulations. • Legislative Decree 32/2010: Implements Directive 2007/2/EC on spatial information infrastructure.
Environment dimension (screening)	The project was screened against the criteria detailed in the environmental checklist according to Annex 3 of the sustainability proofing guidelines. The screening analysis was carried out based on the type of interventions, available documentation, professional judgment and expertise. According to the Promoter, the investment plan's interventions mostly focus on the redevelopment and modernization of infrastructure and assets located on existing motorways. Consequently, no additional environmental assessment procedures are required, as all authorizations required were secured in accordance with regulatory standards at the time of the original construction. In any case, for some specific initiatives, all necessary authorizations, as required by national and local regulations, have been requested, including: • Landscape report, approved by the Ministry of Culture, the Archaeological and Landscape Superintendencies and the landscape offices of the Municipality where the intervention lies; • Hydraulic and hydrogeological authorisations, approved by the competent authorities, for aspects related to the relevant interfaces.

	Moreover, some of the planned interventions fall in or near protected areas (Natura 2000) and a VINCA (Valutazione di Incidenza Ambientale) report and/or VINCA screening is required for such interventions, according to Directive 92/43/EEC. The following projects already obtained approval with no significant negative impacts identified within the related VINCA and/or screening VINCA: • *Adeguamento sismico V.tto Leone (N1-04);* • *Interventi di risanamento acustico in A13 Bologna – Padova (N2-08);* • *Intervento evolutivo Ponte Torrente Enza (N1-30)* • *Adeguamento strutturale V.tto Carafone (N1-06).* • *Manutenzione straordinaria delle gallerie di sant'anna, del fico e san bernardo (N4-104_105)* The process is still ongoing for the following projects: • *Intervento evolutivo Ponte Fiume Taro (N1-31);* • *Intervento evolutivo Ponte sul Fiume Lamone (N1-32).* According to the Sustainability Proofing guidelines (Annex 3 of the Technical guidance on sustainability proofing for the InvestEU Fund – 2021/C 280/01) an analysis was carried out to evaluate the risk level of impacts on the environmental dimensions (air, water, land and soil, biodiversity, noise and odour). The analysis returned a low risk of impacts on all the dimensions. In particular, the project includes interventions that are aimed at maintaining and upgrading existing infrastructure and do not involve substantial changes to the surrounding environment. Furthermore, these interventions are expected to have positive environmental impacts. Among the most significant of such impacts are: • The installation of BEV charging stations at service areas along the motorway network, leading to an expected increase of full electric vehicles on the highway, as a consequence improving air quality and reducing noise levels; • The installation of noise barriers along the most sensitive sections of the motorways, designed to reduce noise levels and minimize the risk of birds collision on the barriers or vehicles; • The enhancement of water reserves through upgrading of water collection and treatment systems along the motorway network, potentially improving water quality; • Interventions aimed at reducing energy consumption, such as installation of LED lighting and implementation of a new BMS (Building Management System) for the integrated control and supervision of the air conditioning systems of the toll stations and other highway buildings. Moreover, installation of photovoltaic systems contributes to increase the rate of energy from renewable sources, leading to meet ASPI's energy needs. Among the various interventions, some are designed to facilitate operational management of traffic and construction sites ("Mercury Transversal Activities"), in order to avoid congestion caused by the presence of construction sites, thus reducing traffic and consequently noise and air pollution. Additionally, ASPI is also committed to green repopulation through the implementation of green works on land available to ASPI, contributing to the decarbonization of emissions from the construction and maintenance of the network itself. In general, most of the planned interventions are enhancements and upgrades to existing structures and systems and do not generate significant impacts, as they are carried out locally, with construction times of limited duration, in the related motorway corridor. During the construction phase, standard practices, and compliance with industry regulations on site management will be enforced to avoid any environmental damage, temporary nor permanent. No significant impacts on the environment are expected during the operational phase following the project's implementation.

Environment dimension (proofing), as applicable	Not applicable, since the findings of the environmental screening process did not require the need to continue with the proofing phase.
Voluntary measures (Positive agenda checklist)	Although a positive agenda has not been drawn up, the project is capable of generating positive environmental impacts, based on the type of interventions planned. As identified in the screening phase, such interventions could lead to improvements mostly on air, water and noise aspects, but also land and biodiversity.
Social Dimension	
Legal framework	This regulatory framework considers the main social regulations: • PNRR, M5C2 (Component C2 - "Social infrastructures, families, communities and third sector"). PNRR is part of the NextGeneration EU (NGEU) programme, an initiative of unprecedented scope and ambition, which the European Union has made available to its members. This is a temporary recovery tool that will allow member countries to cope with the economic and social consequences of the 2020 Covid-19 pandemic, and to rebuild a post-pandemic Europe that is greener, more digital, more resilient and adapted to present and future challenges. • Legislative Decree 30 July 1999, n. 300 Concerning the Reform of the Government organisation, national plan of interventions and social services 2021/2023 • EU Decision 2014/95 • Legislative decree 228/2011 • Corporate Sustainability Reporting Directive (CSRD), 2022 • DPCM, 17 July 2020, Article 7.3, Article 7.4 The options presented shall take into consideration that remedial measures might be necessary to make sure that the project is acceptable to receive InvestEU support. These remedial measures should be robust enough to ensure that the improvements carried out will serve to minimise detrimental impacts and maximise benefits on social dimension all along the project life cycle.
Social dimension (screening)	The project was screened against the criteria detailed in the Checklist in Annex 3 of the sustainability proofing guidelines. What emerged is that the project is unlikely to generate negative impacts on the various issues outlined in the social dimension. In fact, the project mostly concerns the maintenance and enhancement of existing infrastructure and will not result in substantial modifications to the road alignment. With regards to labour, working conditions, human rights, gender equality, health and safety and respect for the environment, ASPI pursues socially responsible and fair behaviour in line with the principles contained in the Official Declaration of Human Rights, ILO conventions, international human rights standards and national labour laws. This ongoing commitment is emphasised and reflected in the following pillars: • Continuous support to the UN Global Compact and drafting of the "Carta degli impegni ESG" in line with the UN SDGs; • Group's Code of Ethics, which ASPI requires all its stakeholders (including suppliers) to comply with and operate in line with the principles of respect for human rights, protection of the environment and health and safety of personnel and workplaces, as well as sustainability;

	• Signing of the Protocol against Harassment and Discrimination in the Workplace (2023), related, among the others, to the respect of disadvantaged and protected categories; • Definition of the Diversity and Inclusion Policy, which provides for the People and Culture Committee ("D&I Committee") to assist the BoD in its responsibilities to oversee the definition of the Group's policies on people management, diversity and inclusion, talent and remuneration/compensation. In 2022 women represent 23% of the entire workforce. On a statistical basis, the snapshot of ASPI's corporate population in 2022 shows a gender split with a femininity index of 29.3%: every 100 men there are 29.3 women. Out of a total of 4.944 employees, 1.121 are women compared to 3.823 men. Specifically, for the year 2022, out of a total of 320 new hires, women represent 15%. The company's commitment is aimed at continuous improvement through the implementation of initiatives and the adoption of procedures and policies harmonized with the broader integrated management system to ensure an inclusive, non-discriminatory work environment in compliance with gender equality; • Definition of an annual updated Gender Equality Plan and Remuneration Policy, through which the Group values skills and experience, the remuneration of resources according to role and organisational responsibilities, pursuing gender equality at every organisational level, and monitoring the gender pay-gap, for which the target to 2024 is 0%; • A way to secure a project against the risk of future issues arising, for instance by ensuring that an early stakeholder engagement process is carried out i.e. disclosing information on safeguarding measures to project-affected people or carry out consultations. • Implementation and maintenance of internationally recognised certifications and related management systems such as: o UNI/PdR 125:2022, relating to gender equality; o ISO 30415, concerning the human resources management system; o ISO 14001, ISO 45001, legislative compliance with the Environmental Consolidation Act (ex. D.Lgs. 156/06) and the Health and Safety Consolidation Act (ex. D.Lgs. 81/08) and the appointment of the HSE Department (2023), in order to ensure that the organisation is based on a careful risk assessment, with particular attention to activities involving high-potential risks (road traffic and investment risk, work at heights, excavations, confined spaces) and guarantees constant alignment with best practices, reference standards and legal requirements, in the identification of prevention and protection measures aimed at both its own employees and those of companies in the supply chain. In this regard, procedures, responsibilities and tools (e.g., continuous training) for the continuous improvement of HSE performance are also defined; o Other internationally recognised management systems and guidelines, such as ISO 9001, ISO 39001, ISO 27001, ISO 27701, ISO 27017, ISO 27018, ISO 31000, ISO 22301, ISO 50001; o Specific sector guidelines, such as ANSFISA guidelines for the implementation, certification and performance evaluation of safety management systems for road and highway infrastructure inspection and maintenance activities. Looking at vulnerable groups, the project is located in Italy and therefore not located on Indigenous Peoples's lands. The Group aims at guaranteeing accessibility to spaces, energy, resources and development opportunities to all personnel. The project is unlikely to pose significant risks to cultural heritage and opposition from local communities. When carrying out construction works, the Group ensures continuous dialogue with local communities at every stage of the decision-making process.

	The only aspect that in the past has caused issues with local communities is the timing and duration of road closures. However, it has been observed that they tend to avoid complete closures of both carriageways at the same time and diversion of traffic to local road networks. Further to that, worksites are closed during holiday periods where an increase in traffic is expected on the network, in order to minimise disruption and, in the event of serious disruptions that cannot be avoided, refund of toll fees has been implemented as compensation for the inconvenience suffered. The Project will improve the safety of the overall ASPI's network, given that the activities include the replacement of safety barriers, improvement of tunnel security, collection of hazardous liquids, seismic enhancement of viaducts, etc. It is also worth pointing out that the project is deemed not to have negative impacts on non-reproducible cultural heritage, sites with unique natural values or intangible cultural heritage. Since these are works on existing assets, authorisations required by national and local regulations have been requested for the specific type of work, and include, in some instances: • Landscape report, approved by the Ministry of Culture, the Archaeological and Landscape Superintendencies and the landscape offices of the municipality where the works are located; • Hydraulic and hydrogeological authorisations, approved by the relevant authorities, for aspects related to interfaces with the works. Considering the nature of the intervention, no land acquisition is expected to be necessary either during the works or at completion. Regarding bridges, the works are on existing structures with partial/total demolition and in situ reconstruction, which require only temporary occupation of private areas for sites and access routes, that will be returned to the owner at the end of the works. For safety barriers and noise barriers, except for operation N2-6 reported in Annex A, no temporary occupation of private areas is expected. For noise barriers, as reported in Annex A, the need for additional temporary occupations may be evaluated once the detailed design is developed. ASPI is committed to continuous improvement adopting KPIs to monitor its level of performance.
Social dimension (proofing), as applicable	Not applicable, since the findings of the social screening process did not require carrying out the proofing phase.
Voluntary measures (Positive agenda checklist)	Although a positive agenda has not been drawn up, the implementation of the proposed project is capable of generating several positive social impacts. The Project will improve the safety of the overall ASPI's network, through the replacement of safety barriers, improvement of tunnel safety, collection of hazardous liquids, seismic enhancement of viaducts, etc. The Project will significantly reduce noise pollution, by an average of over 6 dBA, for over 2,300 people living in the vicinity of the motorway network. Finally, as part of its investment plan, works will be awarded partly to in-house companies and partly to local SME in the engineering and construction sector. Local suppliers, collaborators and subcontractors are expected to be involved in the implementation of the Project.
Other sustainability aspects (as applicable)	
	Public consultations are currently ongoing as part of the VincA procedures for some of the interventions. Results on the request to competent on the absence of significative impacts on the cultural heritage is, in some cases, still on going. Updates by ASPI are expected in this regard. The project is in line with the process outlined in the Italian procurement law and ASPI is SOA certified, which means ASPI is qualified to participate to public tenders.

	ASPI is committed to creating a sustainable strategy and integrated business model to achieve the SDGs. Sustainability is paramount to ASPI. The Group demonstrates its sustainability aspirations with the "sustainability strategy" positioning and with its assessment and selection of projects and investments, as well as identifying, managing and responding to the sustainability challenges each project offers. ASPI is considered to have the resources, tools and management systems to ensure adequate oversight in terms of sustainability performance, measured through the definition and continuous monitoring of KPIs. In this regard, the above-mentioned management systems enables compliance audits to be systematically carried out.