



THE MUNDYS GROUP'S RESPONSIBLE LOBBYING POLICY

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**Approved by Atlantia S.p.A.*

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OUR VALUES

The Mundys Group

The Mundys Group (also known as “the Group”) is one of the leading international players in the infrastructure and mobility sectors. As a strategic investment holding company, we operate in the infrastructure sector via our subsidiaries in the motorway and airport concessions sector in Italy and overseas, and also provide mobility services.

The Group manages 46 concessions in 11 countries, tolling services in 24 countries, five airports and over 9,000 kilometres of toll motorways. Thanks to the commitment of our 21,000 employees, we are constantly striving to make the travel experience simpler and more efficient, accessible and sustainable.

Our mission

To create safer, sustainable, integrated and efficient mobility. Sustainability and innovation are the strategic drivers of our growth projects, which are aimed at creating lasting and shared value, and generating positive effects in the local communities where our infrastructure and mobility services are present.

Our guiding principles

- Integrity: a commitment to protect corporate assets and economic and social capital from unlawful acts of any kind, in full compliance with the applicable regulations in the sectors our Group operates in.
- Transparency: guaranteeing public access to information that is relevant for our stakeholders, in compliance with the law and based on a commitment to protect the data processed during our business activities.
- Fairness: protect and promote the rights and value of our employees and collaborators.
- Ethics: adopt a zero-tolerance approach to behaviour that does not comply with our Code of Ethics

and our good governance policies, first and foremost the Anticorruption Policy and the Diversity, Equality and Inclusion Policy.

- Sustainable success: incorporate elements of environmental and social sustainability – together with economic sustainability – into our business processes.

Compliance

Adoption of codes, guidelines and procedures that encapsulate our guiding principles, thus creating a systematic set of rules designed to guide our activities towards integrity, transparency and fairness. Our Code of Ethics sets out the values, principles and rules that should be respected, in keeping with a culture of responsibility and lawfulness.

- Combatting all forms of corruption. Therefore, we have an Anticorruption Policy and an organisational model that identifies the safeguards and rules for preventing and combatting unlawful activities.
- Constant dialogue with our stakeholders and adoption of an Engagement Policy aimed at establishing and maintaining structured and transparent relations with shareholders, investors and stakeholders, in compliance with regulations regarding access to and disclosure of inside information.

WHY A RESPONSIBLE LOBBYING POLICY IS NECESSARY

Lobbying is a sensitive issue

Relations with the public sector in all its forms, including lobbying, are a sensitive issue, as they are often deemed to be at risk of resulting in undue influence or real or perceived conflicts of interest.

The lack of codified national legislation regulating this issue increases the risk that such activities may be perceived as aimed to obtain undue advantage. On the contrary, international experience shows that transparent institutional relations enable broader democratic participation, thus providing public decision-makers with elements that raise awareness of the real needs of the various production sectors and civil society.

With our in-depth knowledge of the sectors we operate in, and with a positive, responsible and constructive approach, we believe that we can make useful contributions to the decisions of policymakers and regulators.

Aims of the policy

The responsible lobbying policy sets out guidelines for clear and transparent lobbying aimed at presenting legitimate demands, positions and interests to institutions. By submitting our requests in the form of lobbying whilst decisions of general interest are being taken, we aim to contribute to a legislative and administrative process that is transparent, efficient and crystal clear to all the parties concerned.

Scope

Group companies are requested to adopt responsible lobbying policies in line with the general principles set out in this document, making any necessary changes and additions in accordance with the specific organisation and legislation applicable in the country they operate in.

Mundys' Code of Ethics also requires our partners, associated companies and, in general, our stakeholders, to be aware of and comply with policies and procedures that seek to avoid any form of interaction that might lead to offences of any kind, or undermine the core principles of transparency and lawfulness.

RESPONSIBLE LOBBYING

Transparent collaboration with institutions

Institutional relations enable civil society and the production sector to participate in national and supranational policymaking. It is our duty to make our know-how available to institutions in order to contribute to decision-making processes that promote sustainable and inclusive forms of mobility in the general interest. Given our numerous national and international partnerships, we have in-depth knowledge of the sectors we operate in, of the main challenges and opportunities, and of possible short- medium- and long-term developments.

Undoubtedly, transparent and effective dialogue between public decision-makers and businesses can help to define and revise an appropriate legal and regulatory framework, in pursuit of the common goal of ensuring growth and wellbeing for the community.

Therefore, we aim to draw the attention of institutions to the demands of the various sectors the Group operates in, ranging from everyday forms of transport to research and development, in order to better link the devising of public policy to the actual needs of companies.

Our activities

- We follow legislative and regulatory developments at national and international level and conduct a fair and transparent dialogue with the institutional stakeholders involved, thus providing elements and positions that contribute to informed and effective public decision-making, which serves the general interest.
- We are involved in the various public aspects of the decision-making process, through our participation in public consultations, institutional round tables and parliamentary hearings.

GUIDING PRINCIPLES FOR EMPLOYEES AND EXTERNAL STAKEHOLDERS

Clear and transparent mandates

Mundys' Code of Ethics provides for a system of mandates and proxy powers, which identifies the roles and departments responsible for and authorised to interact with representatives of public institutions and/or authorities in the name of and on behalf of the Group, as well as the use of clear, defined, lawful and traceable channels for conducting lobbying activities that are entrusted to recognisable and immediately identifiable parties.

Revolving door policy and conflicts of interest

Without prejudice to the legal prohibition of revolving doors, the Company is responsible for managing the granting of consultancy assignments and appointments to our companies' bodies in accordance with well-established codes of conduct and international regulatory models regarding revolving doors. Before any external professional is appointed to represent our interests, checks are carried out to ensure that there are no incompatibilities linked to current or terminated appointments. As laid down in the Code of Ethics and in the Anticorruption Policy, we confirm our commitment to prevent and manage any actual or potential conflict of interest, to guarantee the impartiality of decisions and the integrity of our operations, by ensuring that representation of our interests is entrusted to persons who are able to carry out this task in a spirit of absolute integrity and fairness.

Internal audits

In line with international best practices and in full compliance with applicable regulations, the Group has adopted a whistleblowing system governed by the Code of Ethics, the Anticorruption Policy, the 231 Model and, in greater detail, the Whistleblowing Procedure, with all corresponding regulations published on the Company's website.

Training

Continuous training on anticorruption and unlawful conduct is promoted. Each Group company, in conjunction with its anticorruption contact persons, plans training activities to ensure that all Group employees are fully aware of the duties and constraints associated with their role.

THE OBLIGATIONS TO BE MET IN DIALOGUE WITH POLITICIANS AND INSTITUTIONS

Undue influence

Adoption of a zero-tolerance policy on the exchange of gifts, gratuities or benefits that are likely to influence the thinking and behaviour of public representatives. Any gifts offered or accepted must be appropriate and bona fide, and unlikely to jeopardise the integrity and reputation of the parties to the relationship, or generate undue advantage or influence, and should also be fully compliant with the Group's responsible lobbying policy. In line with the provisions that are clearly set out in the Code of Ethics, the Group's Anticorruption Policy and the Gifts, Sponsorships and Charitable Donations Procedure, these criteria constitute a key principle for the proper conduct of institutional relations activities.

Funding

No contributions, advantages or other benefits are granted to political parties and trade unions, nor to their representatives or candidates.

Lobbyist registers

In Italy, as in other countries, lobbying is not uniformly regulated.

In conducting institutional relations activities, Mundys' representatives undertake to enrol in lobbyist registers and to comply with lobbying regulations. Mundys is enrolled in the European Transparency Register and complies with all EU lobbying regulations.

Governance and accountability of lobbying activities

The strategies and aims of lobbying and public affairs activities are approved annually by the Board of Directors within the framework of the Communication Guidelines. These are then implemented by the competent External Relations and Institutional Affairs department. Every six months, this department sends a report on its activities to the Risk Control and Corporate Governance Committee and the Supervisory Board, to allow for appropriate control activities.

COMMITMENT TO ENVIRONMENTAL SUSTAINABILITY

A core value

The fight against climate change is a global challenge that involves a vast number of actors and plays a major role in international debate. As a major player in the infrastructure arena, the Mundys Group is aware of its role in combatting climate change and protecting the environment.

Therefore, we are committed to help transition the transport system towards low-carbon mobility, via infrastructure and services that facilitate this shift, in line with the commitments of the Paris Agreement.

Commitments and memberships

A Sustainability Committee composed of independent directors has been established. Its role is to make recommendations and give advice to the Board of Directors on social and environmental sustainability matters. Together with the strategic development guidelines, the Board of Directors has drawn up guidelines and commitments regarding the environmental and social sustainability of our activities, which are set out in a long-term sustainability plan.

Combating climate change is one of the cornerstones of the commitment to sustainable growth. Mundys belongs to the United Nations Global Compact, supports the Paris Agreement on Climate Change, and - as a signatory to the Climate Pledge - has joined the Race to Zero campaign.

Policymaking support

In accordance with the principle of fair cooperation, we are committed to making all of our know-how available to public decision-makers, in order to contribute to the development of national and EU policies aimed at accelerating the fight against climate change, in line with the objectives of the Paris Agreement. The Group's lobbying is conducted with a focus on cooperation in the development of structural measures rather than short-term policies, which ensure a fair and lasting transition whilst guaranteeing transparency in relations with our stakeholders.

In particular, we are committed to ensuring:

- Support for policies to address climate change via rules and regulations
- Transparency of our positions on climate policy/legislation
- Transparency regarding membership of lobbying associations, in line with the Paris Agreement and actions undertaken¹
- Participation in alliances, initiatives and projects with third parties, including national and international climate platforms, in order to promote innovation as a driver for achieving decarbonisation of the mobility sector
- Support for carbon taxation policy
- Support for emissions trading policy
- Support for setting energy efficiency targets/standards
- Support for renewable energy legislation
- Support for energy mix transition policy
- Support for legislation regarding greenhouse gas emissions.

¹: [Click here for the list of industry and sustainability associations](#), which also includes indirect memberships (through subsidiaries)

We are also committed to ensuring that the trade associations Mundys belongs to make decisions and choices in line with the objectives of the Paris Agreement, which support effective measures aimed at mitigating the risks of climate change.

Supported public policies should be aligned with the Company's concrete commitments relating to climate change and climate risk mitigation.

Awareness-raising and promotion

The promotion of issues such as the fight against global warming and climate change is a top priority for Mundys, and we promote initiatives to encourage debate on such matters. In this regard, we are willing to make our tools available for the organisation of speaking platforms, events and, in general, opportunities for dialogue with key stakeholders, in order to discuss the main challenges arising in the coming years and, at the same time, make our interlocutors responsible for environmental protection issues. The Company also aims to ensure that any coalition-building activities undertaken with associations of any kind, as well as other private players or third parties, are not critical to the achievement of our objectives in the fight against climate change.

To ensure the development of cutting-edge policies and to contribute to the debate on this issue, the Company is fully prepared to consider participating in alliances, initiatives and projects with third parties, including the various European climate platforms, in order to promote innovation that leads to a climate-neutral mobility sector.



