

Guidelines Diversity, Equality and Inclusion

Overview

These Diversity, Equality and Inclusion (DE&I) Guidelines are aimed at:

- Fostering and promoting a culture of diversity, a cornerstone of the concept of equality and inclusion, which Atlantia supports in its own business model.
- Guaranteeing each employee equal conditions and opportunities, regardless of age, sex/gender and gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic situation, political or trade union opinion, etcetera.
- Informing all workers of their rights and duties in order to prevent and eliminate any discriminatory behaviour, and to promote a working environment that ensures respect for everyone's dignity.

In order to honour and meet these commitments, starting with senior management, the Company has adopted diversity goals, organisational oversight, active participation mechanisms, and monitoring and checking tools, including:



- **Establishment of a Steering Committee**, to support and guide DE&I challenges, including internal and external representatives, who monitor trends, projects and metrics in terms of defined goals on a quarterly basis;
- **Creation of a DE&I culture that can be integrated** within all business processes (selection, training, performance and development tools, organisational redesign, compensation, innovation, sustainability, people care and welfare);
- **Setting of annual and triennial DE&I goals**, incorporated within the broader sustainability agenda to address the relevant issues;
- **Measurement of progress** via the creation and continuous monitoring of a dashboard, which summarises KPIs, revamped as KHIs (Key Human Indicators);
- **Sharing** of a document, which defines Atlantia employees' "minimum commitment" to accept and promote the principles of diversity, equality and inclusion.

Field of application

These Guidelines, which are prepared by Atlantia SpA, distributed to all staff and given to new hires, are available on the Company's website for all stakeholders, including employees, suppliers and partners.

The Guidelines are based on the principles of the Global Compact, to which Atlantia adheres, on the core constitutional value of gender equality through equality of opportunity, the 2030 Agenda for sustainable development, and the Company's own Code of Ethics².

1: Atlantia joined the Global Compact in June 2015.

2: - Legislative Decree 198/2006 "Code for equal opportunities between men and women, pursuant to Article 6 of Law no. 246 of 28 November 2005";
 - Directive 2006/54/EC, on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation
 - 2030 Agenda for Sustainable Development (SDGs - Sustainable Development Goals)
 - Women's Empowerment Principles
 - ILO Conventions

Contents

As set out in the Group’s Code of Ethics, Atlantia aims to promote optimum conditions of wellbeing within its own ranks. Respect for human rights is the cornerstone of this commitment, with a view to ensuring that all employees are entitled to be treated with equal dignity and respect, including all forms of diversity.

Inclusion is rooted in the Company’s history and is expressed through our chosen Values, where inclusivity and diversity provide a common thread:

- Development and Sustainability
- Innovation and Business Continuity
- Value and Progress
- Diversity and Inclusion
- The Community and the Individual

Atlantia acclaims respect for equality, valuing the uniqueness of every human being, recognising the individual nature of emotions, ideas, beliefs, abilities and potential, and creating a working environment based on the principles of equality and protection of the freedom, dignity and inviolability of the Person.

Atlantia’s commitment is based on this formula:

Respect for Human Rights: Equality = Respect for Individuals: Diversity

While human rights enshrine **respect for the equality of everyone, this principle is upheld by recognising and valuing the uniqueness of every human being.**

Everyone who works at our Company has the inalienable right to be respected for the everyday choices they make, through their emotions, ideas, beliefs, abilities and potential, **whilst respecting the community to which they belong.**

The Guidelines constitute Atlantia’s roadmap for ensuring respect for fundamental rights in an inclusive working environment:

Right	Respect
Right to equality	Respect for diversity
Right to freedom of expression	Respect for the other’s point of view
Right to quality time	Respect for work-life balance
Right to education	Respect for personal development: Lifelong learning
Right to personal and professional security	Respect for personal, social and welfare security
Right to employability	Respect for working conditions



Right to Equality - Respect for Diversity

As set out in the Code of Ethics, Atlantia guarantees equal opportunities, equal dignity and impartial treatment to all our people and will not tolerate any form of discrimination and/or harassment.

All workers must be treated exclusively on the basis of their professional abilities and skills, and **any form of direct or indirect discrimination is prohibited:**

- a. **direct discrimination** when one person is treated less favourably than another is, has been or would be treated in a comparable situation. The difference in this case does not refer to elements linked to merit and/or results that characterise work performed, but rather to distinctions regarding age, sex/gender and gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic situation, political or trade union opinion, etcetera.
- b. **indirect discrimination** whereby an apparently neutral provision, criterion, practice, act, agreement or behaviour may put persons of a particular age, sex/gender and gender identity, sexual orientation, ethnicity/culture, religion, physical condition and disability, economic status, political or trade union opinion, etcetera, at a particular disadvantage compared with other persons .
- c. **harassment:** defined as repeated and persistent hostile conduct, with persecutory intent, likely to violate the dignity of the person and to create an intimidating, degrading, humiliating, hostile or offensive atmosphere.

At Atlantia, we are committed to overcoming all the barriers that undermine each person's free expression, preferring to value the myriad nuances, connotations, traits and facets that each person may express.

For example, one of the administered surveys asks employees to assess whether:

- **“There's a mutual inclusion work environment in the Company: I can be myself in the working environment”.**

The ability to marvel at every aspect of diversity is cultivated on a daily basis, as differing perspectives foresee and reflect the needs and expectations of all our stakeholders. So we invest in this ability to leverage operations and generate business value.

The establishment of a Steering Committee to monitor compliance with the process to achieve the inclusion and diversity goals is vitally important in guaranteeing equality.

3: Pursuant to art. 2 of Legislative Decree 216/2003 "Implementation of Directive 2000/78/EC on equal treatment in employment and occupation".

Right to freedom of expression - Respect for the other's point of view

In a working environment where everyone feels free to express themselves, equal rights can truly be guaranteed. No one should feel intimidated if they wish to put forward their point of view.

The culture underpinning this commitment constantly develops a **self-governing organisation**, defined by partnership and collaboration, in which undertaking a commitment can be based on professional maturity, without the need to be or feel hetero-directed.

The hierarchical reins are slackened in manager-staff relations, which are nourished by constant interaction and feedback, and fostered by systems and tools that promote open dialogue. This enables a relationship to be built in which respect for and openness towards other people's opinions form part of a concrete measurable behaviour agenda.

Having the courage to experiment is a sign of being open to what's new so you can go beyond your comfort zone, and any career mistakes you might make are seen as learning and growth opportunities.

The ability to maintain constructive dialogue and debate while putting forward your own ideas is a manifestation of personal and professional maturity operating in a corporate culture that promotes and encourages ongoing dialogue and sharing.

The capacity for constant learning, which at Atlantia we call "learning agility", is a means for leveraging transformation, progress and the ability to accompany change, which are key elements that underpin our culture and our way of doing business.

In order to boost a culture of utmost freedom of expression, Atlantia regularly deploys initiatives and procedures to gather feedback from all our people (flash surveys, climate and reputation surveys, opportunities for dialogue, focus groups, etc.).

An example is the **Dissent Perception Index (DPI)**:

- **"How free and comfortable do you feel about being able to express your dissent at this time of the year?"**

Right to quality time - Respect for work-life balance

In an ideal working environment people should not have to change their identity when switching from their personal to their professional lives. Fostering organisational wellbeing hinges on promoting a balance between the dual identities of personal and professional time.

At Atlantia our people deserve a satisfying work experience. This is achieved through simplification, concentrating on the essentials, and the knack of making complex things easy to understand. It is also important to establish a goals-based organisation of work, enabling people to shift their focus from time to time and deal with a personal matter.

To support this culture, Atlantia has introduced regular monitoring of staff wellbeing (tracking self-awareness, emotional stability, and work-life balance). Just as Key Performance Indicators (KPIs) look at processes, Key Human Indicators (KHIs) look at the people who drive our Company's actions.

For example, in flash surveys questions such as these are asked:

- **To what extent does your professional schedule allow you to live a balanced personal agenda?**
- **What's your energy level like at this time of year?**

Right to education - Respect for personal development: Lifelong learning

Education is the Company's way of enabling development of our staff, and thereby leverage improvement of the professional community as a whole.

At Atlantia we believe that people are the prime movers of their own development. Therefore, we maintain an organisation in which individuals can identify their own self-development and learning agility tools.

The Company invests in each person's potential. We support our people's skills in order to promote their employability and enhance the contributions they can make to the community and to economic and social development.

Managers can take the first initiatives to build and lead by example, by encouraging the sharing of cultures, work experience, knowledge and skills among their staff. The teams with the highest level of cross-integration are the ones with the greatest differences, as the whole group has the opportunity to benefit from the sharing of views.

These are the leadership traits we want to develop for our people at Atlantia, supported by such initiatives as:

- Events and partnerships with schools and universities;
- Individual performance tools and processes, with 360° feedback so that every nuance can be grasped and adopted;
- Career development tools and processes to balance individual aspirations with professional readiness to take up professional growth opportunities;
- Creation of a **Leadership Factory**, to nurture talent growth from within, in order to meet organisational needs that emerge between the holding company and subsidiaries.

Taking care of people means investing in their training, and in their professional and personal growth. And in doing so, the Company has the privilege of **becoming an observatory for human capital development**.

Right to personal and professional security - Respect for personal, social and welfare security

The place where we all look for security is home, where we can feel protected and be fully in control of our actions. Atlantia seeks to recreate this stability in the workplace on a daily basis, via health and safety policies focused on the wellbeing of all employees and partners in the House of Atlantia.

Representing diversity and welcoming differences also means being able to recognise the various moments in life that make our emotions and needs change over time. Human beings are not always the same, and this is where the concept of life personas helps us to interpret welfare situations, by understanding which protections and supports can sustain colleagues at various moments in their lives: living together, marriage, motherhood and fatherhood, the onset of an illness/disability (temporary or permanent), participation in training activities, looking after family members (children, elderly parents, etc.), support for personal mobility, etc.

Right to employability - Respect for working conditions

At Atlantia we monitor our staff's employability, and create a working environment in which individuals feel they belong and can contribute through their work.

Employment growth is the meeting point of value generation, defined as the synthesis of the Company's contribution and the contributions made by individual employees.

Monitoring and reporting

Atlantia checks actual compliance with the Guidelines via dedicated policy and monitoring tools, including:

- Regular identification and assessment of internal and external risks relating to DE&I issues;
- A system for reporting violations and a sanctions system set out in the Code of Ethics;
- Dialogue with stakeholders;
- Steering Committee activities;
- The KHI dashboard.

As part of its direct responsibilities, the management ensures implementation of activities and goals by promoting an inclusive management culture.

The Human Capital and Organisation Department is responsible for developing the Company's Diversity, Equality and Inclusion strategy, designing the portfolio of initiatives and carrying out the relevant benchmarking, monitoring and reporting analyses, and also specifying the responsibilities of management with regard to these issues.

The programmes are monitored by the DE&I Steering Committee.

Non-compliance with the guidelines

As set out in Atlantia's Whistleblowing Procedure, reports regarding possible violations, conduct or practices that do not comply with the provisions of the Code of Ethics may be submitted.

Workers who feel they have been subjected to harassment or discrimination are invited to inform the relevant Human Resources, Human Capital Organisation (HCO) department without delay.

Any violation of these Guidelines may lead to disciplinary measures being taken against the persons responsible, in accordance with the law and the applicable National Collective Labour Agreement.