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WHISTLEBLOWING PROCEDURE

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Date	Revision	Process Owner	Verified			Approved	
dd/mm/yyyy	01	Internal Audit	Risk Management	General Counsel	Human Capital & Organization	Whistleblowing Team	BoD

Description
<p>This document replaces the Atlantia Group's previous Whistleblowing Procedure, which has been amended to take account of the changes in Atlantia's organisation and governance and the need to bring the entity conducting the investigation closer to the subject of the report.</p> <p>To this end, the main interventions (reflected in the Procedure) concerned:</p> <ul style="list-style-type: none"> - governance aspects (i.e.: provision of a decentralised model for managing reports, changes to the Team make-up in favour of a multidisciplinary approach; strengthening of the role of Internal Audit and provision of information flows with the other parties to the internal control system); - operational process aspects (i.e.: limitation of reporting channels in favour of a single point of entry, preliminary verification and assessment process governed by Internal Audit under the supervision of the Whistleblowing Team, discussions with the other parties to the internal control system and in particular the second lines of defence and the Supervisory Body). <p>The guarantees and protections for Reporting and Reported subjects have, of course, been maintained.</p>

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1. OBJECTIVE OF THE DOCUMENT AND SCOPE OF APPLICATION

1.1 PREAMBLE

The Atlantia Group combines sound business and financial discipline with a commitment to operating in accordance with environmental, ethical and governance principles that meet the highest international standards. In all its activities, the Group requires ethical and professional integrity, a correct behaviour and full compliance with the laws and regulations of all the countries in which it operates, as well as with honesty, reliability, impartiality, loyalty, transparency, fairness and good faith principles.

In line with international best practices and in full compliance with applicable regulations, Atlantia S.p.A. has been implementing a process for collecting and managing reports since 2003, which has evolved over the years, thereby leading to the following milestones:

- the decentralisation of the processes for handling reports at Subsidiaries, for the sake of the timeliness and effectiveness of said reports, except in the presence of a common need to safeguard the Atlantia Group and/or the holding company, Atlantia S.p.A.;
- univocal reporting channels and bodies responsible for analysing reports;
- the provision of common mechanisms for detecting and managing any conflicts of interest in the process of managing reports;
- the assignment, without prejudice to the collegiality of the Whistleblowing Team (formerly the Ethics Office), of a key role to the Internal Audit function of each company in the management of the process, from the receipt of reports to the execution of the preliminary investigation.

1.2 OBJECTIVES OF THE DOCUMENT

This document (hereinafter also 'the Procedure') regulates:

- the process whereby reports are received and handled (so-called 'whistleblowing');
- the modalities for the management of the relevant investigation, in compliance with the legislation on privacy or any other legislation in force applicable to the Reporting and the Reported subjects.

1.3 SCOPE OF APPLICATION AND STARTING DATE

The procedure shall apply to Atlantia S.p.A. and its Italian and foreign subsidiaries.

The following transposition arrangements are envisaged:


- this procedure is to be immediately applied by Atlantia S.p.A., subject to formalisation;
- Atlantia S.p.A.'s Subsidiaries, in accordance with the "comply or explain" principle, shall adopt and implement this procedure in accordance with their individual regulatory and organisational contexts, or propose partial or total derogations, giving Atlantia a detailed explanation by sending an email to organizzazioneatlantia@atlantia.com (within 90 days);
- without prejudice to the "comply or explain" principle and in order to ensure consistency, Atlantia S.p.A.'s Subsidiaries may, in relation to their own Subsidiaries:
 - o issue, in compliance with the principles set out in this procedure, appropriate corporate regulatory documents where adjustments to the individual organisational or operational context are necessary or appropriate; or
 - o provide for the application of this procedure by the Subsidiaries.

In particular, this procedure shall apply to Atlantia S.p.A. following its approval by the Board of Directors.


The Boards of Directors of the individual Subsidiaries shall adopt, by resolution, the principles and contents of this Procedure (with specific reference to the establishment of the collegiate body, the appointment of the coordinator, the design of the process, the establishment of information flows, and the guarantee of confidentiality), without prejudice to the special features imposed by the local regulatory framework and the need for adaptation in relation to the organisational structure, which shall be discussed and approved by the Board, subject to formal justification, and communicated to Atlantia S.p.A.

The addressees of the Procedure are the Top Management, members of the Corporate Bodies, employees, as well as third parties (e.g., customers, suppliers and consultants) in possession of information on violations (or alleged violations) of:

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- Rules and regulations;
 - the Code of Ethics;
 - Model 231;
 - the Anti-Bribery Procedure;
 - the Conflict of Interest Management Procedure;
 - the Corporate regulatory framework (policies, procedures, etc.);
- as well as information on events likely to damage the assets or image of Atlantia.

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2. DEFINITIONS, ABBREVIATIONS AND ACRONYMS

ATLANTIA: Atlantia S.p.A.

BOARD OF DIRECTORS or BoD: the Board of Directors of Atlantia S.p.A.

INTERNAL AUDIT: the Internal Audit of Atlantia S.p.A.

ATLANTIA GROUP: Atlantia S.p.A. and its direct and indirect Subsidiaries.

WHISTLEBLOWING TEAM: the collegiate body responsible for the reporting process, which assesses the adequacy of the process, suggests any improvements to the process to the Board of Directors, and promotes the necessary awareness-raising and training measures for the Company's workforce. It consists of the heads of the following departments of Atlantia S.p.A.: Internal Audit, Human Resources, General Counsel and Chief Financial Officer.

WHISTLEBLOWING TEAM COORDINATOR: it is represented by the Internal Audit Director, who governs the whistleblowing process from their receipt to the closure of the investigation. He is entitled to represent – if necessary – the Team at meetings with the Administration, Management and Control Bodies.

WHISTLEBLOWING TEAM TECHNICAL SECRETARIAT: resource(s) identified by the Whistleblowing Team to support the organisation of the activities of this collegial body (e.g., convening and organising meetings, taking minutes, managing the documentary and electronic archives).

REGISTER OF AUTHORISED SUBJECTS: a record kept under the responsibility of the Whistleblowing Team containing the list of subjects authorised to know from time to time – on a "need to know" basis – of the existence and/or content of a report and the identity of the Reported subjects, as well as – where permitted by law – of the Reporting subjects.

MODEL 231: the Organisational, Management and Control Model (pursuant to Italian Legislative Decree 231/2001) approved by Atlantia S.p.A.'s BoD, in order to prevent the perpetration of offences under Italian Legislative Decree 231/2001.

CODE OF ETHICS: the Group's Code of Ethics defined by Atlantia S.p.A. and adopted by all Group companies, which identifies the essential core of values that make up the corporate culture and are translated into the management principles and policies that underlie daily operations.


SUPERVISORY BODY or SB: the Supervisory Body set up pursuant to Article 6 of Italian Legislative Decree no. 231 of 2001, responsible for supervising the functioning, effectiveness and observance of the Model and its updating.

ANTI-BRIBERY PROCEDURE: the Atlantia Group's Anti-Bribery Procedure.

REPORT: a communication concerning facts that are considered as: unlawful conducts or irregularities; violations of regulations; actions likely to cause damage to the company's assets or image; violations of the Code of Ethics; violations of the Anti-Bribery Procedure; violations of Model 231; violations of company procedures and provisions.

REPORTING SUBJECT: any subject (both inside and outside the Atlantia Group) who makes a Report, having obtained information on the matters referred to above.

REPORTED SUBJECT: any subject to whom the facts subject to a report relate or can be attributed.

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3. REFERENCE STANDARDS AND PRINCIPLES

The provisions of this Procedure shall be supplemented by the provisions of:

- the Group's Code of Ethics;
- Italian Legislative Decree No. 231 of 8 June 2001, as amended;
- European Regulation 2016/679 for the protection of personal data (GDPR), Italian Legislative Decree No. 196 of 30 June 2003 – (Privacy Code) and European and national legislative interventions and/or measures by the competent authorities (Privacy Regulation);
- all company rules and regulations, including Model 231, the Anti-Bribery Procedure, the Internal Control System Guidelines for Financial Reporting and the Tax Compliance Model.

4. THE PROCESS: STAGES, ROLES AND RESPONSIBILITIES

The process consists of the following stages:

- receipt of reports;
- preliminary verification of reports;
- ascertainment of reports;
- closing of reports.

4.1 RECEIPT OF REPORTS

In order to ensure the effectiveness of the reporting process and provide total and indiscriminate access to all those who wish to make a report, Atlantia provides a number of alternative channels, specifically:

- an IT platform, accessible by all Reporting subjects (Employees, Third Parties, etc.) on Atlantia's website <https://digitalplatform.unione fiduciaria.it/whistleblowing/homepage4.asp>;
- e-mail, at the following address: segnalazioni.atlantia@atlantia.com;
- ordinary mail, at the following address: Atlantia S.p.A., Team Segnalazioni Atlantia, via Antonio Nibby, 20 - 00161 Rome.

Where possible, use of the first channel (the IT platform) is preferable, in order to ensure full traceability of Atlantia's receipt and management of the report over time, as well as to handle the need for dialogue between the Whistleblowing Team and the Reporting subject.

Similarly, although anonymous reports are accepted at Atlantia, the Group suggests that Reporting subjects choose non-anonymous reports, for the sake of the speed and effectiveness of investigations. Guarantees and protections for Reporting subjects are set out in paragraph 5 below, to which reference should be made.

4.1.1. CONTENT OF REPORTS

The Reporting subject makes Reports by providing the information at their disposal.


The subsequent stages of preliminary verification and investigation are facilitated by Reports with precise and detailed content, such as, by way of example:

- a description of the facts reported, with an indication of the known circumstances (manner, time and place);
- the identity of the Reported subject(s), insofar as known;
- an indication of any other persons who may report on the facts being reported;
- any documents – also in physical form – substantiating the report,

in addition, of course, to the identity of the Reporting subject (e.g., personal and contact details), in cases where anonymity has not been opted for.

4.2 PRELIMINARY VERIFICATION OF REPORTS

The Coordinator shall analyse the reports received and:

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- should the report contain precise, detailed and verifiable information, initiate the relevant investigation; otherwise, should the report contain unsubstantiated and/or unverifiable information, and should the Reporting subject not be available to provide the necessary additional information, file the report;
- should the report relate to matters that – albeit concerning Atlantia – do not fall within the scope of application of this document (so-called "non-related reports", such as, by way of example, commercial complaints, commercial proposals, marketing activities), forward the report to the Atlantia department responsible for handling the matter, which shall be responsible for updating Atlantia S.p.A.'s Whistleblowing Team on the results of its verification activities;
- finally, should a report concerning a subsidiary of Atlantia be received, the Coordinator shall forward the report to the Subsidiary's Whistleblowing Team, which is responsible for handling the report and updating Atlantia S.p.A.'s Whistleblowing Team on the results of its investigations.

At the first available meeting, the Coordinator shall report on the reports referred to in the above points to Atlantia S.p.A.'s Whistleblowing Team, providing reasons for the choices made.

Atlantia S.p.A.'s Whistleblowing Team may, if deemed necessary, request further information from the Coordinator. Atlantia S.p.A.'s Whistleblowing Team may also reserve the right to handle reports if it identifies significant impacts (e.g. reputational and/or financial damage) for the Atlantia Group (including the holding company) or other Group companies. Such significant impacts on the Atlantia Group as a whole may also relate to reports received from Subsidiaries. In this case, as part of the preliminary verification phase, the individual Company's Whistleblowing Team shall assess the Report, evaluating its possible significant impact (e.g., reputational and/or economic/financial damage) and inform Atlantia S.p.A.'s Whistleblowing Team of any action to be taken, in addition to the receiving Company's ordinary Report management process. On completion of the Report, the Subsidiary's Whistleblowing Team shall inform Atlantia's Whistleblowing Team of the outcome of its checks.

The Coordinator shall convene the Whistleblowing Team for evaluating all questionable cases and for analysing the reports within its competence (e.g., inherent reports – i.e., reports within the scope, substantiated and verifiable) and – alternatively – for validating the proposed modalities of investigation or jointly defining them.

Finally, the Whistleblowing Team shall define the necessary communication flows (if any) within the organisation and/or towards the Administration and Control Bodies. Within the framework of these flows, the Whistleblowing Team shall also inform, according to its competence, the Supervisory Body and the Anti-Bribery Officer.

Finally, the Whistleblowing Team shall have the power to:

- close reports relating to facts already known and fully ascertained by the Whistleblowing Team without the report adding or allowing the addition of further elements or aspects to what is already known (so-called "Outdated Reports");
- refrain from processing reports relating to (i) facts in relation to which investigations are known to be underway by Public Authorities (e.g., judicial authorities and administrative bodies) and (ii) facts that are already known and are the subject of pending litigation between Atlantia S.p.A. and Third Parties or Employees (so-called "Reports on Facts Under Investigation/Ongoing Lawsuits").

4.3 ASCERTAINMENT OF REPORTS


The aim of this stage is to carry out in-depth investigations, in accordance with the procedures defined by the Whistleblowing Team, in order to objectively ascertain whether or not the reported facts are well-founded.

To this end, the Coordinator shall take an active part in the process, with the support of the competent corporate functions and/or external consultants depending on the subject of the report. The Coordinator shall report on the results of the investigation to the Whistleblowing Team, which may request any necessary additions and shall assess, on a case-by-case basis and on the basis of the evidence progressively brought to its attention, whether it is appropriate to activate communication flows towards the organisation, the Administration and Control Bodies and the other parties involved in the internal control system, including in particular the Supervisory Body, the Anti-Bribery Officer, the Tax Risk Officer, the Non-Financial Reporting Officer and the Financial Reporting Officer.

4.4 CLOSING OF REPORTS

The Whistleblowing Team shall examine the results of the investigation phase, and:

- should the content of the report be confirmed, refer the definition of any necessary measures to the competent functions on a subject-to-subject and in accordance with the existing proxy system;
- should weak areas and/or points for improvement in the internal control and risk management system emerge during the audit (regardless of the outcome), request the implementation of the necessary improvement actions; the Internal Audit shall support the competent Management in defining the action plans and monitor (as part of the follow up process) their implementation within the agreed timeframe.

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The Whistleblowing Team shall submit to the Supervisory Body and to the Anti-Bribery Officer (to the extent of their respective competences) the results of the preliminary investigation before its final closure, in order to identify any further needs for investigation.

Finally, the Whistleblowing Team shall proceed to file the report, classifying it as "Founded" or "Not Founded" and "With Actions" or "Without Actions", whether for improving the Internal Control System or otherwise (e.g., reporting to the judicial authorities).

It shall then activate the communication flows between the Administration and Control Bodies and the other parties involved in the internal control system, including in particular the Supervisory Body, the Anti-Bribery Officer, the Tax Risk Officer, the Non-Financial Reporting Officer and the Financial Reporting Officer.

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The documentation (both in paper and electronic form, including the file dedicated to the individual reports and containing the documentation relating to the preliminary verification and assessment activities and their results) prepared and managed as part of the process in question shall be kept by the Technical Secretariat, in compliance with the appropriate levels of security in relation to the risk of accidental or illegal destruction, loss, modification, disclosure and access to information by unauthorised persons.

4.5 HANDLING OF SPECIAL CASES AND POTENTIAL CONFLICTS OF INTEREST

Should the reported facts concern:

- one or more members of the Whistleblowing Team, either directly or indirectly, or activities falling under their organisational responsibilities, said members shall be excluded from the handling of the report;
- one or more members of Atlantia S.p.A.'s Board of Directors, the duties of the Whistleblowing Team shall fall to the Chairman of the Board of Directors or, failing that, to the Director in charge of the Internal Control System.

In the event of further and different situations where a member of the Whistleblowing Team has a conflict of interest, it shall be their responsibility to declare the conflict. Whether to maintain or exclude that member's involvement in Whistleblowing Team meetings dealing with the specific conflict issue shall be assessed by the remaining members.

4.6 COMMUNICATION, TRAINING AND AWARENESS-RAISING

The Whistleblowing Team is responsible for promoting, over time, the necessary awareness-raising and training actions for the corporate population on the whistleblowing process and, in particular, on the usefulness of the process, the supporting tools and the guarantees and protections for Reporting and Reported subjects.

5. GUARANTEES AND PROTECTIONS

5.1 CONFIDENTIALITY GUARANTEE

All Atlantia's staff involved in the handling of reports in any capacity whatsoever shall guarantee confidentiality regarding the existence and content of the report, as well as the identity of the Reporting subjects (where disclosed) and the Reported subjects.

Any communication concerning the existence and content of the report, as well as the identity of the Reporting subjects (where disclosed) and the Reported subjects, shall strictly follow the "need to know" criterion.

To this end, the Whistleblowing Team shall record in the special Register of Authorised Subjects the list of persons to whom it has become necessary to provide communications regarding each report and the information provided (e.g., the existence and/or content of the report, the identity of the Reporting and/or Reported subjects, the outcome of the investigations carried out, etc.).


5.2 REPORTING SUBJECT PROTECTION

5.2.1. CONFIDENTIALITY ON THE REPORTING SUBJECT'S IDENTITY

Atlantia shall guarantee the confidentiality of the Reporting subject's identity from the time the report is received, in accordance with the law.

For reports transmitted via the IT platform referred to in §4.1 above, the confidentiality of the identity of the Reporting subject (as well as the content of the report) shall be protected in the following ways:

- the platform shall be provided by a specialist third party independent from the Atlantia Group;

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- the platform shall adopt a "no-log" procedure, i.e., it shall not collect in any way, either directly or indirectly, information on how the connection is made (e.g. server, IP address, mac address), thereby guaranteeing complete anonymity. In particular, this means that the company's IT systems shall be unable to identify the access point to the portal (IP address), even if access is made from a computer connected to the company network;
- the platform shall guarantee high standards of security, employing advanced encryption algorithms and other methods to prevent unauthorised access;
- no registration shall be required for Internet access to Atlantia's website (available to anyone, including Employees), and Reporting subjects may remain anonymous. If they wish, Reporting subjects may otherwise provide their name and express consent for their details to be communicated to the Whistleblowing Team.

For reports transmitted via paper and electronic mail channels, the confidentiality of the Reporting subject's identity (as well as the content of the report) shall be protected in the following ways:

- paper mail addressed to the Whistleblowing Team shall be delivered unopened (as delivered by the postal service) to the Whistleblowing Team Secretariat;
- only members of the Whistleblowing Team and the Technical Secretariat shall have access to the e-mail box segnalazioni.atlantia@atlantia.com; the administrator of the competent company e-mail system may only access the reference box for technical reasons, subject to a justified case-by-case request to be forwarded in writing to the Whistleblowing Team Coordinator, and access shall only be granted upon prior written authorisation (from the Whistleblowing Team Coordinator).

In all cases in which the name of the Reporting subject has been communicated, in the processing of reports by the Whistleblowing Team, the name of the Reporting subject shall be separated from the content of the report and replaced with the alphanumeric code assigned to them at the time of the first entry in the special Register kept at the Technical Secretariat.

5.2.2. PROTECTION OF REPORTING SUBJECTS FROM RETALIATION OR DISCRIMINATION

In compliance with the law, Atlantia shall prohibit and sanction any form of retaliation or discrimination against anyone making a report (or anyone who has cooperated in ascertaining the facts reported), regardless of whether or not the report turns out to be well-founded.

In particular, should the bona-fide Reporting subject be an Employee, the Whistleblowing Team (availing itself of the relevant corporate functions) shall monitor the Employee's working life for a period of 2 years from the date of the report, in order to prove the absence of any discriminatory action or other forms of retaliation following the report.

5.3 REPORTED PARTY PROTECTION

Atlantia shall require everyone to cooperate in maintaining a corporate environment of mutual respect and shall prohibit any conduct that may harm the dignity, honour and reputation of any individual. The guarantees of confidentiality established by the Procedure shall also protect Reported subjects.

Reported subjects shall not be subject to disciplinary sanctions in the absence of objective evidence of the reported violation, i.e., without investigating the reported facts and notifying the relevant charges in accordance with the legal and/or contractual procedures.


The Reported subjects may not request to know the name of the Reporting subject, except in the cases expressly provided for by law.

For the purpose of further protecting the Reported subjects, the actions and powers allowed to them by law remain unaffected.

6. SANCTIONING SYSTEM

Atlantia shall provide for and impose disciplinary sanctions (where applicable) on its Employees:

- against those who are responsible for any act of retaliation or discrimination or in any case of unlawful prejudice, either direct or indirect, against the Reporting subject (or anyone who has cooperated in the investigation of the facts which are the subject of a report) for reasons connected, either directly or indirectly, with the report;
- against the Reported subject, for the responsibilities ascertained;
- against anyone who breaches the confidentiality obligations referred to in the Procedure;

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- against Employees, as provided for by law, who have made an unfounded report with malicious intent or gross negligence.

Disciplinary measures shall be proportionate to the extent and seriousness of the unlawful conduct ascertained, and may go as far as termination of employment for the most serious cases.

With regard to Third Parties (e.g., partners, suppliers, consultants, agents), the remedies and actions provided for by law shall apply, in addition to the contractual clauses on compliance with the Code of Ethics.

7. PERSONAL DATA PROTECTION

In accordance with the minimisation principle set out in Article 5 of (EU) Regulation No. 2016/679 ("GDPR"), only personal data that is relevant and necessary for the purposes of the Procedure may be processed. Therefore, all personal data (of any natural person) contained in the report or otherwise collected during the investigation phase that is not necessary shall be deleted or anonymised.

The Privacy Procedure contains general information on the processing of personal data in the context of the Procedure.

On the occasion of each report, the Reported subject and other persons involved in the report may not immediately receive a specific privacy notice regarding the processing of their data, in the presence of a risk that providing such a notice would compromise the ability to effectively verify the validity of the report or to collect the necessary feedback.