

A35 Brebemi



Sustainability Report

2024

Voluntary disclosure inspired by the European Sustainability Reporting Standards (ESRS) and by the Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME)

KNOWLEDGE PARTNER: TEHA GROUP

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KEY FACTS AND FIGURES 2024

A35 Brebemi, part of the Aleatica Group, is not merely a transport infrastructure connecting cities, but a bridge that unites communities, facilitates economic development, and promotes sustainable mobility.

We invest in cutting-edge technologies and implement rigorous safety measures to ensure optimal infrastructure management. From the design phase, we have committed to launching initiatives aimed at the sustainable development of our operations to progressively reduce our environmental, social, and governance (ESG) impact.

PROFILE	62.1 km the length of the A35 Brebemi motorway (Brescia–Bergamo–Milan), which crosses 4 provinces, 26 municipalities, 4 river parks, and 4 major waterways	€1,760 million the investment for the construction of the infrastructure, developed through the first project financing initiative in the sector in Italy	€138.7 million revenues achieved in FY 2024 ($\pm 12.3\%$ vs 2023), with €101.3 million in EBITDA ($\pm 15.3\%$ vs 2023) and €2 million in investments as part of the Economic and Financial Plan (EFP)*
	Aleatica since 2020, we have been part of the Aleatica Group, a leading transport infrastructure operator that manages 20 concessions across 7 countries and oversees 366 million vehicles per year on 1,154 km of highways	27,000 the Annual Average Daily Traffic (AADT) in 2024 ($\pm 4.3\%$ vs 2023). Since 2014, this figure has risen from 8,000 to 26,000 vehicles over 10 years ($+220\%$), equivalent to a compound annual growth rate of 16%	€1.2 billion the economic, social and environmental benefits generated for the community in the first 10 years of Brebemi (2014–2023), as highlighted by the study conducted by AGICI
E	1,032 m the pilot section of the Arena del Futuro, where the innovative DWPT (Dynamic Wireless Power Transfer) technology – also known as dynamic induction – is being studied for charging electric vehicles while in motion	25% the recycled material in the porous wearing course mix, obtained from the milling of the motorway's own pavement layers (vs 20% in 2023)	42% Aleatica's goal to reduce greenhouse gas emissions by 2030 in order to achieve climate neutrality by 2050 – a commitment that Brebemi is dedicated to aligning with
S	170 people within the A35 team, 93% are on permanent contracts. 29 new hires joined the team, 20 of whom are women. A total of 3,500 hours of non-mandatory training were provided	79% the rating expressed by Brebemi's employees in the engagement survey, showing an 24% increase in satisfaction with working conditions	Safety star 1 st motorway in Italy to obtain the iRAP certification with a rating of 4 out of 5 stars – demonstrating A35 Brebemi's commitment to user safety
G	Ethics and integrity the values that guide the Group's activities thanks to the Code of Ethics and Conduct, the Organizational Model 231, the Whistleblowing Guidelines, and the internal policies	I-Care the internal platform for reporting unlawful or unethical behavior, ensuring the anonymity of whistleblowers	ESG Supply chain the integration of ESG criteria into the evaluation and selection of suppliers, through a dedicated questionnaire, in line with the Due Diligence process undertaken by Aleatica

*The figures refer exclusively to Società di Progetto Brebemi S.p.A. and do not include Argentea Gestioni S.c.p.A., as each company prepares its own separate financial statements and no consolidated financial statements are available

CORPORATE PROFILE

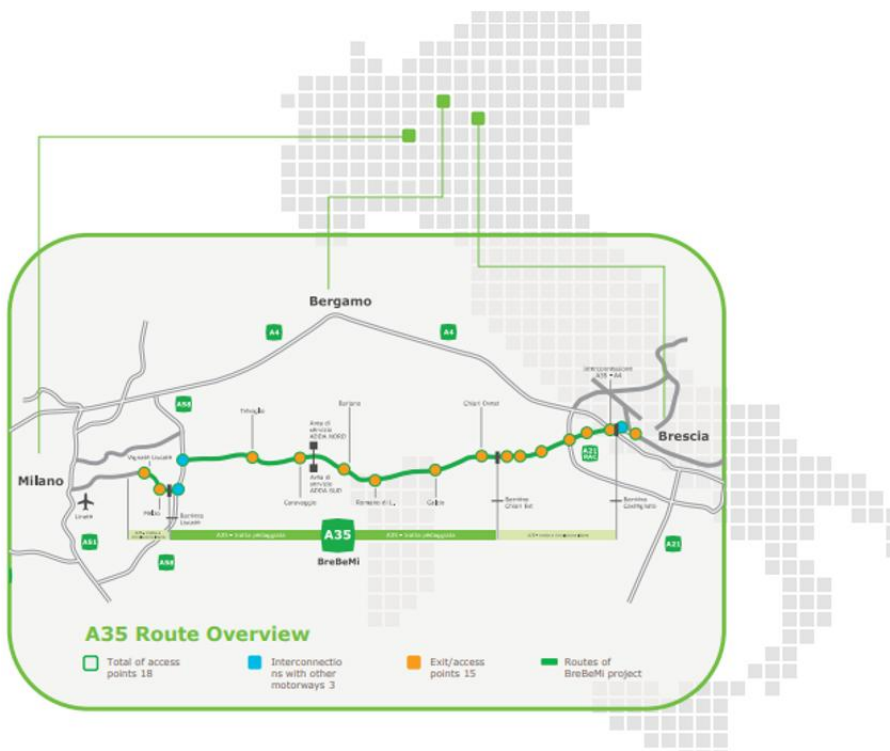
The A35 Brebemi Group: who we are

Operating in the infrastructure sector, the Group is responsible for the design, construction, management and maintenance of the A35 Brebemi ("Brescia-Bergamo-Milan"), the motorway link between the cities of Brescia and Milan.

The A35 Group consists of **Società di Progetto Brebemi S.p.A.**, the concessionaire awarded with the European tender for the design, construction, and management of the A35 and **Argentea Gestioni S.c.p.A.**, the contractor responsible for the operation and maintenance of the asset. This includes the management of ordinary and extraordinary maintenance, execution of civil and/or plant engineering works, toll collection services, traffic and safety management, design and inspection services.

Commissioned in 2014, the A35 Brebemi motorway stretches over 62.1 km, connecting to the A4 Milan-Venice to the east and to the A58 Milan East Outer Bypass (TEEM) to the west. It is also accessible via the A21 motorway through the new Ospitaletto–Montichiari motorway link (A21-RAC).

Designed to relieve severe traffic congestion between Milan and Brescia, it serves not only as a key infrastructure for managing traffic flows in one of the most populated and industrialized regions of the EU, but also as the fastest connection between Central/Southern Italy and Northeastern Italy and Eastern Europe. The registered office of the A35 Brebemi Group is located in Brescia, while the Maintenance Center is in Fara Olivana con Sola.

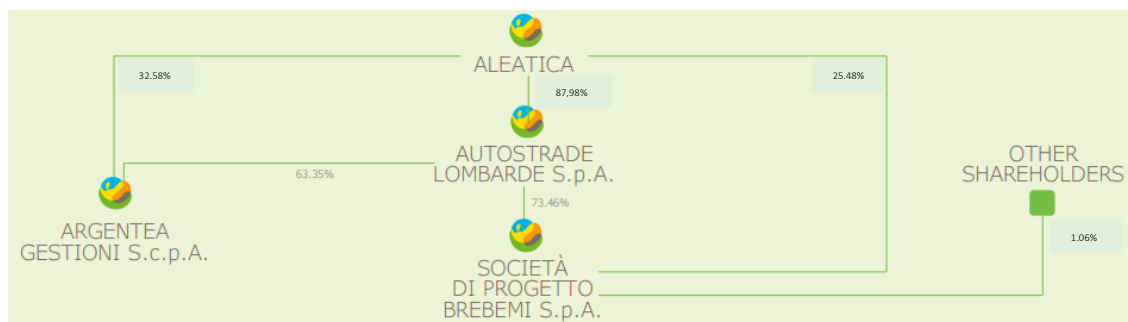


A35 Brebemi's mission is to enhance mobility and the socio-economic development of the local area involved through the design, construction and management of road infrastructure, in compliance with regulations and best practices in safety as well as environmental protection and enhancement.

Since 2020, A35 Brebemi has been part of the Aleatica Group, a global transport infrastructure operator that designs and manages highways and other mobility assets. **With 2,793 employees, Aleatica records an annual turnover of around €1.6 billion.** The company currently manages 20 concessions – including A35 Brebemi – comprising 15 highways, 3 ports, 1 railway line, and 1 airport across Europe and Latin America: Spain, Italy, the United Kingdom, Mexico, Colombia, Peru and Chile.

Corporate structure

Società di Progetto Brebemi S.p.A. and **Argentea Gestioni S.C.p.A.** are controlled by **Autostrade Lombarde S.p.A.** and **Aleatica S.A.U.**



Project history

Established in 1999, Brebemi S.p.A. submitted a proposal to Anas S.p.A. to obtain the concession for the design, construction, and management of the motorway. Subsequently, in June 2003, the company was awarded the European tender, initiating the approval process for the preliminary project and signing in 2007 the related Concession Agreement with its Granting Authority, CAL S.p.A..

Construction works for the A35 Brebemi motorway began in 2009 and were completed in 2014.

1990 – 1999	In 1990, the project for the construction of the motorway link is developed. In 1999, the Chambers of Commerce, the Provinces, the Industrial Associations of Brescia, Bergamo, Cremona, and Milan, together with Banca Intesa, establish Brebemi S.p.A. In the same year, Autostrade Lombarde S.p.A., Brebemi's main shareholder, is also founded.
2000 – 2001	In 2001, the construction of Brebemi is included in ANAS S.p.A.'s "2000–2002 Three-Year Program" and in the "Strategic Projects of National Interest." In December 2001, following a tender launched by ANAS – at the time the sole granting authority for the entire Italian motorway network – Autostrade Lombarde submits the "Preliminary Project."
2002 – 2003	In June 2003, Brebemi S.p.A. was awarded the European tender for the design, construction, and management of the infrastructure, thereby initiating the approval process for the preliminary project. On July 24, 2003, ATI and ANAS signed the Concession Agreement.
2004	On March 10, 2004, Autostrada Brescia Milano S.p.A. (also known as Brebemi S.p.A.) is established, with Autostrade Lombarde as its controlling shareholder.
2005	In July 2005, the Interministerial Committee for Economic Planning (CIPE) approves the Preliminary Project.
2007 – 2009	In February 2007, the Granting Authority CAL S.p.A. is established, with which Brebemi signed the Concession Agreement. The project for the construction of BreBeMi is approved by the Granting Authority in December 2008 and, following its submission to the Lombardy Region, receives final approval in June 2009.
2009 – 2014	Construction works begin in July 2009, and the A35 Brebemi motorway is opened to traffic on July 23, 2014.
2017	In 2017, the first two service areas (Adda Sud and Adda Nord), located near Caravaggio, were opened. On November 13, 2017, the Interconnection with the A4 motorway became operational. The ordinary and extraordinary maintenance of BreBeMi is entrusted to Argentea Gestioni S.c.p.A. (O&M Contractor), with which a Global Service contract was signed in March 2013 for a duration of 19 years and 6 months.

The infrastructure's impact on the local area 10 years after opening

On the occasion of its 10th anniversary, Brebemi commissioned a study conducted by AGICI, a company specialized in economic research, aimed at identifying and analyzing the direct and indirect benefits generated by the A35 Motorway.

The **direct benefits** are both economic and environmental, including a reduction in transportation costs (time, fuel, operating expenses), a decrease in CO₂ emissions, noise pollution and accident rates. As for **indirect benefits**, the improved territorial connectivity has had a significant impact on the logistics and production ecosystem, enhancing the competitiveness of existing businesses and attracting new enterprises.

The study shows that the A35 has not only increased traffic flow, but also stimulated investments by large companies in the municipalities served by the motorway, generating significant opportunities for the local economic fabric.

Analysis of the direct and indirect benefits of A35 Brebemi

DIRECT BENEFITS		INDIRECT BENEFITS (cumulative)	
€ 1,2B	generated in the first 10 years of operation (2014–23)	84	establishment of companies with a combined turnover exceeding €25 billion
€ 820M	reduction in travel time	+5%	employment rate in the affected provinces
€ 180M	reduction in transportation costs	+2%	resident population in the areas concerned
€ 162M	avoided emissions and noise pollution	+9%	real estate market value in the affected territories
€ 23M	avoided accidents	+20%	income level of individuals in the interested areas

GENERAL DISCLOSURES

Basis for preparation

[ESRS 2 BP-1] General basis for preparation of sustainability statements

This Sustainability Statement, prepared on a voluntary basis, refers to fiscal year 2024 (01.01.2024–31.12.2024). The document aims to provide information and data related to the A35 Brebemi Group (hereinafter also referred to as “A35 Brebemi” or “the Group”), which consolidates Società di Progetto Brebemi S.p.A. and Argentea Gestioni S.C.p.A.. Since both companies prepare their own financial statements, the scope of consolidation does not reflect that of the financial reporting, which is conducted on an individual basis.

The Sustainability Statement has been drafted taking into account the impacts, risks, and opportunities (IRO) across the Group’s own operations and the entire value chain. Upstream, the analysis focuses on the supply chain for the procurement of goods and services for roadway maintenance; downstream, it considers end-users, meaning users of the A35 Brebemi.

The information contained in the Sustainability Statement has been filtered to protect the company’s competitive advantage. To safeguard confidentiality, details related to CapEx and OpEx associated with specific actions and the expected financial effects on the identified risks and opportunities have been omitted.

[ESRS 2 BP-2] Disclosures in relation to specific circumstances

Time horizons

In accordance with ESRS 1 and for reporting purposes, the A35 Brebemi Group considers the following time horizons: the reporting period of this document, namely fiscal year 2024 (**short term**); the period between 2025 and 2030 (**medium term**); and the period beyond 2030 (**long term**).

Presentation of sustainability information

The primary objective of this report is to present the policies, actions and metrics used to manage the impacts, risks, and opportunities identified through the double materiality assessment. At present, the A35 Brebemi Group has not formalized specific objectives related to the material topics. However, a Strategic Sustainability Plan to 2030 is currently being developed, and its details will be included in the next edition of this Statement.

In line with the European Sustainability Reporting Standards (ESRS), and given that this is the first year of reporting, only data pertaining to fiscal year 2024 is presented. As a result, no comparative information with previous years is provided. Additionally, no entity-specific disclosures have been applied, nor have estimates been made regarding the data presented.

To draft this document, Brebemi primarily referred to the new ESRS, simplifying its interpretation where possible to reflect the size thresholds of the A35 Brebemi Group. Furthermore, in line with the European simplification proposal, the Company has chosen to provide an alignment between the disclosed contents and the Voluntary Sustainability Reporting Standard for non-listed SMEs (VSME).

The disclosure in accordance with Article 8 of Regulation (EU) 2020/852 of the European Parliament and Council (the Taxonomy Regulation) will be included in the next reporting cycle.

Governance

[ESRS 2 GOV-1] The role of the administrative, management and supervisory bodies

Composition and diversity of the Board of Directors and Board of Statutory Auditors

Società di Progetto Brebemi S.p.A. and Argentea Gestioni S.C.p.A. adopt a traditional governance model, whereby the Board of Directors acts as the administrative body and the Board of Statutory Auditors as the supervisory body.

The current Board of Directors of Società di Progetto Brebemi S.p.A. was appointed on 27 April 2023 by the Ordinary Shareholders' Meeting and will remain in office until the approval of the 2025 Financial Statements. The Board is composed of 8 members, with female representation accounting for 25%.

Composition of the Board of Directors (Società di Progetto Brebemi S.p.A.)			
Name	Gender	Role and responsibilities	Position
Joaquin Gago de Pedro	♂	Chairman	Executive
Matteo Milanese	♂	General Manager and Director	Executive
Giuseppe Bonomi	♂	Deputy Chairman and Director	Executive
Ariela Caglio	♀	Director	Non-executive
Pablo Oliviera Massò	♂	Director	Non-executive
Ruggero Magnoni	♂	Director	Non-executive
Rafael Moreno Cela	♂	Director	Non-executive
Stefania Petruccioli	♀	Director	Non-executive

The Board of Directors of Argentea Gestioni S.C.p.A., composed of 4 members, was appointed by the Shareholders' Meeting held on 27 April 2023 and will remain in office until the approval of the 2025 Financial Statements.

Composition of the Board of Directors (Argentea Gestioni S.C.p.A.)			
Name	Gender	Role and responsibilities	Position
Joaquin Gago de Pedro	♂	Chairman	Executive
Matteo Milanese	♂	General Manager and Director	Executive
Alberto Algisi	♂	Director	Non-executive
Diego De Lapuerta Montoya	♂	Director	Non-executive

The governing bodies steer A35 Brebemi toward sustainable success, ensuring oversight of ethical principles and transparency within the Group. Corporate values and rules of conduct are further defined in the Code of Ethics and Conduct.

The supervisory function for Società di Progetto Brebemi S.p.A. is carried out by the Board of Statutory Auditors, appointed by the Ordinary Shareholders' Meeting on 29 April 2022 and in office until the approval of the 2024 Financial Statements. The Board is composed of 5 members, 40% of whom are women.

Name	Gender	Role and responsibilities
Angela Salvini	♀	Chairwoman
Paolo Panteghini	♂	Statutory Auditor
Pietro Paolo Rampino	♂	Statutory Auditor
Flavio Gnechi	♂	Statutory Auditor
Giovanni Sanga	♀	Statutory Auditor

The Board of Statutory Auditors of Argentea Gestioni S.C.p.A. is composed of 3 members who carry out the supervisory function, including the Chairman and Statutory auditors.

Name	Gender	Role and responsibilities
Paolo Panteghini	♂	Chairman
Leonardo Cossu	♂	Statutory Auditor
Flavio Gnechi	♂	Statutory Auditor

The Group's governing and supervisory bodies possess extensive experience and expertise in the motorway infrastructure and mobility sector. Their in-depth knowledge of the field and strong innovation capabilities ensure a strategic approach, contributing to the achievement of the Group's continued growth and objectives.

Roles and responsibilities

The **Board of Directors** of Società di Progetto Brebemi S.p.A. and Argentea Gestioni S.C.p.A. defines the vision and overall strategic direction of the company, establishing the nature and level of risk deemed compatible with the achievement of the objectives set out in the **Strategic Plan**. Starting in 2025, it will also validate the annual Sustainability Statement, which outlines the material impacts, risks, and opportunities as well as the progress made in addressing them.

The administrative body is supported by the Group's Management, which approves the results of the double materiality assessment and provides guidance for the preparation of the Sustainability Statement, overseeing the entire process. The **Board of Statutory Auditors** of both companies supervises the actions of the directors, ensuring that the company's management and administration are conducted in compliance with applicable laws and the articles of association. Within the scope of ESG matters, the Board of Statutory Auditors does not yet play an active oversight role.

Capabilities and competencies related to sustainability matters

The members of the Board of Directors and Management regularly participate in congresses, events, and conferences addressing issues related to sustainable mobility. However, to date, a structured process for the development of sustainability-related competencies has not yet been formalized. The company acknowledges the importance of this area and will consider implementing training programs aimed at strengthening the skills of its highest governance bodies.

[ESRS 2 GOV-2] Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

With the annual approval of the Sustainability Statement by Management, the Board of Directors validates the results of the double materiality assessment as well as the Policies, Actions, and Metrics adopted to address the relevant IROs. The Board is informed by Management through a dedicated Information Note. *For further information: ESRS 2 SBM-3.*

[ESRS 2/E1 GOV-3] Integration of sustainability-related performance in incentive schemes

A35 Brebemi integrates sustainability-related performance into the definition of variable compensation for Management. Specifically, targets related to the health and safety of both employees and end-users are included. On environmental matters, a short-term monetary incentive has been introduced, conditional upon achieving specific goals and indicators, including the reduction of Scope 1 and 2 GHG emissions. Furthermore, a portion of the variable compensation is linked to the hydrogeological risk assessment, the percentage of recycled asphalt used in the motorway's maintenance, and biodiversity. Regarding social aspects, Management includes targets related to community initiatives and diversity and inclusion strategies.

[ESRS 2 GOV-4] Statement on due diligence

Since Aleatica will be required to prepare a statement on due diligence under the Corporate Sustainability Due Diligence Directive (CS3D), a dialogue process has been initiated involving procurement managers from all Business Units, including A35 Brebemi. **With the aim of identifying, preventing and mitigating negative externalities in its supply chain from a social and environmental perspective, a process is being defined to integrate ESG criteria into the evaluation and selection of suppliers.** The Group is aware that failure to address these aspects could result in reputational and, consequently, financial risks.

[ESRS 2 GOV-5] Risk management and internal controls over sustainability reporting strategy

A35 Brebemi's ESG Working Group consolidates qualitative and quantitative information provided by various operational functions to prepare the Sustainability Statement and, at the same time, to provide the necessary information contribution to the Holding Company. A structured procedure for sustainability reporting, similar to that currently in place for the Financial Statements, is being developed and will be implemented for the next reporting cycle to formalize risk management and internal controls.

[ESRS 2 SBM-1] Strategy, business model and value chain

Business model and value chain

The construction of the Brescia-Milan motorway link was carried out through private financing (project financing). The necessary resources were provided by the Shareholders and obtained through bank financing. The investment will be repaid through the collection of motorway tolls. This model guarantees users a high-quality project, both in terms of construction as well as management and financial aspects. The unit toll rate, which varies based on the section type and vehicle class, is updated annually by a Decree of the Ministry of Infrastructure and Transport, in agreement with the Ministry of Economy, following the parameters established in the Concession Agreement signed at the time of the concession.

Below is a representation of the A35 Brebemi Group's value chain, reflecting upstream and downstream activities as well as those related to its own operations. *For further information: Corporate Profile.*

Category	Phase	Description
Upstream	Procurement of goods and services	Purchase of materials and services for highway maintenance.
	Granting Authority	Verification by CAL S.p.A. of efficiency-related parameters pursuant to the Concession Agreement.
Own Operations	Toll collection and revenue management	Collection of tolls to amortize construction and maintenance costs of the route.
	Traffic and safety	Comprehensive traffic monitoring system and management of emergency requests.
	Maintenance	Maintenance of infrastructure functionality through upkeep activities.
	Customer service	Assistance services and real-time information dissemination to route users.
Downstream	Use of infrastructure	Services ensuring the health and safety of end users and measurement of user satisfaction.
	Service Areas	Fuel stations, parking, and rest areas, directly managed by Chef Express and Autogrill.

[ESRS 2 SBM-2] Interests and views of stakeholders

Brebemi is actively committed to engaging in dialogue and maintaining ongoing relations with its various stakeholder groups, both internal and external. Below the main categories of stakeholders and their respective engagement methods are outlined.

Stakeholder category		Engagement method
Internal	Management and Holding	Company website; company platform Workplace; weekly periodic meetings for each Business Unit; periodic meetings with counterparts in the Holding.
	Employees	Company website; Workplace; weekly periodic meetings for each Business Unit; periodic meetings of some employees with counterparts in the Holding; suggestion and proposal box on ESG topics.
External	Investors and Shareholders	Annual investor meeting where company trends and results are presented and illustrated; semi-annual Investor Report.
	Suppliers, contractors, subcontractors, partners	Tenders; periodic meetings on safety issues and work progress, where applicable, and homologation questionnaires.
	Local communities	Service Charter; company website; dissemination of information about the territory (e.g., archaeological finds and flora-fauna interest information) at Service Areas.
	Public bodies and authorities	Service Charter; company website; dissemination of information about the territory (e.g., archaeological finds and flora-fauna interest information) at Service Areas.
	Users	Service Charter; company website; dissemination of information about the territory at Service Areas; Variable Message Panels (VMP); Customer Assistance Point (CAP); Toll-free number.
	Business customers	Service Charter; website; dissemination of information about the territory at Service Areas; Variable Message Panels (VMP); Customer Assistance Point (CAP); Toll-free number; dedicated discounts.

The interests and opinions of a selected panel of strategic stakeholders were also considered in the double materiality analysis process. Through individual interviews, three external experts – representing the categories of supplier, industry association, and granting authority – were engaged to gather feedback and validate the results obtained. Specifically, the interviews were preceded by the distribution of a brief preparatory guide to ensure a focused and informed discussion.

These contributions were integrated into the analysis and presented to Management during the results validation meeting. This approach ensures that stakeholders' perspectives and interests are adequately incorporated into the identification of impacts, risks, and opportunities (IRO), strengthening the alignment between the Group's strategy and stakeholder expectations.

[ESRS 2 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

The table below provides a brief description of the IROs identified as material in the double materiality analysis, with indications of their distribution along the value chain and the expected time horizons.

ESRS Topics		ESRS Subtopics	IRO*	Description	Value chain	Time horizon
ENVIRONMENT	E1 Climate Change	Climate change adaptation	Positive impact	Positive territorial impacts resulting from adaptation measures	Own operations	Long term
			Risk	Costs related to extreme weather events and reputational damage due to service disruption	Own operations	Medium term
		Climate change mitigation	Negative impact	Negative impacts on climate change due to greenhouse gas emissions along the value chain	Entire value chain	Long term
			Risk	Reputational risk from failure to achieve the Holding’s mitigation targets	Own operations	Medium term
		Energy	Positive impact	Positive impacts from the purchase of Guarantees of Origin		
			Negative impact	Negative impacts from energy consumption along the value chain	Entire value chain	Long term
			Opportunity	Financing opportunities and reputational benefits linked to energy efficiency improvements	Own operations	Medium term
	E2 Pollution	Pollution of air	Negative impact	Negative impacts due to pollutant emissions from ordinary maintenance activities and the circulation of company and user vehicles	Entire value chain	Long term
	E4 Biodiversity and Ecosystems	Land-use change	Negative impact	Negative impact caused by the fragmentation of corridors and degradation of pre-existing ecosystems	Own operations	Short term
		Pollution	Negative impact	Negative impacts on fauna and plant species due to pollutant emissions generated by transport vehicles	Entire value chain	Long term
			Risk	Reputational damage in the event of negative impacts on fauna and plant species caused by pollutant emissions from transport vehicles	Entire value chain	Medium term
		Species population size	Positive impact	Positive impacts on biodiversity thanks to the presence of wildlife corridors	Own operations	Short term
		Land degradation	Negative impact	Negative impact on the territory due to increased impervious surfaces, also linked to construction activities	Own operations	Long term
	E5 Resource use and circular economy	Resource inflows, including resource use	Negative impact	Environmental impact associated with the use of virgin substances and raw materials instead of recycled ones	Upstream; Own operations	Long term

			Opportunity	Reputational benefits and cost savings from the reuse of a percentage of asphalt	Upstream; Own operations	Long term
		Resource outflows related to products and services	Negative impact	Negative environmental impact in the absence of waste recycling strategies	Upstream; Own operations	Long term
		Waste	Negative impact	Negative impact caused by littering and improper waste management along the motorway	Downstream	Medium term
			Risk	Reputational damage, fines, penalties, and clean-up costs associated with illegally dumped waste	Own operations; Downstream	Medium term
SOCIAL	S1 Own workforce	Health and safety	Positive impact	Reduction of the internal injury rate due to training extended to all employees beyond mandatory requirements	Own operations	Long term
			Risk	Fines and reputational damage due to workplace accidents, and risk of psychological repercussions for workers	Own operations	Medium term
		Gender equality and equal pay	Positive impact	Increased employee satisfaction through the promotion of gender equality	Own operations	Short term
		Training and skills development	Positive impact	Positive impact on workers through upskilling and reskilling programmes	Own operations	Short term
		Diversity	Opportunity	Increased employee loyalty and attractiveness thanks to a diverse and inclusive environment and culture	Own operations	Medium term
	S2 Workers in the value chain	Working conditions, Equal treatment and opportunities for all	Negative impact	Negative impacts if suppliers do not ensure adequate working conditions or equal treatment	Upstream	Long term
			Risk	Reputational damage due to the lack of a process for identifying negative externalities	Upstream	Medium term
	S4 Consumers and end users	Freedom of expression	Positive impact	Positive impact related to the protection of anonymity and free expression of opinion	Own operations	Short term
		Access to (quality) information	Positive impact	Positive impacts on customer satisfaction through feedback collection and complaints management	Own operations; Downstream	Medium term
			Risk	Reputational risks from failure to share timely information and risk of non-compliance with user rights regulations	Downstream	Medium term
		Health and safety	Opportunity	Increased user attraction in case of a lower accident rate	Downstream	Long term
GOVERNANCE	G1 Business conduct	Corporate culture	Positive impact	Positive impact generated by the application of company values and principles	Own operations	Medium term
			Risk	Reputational risks and costs arising from potential cyberattacks	Own operations	Medium term
		Protection of whistle-blowers	Risk	Fines and penalties for failing to protect whistleblower anonymity	Own operations	Medium term
		Corruption and bribery	Risk	Fines and reputational damage related to proven cases of active or passive corruption	Own operations	Long term

*It should be noted that not all subtopics have associated risks and opportunities related to an impact, as they were not considered above the materiality threshold.

Impact, risk and opportunity management

[ESRS 2 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

The European Sustainability Reporting Standards (ESRS) requires companies to determine the sustainability matters that are most relevant across their value chain in order to guide the reporting process. To enhance comparability and usability of the information, the standard mandates the use of a predefined list of sector-agnostic topics as a starting point for identifying the relevant environmental, social and governance issues applicable to the business.

Based on this list, the A35 Brebemi Group identified the most significant IROs for the organization across the value chain, considering one or both of the following perspectives:

- **impact materiality (inside-out):** the actual or potential, positive or negative impacts generated by the company on the external environment and people;
- **financial materiality (outside-in):** the actual or potential risks and opportunities arising from the external context that may have financial effects on the company.

To carry out the double materiality assessment, A35 Brebemi conducted an analysis of the sustainability context in which it operates, taking into account the policies, regulations, and trends to which it is most exposed, as well as its value chain. This context analysis was complemented by a benchmarking



exercise aimed at identifying the material topics for A35 Brebemi's main peers, both in Italy and internationally.

Based on the gathered inputs, qualitative and quantitative scores were assigned with the most impacted functions within the Group, following the methodology outlined in ESRS 1 (Double Materiality), with a rationale provided for each IRO. The assessment used a scale from 1 to 5 and evaluated the following aspects:

- **Significance of negative and positive impacts:**
 - Current negative impacts: assessed on the basis of severity (magnitude, scope, and irremediability).
 - Current positive impacts: evaluated according to their magnitude and scope.
 - Potential negative impacts: assessed based on severity (magnitude, scope, and irremediability) multiplied by the likelihood of occurrence.
 - Potential positive impacts: evaluated based on magnitude and scope multiplied by the likelihood of occurrence.
- **Magnitude of risks and opportunities:** determined by considering the financial impact multiplied by the likelihood of occurrence.

In parallel, a preliminary assessment of the financial impact of risks and opportunities was carried out to specify their potential effects on the balance sheet, financial performance (e.g., revenues, EBITDA), cash flows, access to financing, and cost of capital. The materiality threshold was set around the 50th percentile for both the impact assessment (50th) and the financial assessment (44th), ensuring a balanced and consistent view of corporate priorities.

To remove self-referential bias from the process, A35 Brebemi involved three key stakeholders. For more information: ESRS 2 SBM-2. The results of the double materiality analysis were presented to Management and subsequently submitted to the Board of Directors.

The double materiality assessment process in brief

Phase	Activity	Purpose and outcomes
Understanding the context	Megatrend analysis	Megatrend analysis aimed at identifying the policies, regulations, and trends to which the company is most exposed.
	Business model	Sector analysis, including the company's business model and strategy, as well as an assessment of the value chain – upstream, downstream, and within its own operations.
	Benchmark analysis	Identification of relevant topics for A35 Brebemi's main peers, both in Italy and internationally.
Identification of IROs	Preliminary assessment	Preliminary assessment with the Group's Technical Department of the sustainability matters covered by the thematic standards proposed by EFRAG.
	Internal interviews	Individual interviews with the most impacted functions to validate the identified IROs, integrating and adjusting them based on the feedback received.
Definition of the materiality threshold	Evaluation	Evaluation of IROs' significance and magnitude through the assignment of qualitative and quantitative scores and the definition of thresholds based on gathered inputs.
Validation	External validation	Individual interviews with key stakeholders representing the main stakeholder categories of the Group.
Selection of datapoints	Internal validation	Presentation of results to Management and validation on 08/11/2024.
	Identification of reporting requirements	Start of the reporting process, through the identification of the main qualitative and quantitative data to be disclosed for the FY24 reporting period.

[ESRS 2 IRO-2] Disclosure requirements in ESRS covered by the undertaking's sustainability statement

The disclosures were selected based on the results of the double materiality assessment. For each relevant topical standard, the company reports on Policies, Actions and Metrics, excluding non-applicable or voluntary indicators, in accordance with the related Minimum Disclosure Requirements (MDR) and corresponding application requirements.

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ENVIRONMENTAL INFORMATION

ESRS E1 – Climate change

Impacts, risks, opportunities and management policies

[ESRS E1-1] Transition plan for climate change mitigation

A35 Brebemi actively contributes to the Mitigation Strategy defined by Aleatica, aligning with the identified objectives and implementing specific measures to reduce its GHG emissions. To this end, it monitors its annual results to ensure the continuous improvement of its emissions performance.

Aleatica's Mitigation Strategy is structured around ambitious goals: reducing its greenhouse gas emissions by 42% by 2030 and achieving climate neutrality for Scope 1 and Scope 2 emissions by 2050. Scope 1 refers to direct emissions generated by sources owned or controlled by the organization, while Scope 2 refers to indirect emissions resulting from purchased

energy. In order to achieve these targets, several decarbonization levers have been identified, including the gradual replacement of the corporate fleet with hybrid or electric vehicles, the implementation of energy efficiency initiatives, and the purchase of energy from renewable sources.

As regards indirect emissions generated along the value chain (Scope 3), a refinement of the calculation methodology is underway in accordance with international reference standards, including the Greenhouse Gas Protocol (GHG Protocol) and the ISO 14064-1:2018 standard on carbon footprint. To date, Aleatica is focusing on the most relevant emission categories, including GHG emissions resulting from infrastructure use by users, material consumption for maintenance, and waste management. Looking ahead, the Group plans to define and integrate specific targets for Scope 3 into its strategy.

[ESRS E1 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Thanks to the hydraulic assessment of watercourse crossing structures, A35 Brebemi has identified a number of potential physical climate risks that could have significant financial repercussions on its road infrastructure. The intensity, frequency, and variability of heavy rainfall increase the risk of flooding and pavement instability, which may result in costs and reputational damage related to potential service disruptions.

Other physical climate risks, particularly focusing on Europe, emerge from the analysis conducted by the Aleatica Group in its Climate Change Report, the disclosure aligned with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD). These include the increased frequency and intensity of wind and mist, as well as the rise in heatwaves. Such extreme events could cause significant damage to infrastructure, operational disruptions, increased maintenance costs, and risks to health and safety.

While physical climate risks stem from the direct impacts of climate change, including extreme weather events or gradual changes (e.g. rising temperatures), transition risks concern the economic and social effects linked to the shift towards a low-carbon economy. **Among the transition risks identified by Aleatica are potential changes in regulations and policies, technological advancements, and new market trends.** These risks are managed through the Risk and Opportunity Management System, an institutional process led by the Board of Directors, overseen by the Audit and Risk Committee, and supported by Senior Management.

The periodic identification of climate risks will serve as the basis for implementing mitigation actions and assessing the resilience of the business model in the face of climate change.

[ESRS E1 IRO-1] Description of the processes to identify and assess material climate-related impacts, risks and opportunities

The A35 Brebemi Group has implemented a structured process to define climate change-related IROs. The analysis was based on discussions with the Technical Department and on internal documentary evidence (e.g. technical design reports, hydraulic risk assessments, integrated management system), as well as documentation related to Aleatica (e.g. Climate Change Report, Sustainability Report).

Climate change adaptation

In relation to adaptation, positive impacts on the territory emerge thanks to the presence of works carried out during the design and construction phases, aimed at ensuring service continuity and responding to potential climate-related events (e.g. flooding). However, in addition to the physical climate risks reported in Disclosure E1 SBM-3, the analysis also highlights potential risks related to costs arising from extreme weather events and reputational damage due to service interruptions.

Climate change mitigation and energy

With reference to mitigation, an environmental impact has been identified due to GHG emissions – and therefore energy consumption – along the entire value chain. The analyses carried out by A35 Brebemi on **direct (Scope 1) and indirect (Scope 2) emissions**, together with Aleatica's initial quantification of **Scope 3 emissions**, highlight that the latter represent the predominant share of the Group's carbon footprint. These emissions result from the use of the infrastructure by users. A reputational risk may arise for A35 Brebemi in the event of failure to meet the mitigation targets set by Aleatica in its Mitigation Strategy.

However, the Group generates positive environmental impacts through the purchase of Guarantees of Origin (GO) and may benefit from potential financing opportunities and reputational gains linked to energy efficiency improvements.

[ESRS E1-2] Policies related to climate change mitigation and adaptation

The Group adopts a number of policies and tools to manage climate change-related IROs. This need is addressed by the Code of Ethics and Conduct and the Sustainability Policy – developed by Aleatica and uniformly applied across all its Business Units – as well as A35 Brebemi's Corporate Policy.

Code of Ethics and Conduct

The document sets out the guiding principles and values for the operations of all Aleatica subsidiaries, including A35 Brebemi. The purpose of the Code is to guide day-to-day behavior and support decision-making aligned with the company's values: **(i) Safety First, (ii) Social and Environmental Sustainability, (iii) Transparency and Corporate Governance, (iv) Service Excellence, and (v) Passion for the Team.**

Among the topics addressed, the Code promotes environmental protection through a preventive approach aimed at minimizing the negative impacts of its activities and tackling climate change. **In particular, the Group is committed to reducing its carbon footprint by monitoring both direct and indirect GHG emissions.**

The Code applies to all individuals involved in the activities of the Group's companies, including directors, managers, employees, and non-subordinate collaborators such as consultants, intermediaries, and suppliers, as well as third parties engaged in contractual relations with the Group. Everyone is required to comply with the principles outlined, contributing their technical, professional, and ethical expertise to support the achievement of corporate objectives. The document is published on the company's website and made available to all stakeholders.

Sustainability Policy

In order to manage the material IROs related to climate change mitigation and adaptation, Aleatica has defined the Sustainability Policy, committing to: (i) assess climate risks to develop targeted and effective **adaptation solutions**, (ii) contribute to the **reduction of GHG emissions** through a transition plan, and (iii) pursue **energy efficiency** through concrete projects.

Reviewed and approved by Aleatica's Board of Directors, the Sustainability Policy applies to all Group companies and is made available to employees via the corporate Intranet.

Corporate Policy

In line with its commitment to reducing energy consumption, A35 Brebemi has adopted the Corporate Policy, placing environmental protection at its core. The Policy applies to the Group and establishes an ISO 14001:2015 certified environmental management system, which enables the monitoring and optimization of energy performance, the mitigation of negative impacts, and compliance with applicable regulations. Management is responsible for the implementation and monitoring of said Policy, which is communicated to all company personnel.

[ESRS E1-3] Actions in relation to climate change policies

In order to manage the identified IROs, the Group has undertaken a series of initiatives and projects aimed at strengthening the resilience of its infrastructure and reducing both its direct and indirect emissions.

Initiatives for climate change adaptation

Adaptation measures

Considering the significant damage and financial repercussions that physical climate risks can cause to infrastructures, the A35 motorway was designed and built with an approach aimed at preventing potential critical issues. The main solutions adopted include:

- **viaducts over major watercourses with dual independent structures**, the design of these viaducts ensures greater infrastructure resilience by maintaining service continuity in the event that one of the two structures is damaged;
- **optimized positioning and spacing of piers**, this intervention avoids interference with the incised riverbed of watercourses, i.e. the area between the riverbanks;

- **closely spaced interchanges**, the configuration of interchanges ensures corridor continuity in the event of a blockage along a section, by means of alternative routes already identified and shared with the Prefectures and relevant territorial authorities;
- **stormwater detention basins**, the installation of basins along the route allows the interception and attenuation of excess water flow following heavy rainfall and flooding;
- **sizing of water lifting systems**, the intervention involves installing a number of pumps sufficient to ensure system redundancy and protect the territory from flooding events.

Hydrogeological risk assessment

In response to the increase in extreme weather events, the Group has launched a study to assess the vulnerability of the motorway link and manage hydrogeological risk related to heavy rainfall and rising river levels. Spanning across the 2024–2026 period, the study is structured into three phases:

- **assessment of hydrogeological parameters**, in 2024, the first phase involved an analysis of the motorway link's vulnerability, using (i) hydrological and (ii) hydraulic simulations developed during the A35 design phase, tested under stress conditions. The hydrological simulations consider potential increases of more intense precipitation, while the hydraulic ones assess possible increases in river flow rates;
- **identification of hydrogeological risks**, in 2025, the focus will shift to mapping the hydrogeological risk. Activities will include comparing the hydraulic risk mapping charts used during the design phase with the current flood and risk maps. Additionally, a verification of hydraulic risk will be carried out at minor structures, culverts, and trench sections by reviewing design documentation and risk maps to identify any critical issues;
- **intervention solutions in response to risks**, the final phase, scheduled for 2026, consists of defining solutions to reduce the identified risks through preventive interventions in the most exposed areas. Sections at higher hydrogeological risk will undergo further analysis to assess the current mitigation measures and identify possible improvements to prevent damage to the motorway infrastructure.

Monitoring systems

The adaptation of the motorway infrastructure to climate change is also implemented through an integrated system of advanced technologies and solutions designed to ensure timely and effective management of emergency situations. The control room is equipped with systems for real-time monitoring of external conditions along the entire motorway section, supported by a video surveillance system (CCTV) that allows traffic supervision and prompt intervention in case of exceptional events or critical situations.

To further enhance the management of potential adverse climate conditions, weather stations have been installed along the route to send timely alert signals. Additionally, emergency SOS call boxes have been positioned at regular intervals of 2,000 meters along the motorway.

Initiatives for the mitigation of direct GHG emissions (Scope 1 e 2)

The progressive replacement of the vehicle fleet with hybrid-petrol cars

As part of its Mitigation Strategy, A35 Brebemi has launched a program to reduce Scope 1 GHG emissions generated by its corporate vehicle fleet. This initiative aims to promote more sustainable mobility by reducing the environmental impact of its operational activities. The progressive replacement began with company cars designated for mixed use. In 2020, the corporate fleet included 43 vehicles, almost all diesel-powered, with only one hybrid car. **By the end of 2024, thanks to the concrete implementation of the replacement plan, the number of hybrid cars increased to 19 out of a total of 40 vehicles, representing approximately 48% of the corporate car fleet.** Considering the entire fleet, including vans and construction vehicles, the percentage of hybrid or fully electric vehicles reaches 34%, with 21 units out of a total of 62.

The Group has set the objective of almost complete replacement of the corporate car fleet by 2030 and, where compatible with service requirements, plans to include other vehicles in the transition, including those used for maintenance. An additional step was taken in 2024 with the installation of the first charging station for plug-in electric vehicles at the Fara Olivana parking area, to facilitate and promote the adoption of electrified vehicles within the company fleet.

Lighting systems with LED technology

To mitigate the environmental impact resulting from energy consumption and to seize reputational opportunities linked to efficiency actions, the replacement of lighting fixtures installed along the motorway section with LED technology lamps is currently underway.

Said technology offers significant advantages in terms of sustainability and safety. The new systems ensure a longer operational lifespan compared to previous technologies, reducing the need for maintenance interventions and related environmental impacts. Moreover, this technology results in lower energy consumption due to a lower nominal power rating, thereby contributing to the reduction of GHG emissions.

Additionally, the use of light sources with a color rendering index above 70, typical of outdoor lighting, improves obstacle visibility distance and increases safety for vehicles in transit. The white light emitted by the lamps provides greater visual comfort, aligning with the physiological perception of the human eye.

In 2020, the first year these interventions were launched, 58 systems were replaced. **By 2024, the number had increased to 78 LED lighting systems (+34%).**

Green Energy supply contracts

In order to reduce its Scope 2 emissions, A35 Brebemi has, in recent years, signed contracts for the supply of energy entirely sourced from certified renewable sources, covering offices, the maintenance center, and all delivery points along the motorway section.

This initiative began in February 2021 with the subscription to ENEL Green option for the energy supply of the Maintenance Center and the delivery points along the motorway axis, representing approximately 88% of the total supply. In July 2022, the option was extended to cover the energy needs of the Brescia offices through a supply contract with A2A. Subsequently, with the introduction of the new supplier Edison, this choice was confirmed and further consolidated. **As of today, 100% of the Group's energy supply comes from certified renewable sources.**

Photovoltaic panel installation

With the objective of self-producing and consuming renewable electricity, in December 2024 two pilot photovoltaic (PV) systems under 20 KW were installed. The first system was installed at the Calcio toll station with an installed capacity of 19.25 KW, and the second along the motorway at km marker 11+780 with a capacity of 19.8 KW. These systems are designed for self-consumption to reduce daytime energy usage and lower energy absorption from the national grid, initiating a path towards the energy self-sufficiency of the infrastructure. Feasibility studies and evaluations are currently underway for the installation of additional PV systems.

Initiatives for the mitigation of indirect GHG emissions (Scope 3)

Discount schemes dedicated to green users

The quantification of emissions related to motorway construction and management activities conducted by Aleatica indicates that users constitute the primary source of emissions for the highway infrastructure. To mitigate this impact, A35 Brebemi, in its role as motorway concessionaire, does not have direct means to influence the type of circulating vehicle fleet. Nevertheless, it has developed initiatives aimed at promoting sustainable mobility and encouraging the adoption of low-emission vehicles. **Among these, loyalty programs targeting users of green vehicles stand out.** These programs include specific economic incentives.

The initiative, launched on the A35 and the A58, in collaboration with Telepass and active since June 2020, provides a flat 30% discount on the total motorway toll for trips made by light full-electric vehicles and heavy vehicles powered by Liquefied Natural Gas (LNG).

Charging stations for electric vehicles and Liquefied Natural Gas (LNG) refueling stations

With the aim of encouraging the use of low-emission vehicles and thereby mitigating the environmental impact of user-generated emissions, A35 Brebemi has focused on implementing infrastructures dedicated to sustainable mobility. Since March 2021, electric vehicle charging stations have been activated at the Adda Nord and Adda Sud Service Areas. In collaboration with Tesla, each service area has been equipped with **4 fast-charging stations of 250 kW** dedicated exclusively to Tesla vehicles and 1 AC charging station of 10 kW, offering free energy for universal electric vehicle charging.

Since April 2023, in collaboration with Enel X, **4 new electric vehicle charging stations** with open access for multi-brand vehicles have been operational in each service area. These devices allow **fast charging with a power output of up to 300 kW**. To date, the network includes a total of **2 charging stations of 10 kW and 16 fast-charging stations (250 kW)** along the 62 km of the motorway section.

In collaboration with Socogas – an Italian company specializing in the distribution of alternative gases and sustainable fuels – the **first LNG refueling stations** on the Italian toll motorway network were commissioned. LNG represents a sustainable solution for heavy transport, enabling a significant reduction in CO₂ emissions (-15% compared to traditional fuels) and nitrogen oxides (-50%), while eliminating particulate matter and sulfur oxides, and offering economic savings of up to 43% compared to diesel.

The Arena del Futuro

To contribute to the decarbonization of the transport sector, Brebemi has taken an active role in researching innovative technologies aimed at the electrification of the motorway link, through the implementation of Electric Road System (ERS) technology to create an electric induction motorway.

Following in-depth analyses and studies, the Wireless Power Transfer (WPT) system emerged as the optimal solution. **This technology enables electric vehicles to recharge while driving on dedicated lanes, thanks to coils embedded beneath the asphalt that directly transfer the necessary energy to vehicles.** For the purpose of the study, the Group engaged a number of strategic industrial partners to manage various aspects, including the development and integration of the WPT system, the power supply, the distribution, the asphalt, and communications.

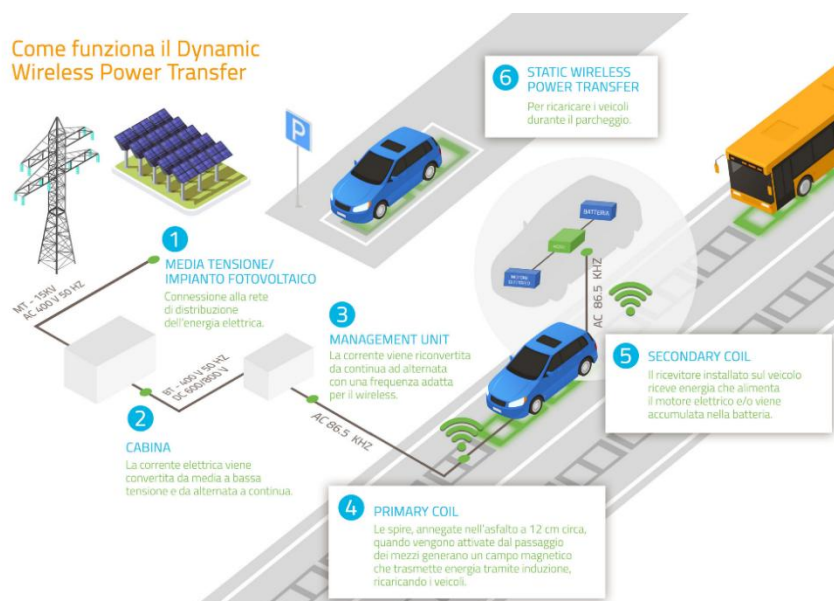
The project involved the construction of a **1,032 meter experimental loop powered with a capacity of 1 MW, located in a private area of the A35 motorway near the Chiari Ovest exit.**

Dynamic wireless charging technologies have been tested on various types of vehicles. Advanced connectivity through IoT technologies is employed to ensure maximum road safety and productivity for commercial vehicles. The study also includes the optimization of road pavement to enhance its durability without affecting the efficiency of inductive charging, as well as an assessment of the environmental benefit.

In 2024, the project was followed by new pilot initiatives, such as the analysis for the installation of the system in Genoa for an urban public transport line, in collaboration with Genoa's Public Transport Company, and for the implementation of a wireless charging facility at Orio al Serio Airport in Bergamo. In addition, discussions are ongoing with Aeroporti di Roma and ATAC Roma for further applications of the system.

In collaboration with IVECO – an Italian company specialized in the production of industrial vehicles, buses, and special-purpose vehicles – and Electreon – a leading company in the development of wireless charging infrastructure for electric vehicles – a new fully electric commercial vehicle has been equipped and subjected to initial testing. With Stellantis – a multinational vehicle manufacturing group – the development of the technology continues to ensure the system's multimodal compatibility and optimize its integration with other on-board technologies. In parallel, together with Stellantis and Electreon, an Advanced Driver Assistance System (ADAS) is being developed to improve the alignment between the vehicle and the infrastructure.

In the first half of 2024, **updates were introduced to both static and dynamic charging systems**, including improvements in energy transmission, replacement of components, and resolution of communication issues between ground systems and vehicles.



[ESRS E1-4] Targets related to climate change mitigation and adaptation

The A35 Brebemi Group aligns with the GHG emission reduction targets set by Aleatica. Furthermore, a Business Plan has been developed with the Holding, in which specific deadlines have been established for the Group to conduct a climate risk analysis, aimed at assessing the potential impact of climate change on its infrastructure and operations.

[ESRS E1-5] Energy consumption and mix

In 2024, A35 Brebemi's energy consumption amounted to approximately 6,700 MWh, with 71% stemming from renewable energy and the remaining 29% from fossil fuels¹. The renewable energy consumed corresponds entirely to the electricity purchased and used for the Brescia offices, the Maintenance Center in Fara Olivana con Sola, and the entire motorway section. In fact, the entire electricity supply is sourced from 100% certified renewable sources.

As for energy derived from fossil sources, the main share (96%) is represented by the consumption of fuels derived from crude oil and petroleum products. The remaining portion comes from district heating and cooling supplied to offices by the waste-to-energy plant in Brescia.

Energy consumption and mix	2024
	MWh
Total energy consumption	6,714.97
Total energy consumption from fossil sources	1,965.57
Fuel consumption from crude oil and petroleum products	1892.32
Consumption of heat and cooling from fossil sources, purchased or acquired	73.25
Share of fossil sources out of the total (%)	29%
Total energy consumption from renewable sources	4,749.4
Renewable electricity purchased	4,749.4
Share of renewables out of the total (%)	71%

[ESRS E1-6] Gross Scope 1, 2, 3 and total GHG emissions

In 2024, A35 Brebemi's total GHG emissions amounted to 489 tCO₂eq and are broken down as follows:

- **Scope 1:** 476.13 tCO₂eq, resulting from direct emissions related to mobile combustion;
- **Scope 2 (location-based):** 1,132 tCO₂eq, calculated based on the average energy mix of the supply grid;
- **Scope 2 (market-based):** 13.16 tCO₂eq, reflecting actual emissions based on the purchase of energy from specific sources².

Gross GHG emissions	2024
	tCO ₂ eq
Gross Scope 1 GHG emissions	476.13
Gross Scope 2 GHG emissions (location-based)	1,132.11
Gross Scope 2 GHG emissions (market-based)	13.16
Total GHG emissions (location-based)	1,608.25
Total GHG emissions (market-based)	489.29
GHG emissions intensity	tCO ₂ eq/EUR
Total GHG emissions (location-based)/Net revenue	11.60
Total GHG emissions (market-based)/Net revenue	3.53

¹ For the calculation, the Group used the fuel conversion factors provided by the Department for Energy Security & Net Zero (2024).

² To calculate market-based emissions, the Group does not have primary data on the origin of the energy used for district heating and district cooling. Therefore, it applied the same emission factors used in the location-based calculation.

ESRS E2 – Pollution

Impacts, risks, opportunities and management policies

[ESRS E2 IRO-1] Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

The double materiality analysis process led to the identification of an impact on the environment and people stemming from air pollutant emissions. These emissions occur internally through the circulation of company vehicles and downstream through the vehicular traffic of infrastructure users³.

Pollutant emissions generated by the transport sector are confirmed by the Italian Institute for Environmental Protection and Research (ISPRA)⁴, which identifies the main pollutants as nitrogen oxides (NOx), non-methane volatile organic compounds (NMVOCs), particulate matter (PM), lead (Pb), benzene (C6H6), and sulfur oxides (SOx).

[ESRS E2-1] Policies related to pollution

The Group adopts policies and tools aimed at addressing the identified negative impact related to air pollution. In response to this issue, the Aleatica Code of Ethics and Conduct and the Policy for the Prevention and Control of Air Pollution – both applicable to A35 Brebemi – along with the Group’s own Corporate Policy, have been implemented.

Code of Ethics and Conduct

Among the commitments set out in the Code of Ethics and Conduct, environmental protection is also pursued through pollution prevention. To this end, the Code requires all recipients to report to the Sustainability Officer of their Business Unit any emissions that may have adverse effects on the environment. For more information: ESRS E1-2.

Policy for the prevention and control of air pollution

In order to mitigate the negative impact generated within its infrastructure, Aleatica has established a dedicated Policy – also applicable to A35 Brebemi – through which it commits to carrying out actions aimed at the prevention and reduction of air pollution.

The objective is to ensure a healthy environment and improve the quality of life for the social groups interacting with the areas surrounding the infrastructure. In addition to complying with applicable regulations, Aleatica encourages the development of emission control, mitigation, and prevention projects across all its subsidiaries.

In applying these principles, Aleatica identifies and assesses risks associated with air pollution and commits to selecting and using construction, maintenance, and operational materials that contain the lowest possible levels of pollutants. The Group also focuses on identifying critical emission points during construction, maintenance, and operational phases, thereby establishing targeted and effective intervention priorities. Approved by Aleatica’s Board of Directors on 18 February 2022, the Policy applies to all Group companies. The document is published on A35 Brebemi’s corporate Intranet.

Corporate Policy

Through its Corporate Policy, A35 Brebemi commits to preventing pollution by limiting the impacts of its activities and complying with applicable regulations. For more information: ESRS E1-2.

[ESRS E2-2] Actions related to pollution

A35 Brebemi has undertaken initiatives aimed at reducing the negative impacts on the environment and people related to air pollution.

³ Air pollutant emissions generated by the corporate fleet represent a marginal share. Since the ESRS E2-3 disclosure metric pertains to emissions stemming from a company’s own operations, and in line with the materiality principle, the Group has considered the specific disclosure of pollutant emissions from this source as not material.

⁴ ISPRA, Atmospheric Pollutant Emissions from the transport sector, 2024.

Initiatives addressing air pollution

Initiatives for sustainable mobility

Sustainable mobility measures adopted to mitigate climate change – such as the progressive replacement of the corporate vehicle fleet with hybrid-petrol vehicles, the implementation of discount schemes for green vehicles, the installation of electric vehicle charging stations and LNG refueling stations – also contribute to the reduction of air pollutant emissions. For more information: E1-3.

ESRS E4 – Biodiversity and ecosystems

Impacts, risks, opportunities and management policies

[ESRS E4-1] Transition plan and consideration of biodiversity and ecosystems in strategy and business model

Since the design phase of the motorway section, A35 Brebemi has implemented several initiatives to mitigate its impact on biodiversity. The Group will assess the possibility of integrating, in the coming years, a Transition Plan focused on biodiversity and ecosystems into its strategy, in line with international standards on the matter and in consideration of the evolving European regulatory framework.

[ESRS E4 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

The A35 Brebemi is not located in areas considered sensitive in terms of biodiversity, i.e. zones characterized by the presence of rare and protected species. Moreover, the infrastructure was designed – and is currently managed – with particular attention to safeguarding the surrounding environment and by adopting measures aimed at minimizing potential alterations to local ecosystems.

The territory crossed by the A35 Brebemi is characterized by the presence of three major rivers – the Oglio, Serio, and Adda – which shape a fluvial landscape bordered by linear formations of hedgerows and tree rows. Moving away from the riverbanks, one encounters the perfluvial area, heavily influenced by extensive agricultural activity and marked by regularly distributed riparian woodlands. These areas host species such as white poplar, alder groves, elm and willow woods, while beyond the riverbeds, natural forests dominated by pedunculate oak and European hornbeam can be found.

The fauna inhabiting this area is adapted to open spaces and is generally resilient to territorial alterations. Such environmental context results in the absence of medium- and large-sized mammal species, with the exception of the Fox, which nonetheless shows very low population density in lowland areas. Small mammals found in this section of the plain include the Hedgehog, the European Mole, several common shrew species (Common Shrew, White-toothed Shrew, Lesser White-toothed Shrew), and various rodents (Field Vole, Savi's Pine Vole, Black Rat, Brown Rat, House Mouse, Wood Mouse). The presence of coypu, European Hare, and Wild Rabbit is recorded, with occasional presence of Weasel and Beech Marten also possible. Bat species reported in the area include the Common Pipistrelle, Savi's Pipistrelle, and the Southern Long-eared Bat.

Birds represent the largest group of vertebrates, with forest species concentrated in the few wooded areas available along the rivers. Open-environment species can be found in the herbaceous zones along riverbeds (e.g., Northern Lapwing and Greater Short-toed Lark), as well as colonial or territorial nesting species on earthen banks (e.g., European Bee-eater, Sand Martin, Common Kingfisher) or on gravel beds (e.g., Little Ringed Plover, Common Sandpiper).

The reptile fauna is relatively limited, with the Dice Snake being the most notable species, commonly found along watercourses and in wetland areas. These same habitats are also the primary environments for most amphibian species, including endemic forms such as the Italian Crested Newt and the Italian Tree Frog, as well as the Lataste's Frog, which has been the focus of several reintroduction efforts within the regional wetland system.

[ESRS E4 IRO-1] Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities

The relevant impacts, risks, and opportunities are associated with the design, construction, and operation phases of the motorway section. With regard to the first two phases, the main impacts concern land use change and soil sealing. The location of the infrastructure may affect the continuity of the above-mentioned natural habitats, potentially leading to the degradation of pre-existing ecosystems.

In this context, A35 Brebemi generates a positive impact on species populations through the construction of dedicated wildlife corridors. At the same time, construction activities lead to an increase in impervious surfaces, reducing soil infiltration capacity and potentially compromising the hydrological cycle. The analysis was based on multiple sources, including interviews with relevant functions and supporting documentation. It also considered the findings validated by the ARPA's Technical Support and the Environmental Observatory, as emerged during the environmental monitoring campaigns conducted in the pre-, during-, and post-construction phases.

The analysis of the operational phase of the motorway section identified impacts on fauna and vegetation, as well as potential reputational risks due to emissions generated by vehicles. The IROs identified in this area are closely related to those associated with pollution. For more information: ESRS E2 IRO-1.

[ESRS E4-2] Policies related to biodiversity and ecosystems

To safeguard biodiversity and ecosystems, Aleatica has developed a Code of Ethics and Conduct, uniformly applied across all its Business Units, while A35 Brebemi has adopted a dedicated policy specifically focused on biodiversity protection.

Code of Ethics and Conduct

Among the commitments set forth in the Code of Ethics and Conduct, environmental protection is also reflected in the safeguarding of ecosystems. To this end, the Code requires all recipients of the document to protect and respect the environment by complying with applicable internal and external regulations. For more information: ESRS E1-2.

Biodiversity protection and promotion Policy

The document outlines the principles and concrete commitments for the protection of ecosystems and the mitigation of the negative impacts of the Group's activities on the natural environment. Drafted by the Environment and Sustainability Department and approved by Management, the Policy actively contributes to the success of national and international biodiversity strategies. The Policy is structured around three core principles:

- **assessment of biodiversity impacts and related protection and promotion strategies**, the first principle concerns the integration of biodiversity conservation into strategic planning and operational activities, with the aim of balancing the business's economic development with environmental protection. A35 Brebemi adopts the "no net loss" principle, applying a mitigation hierarchy that prioritizes preventive over corrective measures. The Group defines clear objectives, monitoring indicators, and specific actions to assess and manage risks and opportunities related to biodiversity.
- **stakeholder engagement**, the second principle refers to stakeholders, as A35 Brebemi promotes the creation of partnerships and collaborative relationships with local, national, and international interest groups to mitigate impacts and support initiatives aimed at achieving a net gain in biodiversity.
- **communication and awareness-raising**, the third principle involves promoting transparent communication of performance and the development of awareness initiatives for the protection of species and natural habitats, with the aim of fostering widespread and shared commitment to preserving natural heritage.

The Policy is communicated and disseminated within the organization and among all stakeholders engaged with A35 Brebemi. The document is available on the company's website and is subject to periodic reviews to ensure continuous improvement and alignment with national and international regulations.

[ESRS E4-3] Actions related to biodiversity and ecosystems

During the design, construction, and operational phases of the infrastructure, the Group implemented a series of actions to limit negative impacts and risks related to biodiversity and ecosystems.

Initiatives to mitigate land use change

Integration with other infrastructures

In order to minimize land occupation, during the design and development phase of the infrastructure, A35 Brebemi placed great emphasis on safeguarding the surrounding territory. **One of the most strategic decisions in this regard was the alignment of the motorway route alongside the High-Speed Rail (HSR) within a single corridor.** This approach helped to **contain the environmental impacts associated with the two infrastructures**, including land disruption, pollutant emissions, and the management of hydraulic crossings. The proximity of the two infrastructures made it possible to achieve significant land savings, returning large areas to their original agricultural or productive use. Furthermore, the interstitial strip between the two infrastructures – typically a residual and scarcely usable area – was minimized.

Particular attention was also given to the design of the Integrated Works, which include the road and hydraulic crossing structures for the two adjacent infrastructures. The identification and resolution of crossing works were jointly addressed by A35 Brebemi and Rete Ferroviaria Italiana from the design phase. The design of these works was carried out with a unified intervention approach to resolve interference for both infrastructures simultaneously, thereby reducing territorial impacts that would have resulted from separate construction phases and limiting the consumption of construction materials that would otherwise have been required for interim works.

Wildlife crossings for ecological reconnection

To mitigate the impacts associated with land use change – such as the fragmentation of ecological corridors and the resulting degradation of pre-existing ecosystems – and to ensure positive effects on wildlife population sizes, **A35 Brebemi has adopted specific strategies aimed at promoting ecological reconnection, thereby preserving the continuity of the natural network within the affected area.**

As part of the design and construction of the motorway, **23 wildlife crossings** were built – crossing points designed to allow animal species to move freely across both sides of the infrastructure. These crossings aim to **reduce the isolation of animal populations** by restoring movement routes that were interrupted by the construction of the motorway. Additionally, they help reduce the risk of road accidents by minimizing the likelihood of wildlife crossing directly over the roadway. These were evenly distributed along the route and strategically located in the most suitable areas, including zones with limited urbanization or industrial activity, to avoid additional disturbances at tunnel entrances. Priority was given to areas near hedgerows or wooded patches that facilitate access to surrounding habitats.

At the entrances of the wildlife crossings, **multi-row shrub hedges** were planted to screen the road embankment and guide wildlife toward the crossing points. Due to their specific function and location, these hedges were composed of species that produce fruits or berries favored by local fauna. To ensure the continued ecological functionality of these crossings, A35 Brebemi carries out regular monitoring inspections.

Initiatives to mitigate pollution and soil sealing

Oil separators for roadway runoff

The A35 motorway is equipped with a treatment system for first flush rainwater resulting from roadway runoff – a solution that exceeds the minimum legal standards. The first flush drainage network is divided into several sections, each converging into a continuous treatment system (oil separators), after which the treated water is discharged into receiving bodies, roadside ditches, or detention basins.

There are 208 oil separators along the motorway. These systems allow for the sedimentation and separation of oil from first-flush water and can also intercept accidental spills resulting from traffic incidents. Separators are completely emptied, cleaned, and equipped with new filters when necessary, on a five-year basis or whenever potentially polluting spills occur.

Phytodepuration tanks

A35 Brebemi has adopted an advanced system for the treatment of first flush rainwater with a dual objective: to reduce soil impermeabilization and to mitigate pollution that could compromise biodiversity. The return of treated water to the environment through roadside ditches and irrigation channels helps counteract the effects of impermeabilization, while the purification process reduces the presence of oils, heavy metals, and other contaminants harmful to ecosystems. Moreover, the constructed wetlands not only purify the water but also provide a suitable habitat for a wide range of organisms, contributing to the preservation of the natural environment.

To achieve these objectives, A35 Brebemi has enhanced the effectiveness of its continuously operating oil separators by integrating them phytodepuration tanks, i.e. engineered wetland areas designed to treat runoff collected from the road surface during initial rainfall events.

The purification process is based on a complex interaction of chemical, physical, and biological mechanisms, made possible by the interplay among substrates, aquatic plants, wastewater, and the microorganisms present in the system. First flush water is separated from second flush water by means of distribution manholes: the former is directed to the treatment system, while the latter is discharged directly into roadside ditches. The collected first flush water then passes through grit and oil separation units to remove suspended solids and oils, is accumulated in prefabricated reinforced concrete tanks, and subsequently pumped into the constructed wetland area. Within these systems, the water undergoes natural microbiological activity and adsorption processes, ensuring denitrification and the precipitation of metals in the form of insoluble compounds.

Initiatives to mitigate the population size of a species

Biodiversity Oasis

The Group has created a Biodiversity Oasis within the enclosed area of the Treviglio interchange. In collaboration with 3Bee, a nature-tech company and leader in biodiversity protection, 100 nectar-rich trees have been planted since 2023, capable of feeding approximately 75,000 pollinating insects per year and potentially absorbing around 7,488 kg of CO₂ from the atmosphere. In addition, three beehives equipped with Hive-Tech technology have been installed: a set of biomimetic IoT sensors powered by small solar panels mounted on the hives' roofs, which record the vital parameters of bee colonies. This monitoring allows for the evaluation not only of the wellbeing of approximately 600,000 bees, but also, indirectly, of the quality of the surrounding environment. In 2024, "Polly Houses" were also installed to provide shelter to solitary bees and other wild pollinators. Plans are in place for the installation of nectar-rich meadows with high regenerative potential in the area. Furthermore, the monitoring of the Oasis is expected to expand beyond pollinating insects to include avifauna.

The Oasis is continuously monitored through satellite imagery and IoT bioacoustic sensors, and is equipped with specific technologies for quantifying results and parameters. The area can also be observed via a dedicated application developed by 3Bee, which allows users to view its location and access real-time monitoring data. Online access is made simple and immediate via a QR code.

A35 Brebemi's commitment is not limited to operational measures: in 2024, **a company-wide training session was held to raise awareness among all employees regarding biodiversity** and the environmental impacts of motorway infrastructure. To further encourage employee engagement, an event was organized for the **planting of the Oasis trees**, with the participation of 10 employees.

Extending its biodiversity initiatives to community education, A35 Brebemi joined the **"Ambassadors of Biodiversity"** project – an awareness program on the role of pollinators – by involving one local primary school in 2023 and a secondary in 2024.

[ESRS E4-5] Impact metrics related to biodiversity and ecosystems change

The motorway does not cross any sites belonging to the Natura 2000 network, but it does affect three protected areas corresponding to the Adda Nord, Serio, and Oglio Nord river parks. Within these areas, A35 Brebemi does not carry out any activities bearing direct environmental impact, with the sole exception of vehicular traffic on the infrastructure itself. The impacts associated with the presence of the infrastructure were assessed and mitigated during the design and construction phases, with the aim of ensuring the protection of the ecosystems involved.

ESRS E5 – Resource use and circular economy

Impacts, risks, opportunities and management policies

[ESRS E5 IRO-1] Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

The double materiality assessment identified as relevant the impacts associated with the use of virgin materials in construction and maintenance activities, as well as the lack of effective waste recycling strategies. At the same time, reputational and economic benefits were recognized in connection with the reuse of a share of waste materials in maintenance activities. A key contribution to the identification of these IROs came from the results of the study carried out using the Life Cycle Assessment (LCA) method, which enabled the evaluation of the environmental benefits generated by the reuse of Reclaimed Asphalt Pavement (RAP) in resurfacing the motorway's wearing courses. Additionally, impacts and risks related to roadside littering by users were also mapped.

[ESRS E5-1] Policies related to resource use and circular economy

To mitigate the IROs related to resource use and the circular economy, Aleatica has developed the Code of Ethics and Conduct and the Waste Policy, both of which are applied to the Group as a whole. In parallel, A35 Brebemi has introduced its own Corporate Policy.

Code of Ethics and Conduct

Among the commitments set forth in the Code of Ethics and Conduct, environmental protection is also reflected in the efficient use of resources. To this end, the Code requires all recipients of the document to minimize waste generation by properly separating materials and ensuring their appropriate disposal, depending on whether they are biodegradable or recyclable. For more information: ESRS E1-2.

Waste Policy

To mitigate the impacts resulting from improper waste management, Aleatica has adopted a Waste Policy that applies to all Business Units. The document is made available on the company Intranet, and its management and implementation are entrusted to the Sustainability and User Services Department.

The Policy sets out guidelines for integrated waste management, aimed at minimizing, utilizing, recycling, and disposing of waste in a controlled manner, in accordance with the principles and commitments pursued under Aleatica's Sustainability Policy. Among its main objectives are the management of non-hazardous or low-hazardous waste to prevent pollution, and the development of mechanisms to minimize waste generation at the source, improving opportunities for reuse and recovery.

In addition to promoting a culture of environmental responsibility through employee training, the Policy also aims to classify the different types of waste produced, analyze their sources and disposal methods, and set targets in the areas of waste reduction, recycling, and disposal.

Finally, the Policy encourages (i) active employee engagement, (ii) the promotion of strategic partnerships with suppliers and organizations for the recovery or controlled disposal of waste, and (iii) internal collaboration to develop effective waste reduction, recovery, and reuse strategies.

Corporate Policy

In line with A35 Brebemi's commitment to adopting effective strategies for waste management and the recycling of operational waste, the Group has adopted the Corporate Policy, which codifies its ISO 14001 certified environmental management system.

Through this Policy, the Group promotes projects that positively impact the life cycle of the motorway or its components. To this end, initiatives are implemented to reuse waste materials and to ensure the proper management of waste found along the route or resulting from accidental events, minimizing the amount disposed of in favor of a recovery-oriented approach. For more information: ESRS E1-2.

[ESRS E5-2] Actions related to resource use and circular economy

A35 Brebemi implements initiatives aimed at optimizing the management of waste and scrap materials, while also promoting a more sustainable approach to raw material sourcing.

Initiatives related to resource inflows and outflows

Recycling and recovery of reclaimed asphalt pavement

The sustainable use of natural resources and the promotion of circular economy principles represent a key driver for environmental protection, the development of new economic opportunities, and the strengthening of long-term competitiveness. **A35 Brebemi has implemented a strategy aimed at increasing the percentage of recycled material obtained from the milling of the motorway's pavement layers.**

In 2022, a research project was launched to identify sustainable solutions for the resurfacing of the porous wearing course, in collaboration with the University of Parma and Mapei. The process began with the identification of the optimal mix design for the asphalt concrete, through laboratory studies and characterization tests aimed at improving its mechanical performance. **In 2023, approximately 16 km/lane of motorway were resurfaced – representing 89% of the total km/lane planned under the 2023 scheduled maintenance program – using a porous wearing course mix containing 20% reclaimed asphalt pavement (RAP). In 2024, the proportion of recycled RAP used in the mix was increased to 25%.**

To analyze the environmental benefits of using recycled materials in road pavements, a study was launched in 2023 based on the Life Cycle Assessment (LCA) method – an internationally recognized analytical approach that evaluates the environmental footprint of a product or service throughout its entire life cycle.

The study compared the environmental impact of four different porous wearing course mixes: One composed entirely of virgin materials and three others containing varying percentages of RAP – 20%, 30%, and 35%. **The results showed a reduction in Global Warming Potential (GWP) of 15% when 20% RAP was used, and a 20% reduction in the case of a mix containing 35% recycled material, compared to the fully virgin mix.**

Recovery and recycling of personal protective equipment

In 2024, a project was launched for the recovery and recycling of obsolete personal protective equipment (PPE), in collaboration with the Health and Safety Officer (RSPP) and Eso S.r.l. – a company providing waste management services to businesses. The initiative involves the collection of used equipment, including items such as shoes and jackets, which are then sent for recycling and transformed into useful materials, such as floor mats and other applications. This solution helps reduce the volume of waste sent for disposal by giving a second life to materials that would otherwise be non-reusable.

Initiatives for waste management

"Ricicla Brebemi ti premia" campaign

A35 Brebemi collaborates with Chef Express on the "Ricicla Brebemi ti premia" campaign, an initiative promoted at the Adda Nord Service Area along the A35 motorway. To encourage the recycling of single-use plastic bottles, an automated incentivized recycling station has been installed, equipped with an advanced compactor machine known as a "plastic eater," where users can deposit single-use PET bottles. For each bottle deposited, the machine issues a 10% discount voucher valid on a wide selection of products at the Chef Express refreshment point, with the aim of promoting a culture of recycling and sustainability among travelers.

[ESRS E5-4] Resource inflows

With regard to incoming flows, the most economically significant category of raw materials is asphalt. However, since the material is not purchased directly by A35 Brebemi but is instead supplied indirectly through contracted milling and paving services, such resource inflow is not considered for reporting purposes. Other purchasing categories, including safety barriers and crash attenuators, are of lower economic relevance and therefore not included in the disclosure.

[ESRS E5-5] Resource outflows

The total amount of waste generated in 2024 is approximately 0.9 tonnes, with the majority of waste sent for disposal (81%) and a smaller portion not destined for disposal (19%). Waste classified as hazardous under the Italian Environmental Code (Legislative Decree 152/2006) accounts for only 4% of the total.

Waste	2024
	kg
Total amount of generated waste	936,697
Total amount of waste diverted from disposal	175,877
of which hazardous	1,281
of which non-hazardous	174,596
Total amount of waste directed to disposal	760,820
of which hazardous	34,740
of which non-hazardous	726,080

Hazardous waste	2024
	kg
Total hazardous waste	36,021
Total radioactive waste	0

SOCIAL INFORMATION

ESRS S1 – Own workforce

Impacts, risks, opportunities and management policies

[ESRS S1 SBM-2] Interests and views of stakeholders

The interests, opinions, and rights of A35 Brebemi's own workforce guide the company's strategic decisions and the adoption of tools aimed at improving employee well-being. Their requests are gathered through structured listening and dialogue channels, both indirect – such as consultation tables between Company Trade Union Representatives (RSA) and Workers' Safety Representatives (RLS) to address employee safety issues – and direct, such as the satisfaction surveys promoted by Aleatica and implemented across all its Business Units.

[ESRS S1 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

Between Brebemi and Argentea, the Group relies mainly on an employee workforce with permanent contracts and does not employ non-employee workers. Within the double materiality analysis, positive impacts include the potential reduction in the injury rate thanks to the provision of non-mandatory training programs that exceed regulatory requirements. A35 Brebemi acknowledges that inadequate management of health and safety risks could expose the Group to sanctions or reputational damage, especially in the event of serious injuries.

At the same time, A35 Brebemi generates positive impacts on employee satisfaction through initiatives promoting gender equality, contributing to the creation of a fair and inclusive environment. Added to this are the benefits on professional growth and skills development, resulting from the provision of upskilling and reskilling programs.

The Group also seizes opportunities related to the promotion of diversity and inclusion, factors that support not only the retention of existing talents but also the attraction of new professional profiles. **Overall, A35 Brebemi's activities do not involve operations at risk of forced, compulsory, or child labour.**

[ESRS S1-1] Policies related to own workforce

To manage the relevant IROs related to its own workforce, A35 Brebemi adopts its own Corporate Policy, alongside specific policies developed by Aleatica and applicable to the Group: the Code of Ethics and Conduct, the Human Rights Policy, the Diversity, Equity and Inclusion Policy, and, finally, the Anti-Harassment Policy.

Code of Ethics and Conduct and Human Rights Policy

With the aim of improving employee satisfaction and attracting new resources, the Code promotes an inclusive and healthy organizational framework, in which each collaborator actively contributes to common success. Among the topics addressed, the Code promotes “passion for the team”, which is reflected in the respect for human rights and the protection of diversity and inclusion. For more information: ESRS E1-2.

Aleatica has a Human Rights Policy aimed at integrating management processes to prevent potential violations and at establishing its commitment through adherence to the main initiatives and directives or guidelines on the matter, including the Universal Declaration of Human Rights, the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human Rights, and the Tripartite Declaration of the International Labour Organization (ILO).

Corporate Policy

To mitigate the potential negative impact on the workplace injury rate and avoid related risks, A35 Brebemi has adopted the Corporate Policy, which codifies the occupational health and safety management system certified as compliant with the UNI ISO 45001 Standard. Through this Policy, the Group ensures adherence to legal, regulatory, and technical requirements, with particular regard to those related to workplace safety, which apply to all its operations. In this context, A35 Brebemi measures its performance through specific indicators, including the completion rate of mandatory training and the trend of indices related to the number and severity of injuries. For more information: ESRS E1-2.

Diversity, Equity and Inclusion Policy

Through the Diversity, Equity and Inclusion Policy, Aleatica ensures equal opportunities for professional growth for the entire workforce, countering all forms of discrimination and protecting the psychological safety of employees. Aleatica has translated these principles into concrete actions by defining and promoting commitments shared by all collaborators. Furthermore, it has identified three strategic priorities – gender, multiculturalism, and disability – to guide the development of initiatives in the first three years of implementation of the Policy.

In terms of governance, primary responsibility for the implementation of this strategy is assigned to the People and Culture Department. Approved by the Board of Directors in 2024, the Policy also applies to A35 Brebemi and is made available to all staff on the Intranet.

Anti-Harassment Policy

With the aim of preventing and eliminating discrimination, including harassment, Aleatica formalizes a zero-tolerance policy towards any form of harassment based on gender identity or sexual preference, aligning with the values enshrined in the Code of Ethics and Conduct. The Group opposes such behaviors, regardless of role or hierarchical level, to ensure an inclusive work environment that respects the dignity of every individual.

To translate these principles into concrete actions, Aleatica prevents and combats any manifestation of harassment through proportionate sanctions, up to dismissal, for those who engage in or threaten offensive behavior. Furthermore, it promotes a corporate culture based on mutual respect, non-discrimination, and collaboration, encouraging employees to report inappropriate episodes through dedicated channels.

Approved by the Aleatica Executive Committee in 2024, the Policy applies to all Group companies and is implemented through local protocols for action and prevention of harassment, drafted in accordance with the legislation in force in each country. The document is made available to all staff on the corporate Intranet.

[ESRS S1-2] Processes for engaging with own workers and workers’ representatives about impacts

A35 Brebemi promotes continuous and structured dialogue with its employees in order to ensure a work environment oriented towards continuous improvement. Central to this process are the biennial employee engagement surveys, conducted by Aleatica and addressed to the whole workforce, with a focus on topics such as trust in leadership, organization and work environment, people development and enhancement, inclusion, and well-being. During the intermediate year, the survey is administered to 35% of employees, randomly selected across all departments.

Based on the results emerging from the survey, A35 Brebemi develops an action plan, accompanied by a detailed scheduling of interventions, which is shared with all employees and periodically updated, ensuring transparency throughout the improvement process. Employees are constantly updated on the progress of the actions implemented, further strengthening their sense of participation.

In 2024, the survey was administered to 30% of the workforce and showed a significant improvement compared to the previous year. The level of engagement recorded a 23% increase, reaching 85% favourable ratings, while satisfaction with working conditions increased by 24%, with a satisfaction index of 79%. Based on the results obtained, two priority areas of intervention were identified: improving and strengthening internal communication and collaboration between different departments, and improving the management of dialogue and feedback.

A35 Brebemi employees also have the opportunity to actively contribute to corporate sustainability topics by sharing ideas and suggestions. To ensure transparent dialogue and encourage the participation of every worker, an anonymous suggestion collection system has been implemented through dedicated boxes placed in accessible areas of the offices. The suggestions collected are periodically analysed with the aim of identifying innovative solutions and integrating internal perspectives into the Group's strategic decisions.

[ESRS S1-3] Processes to remediate negative impacts and channels for own workers to raise concerns

The Group adopts structured procedures to promptly manage any issues reported by its workforce, creating a safe work environment open to listening. In line with the Whistleblowing Guidelines, employees have access to various channels, both internal – such as the “I-Care” platform – and external, to anonymously report unlawful acts and unethical behavior. Employees can raise concerns regarding any act of non-compliance with the Code of Ethics and Conduct, Group Policies, or internal Rules. For more information: ESRS G1-1.

[ESRS S1-4] Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

A35 Brebemi has undertaken a series of initiatives aimed at maximizing positive impacts and opportunities and reducing risks related to its workforce, in terms of health and safety, gender equality and diversity, and training.

Health and Safety Initiatives

Psychological support

To protect the health of Group workers, especially those involved in emergency and accident situations, in 2024, A35 Brebemi introduced Sygmund – a psychological support service for all employees.

Through a digital platform dedicated to mental well-being, accessible via app and website, Sygmund offers support for managing daily challenges, stress, and emotional dynamics, both professional and personal. The initiative aims to protect people's health and well-being, strengthen their self-awareness, encourage listening and sharing, to help people better manage daily situations and emotions. This initiative integrates the measures already adopted by A35 Brebemi, including the possibility for employees to benefit from 3 free online psychotherapy sessions.

Non-mandatory health and safety training

A35 Brebemi has implemented a training programme aimed at reducing risks related to injuries, going beyond the regulatory training requirements on the subject. Società di Progetto Brebemi S.p.A. trained 10 employees for a total of 58 hours through refresher courses for safety managers, Workers' Safety Representative (RLS), and first aid officers. In parallel, Argentea Gestioni S.C.p.A. implemented a training programme involving 162 employees for a total of 1,151 hours, of which approximately 300 were carried out in immersive 3D mode. The activities covered topics such as first aid, fire prevention, scaffolding assembly, management of safety signage, and preparation of supervisors and safety managers.

Gender Equality and Diversity Initiatives

“Gender. An everyday topic where each of us matters”

In 2024, the A35 Brebemi Group launched a project in collaboration with In-Genere, a company specialized in organizational consulting focused on addressing issues related to diversity and equity.

This initiative, titled “Gender. An everyday topic where each of us matters” aims to support internal personal and professional growth, promoting a more attentive and focused work and social environment. Through a series of 6 meetings, including online seminars and debates – scheduled from May to December 2024 – in addition to a dedicated mentoring programme, the project aims to develop innovative leadership and resilience skills within the Group.

The 4 seminars address topics such as collaboration, the importance of language, the role of each individual in achieving gender equity, and strategies to overcome unconscious biases. The 2 debate sessions, on the other hand, delve into challenges in the legal-financial field and the contribution of science in deconstructing gender stereotypes. The mentoring programme is designed to provide the mentoring skills needed to guide and support colleagues returning from parental leave in their professional development within the organization.

Gender Equality Committee

A35 Brebemi has established a Corporate Gender Equality Committee tasked with making suggestions and proposing concrete actions to promote gender equality within the organization. The Committee is structured into two levels: a restricted one with decision-making functions and a broader one open to employee participation.

StraWoman run

On 5 May 2024, A35 Brebemi supported the **participation of its employees in the StraWoman** run, fully covering the registration fee for interested collaborators and contributing with an additional donation to the fundraising in favor of WeWorld, an organization committed to protecting women and minors in vulnerable contexts across 26 countries globally.

StraWoman, a non-competitive 5 km run through the streets of Brescia, contributed to financing Spazio Donna, a WeWorld programme aimed at creating listening and support centers for women in situations of fragility or victims of violence. These welcoming and gathering spaces, managed by specialized teams, offer free individual and group activities aimed at strengthening the self-esteem and autonomy of the individuals involved.

Red benches against femicide and violence against women

On 25 November 2023, on the occasion of the International Day for the Elimination of Violence against Women, A35 Brebemi installed two red benches in the Adda Sud and Adda Nord Service Areas in collaboration with Autogrill and Chef Express.

A symbol of awareness and protest, these benches painted red are placed in public spaces to commemorate women victims of violence and to give visibility to the issue of femicide. Each bench is equipped with a plaque displaying the anti-violence toll-free number, to ensure an immediate support channel in case of abuse and to encourage the reporting of situations at risk.

Initiatives related to skills development

Non-mandatory training programmes

With the aim of strengthening internal skills, A35 Brebemi delivered a training programme dedicated to sustainability topics, language and technical skills. In 2024, 9 hours of “Sustainability Masterclass” were delivered, a training course dedicated to illustrating the fundamentals related to sustainability reporting, the definition of ESG strategic plans, and the European Taxonomy. In addition, the “Envision Sustainability Professional” training was provided to some employees to enable them to use the Envision rating system for sustainable infrastructure. Attention was also dedicated to the topic of biodiversity, addressed through specific workshops in the 2023-2024 timeframe. The training path is enriched by English and Spanish language courses – designed to promote integration with Aleatica – and by targeted technical courses for the different corporate functions.

[ESRS S1-6] Characteristics of the undertaking's employees

As at 31.12.24, the A35 Brebemi team consists of 170 people, almost all employed with permanent contracts (93%). The remaining share has fixed-term contracts (7%). It should be noted that the Group does not employ part-time employees or non-employee workers.

100% of employees are covered by National Collective Labour Agreements (CCNL), depending on their role and classification. Specifically, the applicable agreements are CCNL Autostrade e Trafori, Edili e affini, and Dirigenti industria. In 2024, second-level supplementary agreements were signed.

Employees by gender, contract type and region	2024		
	Males	Females	Total
Total number of employees	114	56	170
Of which permanent	109	49	158
Of which temporary	5	7	12
Of which non-guaranteed hours	0	0	0

During the year, there were 23 terminations, mainly due to retirements, against 29 new hires, of which 20 were women. At the end of the year, the hiring rate was 17% while the turnover rate was 14%.

Number of hires and turnover by gender and age group	2024		
	Males	Females	Total
Number of employees who left the company	9	14	23
Turnover rate	7.89%	25.00%	13.53%
Number of employees hired	9	20	29
Recruitment rate	7.89%	35.71%	17.06%

[ESRS S1-9] Diversity metrics

As at 31.12.24, approximately 76% of A35 Brebemi's workforce is aged 50 or under, while 13% are under 30. Women represent 20% of total employees. The Group Management consists of 5 members, with female representation limited to the Human Resources Department.

Employee distribution by age	2024	
	n.	%
Total employees	170	100
<30 years	22	13
30-50 years	107	63
>50 years	41	24
Gender Distribution in Top Management	2024	
	n.	%
Total top management	5	100
Males	4	80
Females	1	20

[ESRS S1-13] Training and skills development metrics

During the year, 32% of employees took part in periodic performance and career development reviews, including MBO (management by objectives) evaluations, one-off reviews, and grade advancements.

Employees who participated in periodic performance and career development reviews	2024		
	Males	Females	Total
Total number of employees who participated in periodic reviews	35	20	55
% of employees subject to periodic performance review	31%	36%	32%

In the same year, A35 Brebemi provided an average of 18 non-mandatory training hours per employee, 10 for women and 14 for men.

Training Hours per Employee	2024		
	Males	Females	Total
Total number of non-mandatory training hours for employees	1,880	1,262	3,142
Average number of non-mandatory training hours per employee	10.27	14.51	18.48

[ESRS S1-14] Health and safety metrics

100% of A35 Brebemi employees are covered by the health and safety management system.

Health and safety systems	2024	
	n.	%
Total employees covered by health and safety systems	170	100

In 2024, the Group recorded a total of 3 injuries, with an injury rate of 11%. In the same year, there were no deaths due to injuries nor any work-related illnesses.

Workplace injuries	2024	
	n.	%
Number of employee workplace injuries	3	
Total hours worked	271.155	
Workplace injury rate	11.06	

With reference to employee absences, A35 Brebemi recorded a number of lost days due to workplace injuries equal to 77.

Lost days	2024	
	n.	%
Lost days of employees	77	

[ESRS S1-15] Work-life balance metrics

During the year, 17 employees took family leave, including maternity, paternity, and leave under Law 104/1992, equal to 10% of the company population.

Leave	2024		
	Males	Females	Total
Employees entitled to family leave	114	56	170
% of employees entitled to family leave	100%	100%	100%
Employees who took family leave	9	8	17
% of employees who took family leave	8%	14%	10%

ESRS S2 – Workers in the value chain

Impacts, risks, opportunities and management policies

[ESRS S2 SBM-2] Interests and views of stakeholders

The success of the corporate strategy is also based on solid relationships with suppliers and contractors, who are a fundamental element for the proper development of its activities. For this reason, the Group pays great attention not only to its own workforce but also to the workers within its supply chain. In line with the path undertaken by Aleatica, which will be subject to due diligence obligations, A35 Brebemi will integrate a structured process for identifying impacts deriving from its upstream business relationships to support the activities already implemented to mitigate potential negative externalities.

To date, the existing approval procedures for the evaluation and selection of new suppliers are mainly oriented towards environmental requirements (e.g. ISO certifications). For contracts exceeding a certain threshold, it is necessary to provide declarations of suitability – relating to offences, convictions, and judicial records – and the Single Insurance Contribution Payment Certificate (DURC). Furthermore, respect for human rights is an essential requirement: every contract provides for adherence to ethical principles, with the possibility of termination in case of violation.

[ESRS S2 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

65% of the supplier network is local, coming from Northern Italy. The predominant share is represented by suppliers of services and materials for construction and maintenance activities of the route. Maintenance activities related to motorway systems are also outsourced, as well as the management of waste deriving from road surface maintenance activities.

During the double materiality assessment, significant impacts emerged in cases where suppliers do not guarantee adequate working conditions, and reputational risks due to the lack of a process for identifying negative externalities. For more information: ESRS 2 GOV-4 and SBM-3.

[ESRS S2-1] Policies related to value chain workers

A35 Brebemi adopts the Supplier Code of Conduct – drafted by Aleatica and applicable to the Group – in order to manage the identified impacts, risks, and opportunities.

Supplier Code of Conduct

Intended as an extension of the Code of Ethics and Conduct, the Supplier Code of Conduct establishes the minimum guidelines that govern the ethical behavior of suppliers and contractors, in compliance with applicable regulations and Aleatica's values.

- **Safety first:** Aleatica provides the means and information necessary to minimize workplace risks, both for its own staff and for suppliers. All suppliers engaged with Aleatica and its respective Business Units are required to observe and comply with the same safety procedures.
- **Social and environmental sustainability:** suppliers and subcontractors must comply with environmental regulations, implementing conscious and safe practices for the environment in all places where they operate. Where documentary evidence is required, the supplier ensures that it is obtained promptly and kept up to date.

- **Excellence in service:** suppliers guarantee the quality agreed upon at the time of formalizing the service provision, always respecting the client's intellectual property rights and safeguarding the information provided or entrusted to them.
- **Corporate integrity:** the supplier conducts its business according to the principles of business ethics and transparency. In addition to acting in accordance with national and international anti-corruption regulations, it is required to inform Aleatica of any situation that could be considered a conflict of interest.
- **Passion for the team:** in all activities carried out, the supplier must act in respect of human rights, including labour rights. Suppliers must also guarantee their employees the right to freedom of association and collective bargaining, and adequate and fair working conditions. There is also zero tolerance for forced labour, child labour, and discrimination within their supply chain.

Failure to adhere to or violations of the Code may constitute grounds for terminating the business relationship with the supplier. Compliance is the highest function responsible for the implementation of the document, which is published on the company website and provided at the time of contract signing.

[ESRS S2-2] Processes for engaging with value chain workers about impacts

In addition to tenders and periodic meetings organized on specific topics, A35 Brebemi does not have specific tools aimed at engaging workers in the value chain regarding relevant impacts. However, **in line with the path undertaken by Aleatica, the implementation of structured processes for supplier engagement is under evaluation, with the aim of strengthening dialogue and promoting a more participatory management in its activities.** For more information: ESRS 2 SBM-2.

[ESRS S2-3] Processes to remediate negative impacts and channels for value chain workers to raise concerns

The Group has implemented Whistleblowing Guidelines dedicated to receiving anonymous reports, not only from its own employees but also from supplier personnel and other business partners. The digital platform I-Care allows for the reporting – through a guided online process on the company website – of suspected unlawful or irregular conduct, breaches of regulations, breaches of the 231 Model, breaches of the Code of Ethics, and breaches of the Anti-Corruption Policy. For more information: ESRS G1-1.

[ESRS S2-4] Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action

Initiatives related to due diligence in the supply chain

Integration of ESG Criteria in the Supply Chain

In order to begin mapping and assessing impacts, risks, and opportunities present in the supply chain, A35 Brebemi has undertaken an ESG assessment process of its suppliers, in line with international standards and the regulations to which Aleatica is subject. The Group is aware that a lack of attention to these aspects could lead to reputational and, consequently, financial risks.

The commitment to mitigating risks is reflected in robust due diligence carried out by Procurement and Contracts as contemplated in the Procurement and Contracting Standard. A series of analyses with different approaches are carried out on suppliers to mitigate risks within the supply chain. To this end, a questionnaire has been developed, composed of a series of questions regarding general, environmental, social, and governance topics. To assign a score three ranges have been defined with an associated low, medium, and high risk level. Suppliers that, as a result of the assessment, fall into the medium and high-risk categories will require an additional level of screening for engagement purposes and a series of approvals at various levels. The process is currently under evaluation by the Purchasing and Sustainability Department managers of the Business Units.

ESRS S4 – Consumers and end-users

Impacts, risks, opportunities and management policies

[ESRS S4 SBM-2] Interests and views of stakeholders

The Group recognises users of the motorway section as key stakeholders whose perspective guides the corporate strategy. The relationship with end-users is fundamental to ensuring effective and quality service. For this reason, A35 Brebemi provides timely dissemination of real-time information on events that may affect travel and possible alternative routes through the Customer Assistance Point – located at the Treviglio toll station – the toll-free number, variable message panels along the route and at motorway access points, and the company website.

The presence of staff 24 hours a day and the widespread network of hardware and software controls guarantee users a high-quality and reliable service. Finally, to foster a direct and constructive relationship, user needs are collected and analysed through structured listening channels. For more information: ESRS 2 SBM-2 and S4-2.

[ESRS S4 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

As part of the double materiality analysis, positive impacts were identified on the satisfaction of end users of the motorway section thanks to the active collection of feedback and the effective management of any complaints, ensuring the protection of anonymity and freedom of expression.

At the same time, the Group is aware that the failure to share timely information on the service provided or the failure to comply with the regulations on minimum user rights towards motorway concessionaires (Resolution no. 132/2024 of the Transport Regulation Authority) could expose A35 Brebemi to sanctions or reputational damage.

Finally, among the opportunities identified, the Group acknowledges that a reduction in the incidence of accidents along the motorway section contributes to increasing user attractiveness.

[ESRS S4-1] Policies related to consumers and end-users

A35 Brebemi uses dedicated tools including the Service Charter and the UNI ISO 39001 certification for road traffic safety compliance.

Service Charter

To facilitate user access to quality information, A35 Brebemi prepares and updates the Service Charter every year. Required by the Transport Regulation Authority (ART), which is responsible for ensuring that motorway operators provide clear, transparent, and precise information to users, this document describes the services offered to travelers, response times in case of breakdowns or accidents, and the procedures for handling complaints. The aim is to promote correct and informed use of the motorway.

The final section of the document is dedicated to the protection of users and their freedom of expression. A35 Brebemi provides information on the tools made available to express needs, submit complaints, and evaluate the quality of the service received. The document is made available on the company website.

Corporate Policy and Road Traffic Safety Certification

To provide a safe and quality service, A35 Brebemi has adopted the Corporate Policy, which codifies the quality management system compliant with UNI ISO 9001 Standard. Through this Policy, the Group implements a system that promotes managerial efficiency and operational competence. For more information: ESRS E1-2.

With the aim of reducing the incidence of accidents, in 2024 the management systems of Brebemi and Argentea obtained UNI ISO 39001 certification for road traffic safety compliance. This certifies the Group's commitment to the safe management of the route, ensuring constant monitoring of related activities and processes. Currently, the Corporate Policy and Certification are documented separately, but integration is planned.

[ESRS S4-2] Processes for engaging with consumers and end-users about impacts

To measure and monitor user satisfaction, A35 Brebemi has activated a service dedicated to collecting their feedback. Through the completion of a questionnaire, the Group can identify the strengths and potential areas for improvement of the service.

The questionnaire, accessible via a web platform managed by an external company, can be completed by following the instructions available on the company website or by scanning the QR Code displayed on the totems located in the service areas and at the Customer Assistance Point.

[ESRS S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

A35 Brebemi provides various channels to ensure open and transparent dialogue with users. **To contribute to service improvement, users can report any issues or send suggestions or complaints through different communication channels.**

The Group guarantees the possibility of sending a written communication, using the dedicated e-mail address, or completing the specific “User Communication” form available on the company website and at the stations staffed by A35 Brebemi personnel.

[ESRS S4-4] Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

To ensure high standards of health and safety and to guarantee maximum user satisfaction along the motorway section, A35 Brebemi has launched a series of initiatives.

Initiatives for user health and safety

iRAP (International Road Assessment Programme) Certification

A35 Brebemi is the first motorway in Italy and among the first in Europe to have received the international iRAP (International Road Assessment Programme) certification in 2024, a recognition that certifies the excellence of road infrastructure in terms of safety. The iRAP certification assesses road infrastructure based on global safety standards, assigning a rating from 1 to 5 stars. Each improvement in road classification – for example from 1 to 2 stars – can reduce fatal accidents by up to 50%. **Infrastructure that achieves 3 stars or more, such as A35 Brebemi which obtained a 4-star rating, is significantly safer and contributes to saving lives.**

Accident simulations with institutions and local authorities

The Group consolidates its commitment to reducing accidents on the route and enhancing road safety by **conducting accident simulations, coordinated by the Prefecture of Bergamo and involving all the bodies concerned in motorway emergencies.**

This project, initiated voluntarily beyond regulatory obligations, allows for testing and optimizing rescue protocols in critical scenarios, ensuring a prompt response to emergencies. In 2024, two drills were conducted involving emergency calls and coordinated interventions by emergency teams, aimed at evaluating the management of critical situations. An additional simulation is planned for 2025, with the aim of making the initiative an annual event.

Accident rate analyses

A35 Brebemi carries out voluntary analyses of the accident rate, both on a six-month basis and following critical events, such as fatal accidents. In synergy with the Highway Police, the Group conducts detailed analyses to identify areas with a higher concentration of accidents and to define corrective actions. In the months following their implementation, the effectiveness of the measures adopted is constantly measured and verified to achieve continuous improvement.

The Group also monitors any accidents that have occurred on other motorways, checking for the presence of similar situations along its own route and implementing preventive strategies to avoid such occurrences along the A35 Brebemi.

Checks on users’ psychophysical condition

In 2024, a second-level control session was conducted, an operation aimed at ensuring road safety through an in-depth check of drivers’ psychophysical condition. The intervention, carried out in collaboration with the Highway Police, involved the complete closure of the section during night hours and the diversion of traffic to the service areas, where checks were carried out to detect the possible presence of drivers under the influence of alcohol or drugs. An additional control session is planned for 2025.

The use of drones for monitoring activities

In the second half of 2024, A35 Brebemi launched the Autonomous Drone Asset and Traffic Monitoring project, in partnership with AI View Group. This initiative involves the monitoring of the motorway section and traffic through the use of specific technological drones equipped with thermal cameras. The ultimate goal is to create an autonomous system for monitoring the various motorway assets not only in emergency situations.

To date, the system consists of two drones which, during standby periods, are stationed at specific locations at km marker 2+200 towards Milan and km marker 39+700 towards Milan. Through the remote activation and operation of these drones, the system can provide real-time information on:

- **Asset monitoring:** pavement, fencing, noise barriers, and other equipment present both on the carriageway and in the adjacent areas.
- **Traffic monitoring:** real-time traffic, presence of queues, stationary vehicles, or obstacles.

The data is subsequently sent to the Operations Centre, from which interventions can be planned and information shared.

Autostrada Facendo – Andiamo sul Sicuro

A35 Brebemi is a member of the Autostrada Facendo Association, committed to the preparation and dissemination of educational materials and events aimed at raising awareness of the importance of road safety. The Group actively contributes with the intention of promoting greater awareness, particularly among young people.

The Group takes part in the event "Autostrada Facendo – Andiamo sul Sicuro", an initiative that involves local schools and students through games and workshops on road safety topics such as the use of seat belts, compliance with speed limits, driving distractions, and the risks associated with alcohol and drug use. At the event location, the Highway Police's Blue Bus is present, a real travelling multimedia classroom. In 2024, the initiative recorded wide participation: in Chiari, on 22 and 24 April, 540 students participated. In Treviglio, on 14 and 15 October, 860 students were involved.

(S)heWorks I Care

Also as part of awareness-raising activities, A35 Brebemi participates in the international initiative "(S)heWorks I Care" aimed at promoting respect and awareness among motorway network users towards the personnel working on road infrastructures. The initiative is promoted by ASECAP, the European Association of Operators of Toll Road Infrastructures, of which A35 Brebemi is a member. On 20 June 2024, A35 Brebemi hosted this initiative at the Adda Nord and Adda Sud service areas.

Initiatives for user satisfaction

Customer Care Committee

To promote user satisfaction and loyalty, Aleatica's Management has established the Customer Care Committee, a body dedicated to enhancing user feedback as a driver of continuous improvement. The operational process starts from actively listening to user reports, on the basis of which an action plan is defined. Through the study of user behaviors and choices, the Committee has outlined 5 typical profiles, each representative of specific needs, habits, and expectations. This segmentation has made it possible to develop customized listening strategies.

Dialogue with users and freight transport operators

On 23 and 24 May 2024, two days of dialogue with users were organised at the Adda Nord and Sud Service Areas, during which 299 surveys were collected, allowing for an understanding of the overall customer perception and the gathering of improvement insights. The questionnaires recorded a high Net Promoter Score (NPS), which measures the general satisfaction index. The average customer satisfaction index was 9/10. In particular, 91% of respondents expressed satisfaction with the perception of safety during the journey and 89% with the maintenance of the motorway.

At the same time, to respond to the specific needs of freight transport operators – a category identified among the 5 typical customers of A35 Brebemi – the Group administered 12-question surveys, through which it was possible to map the level of appreciation of the services and gather suggestions for improvement. The data collected will be analysed in detail and presented to Management, with the aim of identifying targeted interventions.

GOVERNANCE INFORMATION

ESRS G1 – Business conduct

Impacts, risks, opportunities and management policies

[ESRS G1 IRO-1] Description of the processes to identify and assess material impacts, risks and opportunities

The results of the double materiality assessment highlight a positive impact deriving from the strength of the Group's corporate culture, oriented towards the principles of ethics and integrity, which is reflected on both internal and external stakeholders. The concrete application of the values expressed in A35 Brebemi's Code of Ethics and Corporate Policies contributes to strengthening trust and transparency in relationships with various stakeholders.

The Group is also aware of the potential risks of sanctions and reputational damage in relation to any confirmed episodes of cyber attacks and corruption, mitigated through the implementation of specific policies and dedicated training programmes. An additional area of attention concerns the protection of whistleblowers, where a lack of anonymity safeguards could lead to economic and legal risks.

[ESRS G1-1] Business conduct policies and corporate culture

The Group adopts policies and tools aimed at addressing IROs related to corporate culture and conduct.

Code of Ethics and Conduct

The Code of Ethics and Conduct guides daily behaviours and strategic business decisions in line with the principles of transparency and Corporate Governance. Among the topics addressed, the Code promotes corporate integrity, which is reflected in zero tolerance for bribery, improper payments, the correct management of privileged information, and privacy. For more information: ESRS E1-2.

Personal Data Protection Policy

In order to mitigate potential risks related to non-compliant management of personal data, Aleatica has established a Personal Data Protection Policy to ensure a structured and consistent approach to privacy protection applicable to the entire Group. This framework defines organizational principles, roles, and responsibilities.

Group companies acting as Data Controllers of personal data, that is, information relating to identified natural persons, are required to provide data subjects – including employees, customers/users, suppliers – with clear and comprehensive Privacy Notices, in compliance with applicable regulations, regardless of how such data is collected or obtained.

The governance system provides that the Board of Directors of each company appoints a Data Protection Officer (DPO), responsible for coordinating and supervising compliance with local laws and regulations, in constant coordination with Aleatica's General Data Protection Officer. In line with EU General Data Protection Regulation 2016/679, personal data must be processed solely for lawful purposes and in accordance with the law as well as internal company rules. Data subjects must be informed in a reliable, comprehensive, transparent, and understandable manner about the processing of their data.

Anti-Corruption Policy

Aware of the risk of sanctions and reputational damage resulting from any cases of active or passive corruption, Aleatica has defined the Anti-Corruption Policy, which establishes the principles and requirements for compliance with anti-corruption laws. This Policy applies to all personnel, members of the Board of Directors, and third parties with whom Aleatica has business relationships, with the aim of preventing and countering any inappropriate behavior.

Aleatica maintains a zero-tolerance approach towards any form of corruption, ensuring full compliance with applicable regulations, including the Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and international guidelines issued by the Organization for Economic Co-operation and Development (OECD) and the United Nations.

With this objective, members of the Board of Directors and company executives annually sign an Anti-Corruption Certification, in which they declare that they have complied with all applicable laws. The Anti-Corruption Policy, reviewed

and approved by Aleatica's Board of Directors, applies to all Group companies. The document is made available to all staff on the Intranet.

Organization, Management and Control Model (MOGC)

Società di Progetto Brebemi S.p.A. and Argentea Gestioni S.C.p.A. have adopted two separate MOGCs, aimed at establishing a structured system of procedures and activities to prevent crimes pursuant to Legislative Decree 231/2001 and to ensure that all operations are carried out legally, correctly, and transparently. Through the adoption of the Model, the two Companies pursue the following objectives:

- Establish the values of ethics and respect for legality.
- Create awareness among the recipients of the Model that, in the event of violations, they may commit offences subject to criminal penalties.
- Reiterate that such forms of unlawful behavior are strongly condemned, as they are contrary not only to legal provisions but also to the ethical principles that the Group intends to uphold in the conduct of its business activities.
- Enable the Companies, through monitoring activities in risk areas, to intervene promptly to prevent or counter the commission of such offences.

Recipients are considered to be employees and anyone operating in any capacity on behalf of or in the interest of the Company itself (e.g. collaborators, consultants, suppliers, partners). For both Companies, the task of monitoring the functioning and compliance with the Model and ensuring its update is entrusted to the Supervisory Body (OdV).

Appointed by the Board of Directors, the OdV also monitors the actual effectiveness of the Model, its adequacy, application, and the effectiveness of the sanctioning system. The OdV is also operationally responsible for implementing the control procedures provided for in the Model. The updated MOGC has been approved by the Board of Directors and the documents are disseminated through the Intranet.

Whistleblowing Guidelines

To ensure the protection of whistleblowers' anonymity, Società di Progetto Brebemi S.p.A. and Argentea Gestioni S.C.p.A. have adopted the Whistleblowing Guidelines as an integral part of the MOGC. These Guidelines formalise channels, procedures, and resources to enable whistleblowers to report unethical behavior or breaches of conduct principles, protecting their anonymity and safeguarding them from any retaliatory or discriminatory action.

The reporting channels made available are divided into internal and external, depending on whether they are managed directly by the Company or by authorized third parties. Internal channels include the I-Care platform, a dedicated telephone line, and email. Regarding external channels, reports can be submitted in writing through the channel activated by the National Anti-Corruption Authority (ANAC). The management of reports and the internal channel is entrusted to Aleatica's Compliance Function Manager, who possesses the required autonomy and independence, while the management of the dedicated email is entrusted to the respective Supervisory Bodies (OdV).

The Whistleblowing Guidelines apply to employees, self-employed workers and collaborators, freelancers, volunteers, consultants, shareholders, directors, suppliers, interns, and individuals performing administration, management, control, supervision, or representation functions.

[ESRS G1 MDR-A] Actions and resources related to responsible business conduct

A35 Brebemi has undertaken a series of initiatives aimed at maximizing positive impacts and reducing negative impacts and risks related to responsible business management.

Initiatives related to corporate culture

Cybersecurity Management

A35 Brebemi has adopted a cyber risk management model based on international standards and including procedural, training, evaluation, and periodic review aspects, allowing for the management of potential risks arising also from increasing organizational complexity. This framework has led to the adoption of the best technological solutions and the selection of the best partners to strengthen the protection of the corporate perimeter.

In parallel, a periodic vulnerability plan for the infrastructure is carried out with the support of specialized technicians, aimed at identifying any areas for improvement in corporate cybersecurity. A Disaster Recovery plan is active, as part of the **Business Continuity** process, which specifies at a technical level the precautions to be taken and the activities to be carried out to safeguard company data and functions from attacks or disastrous events.

Privacy Training

To strengthen staff awareness of the importance of personal data protection and ensure compliance with applicable regulations, in addition to the training provided by Aleatica, the Group has promoted a privacy training initiative.

The training was delivered in April 2022, via an e-learning platform, involving a total of 102 participants. At the end of the course, participants were required to complete an assessment questionnaire to evaluate the effectiveness of the training activity and the level of understanding of the topics covered. The results showed an overall average of correct answers equal to 89%.

In July 2024, Aleatica Group carried out a global awareness campaign – aimed at executives, managers, and administrative staff – on the identification and reporting of personal data breaches.

Initiatives related to active and passive corruption

Anti-Corruption Clause

To prevent any form of unlawful conduct in contractual relationships, the A35 Brebemi Group has introduced an Anti-Corruption Clause within pre-contractual and contractual documentation with third parties. This provision binds suppliers, contractors, and partners to comply with applicable regulations, imposing adherence to the highest ethical standards. The companies involved must certify that they have not violated national or international anti-corruption laws and commit to complying with Aleatica's Code of Ethics and Conduct. In case of non-compliance with the obligations provided, the clause allows for immediate termination of the contract and compensation for any damages.

Training and Awareness on the Organization and Management Model ("MOGC")

With the aim of raising employee awareness on the principles and procedures fundamental to the prevention of offences and compliance with corporate regulations, A35 Brebemi has implemented a structured training programme on the MOGC.

In 2020, the training was delivered via an e-learning platform, with an average understanding rate of 99%. In 2022, the programme was strengthened with online training sessions, during which participants were required to sign the declaration of acceptance of the 231 Model and complete an assessment questionnaire. With an average participation rate of 90%, the questionnaires confirmed a good level of content assimilation, with correct answer percentages of 95% for Argentea and 96% for Brebemi.

In 2024, the training programme continued via the e-learning platform. Confirming the effectiveness of the initiative, the assessment questionnaire showed a correct answer rate of 87% for Argentea, with 32 out of 34 participants completing the test, and 92% for Brebemi, with 28 out of 29 participants completing the assessment.

In addition, every year the Group organizes **Compliance Week**, a week of awareness-raising during which employees are provided with training capsules and in-person sessions on topics related to personal data management, information security, and anti-corruption, within which information is also provided on the I-Care reporting platform.

[ESRS G1-4] Confirmed incidents of corruption or bribery

In 2024, no confirmed cases of active or passive corruption were recorded.

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Basic Module – general information

ESRS Code	Disclosure	Location (or information)
B1 – Basis for preparation	B1 (a) – Option used for reporting	§ [ESRS 2 BP-2] Disclosures in relation to specific circumstances Errore. L'origine riferimento non è stata trovata.
	B1 (b) – Omission of information	N/A
	B1 (c) – Reporting scope	§ [ESRS 2 BP-1] General basis for preparation of sustainability statements
	B1 (d) – List of subsidiaries included in the reporting scope	N/A
	B1 (e) – Other information	i) Legal form of the company: Società di Progetto Brebemi S.p.A., Argentea Gestioni S.c.p.A. ii) NACE Code: 421000, 522120 iii) Total assets (in euros): €2,071,810* iv) Sales revenue (in euros): €138.7 million* iv) Number of employees or full-time equivalents: 170 v) Country of main operations and location of significant activities: Italy vi) Geolocation of owned, leased, or managed sites: Italy <i>*The figures refer exclusively to Società di Progetto Brebemi S.p.A. and do not include Argentea Gestioni S.c.p.A., as each company prepares its own separate financial statements and no consolidated financial statements are available.</i>
B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy	B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy	Information on practices, policies, and initiatives aimed at transitioning to a more sustainable economy is provided throughout the document in relation to the topic being discussed.
B3 – Energy and greenhouse gas emissions	B3 – Energy and greenhouse gas emissions	§ ESRS E1 – Climate change
B4 – Pollution of air, water and soil	B4 – Pollution of air, water and soil	§ ESRS E2 – Pollution
B5 – Biodiversity	B5 (a) – Sites and operational facilities located in or near areas sensitive from a biodiversity perspective	§ [ESRS E4 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
	B5 (b) – Metrics relating to land use change	§ [ESRS E4-5] Impact metrics related to biodiversity and ecosystems change
B6 – Water	B6 – Water withdrawals, consumption and discharges	Information not available.
B7 – Resource use, circular economy and waste management	B7 (a) – Waste generated	§ [ESRS E5-5] Resource outflows
	B7 (b) – Waste destined for recycling or reuse	§ [ESRS E5-5] Resource outflows
	B7 (c) – Resource inflows	§ [ESRS E5-4] Resource inflows
B8 – Workforce – General characteristics	B8 (a) – Total number of employees by contract type	§ [ESRS S1-6] Characteristics of the undertaking's employees
	B8 (b) – Total number of employees by gender	§ [ESRS S1-6] Characteristics of the undertaking's employees
	B8 (c) – Total number of employees by country	The Group operates in Italy
B9 – Workforce – Health and safety	B9 (a) – Number and frequency rate of recordable workplace injuries	§ [ESRS S1-14] Health and safety metrics
	B9 (b) – Number of deaths due to workplace accidents and occupational diseases	§ [ESRS S1-14] Health and safety metrics
B10 – Workforce – Remuneration, collective bargaining and training	B10 (a) – Ratio between remuneration and minimum wage	Information not available
	B10 (c) – Percentage of employees covered by collective bargaining agreements	§ [ESRS S1-6] Characteristics of the undertaking's employees
	B10 (d) – Average number of training hours per employee	§ [ESRS S1-13] Training and skills development metrics
B11 – Business conduct	B11 – Convictions and fines for corruption and bribery	§ [ESRS G1-4] Confirmed incidents of corruption or bribery

Comprehensive Module

ESRS Code	Disclosure	Location (or information)
C1 – Strategy: Business Model and Sustainability – Related Initiatives	C1 (a) – Description of significant groups of products and/or services offered	§ Corporate profile
	C1 (b) – Description of significant markets in which the company operates	§ Corporate profile
	C1 (c) – Description of main business relationships	§ Corporate profile

	C1 (d) – Description of key elements of the sustainability strategy	Information not available
C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	C2 (a) – Description of practices, policies and future initiatives	Information on practices, policies, and initiatives aimed at transitioning to a more sustainable economy is provided throughout the document in relation to the topic being discussed.
C3 – GHG reduction targets and climate transition	C3 – Emissions reduction and climate transition targets	§ [ESRS E1-1] Transition plan for climate change mitigation
C4 – Climate risks	C4 – Climate risk analysis	§ [ESRS E1 SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
C5 – Additional (general) workforce characteristics	C5 (a) – Gender diversity at managerial level	Information not available
	C5 (b) – Non-employee personnel	The Group does not have any non-employees.
C6 – Additional own workforce information - Human rights policies and processes	C6 (a) – Code of conduct	§ [ESRS E1-2] Policies related to climate change mitigation and adaptation
	C6 (b) – Human rights policies	§ [ESRS G1-1] Business conduct policies and corporate culture
	C6 (c) – Reporting mechanisms	§ [ESRS G1-1] Business conduct policies and corporate culture
C7 – Severe negative human rights incidents	C7 (a) – Human rights incidents	During the reporting period, the Group did not encounter any human rights incidents within its workforce.
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks	C8 (a) – Revenues from certain sectors	N/A
	C8 (b) – Exclusion from EU benchmark	The Group is not excluded from EU benchmarks.
C9 – Gender diversity ratio in the governance body	C9 – Gender diversity in governance bodies	§ [ESRS 2 GOV-1] The role of the administrative, management and supervisory bodies