

1 Who can file a disclosure?

Anyone can make a disclosure to the Atlantia Group's Ethics Officer or the supervisory board of a Group company for matters relating to Legislative Decree 231. Whistleblowers may be permanent or fixed-term employees, including executives, interns and other staff employed by Group companies, members of the management boards and oversight bodies of Group companies or third parties (such as, for example: suppliers, customers, external staff, consultants, brokers, agents or persons who in any event have engaged in, engage in or intend to engage in business relations with Group companies).

2 Is it obligatory for a whistleblower to identify themselves in order to file a disclosure via the digital platform?

No, by accessing the system via the Company's website, the whistleblower can file a disclosure without having to register. Once the disclosure has been filed, the system produced a code number that the whistleblower must keep a note of and use when re-entering the platform and accessing messages to and from the Ethics Officer, whether anonymously or otherwise.

Only employees of the Italian Group subsidiaries are allowed to access the platform using the Group's intranet, following prior registration. In this case, the identity of the whistleblower is rendered anonymous by the system, meaning that the disclosure can be viewed in completely anonymous form. (see also FAQ no. 10).

3 Is it possible to file an anonymous disclosure?

Yes, the system enables completely anonymous disclosures to be filed. To ensure that the concerns raised are effectively investigated, it is preferable for the whistleblower to put their name to the disclosure, given that, in any event, the whistleblower's identity is protected and that they will be protected from victimisation or discrimination. (see also FAQs no. 10 and 11)

4 What concerns (and persons) should be disclosed?

A disclosure may regard any conduct by permanent or fixed-term employees of the Group, including executives, interns and other staff employed by Group companies, members of the management boards and oversight bodies of Group companies or third parties that may cause damage to or prejudice Atlantia's activities and those of Group companies. Disclosures may raise concerns regarding illegal conduct or irregularities, violations of legislation; violations of the 231 Model, violations of the Code of Ethics, violations of the Anti-corruption Policy and violations of company procedures and rules in general.

5 What should the disclosures contain?

To enable their concerns to be investigated, the whistleblower must report everything they know in good faith, providing all the information in their possession to ensure that the concerns raised in the disclosure can be investigated.

6 What purpose does the code assigned to the disclosure have?

The ID code assigned to the disclosure enables the anonymous whistleblower to access the system again and to provide further clarifications or documentation supporting the disclosure, again in anonymous form.

7 When is the disclosure deemed to have been filed?

The disclosure has been correctly filed once the «file disclosure» procedure has been completed or once the whistleblower has filled in all the required fields and clicked on the «Send» button. The data is then registered on the system. If the whistleblower fails to complete the disclosure process by clicking on the «Send» button, all the data provided up to that point will be lost.

8 Is it possible to find out the status of the disclosure process?

Yes, the whistleblower can access the portal at any time after filing a disclosure, using the assigned code, in order to check that the disclosure has been received by the Ethics Officer and the presence of any messages from the Ethics Officer or from the supervisory board of the relevant Group company for matters relating to Legislative Decree 231.

9 How can the status of the disclosure be accessed?

Whenever necessary, by entering the code into the relevant space on the platform's home page.

10 How is the confidentiality of the whistleblower and the reported person protected?

The Atlantia Group protects the whistleblower's identity from the time it receives the disclosure, with prejudice to compliance with legal requirements.

In the case of disclosures received via the IT platform, the whistleblower's identity is protected by the fact that the system stores the whistleblower's name in anonymised form (where, obviously, the whistleblower has provided their details) and by a no-log policy, ensuring that no record is kept, either directly or indirectly, of the connection used (for example, the server, IP address or mac address), even when access is from a computer connected to one of the Group's networks.

All Atlantia people who receive a disclosure and/or who are aware of it, for whatever reason, are required to ensure that the existence and content of the disclosure remain confidential, as well as the identities of whistleblowers and reported persons.

Any communication regarding the existence and content of the disclosure, and the identities of whistleblowers and reported persons, must be strictly on a need-to-know basis.

Appropriate protections of confidentiality also apply in the case of disclosures received in paper form or electronically.

11 Is the whistleblower protected from victimisation or discrimination?

In accordance with the law, Atlantia guarantees that anyone making a disclosure in good faith is protected from any victimisation or form of discrimination directly or indirectly linked to the disclosure.

The Ethics Officer (availing itself of the relevant departments) monitors the working life of the employee over a period of 2 years from the date of the disclosure, to ensure the absence of any discriminatory actions or other forms of victimisation resulting from the disclosure.

12 Who examines disclosures and handles the investigation?

The Ethics Officer may conduct the investigation directly, obtaining information from the relevant departments within Group companies. Alternatively, the Ethics Officer may (i) avail itself of the support of the Relevant Departments, as identified from time to time, in conducting the investigation, requesting feedback on the concerns raised; (ii) request the Group's Internal Audit Department to carry out the necessary checks designed to analyse and assess the grounds for the concerns raised. The Internal Audit Department then provides the Ethics Officer with an audit report on the checks conducted.

13 What protections are there for the reported person?

The guarantees of confidentiality provided by the Policy also protect the reported person.

The Reported Person shall not be subjected to disciplinary action if there is no objective proof of the reported violation, or without conducting an investigation of the concerns raised by the disclosure.