

Autostrade per l'Italia Communication on Progress (COP) – Fiscal Year 2008

AREA OF APPLICATION	PRINCIPLE	ACTIONS AND RESULTS
HUMAN RIGHTS	<p>1. Businesses should support and respect the protection of internationally proclaimed human rights</p> <p>2. Make sure that they are not complicit in human rights abuses</p> <p>Rif.:</p> <p>Code of Ethics (page 11) http://www.autostrade.it/pdf/Codice_Etico.pdf</p> <p>GRI/G3: LA4, LA7-9, LA13-14, HR4, HR1-7, SO5, PR1, PR8</p> <p>Sustainability Report 2008 (page: 39, 40, 46, 63, 66, 70, 73, 77, 78, 81, 84, 87, 130) http://www.autostrade.it/en/sostenibilita/report/sustainability_autostrade_2008.pdf</p>	<p>All the activities of Autostrade per l'Italia and its subsidiaries are mostly in Italy.</p> <p>The Autostrade per l'Italia's commitment to the principles in the areas of corruption prevention, human rights and labour protection is expressed in the Code of ethics, available on Autostrade per l'Italia's web site (www.autostrade.it), also distributed to all staff in order to increase awareness and improve behaviours.</p> <p>The Code is attached to tender, supply and service contracts, with the requirement to the suppliers to comply with its principles.</p> <p>In 2008, on the occasion of the 60th anniversary of the Universal Declaration of Human Rights, the Company signed the CEO Statement on human rights, which requires signatories to the Global Compact to invite governments to fulfil all their obligations on human rights and continue to support and respect such rights within their sphere of business.</p>
LABOUR STANDARDS	<p>3. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p>4. the elimination of all forms of forced and compulsory labour;</p> <p>5. the effective abolition of child labour;</p> <p>6. the elimination of discrimination in respect of employment and occupation.</p> <p>Rif.:</p> <p>Code of Ethics (page 16-17) http://www.autostrade.it/pdf/Codice_Etico.pdf</p> <p>GRI/G3: EC7, LA2, LA4-5, LA13-14, HR1-7, SO5.</p> <p>Sustainability Report 2008 (page 39, 40, 46, 63, 64, 65, 66, 87, 129, 130) http://www.autostrade.it/en/sostenibilita/report/sustainability_autostrade_2008.pdf</p>	<p>Autostrade per l'Italia manages a workforce of over 9,900 throughout Italy in full compliance with the rights established by law and in labour contracts, and without any limitation or discrimination with regard to gender, race, nationality or religion. Autostrade per l'Italia operates mostly in Italy, where the laws in force are in accordance with universally recognised international standards, including the "United Nations Universal Declaration of Human Rights", the "International Covenant on Civil and Political Rights", the "International Covenant on Economic, Social and Cultural Rights", and the "International Organisation of Labour Conventions", etc.</p> <p>Autostrade per l'Italia does not operate any discriminatory policy in the criteria for selection and remuneration of men and women employees, nor are any differences applied in the treatment of protected categories. Ratio of basic salary of men to women by employee category is one.</p> <p>Autostrade per l'Italia's workforce is required to be informed of and comply with the principles of honesty, reliability, impartiality, loyalty, transparency, fairness and good faith set out in the Company's Code of Ethics, and to make their technical, professional and ethical knowledge available to the company by which they are</p>

		<p>employed.</p> <p>There is no record so far of episodes linked to discriminatory practices or violations of the principles set out in the Code of Ethics with reference to staff and other stakeholders.</p> <p>Industrial and trade union relations.</p> <p>Industrial relations reflect the rigorous observance of commitments set by the relevant national legislation and the collective contract, as well as policies based on a constructive dialogue with trade unions, for the purpose of increasing productivity and service efficiency and promoting the enhancement and development of the workforce.</p> <p>All of Autostrade per l'Italia's workforce are covered by national collective labour contracts, required by law in Italy, and 70% of staff are members of a labour union. A 60-day notice period is required prior to the transfer of individual workers to a different workplace for technical, organisational or industrial reasons. A six-month notice period is required in the event of the transfer of groups of workers to a different workplace. In the event of disposal of a division or business unit, as required by art. 47 of Law 428/1990, a 25-day notice period is required. All principles of legal and non discriminatory employment are included and acknowledged in labour contracts and the Code of Ethics, in accordance with national and EU legislation.</p> <p>Workplace Health and Safety</p> <p>Autostrade per l'Italia, which has been working for years to improve the health and safety of its employees, upgraded the Prevention and Protection Service in 2008 by creating a special "Health, Safety and Environment" structure. A Workplace Health and Safety Committee was also set up to co-operate with the trade unions (Filt-Cgil, Fit-Cisl, Uiltrasporti, Sla-Cisal and Ugltrasporti-At), representatives of Autostrade per l'Italia SpA and external work safety experts. The Committee's tasks are to:</p> <ul style="list-style-type: none"> - monitor developments in Italian and EU legislation on workplace health and safety and help identify initiatives, projects and solutions to improve work safety standards; - monitor trends in accidents and professional diseases and the procedures for adopting the health and safety management system (SGSSL); - promote new initiatives to foster the "culture of safety" amongst employees, also through information and training. <p>In 2008, Autostrade per l'Italia SpA obtained renewal of its OHSAS 18001 certification (2006) for "Management of motorway infrastructure and services and provision of support activities". This also includes the employer's activities in the Rome headquarters, the Florence offices and the Fiano Romano, Barberino di Mugello and Romagnano Sesia laboratories.</p>
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		children of employees working near the Rome and Florence offices (77 children in all).
ENVIRONMENT	<p>7. Businesses should support a precautionary approach to environmental challenges</p> <p>8. Undertake initiatives to promote greater environmental responsibility</p> <p>9. Encourage the development and diffusion of environmentally friendly technologies</p> <p>Rif.: GRI/G3: EC2, EN1-30.</p> <p>Sustainability Report 2008 (page:2, 57, 90, 91, 96-121,129, 130)</p> <p>http://www.autostrade.it/en/sostenibilita/report/sustainability_autostrade_2008.pdf</p>	<p>Energy initiatives. Autostrade per l'Italia's 5-year plan (2008-2013) provides for initiatives in the following sectors:</p> <ul style="list-style-type: none"> - production of electrical energy from renewable sources; - electrical energy saving for tunnel and service area lighting; - replacement of obsolete heating and air conditioning systems with high-efficiency plant, use of geothermal energy underground to produce heat and electricity and tri-generation (production of electrical, thermal and cooling energy) in the main office buildings; - "passive" improvement of energy efficiency in office buildings in Rome and Florence and outlying structures (section departments, maintenance points, snow points). <p>With regard to renewable sources, in 2007 the Group launched a plan to install solar power plants along its motorway network. The following progress has been made at 31 December 2008:</p> <ol style="list-style-type: none"> 1. 3 solar power plants are already in use at as many service areas, producing approximately 130,000 kWh of electricity a year and thus reducing CO2 emissions by 70 tonnes a year; 2. work has begun on the installation of solar panel roofs at 92 service areas, with the aim of producing 5,600,000 kWh of electricity a year and reducing CO2 emissions by around 3,000 tonnes a year. 3. further solar power applications are under development for use in buildings or on land owned by the Group. <p>An energy saving plan for motorway tunnels is being put in place, involving the progressive replacement of traditional lamps with more efficient LED lamps. During 2008 lighting in the following tunnels was replaced: Crocina (km 355.60 on the northbound carriageway of the A1 between Florence and Rome), Vado (km 216 on the southbound carriageway of the A1 between Bologna and Florence) and Monte Moro (km 12.5 on the southbound carriageway of the A12 between Genoa and Sestri Levante).</p> <p>The contribution of technological systems to reducing air pollution caused by the network In terms of air pollution, since 2007 the Group has developed three calculation models designed to measure the quantity of CO2 saved, on its network, as a result of the introduction of the Telepass and Tutor systems, and the adoption of recycling procedures and techniques for motorway pavements in need of repair. The reduction in emissions in 2008, following introduction of the Group's technology systems, amounts to 27,852 tonnes of CO2 in the case of Telepass (27,293 tonnes in 2007) and 32,595</p>

		<p>tonnes of CO2 in the case of Tutor (13,370 tonnes in 2007).</p> <p>Eco-fuel incentives: To promote eco-compatible fuels, Autostrade per l'Italia's 2008 and 2009 tender procedure for fuel service contract assigns higher scores to companies that offer environmentally sustainable product mixes. At 31.12.2008, Autostrade per l'Italia service areas had 133 LPG pumps (52% of total fuel pumps) and 9 natural gas distributors.</p>
ANTI-CORRUPTION	<p>10. Businesses should work against corruption in all its forms, including extortion and bribery.</p> <p><u>Rif.:</u></p> <p>Code of Ethics http://www.autostrade.it/pdf/Codice_Etico.pdf</p> <p>GRI/G3: SO2-SO5</p> <p>Sustainability Report 2008 (page 28, 44, 45, 87,131) http://www.autostrade.it/en/sostenibilita/report/sustainability_autostrade_2008.pdf</p>	<p>Since 2005, the listed holding company, Atlantia, which controls Autostrade per l'Italia, has participated in the Partnering Against Corruption Initiative (PACI). The initiative was launched by the World Economic Forum in January 2004, based on the belief that a policy of zero tolerance towards corruption was in the interests of both the political and social system and the world of business. To this end, a working group made up of managers from 130 major companies drew up a set of principles calling for a strong commitment from signatory companies in terms of:</p> <ul style="list-style-type: none"> • the adoption of zero tolerance policies to combat corruption; • the adoption, within internal organisations, of a practical and effective anti-corruption programme, based on PACI guidelines. <p>The Group started a formal anti-corruption programme since 2001.</p> <p>In 2002, the Board of Directors of Autostrade approved the Organisation, Management and Control Model and the associated Group Code of Ethics, and submitted them to the Ministry of Justice, in compliance with the terms of Legislative Decree 231/2001, which contains regulations concerning the administrative liability of companies and associations, bribery included. The purpose of the Model is to help the Group build a structured, integrated system of procedures and preventive measures against the various types of offence envisaged by the Decree by singling out areas of particular risk and introducing routine procedures for risk control.</p> <p>The key elements of the Model are:</p> <ul style="list-style-type: none"> • mapping the "sensitive" areas of the Company – i.e. those business activities that lend themselves most easily to the commission of the offences referred to in the Decree; • establishing a Supervisory Body to ensure that the Model is working properly and effectively. <p>All the motorway concessionaires in the Atlantia Group have adopted the Organisation, Management and Control Model required by decree law 231/01 and subsequent</p>

		<p>amendments, and have established a Supervisory Board. Atlantia SpA's Supervisory Board, chaired by Renato Granata, Emeritus Chairman of the Constitutional Court and the First Honorary Adjunct Chairman of the Supreme Court, consists of the Company's General Counsel and the Head of the Internal Auditing Department. In 2008, the Board met 13 times and reported periodically to the Board of Directors and the Board of Auditors on the activities performed, with regard to both updating of the Organizational, Management and Control Model and implementation of its audit plan.</p> <p>In 2003, the Group introduced an Ethics Officer to circulate the Code of Ethics and monitor levels of awareness of and compliance with it, also through Atlantia's Internal Audit, and to prepare communication initiatives and other activities to improve knowledge of the document, propose operating guidelines and procedures to reduce the risk of violating the Code and to ensure the Code is appropriately updated.</p> <p>There is an e-mail contact ethic_officer@atlantia.it) for signalling conduct not compliant with the of the Code of Ethics and for enquiries about the Code. In 2008, the Ethics Officer did not receive signalling of any alleged infringements of the Code of Ethics or episodes of discriminatory practice in respect of any stakeholder bound by the principles of the Code of Ethics.</p> <p>The Internal Audit organizational unit has the functions of monitoring and checking the correct operation of the internal control system in an annual programme of internal auditing. The Unit also carries out monitoring of the "organization, management and control model pursuant to law 231/01" on behalf of the Company's Supervisory Board.</p> <p>The Internal Audit unit is charged with identifying aspects of the internal control system to improve and making proposals for corrective action to the CEO, the relevant function heads and internal control officers.</p> <p>Internal Audit must also follow-up the corrective action they recommend and report on its completion to the CEO, the relevant function heads and internal control officers.</p> <p>In 2008, the audit plan (based on risk assessment findings) focussed on monitoring the control of corruption and fraud risks and compliance with the relevant regulations. To complete such audit activities, the Internal Audit unit also engaged external consultants.</p> <p>In 2008, the Internal Audit unit carried out around 30 audits in various departments of Autostrade per l'Italia SpA and its main subsidiaries.</p> <p>In 2008, 1% of Autostrade employees received training on the organization's anti-corruption policies and procedures. Such training addressed the entire management and any</p>
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NS. RIF.

ROMA

VS. RIF.

UNI Global Compact Office
United Nations
New York, NY 10017
USA

Autostrade per l'Italia is the largest toll motorway operator in Italy, 100% owned by the holding company Atlantia. Autostrade per l'Italia manages a network of over 3,400 km under concession, representing 52% of Italy's entire motorway system, and accounting for 60% of the nation's toll motorway network and around 9% of Europe's toll motorways.

The public utility of the operated asset gives to the company a role of great social importance.

Our commitment to sustainability forms an integral part of Autostrade per l'Italia's values and mission, which is to guarantee the development of motorway infrastructure serving social and economic growth and linking millions of people everyday. Responsibility for us means to offer high quality of service standards to our customers, focus on road and workplace safety, to hold talks with local administrations and communities during roadworks and to reduce environmental impacts in all our business activities.

In 2004, the Company decided to support the Global Compact project and to subscribe to the Ten Principles, truly convinced that they are in line our values and beliefs. Actions undertaken in the last years confirm the commitment to the Ten Principles, by the subscription of the "Caring for Climate: The business Leadership Platform", signed by the CEO of Autostrade per l'Italia in the June of 2007 and the signing of Global Compact human rights CEO Statement in 2008, on the occasion of the 60th anniversary of the Universal Declaration of Human Rights.

Autostrade per l'Italia's commitment to the Global Compact Ten Principles is included in the 2008 Sustainability Report, approved by the Board of Directors in the March of 2009 and widely distributed to the most important stakeholders.

The 2008 Sustainability Report was drafted, for the second year running, in accordance with Global Reporting Initiative (GRI) G3 guidelines at A+ compliance level that represents the highest level of conformity to the Guidelines. It contains the new edition of the "Charter for Sustainability" articulated in areas of commitment, objectives and future provisioning that the Company pledges to perform in order to improve its own social responsibility. I'm pleased to attach - together with the Communication On Progress - a copy of 2008 edition of Autostrade per l'Italia's Sustainability Report.

Best regards,

autostrade//per l'italia
Il Presidente
Gian Maria Gros-Pietro