MOODY'S RATINGS

ASSESSMENT
16 December 2024

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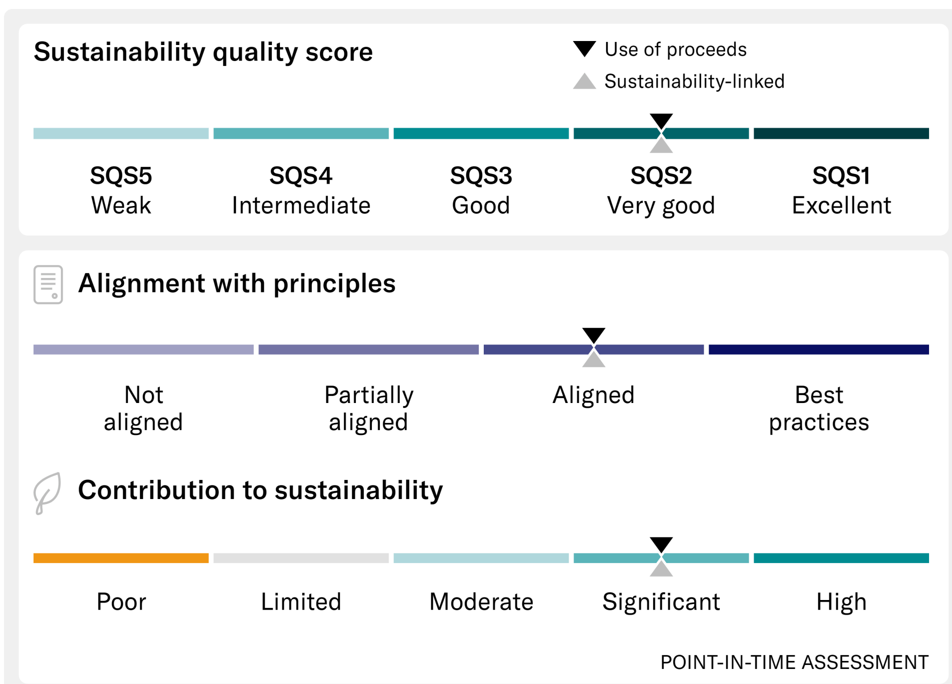
ASPI - Autostrade per I'talia Group

Second Party Opinion – Sustainable Finance Framework Assigned SQS2 (Use of Proceeds) and SQS2 (Sustainability-Linked)

Summary

We have assigned an SQS2 sustainability quality score (very good) to the use of proceeds portion and an SQS2 sustainability quality score (very good) to the sustainability-linked portion of ASPI's sustainable finance framework dated 16 December 2024. The framework covers three eligible use of proceeds categories and three key performance indicators (KPIs). For the use of proceeds portion, the framework is aligned with the four core components of the International Capital Market Association's (ICMA) Green Bond Principles (GBP) 2021 (with June 2022 Appendix 1) and the Loan Market Association, Asia Pacific Loan Market Association and Loan Syndications & Trading Association's (LMA/APLMA/LSTA) Green Loan Principles (GLP) 2023, and demonstrates a significant contribution to sustainability. For the sustainability-linked portion, the framework is aligned with the five core components of the ICMA's Sustainability-Linked Bond Principles (SLBP) 2024 and the LMA/APLMA/LSTA Sustainability-Linked Loan Principles (SLLP) 2023, and demonstrates a significant contribution to sustainability.



Scope

We have provided a second party opinion (SPO) on the sustainability credentials of ASPI's sustainable finance framework, including its alignment with the International Capital Market Association's (ICMA) Green Bond Principles (GBP) 2021 (with June 2022 Appendix 1), the Loan Market Association, Asia Pacific Loan Market Association and Loan Syndications & Trading Association's (LMA/APLMA/LSTA) Green Loan Principles (GLP) 2023, the Sustainability-Linked Bond Principles (SLBP) 2024 and the LMA/APLMA/LSTA Sustainability-Linked Loan Principles (SLLP) 2023. Under the framework, the company plans to issue use-of-proceeds green or sustainability bonds and loans with the aim of financing projects comprising three eligible green categories, as outlined in Appendix 4 of this report. In addition, the company has selected three sustainability KPIs for potential issuance of sustainability-linked bonds and loans – in the areas of GHG emissions (KPIs 1 and 2) and electrification of the network (KPI 3), as outlined in Appendix 5 of this report. We have assessed the alignment with principles and contribution to sustainability components of both the use-of-proceeds and sustainability-linked portions of the financing framework independently, resulting in two separate SQS scores.

Our assessment is based on the last updated version of the framework received on 15 November 2024, and our opinion reflects our point-in-time assessment[1] of the details contained in this version of the framework, as well as other public and non-public information provided by the company.

We produced this SPO based on our Assessment Framework: Second Party Opinions on Sustainable Debt, published in November 2024.

Issuer profile

ASPI is the largest operator of tolled motorways in Italy. Together with its subsidiaries, ASPI manages a network of almost 3,000 km of motorways under long-term concession agreements granted by the Italian government. ASPI's capital expenditure (capex) programme is the largest in the European toll road sector. This reflects the large size of the network, the historical level of congestion on the roads, and the age of the infrastructures managed. In particular, certain sections of the network tend to experience high congestion during peak times, such as motorways that lead to and from major urban centres including Bologna, Genoa, Florence, Milan, Naples, and Rome.

The toll road sector faces a limited impact from environmental risks overall. In general, ASPI does not have significant exposure to consequences of extreme weather events thanks to its geographical diversification across Italy. The increasing use of electric or hybrid cars is a further mitigant, with new revenue streams likely to support any investment by toll road operators in additional facilities such as charging stations. Toll road traffic can also be affected by physical climate risks. Mitigating factors include insurance policies, regulations in some jurisdictions that allow for the recovery of unforeseen costs or losses, and state intervention.

Strengths

» The vast majority of the use of proceeds categories follow stringent standards and best available technologies, although inherent negative externalities are present in road projects.

» KPIs 1 and 2 should always be used together and will represent 75% of the company's total carbon footprint.

» External verification in place for both portions of the framework.

Challenges

» Historical data of KPIs 1 and 2 show that ASPI's GHG emissions have not decreased in the past years.

» The use of market based approach with a zero emission factor in KPI1 could lead to discrepancies between the reported emissions and actual energy use.

Alignment with principles - use of proceeds

ASPI's sustainable finance framework is aligned with the four core components of the ICMA's GBP 2021 and LMA/APLMA/LSTA's GLP 2023. For a summary alignment with principles scorecard, please see Appendix 1.

- [x] Green Bond Principles (GBP)
- [x] Green Loan Principles (GLP)
- [ ] Social Bond Principles (SBP)
- [ ] Social Loan Principles (SLP)
- [ ] Sustainability-Linked Bond Principles (SLBP)
- [ ] Sustainability Linked Loan Principles (SLLP)

Use of proceeds

Not aligned	Partially aligned	Aligned	Best practices

Clarity of the eligible categories – BEST PRACTICES

ASPI has communicated the nature of expenditures, the eligibility and exclusion criteria, and the location of the eligible projects for all project categories, which are all in Italy. The types of financing under the present framework can include capital and operational expenditures (capex and opex), and should be net of any other public contributions, dedicated green funding, project financing, and any State or European subsidies. Eligibility criteria are clearly defined for all categories and project types, following EU Taxonomy criteria, including the substantial contribution and their respective Do No Significant Harm (DNSH) criteria.

Clarity of the environmental or social objectives – BEST PRACTICES

The company has outlined the environmental objectives associated with its eligible categories. All eligible categories are relevant to the respective objective to which they are aiming to contribute, notably climate change adaptation, as well as the UN Sustainable Development Goals (SDGs), making the framework coherent with international standards (see Appendix 2 for more details).

Clarity of expected benefits – BEST PRACTICES

ASPI has identified clear expected environmental benefits for all categories and these benefits are relevant based on the projects likely to be financed under each category. Relevant and measurable benefits are identified in the framework for each of the eligible categories it contains. The benefits will be assessed by the issuer and quantified for all eligible project categories in the corresponding annual reporting. The issuer has also committed to a three financial year look-back period, and to disclose an estimation of the refinancing share to investors prior to any issuance.

Process for project evaluation and selection

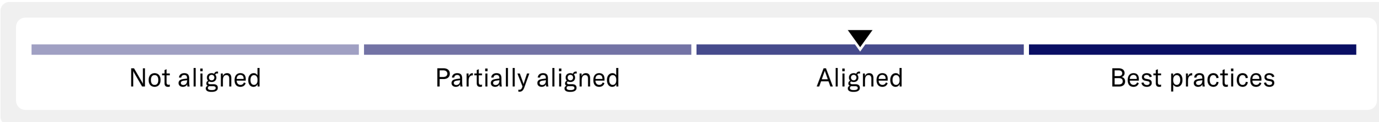
Not aligned	Partially aligned	Aligned	Best practices

Transparency and clarity of the process for defining and monitoring eligible projects – BEST PRACTICES

The company's decision-making process for the evaluation and selection of projects is clear and structured, and outlined in its framework which will be publicly available. ASPI has set up a dedicated sustainable finance working group (SFWG), which is in charge of evaluating and selecting eligible green projects and allocating net proceeds to such projects. The SFWG will also monitor, at least annually, the continued compliance of projects with the eligibility criteria. In case of any project postponement or non-compliance with eligibility and exclusion criteria, ASPI commits to allocate the proceeds to other projects that would comply with the eligible green categories as soon as reasonably practicable.

The environmental and social risk mitigation process is publicly disclosed in the Framework. The company conducts environmental and social risk identification, evaluation and mitigation, both as part of the project evaluation and selection process, and throughout the life cycle of projects.

Management of proceeds

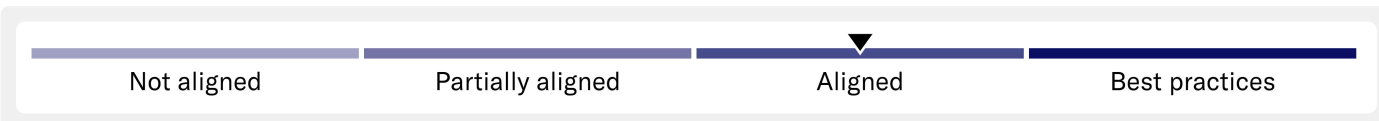


Allocation and tracking of proceeds – ALIGNED

ASPI has defined its process for the management and allocation of proceeds in its framework. The net proceeds will be tracked internally and an equivalent amount will be earmarked for allocation to the portfolio of eligible green projects. Annually, adjustments will be made to the portfolio of eligible projects to ensure that the amount of proceeds matches the allocated funds. ASPI expects to allocate proceeds within 36 months of issuance.

Unallocated proceeds will be invested as ASPI's own discretion, *as per* its liquidity management policy, including in cash or cash equivalents, overnight or other short-term financial instruments.

Reporting

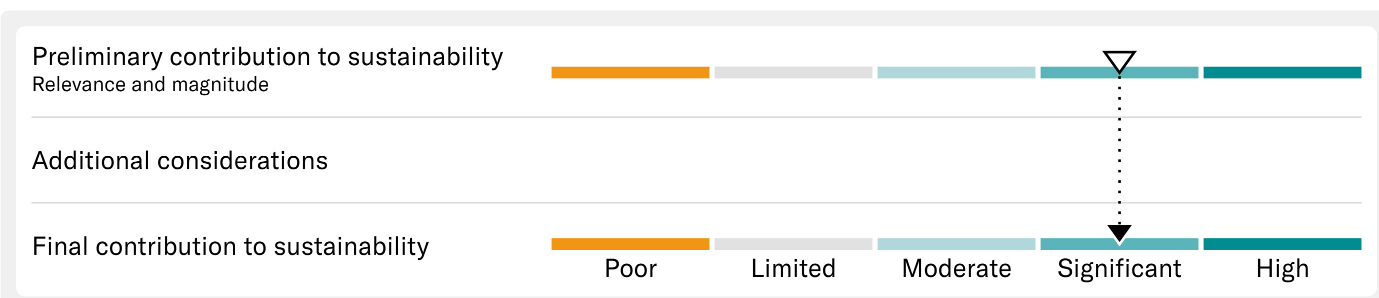


Reporting transparency – ALIGNED

ASPI has committed to publish annual allocation and impact report on its sustainable finance instruments until the full allocation of proceeds. The report will be publicly available and will cover relevant information about the allocation of proceeds, and, in the presence of controversial issues, will bring potential environmental and social risks associated with the selected projects. Key methodology or data sources, and assumptions for calculation, will be publicly available in this report and will be disclosed on ASPI's website. The reporting will be verified by an independent party on an annual basis until full allocation of proceeds.

Contribution to sustainability - use of proceeds

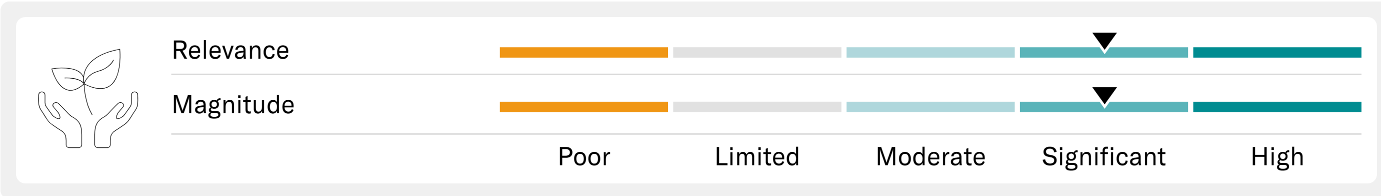
The framework demonstrates a significant overall contribution to sustainability. This reflects a preliminary contribution to sustainability score of significant, based on the relevance and magnitude of the eligible project categories, and we have not made an adjustment to the preliminary score based on additional contribution to sustainability considerations.



Preliminary contribution to sustainability - use of proceeds

The preliminary contribution to sustainability is significant, based on the relevance and magnitude of the eligible project categories. Based on information provided by the company, the vast majority of the proceeds are expected to be allocated towards the climate change adaptation category, and therefore we have assigned a higher weight to this category in our score. A detailed assessment by eligible category has been provided below.

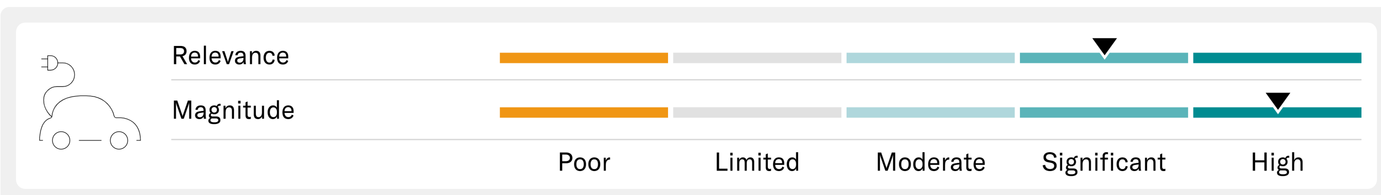
Climate Change Adaptation



Projects to enhance the resilience of roads networks against climate change address a significant environmental issue both in the local context and for the issuer's sector. Italy has experienced a notable increase in extreme weather events, such as intense rainfall, heatwaves, and flooding. Climate resilient roads are vital for connecting communities, facilitating trade, and ensuring access to essential services. However, although Italy is located in an area identified as particularly vulnerable to climate change, the country is not considered among the countries most at risk of extreme climate hazards [2].

The magnitude of eligible projects is considered significant. The eligible projects are expected to have positive long-term impact on climate change adaptation and adhere to stringent technical eligibility criteria. All projects under this category will follow the criteria set in the EU Taxonomy for climate change adaptation and circular economy activities, including the substantial contribution and their respective DNSH criteria, and do not include any new construction of roads or lanes. However, eligible projects have inherent negative externalities such as noise and air pollution from fossil fuel-based vehicles using roads, which reduces the overall positive impact of the projects.

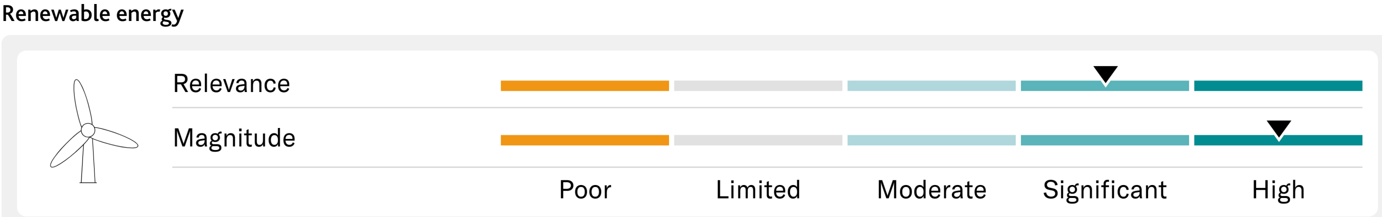
Clean Transportation



Digital and smart mobility solutions, LED and EVs charging stations are considered significantly relevant to tackle tool roads' sector carbon emissions. Currently, Italy has over 37,000 charging points, and the country's goal is to reach 110,000 public charging points by 2030.[3] The expansion of EV charging stations is crucial for meeting the increasing demand and promoting the adoption of electric vehicles (EVs) and foster their widespread adoption. Indeed EVs play a pivotal role in reducing greenhouse gas emissions, improving air quality, and transitioning away from fossil fuels, all of which are essential steps toward achieving climate goals. We also considered of significant relevance the LED lightening of tunnels and smart traffic systems projects, as they reduce congestion and consequently GHG emissions.

The magnitude is considered high. All projects under this category are implementing the best available technologies and should have highly positive long term positive impact, avoiding the creation of new negative externalities or locked-in effects. Minimal environmental externalities are expected from the construction works required for the EV charging stations and the issuer has adequate E&S management procedures in place to address these concerns.

Renewable energy



Projects related to the construction, installation, operation and maintenance of solar photovoltaic (PV) in Italy's roads would significantly contribute to climate change mitigation although these would address only a limited portion of the company's overall emissions. Natural gas is the largest source of energy in Italy, playing a crucial role in electricity generation and heating. Increasing the renewable energy generation in the country is still highly relevant, as in 2023, renewables accounted for only 30% of the total energy consumption and 55% of the electricity generation. From an issuer's perspective, however, the scope 2 emissions individually represents less than 6% of ASPI's total carbon footprint, limiting the overall relevance of this category.

The magnitude is assessed to be high. Solar PV installations are considered to represent best available technologies, and the issuer's systematic use of environmental impact assessments and following the substantial contribution criteria for the applicable activities from the EU Climate Delegated Act further enhance positive impact.

Additional contribution to sustainability considerations - use of proceeds

We have not made an adjustment to the preliminary contribution to sustainability score based on additional considerations.

The company has in place a well-structured environmental risks' assessments processes, including the monitoring of biodiversity loss and land use. The environmental management system is embedded into the wider industrial management system governing operations, which is based on several ISO certifications (e.g: ISO 45001, ISO 14001 and ISO 9001). Regarding climate change adaption, assets are designed to take into account the local ecosystem. The company has conducted a global study on climate physical risks to identify and remedy these risks.

However, we point that ASPI has faced several controversies related to the safety of its roads, including the collapse of the Genoa bridge in 2018. The issuer has informed that, following the civil liabilities settlements in court and internal restructure of the company, currently there are only a couple of investigations in course, and that any asset under investigation would be considered eligible under this framework.

Projects to be financed under ASPI's framework are coherent with its broader sustainability strategy. The group's emission reduction targets are consistent with an ambition to limit the temperature increase to 1.5°C, as in line with SBTi. The activities defined under the framework should contribute to the company's target of operating zero-emissions toll roads and develop the use of electric vehicles across its motorways.

Alignment with principles - sustainability-linked

ASPI's sustainable finance framework is aligned with the five core components of the ICMA's SLBP 2023 and LMA/APLMA/LSTA's SLLP 2023. For a summary alignment with principles scorecard, please see Appendix 2.

- ○ Green Bond Principles (GBP)
- ○ Green Loan Principles (GLP)
- ○ Social Bond Principles (SBP)
- ○ Social Loan Principles (SLP)
- ☑ Sustainability-Linked Bond Principles (SLBP)
- ☑ Sustainability Linked Loan Principles (SLLP)

Selection of key performance indicators

Not aligned	Partially aligned	**▼ Aligned**	Best practices

Definition – ALIGNED

ASPI has clearly detailed the characteristics of the KPIs, including the units of measurement, rationale and process for the selection of the KPIs, as well as the calculation methodologies and scope. These details have been disclosed in the publicly available framework. The company has selected three KPIs. KPI 1 targets the absolute reduction of scope 1 & 2 emissions in tons of CO_2eq. KPI 2 focuses on reducing scope 3 emissions from capital goods linked to infrastructural development under concession, calculated as tons of carbon dioxide equivalent (tCO_2eq) per euro million of capital expenditure linked to infrastructural development under concession (€M) (tCO_2eq/€M). Finally, KPI 3 aims to achieve 100% of eligible service areas to be equipped with electric vehicles charging points (EVCPs).

Measurability, verifiability and benchmark – ALIGNED

The KPIs selected by ASPI are measurable and externally verifiable. The calculation methodologies are consistent, and in case of any change in methodology, the company commits to inform investors about such changes. The KPIs' definitions rely on external references, which allow them to be benchmarked. KPI 1 and 2 are based on widely accepted metrics for monitoring and reporting GHG emissions, namely the GHG Protocol. KPI 3, while not based on a standard, is considered as a clear and widely accepted indicator and metric. It is also part of the ICMA KPIs registry 2023. Historical performance data have been disclosed for KPI 3. KPI 1 and 2 lack historical data before the baseline year.

Relevance and materiality – ALIGNED

The selected KPIs are relevant, core and material to ASPI's business strategy for its current and future operations. They address relevant sustainability challenges for the transportation sector, more specifically toll road. KPI 1 covers 100% of scope 1 and 2 emissions, which represent 16% of the total GHG emissions of the company. KPI 2 emissions covers 72% of the scope 3 emissions. The company will systematically use KPIs 1 and 2 together, ensuring a total 75% coverage of ASPI's total carbon footprint. KPI 3 covers 100% of the eligible service areas to be equipped with EVCPs. It represents 82% of the total service areas of ASPI. The level of relevance of the KPIs is analyzed in detail in the "Contribution to sustainability" section.

Calibration of sustainability performance targets

Not aligned	Partially aligned	**▼ Aligned**	Best practices

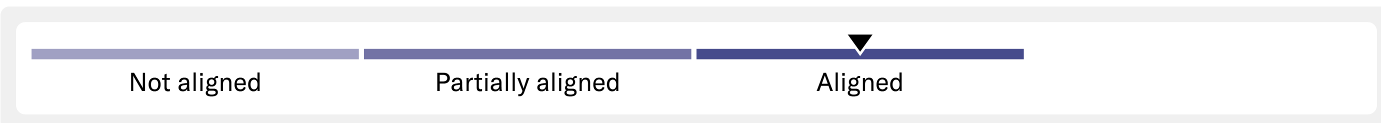
Consistency and ambition – ALIGNED

The selected SPTs are consistent with the company's sustainability strategy, including the goals to be net zero across all scopes by 2050 and to deploy EVCPs across all the company's network. The SPTs related to KPI 1 follow a positive trend compared to the business-as-usual (BaU) scenario, however, the pace of reduction is slower than for the 2019-23 period. The SPT of KPI 2 demonstrates a material improvement compared to the BaU scenario. KPI 3 also demonstrates a material improvement compared to BaU scenario. The SPTs of the three KPIs have been informed by benchmarks and external references. The level of ambition for the three SPTs is analysed in detail in the “Contribution to sustainability” section.

The means for achieving the SPTs, as well as any other key factors beyond the issuer's direct control that may affect the achievement of the SPTs, are disclosed in the framework. However, we emit reserves towards the credibility of the means of achievements related to KPIs 1 and 2. KPI 1 related GHG emissions have only decreased due to the use of a market-based approach methodology for calculating scope 2 emissions. The company uses a zero emission factor, explaining the large decrease in emissions between 2019 and 2023. Scope 1 emissions have shown no reduction in the same period, explained by the company as a consequence of the high volume of capex plan during those past years. KPI 2 related emissions have also shown no evolution between 2019 and 2023.

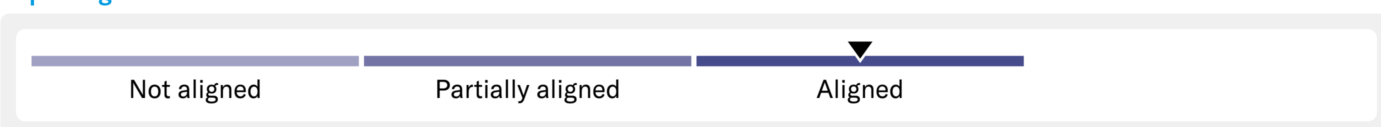
Disclosure – BEST PRACTICES
The timeline, baseline and trigger events have been disclosed in the framework. Relevant intermediary targets were set in the form of SPTs to provide sufficient visibility into the performance of three KPIs over time. The selected baselines are externally verified, and are considered relevant and reliable.

Instrument characteristics



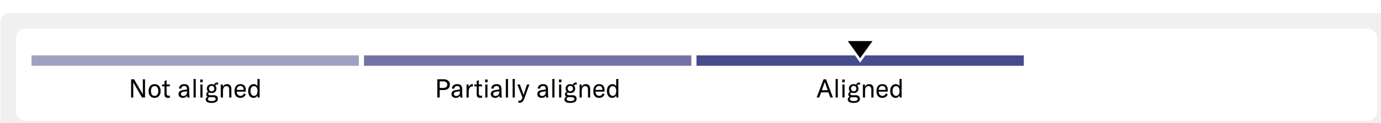
Variation of structural characteristics – ALIGNED
The financial variation structure has been defined and is disclosed in the framework. The exact mechanism and impacts, such as a coupon step-up, redemption premium or margin adjustment, will be detailed in the corresponding transaction documentation and are explained in the sustainable financing framework for different types of sustainability-linked financial instruments. The specific KPIs and SPTs will be detailed for each instrument in the corresponding documentation.

Reporting



Transparency of reporting – ALIGNED
ASPI has committed to report annually until the last trigger event of the financial instruments and in the event of material changes. The intended scope and granularity of the reporting are clear and exhaustive, covering all the required and recommended elements, including information on the performance of the KPIs and any relevant information enabling investors to monitor the level of ambition of the SPTs. The reporting will be made publicly available on the company's website.

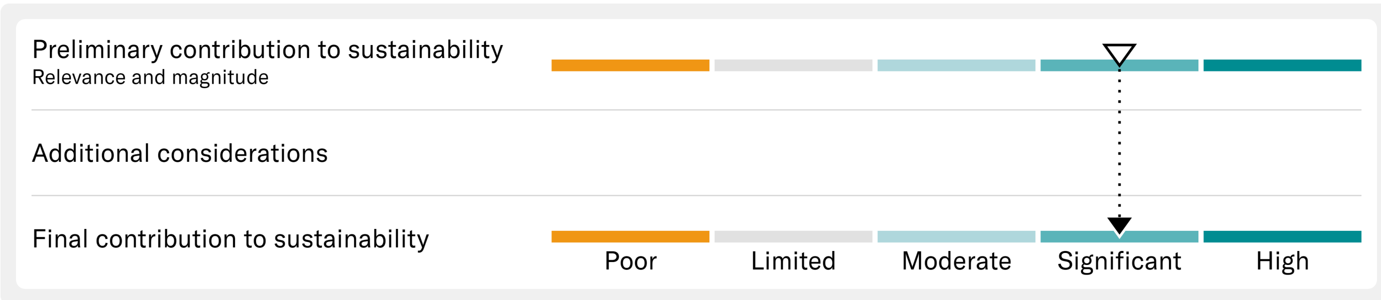
Verification



Verification process – ALIGNED
The performance of each KPI against the relevant SPTs will be externally verified on an annual basis and in the event of material changes affecting the instrument's financial characteristics until the last trigger event of the instrument. The verification assurance report will be made publicly available on ASPI's website.

Contribution to sustainability - sustainability-linked

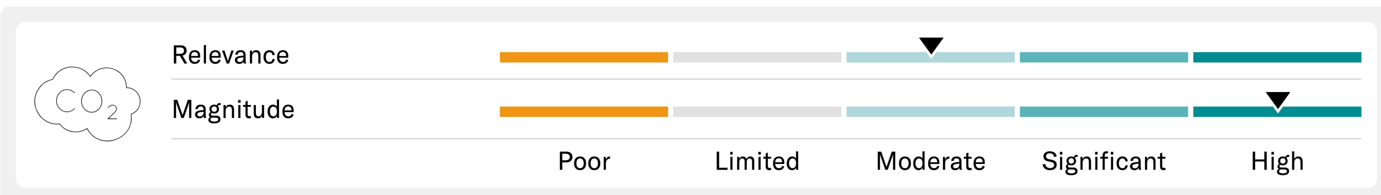
The framework demonstrates a significant overall contribution to sustainability. This reflects a preliminary contribution to sustainability score of significant, based on the relevance and magnitude of the KPIs and SPTs, and we have not made an adjustment to the preliminary score based on additional contribution to sustainability considerations.



Preliminary contribution to sustainability - sustainability-linked

The preliminary contribution to sustainability is significant, based on the relevance and magnitude of the KPIs and SPTs. A detailed assessment by KPI has been provided below.

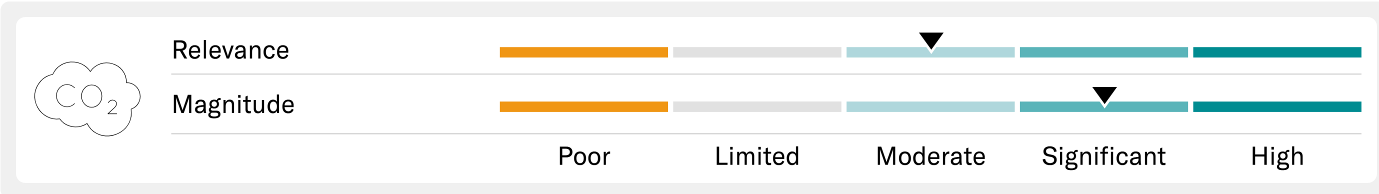
KPI 1: Absolute scope 1 and 2 GHG emissions reduction



KPI 1 is considered to be of a moderate relevance due to a combination of carbon footprint coverage and the methodology employed for the calculation of scope 2 emissions. The issuer uses a market-based approach, utilizing a zero emission factor certified renewable energy creating discrepancies between the emissions reported and the energy used, which could lead to the overestimation of the effectiveness of the mitigation measures. According to this methodology, scope 2 emissions account for only 1% of total scope 1 and 2 emissions. In contrast, when applying the location-based approach, scope 2 emissions constitute 53% of the total scope 1 and 2 emissions in 2023. As for the coverage, KPI 1 covers 100% of scope 1&2 emissions but only 12% of the total carbon footprint of the company. The issuer has committed to systematically use KPI 1 and 2 together, thus covering about 75% of the total company's carbon footprint. Finally, the company employs an absolute measure methodology, which is viewed as the most reliable and robust reduction indicator.

The magnitude of the SPTs associated with KPI 1, which reflects their ambition, is considered high, based on a combination of three benchmarking approaches. According to Moody's temperature alignment estimations, the issuer is in line with the 1.5°C scenario for the SPTs 2030 and 2038. Those same targets are also validated by Science Based Targets initiative (SBTi) in line with the 1.5°C scenario. Regarding the business as usual scenario, the expected reduction for the SPTs (2023-2030 and 2030-2038) shows a less positive trend than that in 2019-22. The period covered under the SPTs should only achieve a total 44% reduction, or a compound annual reduction rate (CARR) of 3.8% (period 2023-2038). This progress, although showing a positive trend, falls short of the prior performance of a total 61% reduction, or a CARR of 20.8%, between 2019 and 2022. The deceleration in emissions reduction is attributable to the issuer's major curtailments in scope 2 emissions, facilitated by the full use of electricity derived from renewable energy sources and scope 2 emissions being accounted as zero. Meanwhile Scope 1 emissions have not decreased between 2019 and 2023. This situation was explained by the issuer as a result of the company's large investment in CAPEX in the past three years. In terms of peers comparison we consider ASPI to be a top performer among the industry sector.

KPI 2: Intensity of Scope 3 GHG emissions from capital goods linked to infrastructural development under concession, calculated as tons of carbon dioxide equivalent (tCO2eq) per euro million of Capital Expenditure linked to infrastructural development under concession (€M) (tCO2eq/€M).

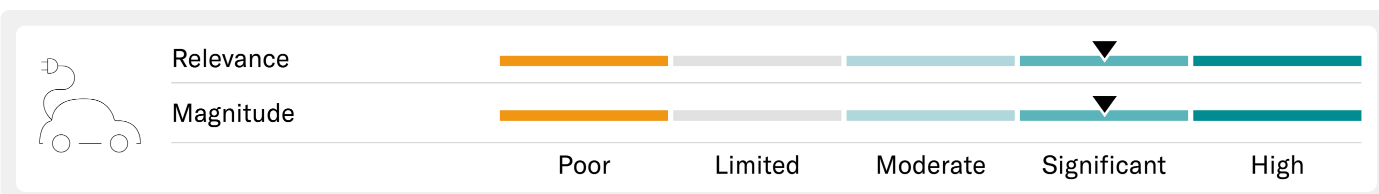


The relevance of KPI 2 is considered to be moderate, due to a combination of cabon footprint coverage and the calculation methodological approach of the KPI. Regarding the KPI2 coverage, when combined with KPI 1, the coverage extends to a significant portion of the GHG emissions, namely, 75% of total emissions. However, the KPI uses carbon intensity unit based on its capital expenditures (CAPEX), which we consider to be a less reliable and robust indicator compared to an absolute target. CAPEX as a normalizer can bring methodological challenges in the medium and long term, including variability of Capex accounting rules and variety between industries.

The KPI does not consider GHG emissions from vehicles circulating on ASPI's toll roads, which represents a non-negligeable part of the total emissions of the road transport. Italy is composed by 7,000 of km of highways, of which ASPI operates around 42%, with an estimate of 2.5 million vehicles using ASPI's toll roads every day. However, there is currently no consensus on accounting and target-setting for those emissions, nor in the GHG Protocol or any other relevant standard, reason why we have not impacted the overall relevance score of KPI 2.

The significant magnitude of the SPT related to KPI 2 reflects the metrics' ambition level and is determined by three benchmarking approaches. To date, the SBTi does not classify scope 3 targets by temperature. However, the SBTi mentions that it reviews scope 3 ambition to ensure it meets at least well-below 2°C scenario for its 2030 target. Moody's temperature alignment methodology also confirms that the issuer's targets are consistent with a well below 2°C scenario. Regarding business-as-usual scenario, the SPT shows a material improvement between 2023 and 2030 compared to the previous evolution from 2019 to 2023. However, this is because the KPI has shown no evolution between 2019 and 2023. Meanwhile, total absolute scope 3 emissions have increased by 110% during the period from 2019 to 2023. This increase in absolute emissions was also a consequence of the enormous CAPEX plan of the past years. It should be noted that despite a large increase in absolute emissions, the company has succeeded in limiting the increase of its intensity GHG emissions, which is seen positively. In terms of peer comparison, the analysis is limited due to the construction of the KPI, although one peer seems to have set targets in line with ASPI's.

KPI 3: Percentage of eligible service areas along ASPI network covered with electric vehicle charging stations out of total eligible service areas



The relevance of KPI 3 is considered to be significant as it is as a credible enabler of decarbonization. Although it is not expected to significantly impact the company's own GHG emissions, its role in broader decarbonization efforts is recognized. The deployment of electric vehicles charging points (EVCPs) is a key step to participate to the decarbonization of the road transport sector, responsible for 73% of the emissions of the transport sector in 2022, in the European Union[4].The KPI covers 100% of the eligible service areas, and 82% of the total company's service areas.

The significant magnitude of the SPTs related to KPI 3 reflects the metrics' ambition level and is determined by three benchmarking approaches. The SPT shows a material improvement for the period 2023-2029 compared to business as usual scenario 2022-2023. The percentage of service areas equipped with EVCPs will increase by 42 percentage points between 2023 and 2029, compared to a 32 percentage points increase in the period 2022-2023. In terms of peer comparison, ASPI is considered in line with its peers, although the analysis is limited due to differences in the measurement unit. Regarding external benchmarks, the European and Italian regulation requires to have EVCPs every 60km, and ASPI is committed to go beyond by installing EVCPs every 34km, and although this KPI is not directly comparable, seems to be a reasonable proxy to ASPI's public target.

Additional contribution to sustainability considerations - sustainability-linked

We have not made an adjustment to the preliminary contribution to sustainability score based on additional considerations. Given the nature of sustainability-linked instruments, additional considerations such as management of environmental and social risks and coherence are typically not material considerations in this component of our assessment, as discussed in our SPO assessment framework.

Appendix 1 - Alignment with principles scorecard for the use of proceeds portion of ASPI's sustainable finance framework

Factor	Sub-factor	Component	Component score	Sub-factor score	Factor score
Use of proceeds	Clarity of the eligible categories	Nature of expenditure	A	Best practices	**Best practices**
		Definition of content, eligibility and exclusion criteria for nearly all categories	A		
		Location	A		
		BP: Definition of content, eligibility and exclusion criteria for all categories	Yes		
	Clarity of the objectives	Relevance of objectives to project categories for nearly all categories	A	Best practices	
		Coherence of project category objectives with standards for nearly all categories	A		
		BP: Objectives are defined, relevant and coherent for all categories	Yes		
	Clarity of expected benefits	Identification and relevance of expected benefits for nearly all categories	A	Best practices	
		Measurability of expected benefits for nearly all categories	A		
		BP: Relevant benefits are identified for all categories	Yes		
		BP: Benefits are measurable for all categories	Yes		
		BP: Disclosure of refinancing prior to issuance and in post-allocation reporting	Yes		
		BP: Commitment to communicate refinancing look-back period prior to issuance	Yes		
Process for project evaluation and selection	Transparency and clarity of the process for defining and monitoring eligible projects	Clarity of the process	A	Best practices	**Best practices**
		Disclosure of the process	A		
		Transparency of the environmental and social risk mitigation process	A		
		BP: Monitoring of continued project compliance	Yes		
Management of proceeds	Allocation and tracking of proceeds	Tracking of proceeds	A	Aligned	**Aligned**
		Periodic adjustment of proceeds to match allocations	A		
		Disclosure of the intended types of temporary placements of unallocated proceeds	A		
		BP: Disclosure of the proceeds management process	Yes		
		BP: Allocation period is 24 months or less	No		
Reporting	Reporting transparency	Reporting frequency	A	Aligned	**Aligned**
		Reporting duration	A		
		Report disclosure	A		
		Reporting exhaustivity	A		
		BP: Allocation reporting at least until full allocation of proceeds, and impact reporting until full bond maturity or loan payback	No		
		BP: Clarity and relevance of the indicators on the sustainability benefits	Yes		
		BP: Disclosure of reporting methodology and calculation assumptions	Yes		
		BP: Independent external auditor, or other third party, to verify the tracking and allocation of funds	Yes		
		BP: Independent impact assessment on environmental and social benefits	Yes		
				Overall alignment with principles score:	**Aligned**

Appendix 2 - Alignment with principles scorecard for the sustainability-linked portion of ASPI's sustainable finance framework

Factor	Sub-factor	Component	Component score	Sub-factor score	Factor score
Selection of key performance indicators (KPIs)	Definition	Clarity	A	Aligned	**Aligned**
		Disclosure	A		
	Measurability, verifiability and benchmark	Measurability	A	Aligned	
		Verifiability	A		
		Consistency of the calculation methodologies	A		
		Benchmark	A		
		BP: Commitment for any changes in KPI calculation methodology, or changes or additions to KPIs or SPTs, to be externally reviewed	Yes		
		BP: Benchmark based on external references	Yes		
		BP: Disclosure of externally verified historical performance data	No		
	Relevance and materiality	Relevance to the issuer's strategy	A	Aligned	
		Relevance to sector standards	A		
Calibration of sustainability performance targets (SPTs)	Consistency and ambition	Consistency with the issuer's sustainability targets	A	Aligned	**Aligned**
		Ambition of the SPTs compared to historical performance	A		
		Ambition of the SPTs compared to external benchmarks	A		
		BP: Disclosure of the means for achieving the SPTs	Yes		
		BP: Credibility of the means for achieving the SPTs	No		
	Disclosure	Disclosure of the SPTs' achievement timeline, baseline and trigger events	A	Best practices	
		BP: Disclosure of the timeline, baseline and trigger events, including relevant intermediate targets	Yes		
		BP: Relevance and reliability of selected baselines	Yes		
Instrument characteristics	Variation of structural characteristics	Definition of the variation of the financial or structural characteristics	A	Aligned	**Aligned**
		Disclosure of the variation of the financial or structural characteristics	A		
Reporting	Transparency of reporting	Reporting frequency	A	Aligned	**Aligned**
		Intended scope and granularity	A		
Verification	Verification process	External verification of the SPTs' achievement	A	Aligned	**Aligned**
		Frequency	A		
		Duration	A		
		Disclosure	A		
				Overall alignment with principles score:	**Aligned**

Appendix 3 - Mapping eligible categories and key performance indicators to the United Nations' Sustainable Development Goals

ASPI's framework is likely to contribute to five of the United Nations' Sustainable Development Goals (SDGs). The three eligible use of proceeds categories are likely to contribute to five SDGs, while the three sustainability-linked key performance indicators are likely to contribute to three SDGs, namely:

UN SDG 17 Goals	Eligible Category/KPI	SDG Targets
GOAL 7: Affordable and Clean Energy	*% of service areas equipped with EVCPs*	7.1: Ensure universal access to affordable, reliable and modern energy services
	Renewable energy	7.2: Increase substantially the share of renewable energy in the global energy mix
GOAL 9: Industry, Innovation and Infrastructure	*% of service areas equipped with EVCPs*	9.1: Develop sustainable infrastructure to support economic development and human well-being, focusing on equitable access
	Clean transportation	
GOAL 11: Sustainable Cities and Communities	*Clean transportation*	11.2: Provide access to safe, affordable, accessible and sustainable transport systems for all
GOAL 12: Responsible Consumption and Production	*Climate change adaptation*	12.2: Achieve the sustainable management and efficient use of natural resources
GOAL 13: Climate Action	*Scope 1, 2 & 3 GHG emissions reduction*	13.1: Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
	Climate change adaptation	
	% of service areas equipped with EVCPs	13.2: Integrate climate change measures into national policies, strategies and planning

The United Nations' Sustainable Development Goals (SDGs) mapping in this SPO considers the eligible project categories and key performance indicators and associated sustainability objectives/benefits documented in the issuer's finance framework, as well as resources and guidelines from public institutions, such as the ICMA SDG Mapping Guidance and the UN SDG targets and indicators.

Appendix 4 - Summary of eligible categories in ASPI's framework

Eligible Categories	Description	Sustainability Objectives	Impact Reporting Metrics
Climate Change Adaptation	Investments and expenditures in projects and infrastructure that would reduce risk exposure and/or severity of impacts of extreme physical climate events, enhancing the resilience of the network. <u>EU Taxonomy alignment commitment:</u> Climate change adaptation 6.15 Infrastructure enabling road transport and public Transition to a Circular Economy 3.4 Maintenance of roads and motorways	Climate Change Adaptation	- % of people protected with noise barrier/equipment installed - Kms of animal fencing installed - Number of hectares compensated - Number of adapted assets (tunnels, bridges, viaducts) - Number of days between a disaster and the related response and recovery - Reduction in the number of operating days lost due to extreme weather events - Reduction in repair costs due to extreme weather events on the infrastructure - Reduction of environmentally sensitive areas impacted by construction works
Clean Transportation	Investments and expenditures related to adaptation and modernisation of the infrastructure through digital and smart mobility solutions. <u>EU Taxonomy alignment commitment:</u> Climate change mitigation 6.15 Infrastructure enabling road transport and public transport Circular Economy 1.2 Manufacture of electrical and electronic component	Climate Change Mitigation	- Annual GHG emissions reduced/avoided in tCO2–e p.a. - Reduction of Energy Consumption measured as KWh per year - Kms of tunnels whose traditional lighting system has been replaced with LEDs
Renewable Energy	Investments and expenditures related to the construction, installation, operation, maintenance, and repair of electricity generation facilities that produce electricity using solar photovoltaic (PV) . <u>EU Taxonomy alignment commitment:</u> Climate change mitigation 4.1 Electricity generation using solar photovoltaic technology	Climate Change Mitigation	- Annual GHG emissions reduced/avoided in tonnes of CO2e - Annual renewable energy generation in MWh/GWh (electricity) - Additional capacity of renewable energy plant(s) constructed or rehabilitated in MW

Appendix 5 - Summary of key performance indicators in ASPI's sustainable finance framework

KPIs	SPTs	Sustainability Objectives	Unit of measurement
Absolute scope 1 and 2 GHG emissions	SPT 1: Achieve 68% reduction by 2030 and 78% by 2038, baseline 2019	Climate change mitigation	tCO2eq
Scope 3 GHG emissions from capital goods linked to major infrastructural development under concession per €M Capital Expenditure	SPT 2: Achieve 52% reduction by 2030, baseline 2019	Climate change mitigation	tCO_2eq/€M
Percentage of eligible service areas covered with electric vehicles charging stations in the ASPI's network	SPT 3: Reach 100% by 2029, baseline 2023	Climate change mitigation	Percentage (%)

Endnotes

1 Point-in-time assessment is applicable only on date of assignment or update.

2 Climate Change Knowledge Portal, Italy, The World Bank, November 2024

3 Thousands of charging points for Italy, Mobility Portal Europa, November 2024.

4 Greenhouse gas emissions from transport in Europe, European Environmental Agency, 2024.

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