

Materiality Analysis

Materiality analysis is the investigation aimed at identifying and evaluating the most relevant environmental, social and economic issues for society, regarding the impacts generated towards the environment, people and the economy. In this context, during 2023, ATM updated its materiality analysis in order to be able to understand possible changes in stakeholders' expectations and needs in relation to the events that occurred during the year. The analysis was updated in line with the new sustainability reporting standards of the *Global Reporting Initiative* (GRI), published in 2021 and effective from January 2023.

The new GRI materiality aims to identify relevant issues after determining the (positive and negative) impacts generated by the Group on society, the environment, the economy, including impacts on human rights.

In 2023, the process of updating the materiality analysis topics began by taking four Group peers/competitors and two academic sources as reference: the SASB and S&P Global Robeco SAM reporting standards.

The material issues publicly disclosed by the target companies were analysed to inform the 2023 materiality analysis for the Group.

Four new material themes emerged from the benchmark:

- "Air quality", which was merged with the old topic "Noise and vibration mitigation"
- "Human Rights", a theme that was separated from "Ethics, Integrity and Compliance" to give it more prominence.
- "Innovation, Digitalisation and Cybersecurity"
- "Risk and Crisis Management"

The same methodology as in the previous year was then used to update the issues, which requires identifying and prioritising relevant issues and their impacts through the following steps:

- **PHASE 1:** identification of the impacts generated by the Group, updating of material issues and involvement of stakeholders, Top Management and the Board of Directors;
- **PHASE 2:** strategic evaluation and approval by the Board of Directors of the material issues identified and reported.

STEP 1: In the first phase, the relevant impacts for each issue were submitted to internal and external stakeholders, as well as to members of the Top Management and Group Board members for evaluation. In particular, the update of the analysis involved more than 1,470 external stakeholders, including customers, the Municipality of Milan and other Public Administration institutions, ATM Group employees and their families, suppliers and commercial partners, investors, representatives of research centres and universities, the media, trade union representatives and the territory, local communities and NGOs, through the distribution of specific questionnaires. In fact, all stakeholders were asked to provide an assessment of the positive and negative impacts identified for each issue and reported within online surveys, in which it was also suggested to suggest any additional impacts relevant to the Group if not previously mapped. The description of the 16 issues and their identified impacts are summarised in the table below.

STEP 2: When the results were compiled, each impact was associated with its related thematic area and some thematic areas therefore had more than one impact. To define the final list of material impacts and issues, only the issue with the highest final consolidated score calculated from the average of the votes of all **Stakeholders** and the **Top Management** was selected. This analysis allowed the 16 sustainability themes to be prioritised. This materiality analysis was presented and approved by ATM S.p.A.'s Board of Directors on 30 November 2023.

In addition to dictating the Group's areas of action in the field of sustainability, the material issues revealed by the analysis described above are also the starting point for identifying the contents of this document and the foundation on which the Group has drawn up its sustainability plan.

Below, in tabular form, are the ATM Group's 16 material issues and their impacts:

Area	MATERIALITY TOPIC	IMPACTS	GROUP INVOLVEMENT
Environmental issues	Climate change, energy consumption and environmental impacts	<ul style="list-style-type: none"> ATM Group's energy consumption from non-renewable sources, with negative impacts on the environment and reduction of the energy stock Generation of direct and indirect GHG emissions (Scope 1 and 2), i.e. the direct contribution to climate change through pollutant emissions and indirect contribution through diffusion of dust into the atmosphere, related to the Group's activities Generation of indirect GHG emissions (Scope 3), i.e. that due to the ATM Group's activities there is a generation of indirect climate-changing emissions 	Caused by the Group and directly connected through a business relationship
	Responsible resource and waste management	<ul style="list-style-type: none"> Negative impact from water withdrawals affecting the availability of the resource itself and ecosystem needs Contamination of soil and groundwater through water discharges resulting from the Group's discharge of pollutants into water resulting in the contamination of soil and groundwater Generation of hazardous and non-hazardous waste and its inadequate disposal 	Caused by the Group and directly connected through a business relationship
	Air quality, noise and vibration mitigation	<ul style="list-style-type: none"> Mitigation of vibration/acoustic pollution understood as ATM's promotion of initiatives to improve the quality of life of residents Vibro/acoustic pollution, i.e. the resulting negative effects on people's health and quality of life caused by the Group's activities and infrastructure Generation of other significant air emissions (SO₂, NO_x, NMVOC, PM 2.5, NH₃) 	Caused by the Group
Social Topics	Intermodality and integration of services	<ul style="list-style-type: none"> Customer satisfaction, understood as the proposal of an efficient, integrated, customised mobility offer 	Caused by the Group and directly connected through a business relationship
	Quality and accessibility of services	<ul style="list-style-type: none"> Service usability, understood as the improvement of the quality and accessibility of public transport for better usability of services by ATM's customers 	Caused by the Group
	Security & safety	<ul style="list-style-type: none"> Counter-crime understood as the promotion of proper management and coordination with law enforcement agencies to ensure the physical safety of people (both Group personnel and passengers) 	Caused by the Group either directly or indirectly

	Relations with the territory and local development	<ul style="list-style-type: none"> Contribution to the socio-economic development of local communities understood as the development of training and professional opportunities in collaboration with universities and research centres 	Caused by the Group
	Human rights	<ul style="list-style-type: none"> Human rights violations, i.e. the potential non-respect of human rights along the value chain (the right to freedom of association and collective bargaining, child labour, forced labour, etc.) with repercussions on human dignity and community development 	Caused by the Group
Personnel-related topics	Diversity, inclusion and welfare	<ul style="list-style-type: none"> Creation of an inclusive working environment and development of welfare, understood as the promotion of corporate activities and initiatives that counteract discrimination by ATM Potential incidents of discrimination and/or abuse within the Group 	Caused by the Group
	Training and professional development	<ul style="list-style-type: none"> Employee training and growth, understood as ATM's promotion of customised training activities and programmes (general and technical) with growth objectives 	Caused by the Group
	Occupational health and safety protection	<ul style="list-style-type: none"> Workers' health promotion, understood as the promotion of training activities and services to protect occupational health Accidents and illnesses at work, through the Group's operations (and/or unhealthy or risky production processes and a lack of attention to systems/procedures) causing accidents, occupational illnesses or other accidents in the workplace, with consequences for workers' health 	Caused by the Group
Governance Themes	Ethics, integrity and compliance	<ul style="list-style-type: none"> Ethics, anti-corruption and business integrity, understood as promoting communication and training of employees, business partners and other stakeholders on anti-corruption regulations and procedures Potential incidents of corruption, anti-competitive behaviour, antitrust and monopolistic practices by the Group Non-compliance with laws or regulations, i.e. how for ATM non-compliance with laws, regulations and standards in the field of sustainability can cause social/environmental/economic damage and associated reputational damage 	Caused by the Group

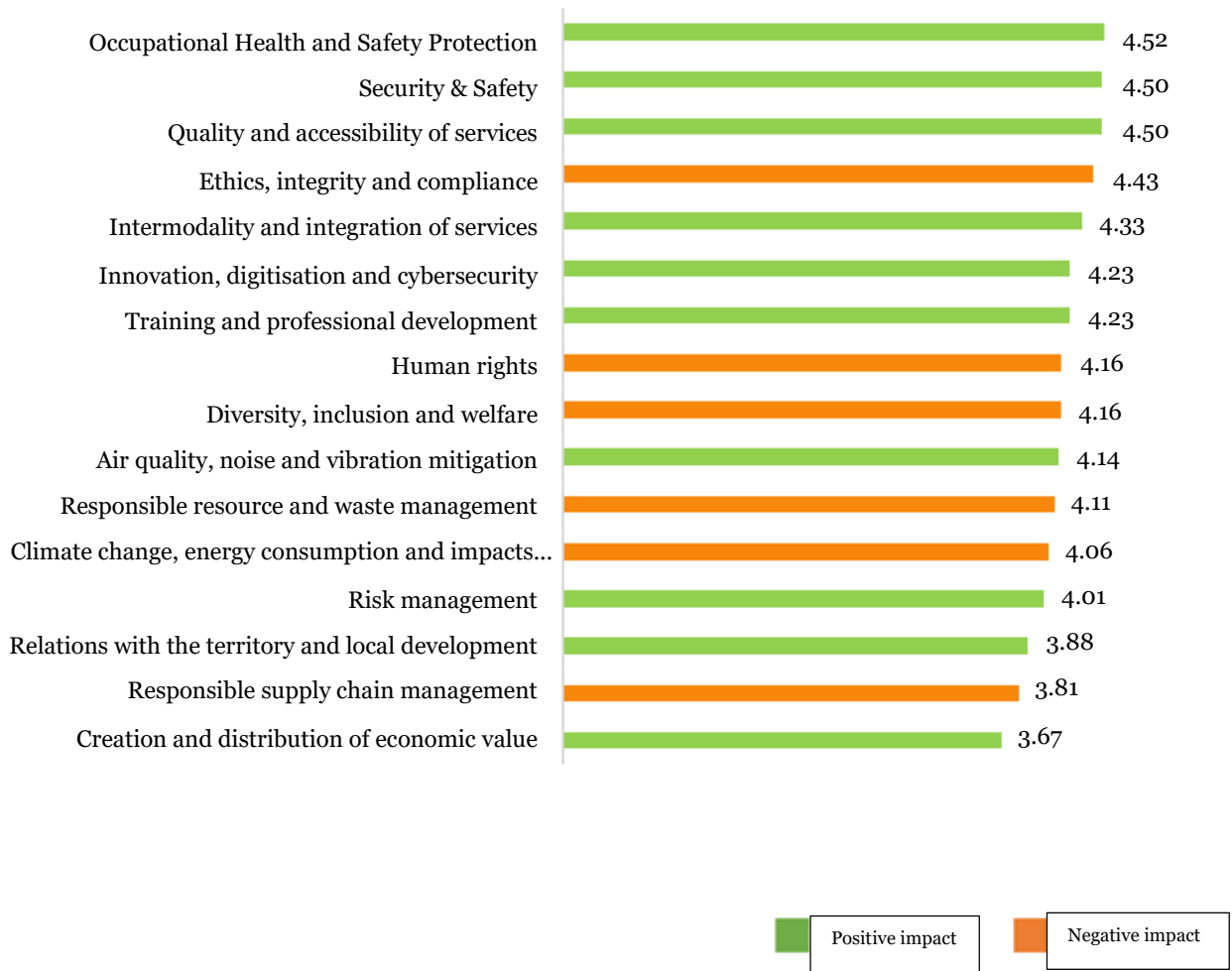
	Responsible Supply Chain Management	<ul style="list-style-type: none"> Sourcing from local suppliers, understood as the promotion of purchasing from local suppliers, thus generating benefits both in terms of developing the local economy and reducing environmental impact Failure to select, evaluate, and monitor suppliers according to ESG criteria, which could lead to indirect damage by ATM 	Caused by the Group and directly connected through a business relationship
	Innovation, digitisation and cybersecurity	<ul style="list-style-type: none"> Promotion of digitisation, understood as the promotion of digital efficiency of ATM Group services leading to greater usability of the services offered Violations of customer security and privacy and cyber attacks resulting in the loss of customer data by the Group 	Caused by the Group
	Risk and crisis management	<ul style="list-style-type: none"> Risk management, understood as the realisation of positive impacts on stakeholders (customers, investors, suppliers, etc.) due to proper risk management by the ATM Group 	Caused by the Group
	Creation and distribution of economic value	<ul style="list-style-type: none"> Socio-economic development, understood as the payment of taxes and distribution of economic value to shareholders/stakeholders by ATM 	Caused by the Group

The following are the concluding results from the analysis of questionnaires completed by the Group's Top Management and Stakeholders.

Materiality Topic*	Impacts	Score
Occupational health and safety protection	Workers' health promotion	4.52
Security & Safety	Fighting crime	4.5
Quality and accessibility of services	Service usability	4.5
Ethics, integrity and compliance	Incidents of corruption	4.43

Intermodality and integration of services	Customer satisfaction	4.33
Innovation, digitisation and cybersecurity	Promoting digitisation	4.23
Training and professional development	Employee training and development	4.23
Human rights	Violation of human rights	4.16
Diversity, inclusion and welfare	Incidents of discrimination	4.16
Air quality, noise and vibration mitigation	Vibro/acoustic pollution mitigation	4.14
Responsible resource and waste management	Waste management	4.11
Climate change, energy consumption and environmental impacts	Energy consumption	4.06
Risk management	Risk management	4.01
Relations with the territory and local development	Socio-economic development	3.88
Responsible supply chain management	Failure to select suppliers based on ESG criteria	3.81
Creation and distribution of economic value	Socio-economic development	3.67

Materiality Impact 2023



Compared to last year's publication, the positioning in terms of the priority of some of the Group's material topics has shifted. For the ATM Group, the relevance of issues related to the health and safety of passengers and workers has increased, the quality of the service offered remains of primary importance and the theme of Ethics, Integrity and compliance is gaining in importance.

With regard to the relevance of issues for stakeholders, there is a growing focus on the health and safety of passengers and workers, and the importance of the quality and accessibility of services is confirmed.