

Social Information

ESRS S1 Own Workforce

IRO Table

Sub Topic	IRO	Type	Value Chain	Time Horizon
Working Conditions	Impact: Development of training activities and implementation of services for employee health protection aimed at promoting the psycho-physical well-being of workers beyond the mandatory safeguards provided by applicable regulations	Positive – Current	Own Operations	Short-term
	Impact: Negative impact on the health and safety of employees and non-employees due to the failure to adopt safeguards, or their non-compliance, at the Group's operational sites, with the possibility of injuries, occupational diseases or other workplace incidents	Negative – Current	Own Operations	Short-term
	Impact: Worker contract coverage and freedom of expression and association thanks to the presence of Worker Protection Councils and opportunities to join representative associations	Positive – Current	Own Operations	Short-term
	Risk: Assaults against ATM personnel (both at depots and facilities and on transport vehicles) by service users, with consequent reputational and economic damages due to refunds/compensation and possible service interruptions	N/A	Own Operations	Short-term
	Risk: Collective conflict (strike) by ATM personnel aimed at recognition of better working conditions in terms of wages, safety and rights, with consequent impacts on service continuity and reputational damages	N/A	Own Operations	Short-term
	Risk: Labour market evolution that causes difficulties in recruiting competent personnel in line with company needs (for example, due to shortage of required skills in the market), with consequent operational and reputational impacts due to service reduction and/or restructuring and training costs	N/A	Own Operations	Short-term
Equal Treatment and Opportunities for All	Impact: Contribution to employee training and development, through the promotion of training activities and personalized programmes (general and technical) with growth objectives	Positive – Current	Own Operations	Short-term
	Impact: Creation of an inclusive work environment and development of welfare, through the promotion of company activities and initiatives that combat discrimination by ATM	Positive – Current	Own Operations	Short-term
Other Work-Related Rights	Impact: Violation of employee privacy due to the absence of adequate safeguards for data protection	Negative - Potential	Own Operations	Medium-term

- **Strategy**

ESRS 2 SBM-2– Interests and Opinions of Stakeholders

(SBM 2 12) The opinions, interests and rights of workers are integrated into the strategy and business model of the ATM Group through specific engagement and dialogue activities. In particular, workers are involved both within the Stakeholder Engagement conducted during the Double Materiality analysis, as well as through additional moments of dialogue and dedicated initiatives,

as well as through various channels made available by the ATM Group, as detailed in paragraph S1-2 Engagement Processes.

ESRS 2 SBM-3– Relevant Impacts, Risks and Opportunities and Their Interaction with Strategy and Business Model

(SBM 3 13.a) The strategy of the ATM Group, articulated and declined in the **Industrial Strategic Plan 2021-2025**, was developed in line with its peculiarities, as well as in consideration of the evolution of market trends. As an integration of the Industrial Plan, and in harmony with the environmental transition "Milano Mix" promoted by the Municipality of Milan, the Group has pursued the refinement of its sustainability strategy, which is implemented in the **Sustainability Policy**.

The impacts identified during the Double Materiality Analysis are linked to the Group's strategy, and are guided by it, in line with the **Great Workspace** Pillar - which aims to promote a positive work environment for all employees, which attracts and enriches people and values diversity. On the occasion of the review of the Industrial Strategic Plan, it was decided to also insert a new pillar called **"People and Culture"** as a testimony to the Group's commitment to putting its people at the center. The first actions implemented made it possible to improve internal communication, strengthen Welfare, Diversity, Equity & Inclusion best practices, increase employer branding and adopt new practices to improve the selection and recruitment of new talents.

Finally, the identified impacts aimed at increasing people's well-being led to a new strategic objective for ATM: during 2025, the company chose to certify itself according to UNI/PdR 125, adopting a management system that values gender equality, inclusion and work quality.

(SBM 3 13.b) On the other hand, risks are mainly linked to the company's business model and especially to the activities carried out. The link between risks and the business model is reflected in the centrality of personnel in the Group's activities: the quality and continuity of the public transport service depends in fact on the availability, motivation and competence of the workforce.

(SBM 3 14) The information relating to ESRS S1– Own Workforce refers to all people belonging to the different professional areas of ATM employees affected by the Group's operations, both upstream and downstream of the value chain.

(SBM 3 14.a) As of December 31, 2025, the ATM Group consists of **11,356 employees**. The workforce includes both employees on permanent contracts and those on fixed-term contracts. In addition, this figure includes 30 non-employees belonging to the following categories: collaborators, consultants, interns, professionals, and trainees.

(SBM 3 14.b) ATM has identified two negative impacts: one concerning employee health and safety, linked to the occurrence of potential accidents, incidents, or occupational illnesses within the areas where ATM personnel operate; and the other related to potential incidents of employee data breaches. However, these impacts are linked to individual incidents that may occur during the course of business activities.

(SBM 3 14.c) The **positive impacts** identified relate to the areas of secure employment, health and safety, collective bargaining, and equal opportunity and equal treatment. These impacts stem from the training provided by the Group, from health and safety measures, and from the activities ATM implements to ensure an inclusive and harmonious environment.

(SBM 3 14.d) People are ATM's primary resource for ensuring the delivery of its services. For this reason, three risks related to its workforce have been identified, concerning the health and safety of ATM staff, working conditions, and freedom of expression, as well as challenges linked to changes in the world of work, which make it difficult for ATM to find the right skills in the market. No opportunities related to its workforce have been identified.

(SBM 3 14.e) The activities carried out by the ATM Group do not have any significant impacts on its workforce related to the climate transition.

(SBM 3 14.f, 14.g) The ATM Group conducts its public transportation operations in the following geographic areas: Italy, Denmark, and Greece. These countries are characterized by a robust European regulatory framework regarding labor protection and fundamental rights; therefore, there are no types of operations or geographic areas identified as being at serious risk of forced or child labor (as defined by ILO Convention No. 138/1973—15 years of age—or according to local regulations—e.g., 16 years of age in Italy). Furthermore, ATM's operations fall within the scope of EU legislation and the respective national laws that prohibit all forms of forced or child labor (contrary to the international and local regulations) and guarantee safe and dignified working conditions.

All employees of the ATM Group are also hired under regular employment contracts that comply with local laws and the applicable collective bargaining agreements in the various countries. The procedures for selecting, hiring, and managing personnel are designed to prevent any risk of forced labor, child labor, or uncontracted labor. No forms of informal employment or employment arranged through unverified third parties are used.

(SBM 3 15, 16) The Double Materiality Analysis highlighted that Group employees who work in close contact with service users (such as drivers, station operators, etc.) are indeed at greater risk of assault compared to employees working, for example, in offices or depots, and it is for the latter that ATM is committed to ensuring greater safety and control.

- **Management of impacts, risks and opportunities**

S1-1 – Policies Regarding In-House Workforce

(ESRS 2 MDR-P 65, S1-1 19) The ATM Group has several internal policies in place for its entire workforce that help create an ethical, inclusive, and safe work environment for all employees, promote their physical and mental well-being, and mitigate potential instances of discrimination:

- Code of Ethics
- Charter of Values
- Code of Conduct
- Social Responsibility Policy and SA 8000 Standard
- Quality, Environment, and Safety Policy
- Gender Equality Policies and Gender Certification in accordance with the UNI PDR 125:2022 standard

The Code of Ethics

The ATM Group's Code of Ethics constitutes the set of values and guidelines for conduct that make up the Group's "identity." The document is based on the provisions of Legislative Decree 231/2001, anti-corruption legislation governed by Law No. 190/2012, transparency regulations set forth in Legislative

Decree 33/2013 as amended, the provisions of SA8000, and the international standards ISO 9001 and 14001.

The Code of Ethics is approved by the Board of Directors of ATM S.p.A. and adopted by the Boards of Directors of the other Group companies.

Transparency, ethics/fairness, loyalty, quality of life in communities, and the continuous pursuit of excellence are just some of the guiding principles considered by ATM in adopting a governance structure appropriate to its nature, size, and operational structure. These values, shared at all levels of the organization, are recognized as fundamental to the conduct of business operations and are explicitly stated both within the Code of Ethics (harmonized in September 2018 with the Group Anti-Corruption and Transparency Model (“ACT Model”)) and in the Charter of Values, introduced in 2024. The Code encompasses the set of behavioral guidelines that define ATM’s identity and sets forth the related ethical and social responsibilities, binding the corporate bodies, management, employees, external collaborators, suppliers, and all those who have dealings with the Group’s companies. It applies to the parent company ATM S.p.A. and to the Group companies subject to its management and coordination. It constitutes a fundamental element of the overall Internal Control and Risk Management System, together with the Group’s Anti-Corruption and Transparency Model and the Organization, Management, and Control Models pursuant to Legislative Decree 231/2001 of the Parent Company and the companies that have adopted them.

In 2022, ATM launched an ongoing project to comprehensively update and harmonize the entire Code of Ethics, 16 years after its initial adoption. The second phase of the project, launched in 2023 (the so-called “2023 Code of Ethics Project”), was ultimately aimed at aligning the Code of Ethics with the “Guidelines for Conduct” and other documents underpinning governance and the internal control and risk management system.

The purpose of this project is to:

- strengthen and promote the corporate culture;
- promote alignment of behaviors both within and outside the organization with its values and principles;
- foster relationships with stakeholders to better understand their expectations;
- lay the groundwork for contributing to value creation, including through the management and reporting of “ESG” (Environmental, Social, and Governance) and sustainability aspects.

The project is grounded in key regulations and guidelines, as well as best practices in the areas of business ethics and corporate social responsibility. Its initial phase resulted in the drafting of the ATM Group’s “Code of Conduct”—which has been in effect since July 2023—to supplement and clarify the Code of Ethics. These Guidelines, including through ethical dilemmas and practical case studies, enable the Group’s employees, suppliers, and partners to be aware of their obligations and prohibitions in their conduct.

As mentioned, the Group Code of Ethics governs the management of relationships between ATM and those with whom it comes into contact (employees, customers, suppliers, etc.) and sets forth the guidelines for such interactions. All Group companies recognize **the central importance of people** and are committed to adequately and periodically assessing and developing the skills and competencies of each employee through a system of ongoing training and by offering all workers the same opportunities without any discrimination, ensuring the protection of health and safety at work and environmental protection. Each company expects employees at every level to collaborate in maintaining a climate of mutual respect for the dignity, honor, and reputation of each individual. Furthermore, no form of illegal employment or direct or indirect discrimination of any kind is tolerated in employment relationships. Each Company is required to prevent and, in any case, address workplace bullying and personal harassment of any kind. The Group Companies are committed to conducting

their operations in full compliance with applicable laws and regulations regarding health and safety prevention and protection, pursuing the goal of continuous improvement in workplace health and safety conditions, as well as environmental aspects. In construction and service contracts, the Group must monitor and ensure that the contractor properly applies collective bargaining agreements, paying particular attention to child labor and regulations regarding hygiene, workplace safety, and the environment, as well as compliance with obligations regarding wages, social security contributions, and the employment of third-country nationals residing in the country illegally. This is to ensure proper oversight of working conditions throughout the value chain.

In its dealings with customers and citizens, the Code of Ethics requires the establishment of a relationship based on the quality, reliability, and efficiency of the services provided, and one that guarantees timely, accurate, clear, easily accessible, and truthful information regarding the services and offerings provided.

Finally, ATM conducts its dealings with institutions and public administrations with a view to **transparency**, avoiding any conduct that could imply favoritism or other unethical benefits in order to promote the Group's activities and its market position. Finally, the contents of the Code of Ethics are the subject of extensive training, which is conducted annually.

The Charter of Values

The ATM Group's Charter of Values serves as the ethical and cultural framework that guides decisions, behaviors, and relationships within the organization. The document promotes and instills five core values among all members of the Group:

- Passion
- Care
- Inclusion
- Innovation
- Sustainability

Each value is translated into concrete behaviors that guide daily operations, including: taking responsibility, a commitment to making a positive impact, customer focus, respect and active listening, collaboration, and openness to dialogue.

2025 saw a consolidation of internal initiatives linked to specific processes, particularly in recruitment, onboarding, and learning activities, as well as in the second edition of the *ATM Awards*.

At the same time, the company intensified its internal initiatives focused on listening and engagement. The roadshow launched the previous year continued with a specific focus on operational staff, who were reached directly at surface kiosks and subway stations. Opportunities for dialogue with employees were also expanded through dedicated focus groups held at the depots. In terms of external communications, ATM has expanded the reach of its values through a more widespread presence at employer branding events and on social media channels, particularly on the company's LinkedIn page, featuring video testimonials from its Values Ambassadors.

Overall, 2025 reaffirmed ATM's commitment to translating its principles into concrete, measurable actions in support of a modern, sustainable, and truly people-centered public transportation system.

Code of Conduct

The Code of Conduct sets forth the principles of conduct established by the ATM Group for its employees, including provisions governing disciplinary procedures in the event of violations, as well as a Code of Conduct.

The Code of Conduct was drafted taking into account the principles contained in the Code of Ethics and the provisions of the Organization, Management, and Control Model adopted by the ATM Group, the provisions of SA8000, and the international standards ISO 9001, ISO 14001, and ISO 45001, as well as the applicable laws and contractual provisions governing the employment relationship of the intended recipients.

The principles of conduct contained in the Code of Conduct are grouped into the following areas:

- Health and Safety,
- Bullying and Harassment,
- Protection of diversity, dignity, and integrity of workers and equal opportunity,
- Regulations and discipline,
- Fairness in negotiations,
- Anti-corruption,
- Conflict of interest,
- Privacy,
- Confidentiality and use of company assets/tools,
- Respect for the environment,
- Fairness in customer relations.

All sections outline the **principles, prohibitions, and obligations** that govern the relationship between ATM Group companies and their employees. In addition, to make these provisions clearer and more practical, ethical dilemmas are presented as practical examples of situations in which an employee might find themselves. Each dilemma is accompanied by an explanation of the appropriate course of action.

(S1-1 24.a, 24.b, 24.c) All Group companies combat workplace bullying, meaning any form of psychological and/or sexual harassment occurring in the workplace, and ensure that, in work relationships, the physical and mental integrity of other employees is not violated in any way and that an intimidating, hostile, degrading, humiliating, or offensive environment is not created. Furthermore, all Group companies recognize diversity as an added value and promote open and inclusive work environments, safeguarding the rights and freedoms of employees, as well as equal opportunities among them, including during the recruitment process. The Group also opposes all forms of discrimination, whether direct or indirect, and therefore any provision, act, practice, or behavior that discriminates against employees on the basis of gender, ethnicity, union membership, religion, sexual orientation, personal or political beliefs, disability, or age, as well as any treatment or modification of working conditions and hours that, on the basis of gender, chronological age, personal or family care needs, pregnancy, or maternity or paternity (including adoption), places or may place employees at a disadvantage. The Code of Conduct specifically outlines all behaviors that fall under these categories.

(S1-1, 24.d) **The Code of Conduct against Violence and Harassment in the Workplace**, appended to the Guidelines of Conduct, refers to constitutionally enshrined principles of equality between men and women, the protection of individuals and workers, EU and national legislation on the protection of the dignity of women and men in the workplace and on sexual harassment, the ATM Group's Code of Ethics, and current collective bargaining agreements. This document aims to prevent and/or eliminate conduct that constitutes harmful behavior (discrimination, psychological and/or sexual harassment, acts of mobbing). It is intended for all those who, regardless of the type of employment relationship and professional classification, perform their work within the companies of the ATM Group.

The Code is available internally through posting in a location accessible to all and publication on the company intranet. The document is kept on file at each Company/Department/Departmental Office, which is responsible for appropriately communicating and disseminating any amendments or additions

that may be made, as well as for providing a copy of the updated text to interested parties upon request.

All those to whom the Code applies have the right and duty to contribute to and ensure a work environment in which the dignity of individuals is respected, informing the Trusted Advisor(s) if necessary. Furthermore, the heads of organizational units:

- have the duty to promote the prevention of harassment in the workplaces where they perform their duties,
- are required to ensure compliance with the Code and to promote the dissemination of its content,
- in the event that conduct occurs that constitutes the behaviors described in the Code, are encouraged to promptly inform the Trusted Advisor, paying particular attention to restoring a work environment conducive to proper interpersonal relationships.

To ensure **the effective implementation of the Code**, the position of Trusted Advisor is established. This individual is appointed by the General Manager of the ATM Group based on proven moral character, experience, and professional competence necessary to perform the assigned duties with full autonomy. The Trusted Advisor, who comes from outside the company, acts with full autonomy, fairness, impartiality, and absolute confidentiality in the performance of their duties. Anyone who believes they have been a victim of discrimination, harassment, or bullying may confidentially contact the Trusted Advisor, who will, within the scope of their duties, implement the necessary procedures, or may contact the Company directly (line manager and/or HR manager), who will then invite the individual to contact the Trusted Advisor.

As part of their duties, the Trusted Advisor may:

- listen to the person concerned during one or more meetings, giving them the attention needed to properly assess the problem and provide guidance, ensuring they are fully informed about the steps to take,
- arrange for specialized consultations (e.g., legal or psychological) within the company or with private specialists, as may be necessary to resolve the case,
- suggest referral to anti-violence centers or centers for psychological support and/or structured mediation programs,
- gather any relevant testimony and access documents or administrative records pertaining to the case in question,
- invite and interview the person believed to be responsible for the harmful or discriminatory behavior,
- propose mediation meetings between the person claiming to be the victim and the person identified as the perpetrator of the alleged harassment or discrimination,
- conduct effective mediation between the parties,
- propose solutions to the parties involved and/or to management, unit, or operational sector leaders aimed at stopping the reported behavior, removing its effects, and preventing its recurrence,
- if the person concerned reports a situation of violence in the private sphere, listen and provide counseling; if necessary, arrange for specialized counseling (e.g., legal or psychological) with private specialists; and suggest referral to anti-violence centers or psychological support centers, as provided for in Article 10 of ILO Convention 190/2019.

The Trusted Advisor's investigation will be concluded, barring any unforeseen circumstances, no later than thirty days from the date the report was submitted. Depending on whether the outcome is positive or negative, the necessary measures will be implemented to properly resolve the matter.

Social Responsibility Policy and SA 8000

(S1-1 20) ATM has not established a specific Human Rights Policy at the Group level. However, the management of this issue, for the Parent Company and for the directly controlled Italian subsidiaries that have obtained SA8000 certification, is governed by **the Social Responsibility Policy**, developed within **the Social Responsibility Management System** in accordance with the international standards **SA8000:2014** and **UNI ISO 26000**. This Policy reflects a concrete commitment to the continuous improvement of the management system through annual reviews and monitoring, aided by specific tools such as periodically updated risk analyses and ongoing internal audits. Primary objectives include **safeguarding employees' working conditions** and **fostering a positive work** environment that attracts and enriches the workforce through the development of corporate policies that value individuals and diversity. Furthermore, the Group ensures continuous adaptation to social and legislative requirements in the field of safety, the management of relationships with suppliers and subcontractors—giving preference, where possible, to entities that are mindful of environmental, social, and ethical considerations and share the values of the ATM Group—and, last but not least, the communication of SA8000 principles to the public through social initiatives.

(S1-1 21) The SA8000 standard originated as a compilation of principles established by other international documents such as the UN Universal Declaration of Human Rights, the UN Convention on the Rights of the Child, the ILO (International Labour Organization) Conventions and Recommendations, and the UN Conventions against Discrimination. The ATM Group ensures that its workforce policies comply with internationally recognized standards regarding human rights and working conditions. ATM operates in accordance with the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO), and United Nations conventions, as well as national laws and regulations governing labor and workplace safety.

Through the Social Performance Team, established in 2015, the Group ensures ongoing compliance with the SA8000 standard and promotes a work environment based on dialogue, cohesion, and physical, mental, and social well-being. The SA8000 certification has been renewed three times: in 2015, 2018, and 2021, and in 2023, the renewal process for the certificates of ATM S.p.A., Nord Est Trasporti S.r.l., GeSAM S.r.l., and Rail Diagnostics S.p.A. for the period 2024–2027 was successfully completed. The process was finalized in 2024 with a fine-tuning of the findings from 2023, and in May 2024, the new certificates valid for the new three-year period were issued. CityLink S.r.l. was added to the list of already certified companies as of December 2024.

In line with the requirements of the standard, the Group ensures compliance with national and international laws regarding labor and the workplace, as well as adherence to ethical requirements, including freedom of association and the right to collective bargaining, and is committed to avoiding any form of discrimination based on race, gender, religion, political affiliation, disability, sex, age, to ensure equal opportunities, to guarantee fair pay, and to maintain reasonable working hours.

(S1-1 22) The SA8000 standard requires compliance with the following requirements regarding respect for human rights in the workplace:

- Not to employ or facilitate the use of child labor,
- Not to use or facilitate the use of forced or compulsory labor,
- To ensure a safe and healthy workplace for all employees,
- Respect the right of workers to associate and join labor unions,
- Do not engage in discrimination of any kind,
- Do not use or support disciplinary practices such as corporal punishment, physical or mental coercion, or verbal abuse,
- Adjust working hours in accordance with applicable laws and agreements,

- Pay employees in accordance with the contracts in force,
- Implement and maintain an active Social Responsibility Management System.

The essential requirements of the SA8000 system are:

- definition of a Social Responsibility Policy and the related commitments that the ATM Group intends to fulfill,
- annual management review of the Management System,
- selection and monitoring of social responsibility issues within the ATM Group's supply chain,
- management of reports and suggestions coming from both within the ATM Group and the supply chain,
- internal and external communication,
- periodic audits of the System.

All requirements of the standard are monitored and managed through actions and procedures described in detail in the annual SA8000 Report, which also includes data on certified companies. Additionally, periodic meetings are held throughout the year to monitor the correct and effective implementation of the policy.

(S1-1, 20.c) Reports of inconsistencies and/or violations of the SA8000 standard's principles, as well as any suggestions for improvement received by ATM, are recorded and continuously monitored by the SA8000 Team, which coordinates with the relevant company departments to conduct investigations, in accordance with the principle of confidentiality. Employees who wish to submit reports and suggestions may do so via the dedicated form on the intranet page dedicated to Social Responsibility, either anonymously or not, and via the dedicated company email address. Furthermore, at all company locations, near bulletin boards or break rooms, there are drop boxes for reports and suggestions, which are periodically checked and emptied of the reports received.

(S1-1, 20.b) Employees were engaged through the widespread distribution of materials describing the SA8000 standard, its requirements, and its relevance to the company's operations; a training program was also implemented to gradually cover all Group employees. Trade unions, in turn, were made aware of the SA8000 standard and have joined and supported the process of aligning business activities with it. Furthermore, they actively participate in the process through the appointment of three Employee Representatives who are involved in the Management System as members of the Social Performance Team.

(S1-1 20, 21) The Danish subsidiary, on the other hand, has adopted its own **Human Rights Policy**, which aims to promote a culture of respect for human rights and proactively prevent any involvement in violations, both within the organization and throughout its business relationships. In line with the United Nations Guiding Principles (UNGPs) and the OECD Guidelines, the Human Rights Policy defines a comprehensive human rights due diligence process. This process includes several key stages:

- **Identify and assess potential and actual impacts** on human rights in order to understand the nature and extent of the risks.
- **Manage, prevent, or mitigate negative impacts** on human rights through strategic interventions and proactive measures.
- **Provide, or collaborate in providing, remedies** for impacts that Metro Service has caused or contributed to. Additionally, the company facilitates efforts to remedy negative impacts directly linked to Metro Service through business relationships.

When updates are necessary, the Human Resources Director is responsible for revising the Human Rights Policy to reflect new requirements or changes in context. The HR Director also oversees the implementation of this policy within Metro Service, while the CEO bears ultimate responsibility for

ensuring compliance with the company's human rights commitments. The Human Rights Policy is published on Metro Service's internal intranet to ensure transparency and full accessibility.

ATM Group Quality, Environment, and Safety Policy

(S1-1 23) The ATM Group is firmly committed to the continuous improvement of its management systems in accordance with the values set forth in the Code of Ethics, the Code of Conduct, and international standards such as ISO 9001, ISO 14001, and ISO 45001. Furthermore, it defines the criteria for identifying and achieving performance objectives, which include the prevention of work-related injuries and illnesses, the effectiveness and efficiency of process oversight, the proactive management of risks and opportunities, organizational clarity, and full compliance with applicable environmental and safety regulations. We continuously identify health and safety hazards, assess any residual risks, and implement appropriate preventive measures to ensure safe and healthy workplaces. For further information on the QAS Policy, please refer to Chapter **E2 – Pollution**.

Gender Equality Policies and Gender Certification in accordance with the UNI PDR 125:2022 standard

The ATM Group aims to position itself as a leading player on the national stage in the field of gender equality, recognizing its strategic and cultural value for the sustainable development of the organization and the community.

The company demonstrates a concrete commitment to the continuous improvement of its management systems by defining criteria for identifying and achieving performance objectives, consistent with the objectives set forth in the Code of Ethics, the ATM Group's Guidelines of Conduct, and the UNI PDR 125:2022 standard. In this context, the Group sets the following strategic objectives and commits itself in a concrete and ongoing manner to:

- promote inclusive work environments based on mutual respect, the celebration of diversity, and the elimination of all forms of violence, harassment, and discrimination, whether direct or indirect;
- guarantee equal opportunities at every stage of professional life, from recruitment to career development, ensuring that every individual has access to the same rights, resources, and opportunities for growth, regardless of gender;

In pursuit of this strategic objective, in 2025 the Group obtained UNI/PdR 125:2022 certification, the national standard that defines criteria, indicators, and requirements for managing gender equality in organizations. Obtaining this certification represents a fundamental step in the Company's journey toward a more equitable, inclusive, and people-centered development model.

The certification process, launched in 2024, involved all Group companies based in Italy and was characterized by intensive analysis, monitoring, and reporting on corporate management systems. The process assessed six key areas: culture and strategy, governance, human resources management, growth opportunities and women's inclusion, pay equity, and parental support and work-life balance. Achieving this milestone was made possible by a structured commitment aligned with the company's values. Among the most highly regarded initiatives are:

- **achieving pay equity** by closing the gender pay gap;
- strengthening **the corporate welfare system**, designed to support employees through different life stages;
- the implementation of measures dedicated to **parental** support, work-life balance, and professional growth opportunities;
- the promotion of a culture of respect through **the training of over 700 managers** and the introduction of roles such as Champions and Ambassadors;

- the adoption of **Behavioral Guidelines**, a Code of Conduct against harassment, and the appointment of a Trusted Advisor, an external figure dedicated to listening to and protecting employees.

The ATM Group consistently promotes initiatives aimed at raising awareness of gender issues, combating violence, and reducing the gender gap in terms of equal opportunity, both independently and through collaboration with agencies, institutions, and other organizations that share the same principles of equity, inclusion, and social responsibility. These initiatives are complemented by ongoing awareness-raising efforts among its employees and, more broadly, the Group's stakeholders, with the aim of fostering a corporate culture rooted in respect as an essential value—the foundation of collective well-being and the quality of professional relationships.

The decision to certify its management system is a decisive and significant step, demonstrating the organization's concrete and prioritized commitment to achieving its established goals, placing a strong emphasis on attention and respect for all internal and external stakeholders involved in business processes. To this end, Senior Management has established the **Gender Equality Steering Committee** and appointed a **Gender Equality Management System Officer**, who will be tasked with monitoring internal processes and promoting continuous improvement in the area of gender equality.

The certification, obtained in November 2025, also plays a decisive role in promoting a culture of responsibility throughout the entire value chain, positively influencing the behavior of partners and suppliers, who are expected to align themselves with the same principles of transparency, ethics, and inclusivity. In this sense, the certified management system becomes a tool for integrated governance and continuous improvement, supporting the corporate strategy and the creation of shared value.

The Greek subsidiary **Thema** has also adopted its own **Policy for the Prevention and Combating of Violence and Harassment in the Workplace**, which aims to promote a professional environment based on respect, equal opportunity, and non-discrimination. The Policy defines principles, rules, and procedures for managing internal reports and related investigations, applying to employees, partners, interns, and third parties in all work contexts, including remote work, business travel, and corporate events. Furthermore, in 2025, the company adopted a **Recruitment Policy** designed to ensure transparent, merit-based processes that comply with current regulations, promoting equal opportunity and non-discrimination at all stages of the hiring process. The policy applies to the entire selection process, from the publication of the job posting to the employee's onboarding, across all functions and organizational levels.

Finally, the Danish subsidiary, Metro Service, is also committed to ensuring respect for diversity and inclusion through its **Diversity and Inclusion Policy**. This Policy applies to all Metro Service employees and members of the Board of Directors. It also extends to the company's suppliers and business partners, who are required to adhere to the same principles through the Supplier Code of Conduct. Everyone within the company is responsible for contributing to an inclusive work environment, where equal opportunities are guaranteed regardless of individual background. Metro Service values diversity in all its forms, recognizing that an inclusive environment fosters innovation, engagement, and operational success. The Diversity and Inclusion Policy recognizes the importance of a diverse workforce, in which no employee is subject to discrimination based on gender, gender identity, disability, race, ethnicity, nationality, religion or belief, sexual orientation, age, educational level, socioeconomic status, or any other characteristic protected by law. All employment decisions—including hiring, promotions, and professional development—are based on merit and competence. The Policy was drafted by the CSRD task force and approved by the Director of Human Resources and

the SteerCo. It was also shared with the Cooperation Committee. The Policy is published on Metro Service's internal intranet to ensure transparency and full accessibility.

S1-2– Processes for engaging employees and employee representatives regarding the impacts

(S1-2 27.a, 27.b, 27.e) ATM engages with its workforce through various channels, depending on the specific topic at hand (such as health and safety, employee welfare, etc.).

With regard to these issues—and thus the impacts and risks related to health and safety—in addition to the annual meeting required by Article 35 of Legislative Decree 81/08, ATM organizes meetings with worker safety representatives (currently 10 in Italy, belonging to union representatives) as needed, such as in the case of significant regulatory updates. During these meetings, attendees are asked to identify issues requiring attention in order to strengthen safety measures. Another example is the process of selecting certain personal protective equipment (e.g., footwear), for which, once the minimum protective characteristics have been defined, samples are distributed to specific groups of workers so that they can provide feedback on comfort and functionality across the different types. With regard to all the welfare services offered, an internal survey was conducted in January 2025 to gauge overall satisfaction. Following the release of the results, in-depth focus groups were organized to gain a detailed understanding of the findings and the needs of employees. The findings from both the survey and the focus groups are then taken into account when designing services for the following year. Internal training programs are also defined based on the needs expressed by the business lines.

Finally, with regard specifically to contractual aspects (such as, for example, working hours), these are also analyzed through discussions with labor unions in order to define second-level agreements. In fact, there is an Industrial Relations Protocol that governs relations with the unions, as well as the procedures for dialogue.

(S1-2 27.c) The person responsible for engagement activities varies depending on the type of activity, ranging from departments handling Industrial Relations to the QHSE department or the Human Resources department.

(S1-2 27.d) All employment relationships within the Group are governed by National Collective Bargaining Agreements (CCNL) and/or second-level bargaining agreements and/or other relevant contractual arrangements depending on the country of operation. Through second-level bargaining, ATM S.p.A. ensures measures aimed at improving compensation and corporate welfare to enhance the well-being of its employees, through measures such as, for example, regulation of work shifts, availability of paid leave, and accessibility.

(S1-2 28) Within the ATM Group, there are vulnerable groups, such as employees with specific psychomotor needs, employees with disabilities, or others. These employees are supported in all their daily activities through ongoing assistance and attentive listening. Furthermore, their needs and perspectives are given special attention during employee feedback sessions.

S1-3– Processes for addressing negative impacts and channels through which employees can raise concerns

(S1-3 32.a, 32.b, 32.c) The ATM Group has adopted an integrated and systematic approach to managing reports of suspected or alleged violations and/or offenses. Specifically, ATM and its Subsidiaries have established a process for tracking and managing all reports, defined as any information concerning alleged findings, irregularities, violations, reprehensible conduct or events, or any other practice involving employees, members of the Corporate Bodies (Board of Directors, Board of Statutory Auditors) and/or other governance bodies (Supervisory Board), the Independent Audit Firm, and third parties (partners, customers, suppliers, consultants, collaborators, etc.) that does not comply with the provisions of the Code of Ethics, Model 231, the Model 231s of the Subsidiaries, and the ACT Model, or that may cause harm, including reputational harm, to the ATM Group.

Reports to the ATM Group’s Supervisory Bodies regarding conduct or events that may constitute a violation of the 231 Models or that, more generally, are relevant for the purposes of Legislative Decree No. 231/01, may be submitted as follows for the specific Group companies concerned:

- **through the online whistleblowing tool** established for the parent company ATM S.p.A. and its directly controlled subsidiaries under Italian law (CityLink S.r.l., Gesam S.r.l., International Metro Service – IMS - S.r.l., Nord Est Trasporti – NET- S.r.l., Rail Diagnostics S.p.A.), also pursuant to Legislative Decree No. 24 of March 10, 2023 (Implementation of Directive (EU) 2019/1937 of the European Parliament and of the Council of October 23, 2019, on the protection of persons reporting on breaches of Union law and laying down provisions regarding the protection of persons reporting on breaches of national law),
- **by regular mail: CONFIDENTIAL** to the Supervisory Body (specify the relevant company) c/o ATM S.p.A., to the Audit and Internal Control Department, CONFIDENTIAL – Foro Buonaparte 61, 20121 Milan.

Following the report, the ATM Group implements all appropriate and effective measures to ensure that the confidentiality of the whistleblower’s identity—or of anyone providing information useful for identifying conduct inconsistent with the reporting management procedure—is always guaranteed, and, in general, the Group’s SCIGR, subject to legal obligations and the protection of the rights of ATM and its Subsidiaries and/or of persons accused erroneously and/or in bad faith.

The Reporting Team, whose members are appointed as needed and may vary from case to case depending on the subject matter of the report, establishes the necessary communication channels within the organization and/or with the Board of Directors and the Audit Committee.

The Group will also ensure its full cooperation with the competent authorities. Any violation will be addressed through the application of **appropriate and proportionate disciplinary sanctions**, taking into account the potential criminal nature of the conduct in question, and, in the case of reported third parties, will result, based on specific assessments, in the failure to establish or the termination of contractual relationships.

In addition to the whistleblowing channel described above, the following additional channels are available:

- **Report boxes**, located at every company location, for reports related to the SA8000 standard,
- **An online form** on the company intranet and website through which reports of non-compliance with the principles of the SA8000 standard can be submitted to ATM,
- A dedicated SA8000 **email address**.

These channels are made available directly by the parent company ATM S.p.A.

(S1-3 32.d, 32.e) The ATM Group communicates and makes available to all its employees the section of **the website for reporting misconduct**, where it is possible to submit a report online, in complete confidentiality via the Whistleblowing Reporting software, regarding alleged misconduct or findings of alleged irregularities or violations of which they have become aware by virtue of their employment relationship and role.

Furthermore, to ensure awareness of the Whistleblowing channel, it should be noted that ATM develops a **three-year training plan covering 231, ACT, and Business Ethics**, which, where necessary, includes updates to the 231 Models of Group Companies and the Group Anti-Corruption Model. This training, aimed at corporate bodies, senior management, and middle management, is inspired by leading practices and is based on ethical dilemmas and practical cases that require the active involvement of each participant. The training sessions for the year 2025 were conducted in person. Video tutorials were also used, including a specific one on Whistleblowing (“WB”). The training can be supplemented with asynchronous training modules. The 231, ACT, and Business Ethics training within the ATM Group is therefore tailored and differentiated depending on whether it is intended for employees and middle management working in specific risk areas, executives, corporate bodies, or the Technical Secretariat of the Supervisory Board/Internal Audit function. In the latter case, specialized external meetings have been held to ensure ongoing preparedness in managing the evolution of the “231 Offenses Catalog” and related case law.

(S1-3 33) Reports are processed and subsequently handled in accordance with the applicable Whistleblowing Policy.

S1-4– Actions addressing significant impacts on the organization’s workforce, approaches to managing significant risks and pursuing significant opportunities related to the workforce, and the effectiveness of such actions

(ESRS 2 MDR-A 68) The following outlines the actions and initiatives that ATM is implementing to manage its impacts, risks, and opportunities related to its workforce, as well as to achieve its strategic objectives, such as ensuring a healthy work-life balance, promoting continuous professional development through training, and ensuring a healthy and safe work environment.

ACTION	SCOPE OF APPLICATION	TIME HORIZON	TARGET	PERFORMANCE 2025	CAPEX / OPEX 2025	FUTURE CAPEX / OPEX
Corporate welfare and work-life balance	Company population	Annual	N/D	N/D	Nursery 700.000 € (cost in Italy)	Nursery 700.000 € (cost in Italy)
ATM foundation shares	Employees and pensioners (Italy)	Annual	N/D	N/D	4,5 €/mln	4,6 €/mln
Training and professional development	Company population	Annual	N/D	N/D	1,7 €/mln	1,8 €/mln
Staff health and safety	Company population	Annual	N/D	N/D	1,8 € /mln <i>flu vaccination campaign and occupational medicine</i>	2,0 €/ mln
Privacy and Data Protection	Company population	Annual	N/D	N/D	~ 1,1 €/mln	~ 1,4 €/mln

(S1-4 38.c) Employee Benefits and Work-Life Balance

To ensure an inclusive work environment and provide employee benefits that support the well-being of its staff, ATM has implemented the following initiatives:

- **Company daycare centers:** These daycare centers are a core project of the CURA division and are designed for employees' children or grandchildren aged 0 to 3. In 2025, 90 employees used the service, for a total of 97 children. The staff who use it most are field staff and blue-collar workers. The customer satisfaction survey confirms the high overall satisfaction with the service offered at 97%.
- **Parenting support:** ATM secured funding through the #riparto call for proposals in the amount of €579,200, of which €455,200 was granted, for activities dedicated to working new mothers with children between 0 and 3 years of age. The goal of the call for proposals is to prevent new mothers from leaving the workforce by supporting them in their return to work and in achieving work-life balance. The initiatives planned and to be implemented during the 2025–2027 period are as follows: childcare vouchers, financial education, individual and group coaching to support parenting, family care platforms, and 360° well-being programs.

- **Financial Support and Development Committee:** This committee, appointed by the company and the union, allows employees facing financial hardship to access their severance pay (TFR) beyond the requirements of the law. It also awards merit-based educational grants to employees' children or working students who achieve good academic results. In 2025, 22 requests for severance pay were approved for a total amount of over 215,000 euros, of which 2,000 euros were disbursed in 2025. Over 820 study grants were awarded, totaling over 470,000 euros. Time Care for Single Parents: To assist individuals facing significant work-life balance challenges, allowing them to continue working productively while fulfilling their family responsibilities without disrupting service schedules, the Time Care project continued for single parents (field service) with children under 15, with the creation of ad hoc "off-schedule" shifts (8:00 AM–9:00 AM and 3:00 PM–5:00 PM; for widows and widowers, a fixed day off on Sundays is provided). In 2025, 11 Time Care shifts were implemented.
- **Housing and Accommodation Assistance:** Starting in December 2024, ATM will offer a housing allowance of €3,000 gross to help cover rental expenses for the first few months for surface transit drivers who have moved to Milan. Alternatively, drivers may request accommodation, which is provided for 6 months at Fondazione San Carlo and Opera Cardinal Ferrari. This initiative is funded entirely by company funds. New drivers hired no more than 6 months prior to the date of the call for applications, who reside outside the Metropolitan Cities of Milan, Monza Brianza, Lodi, and Pavia, are eligible to apply for the housing allowance or accommodation. In 2025, 34 housing vouchers were issued and 29 accommodation spots were utilized.
- **Housing allowance and accommodation:** Since December 2024, ATM has offered a gross housing allowance of €3,000 to help cover, for the first few months, the rental costs incurred by surface transport drivers who have moved to Milan. Alternatively, it is possible to request accommodation, which is offered for 6 months at Fondazione San Carlo and Opera Cardinal Ferrari. This investment is funded entirely by company funds. New drivers hired no more than 6 months prior to the date of publication of this announcement, who reside outside the Metropolitan Cities of Milan, Monza Brianza, Lodi, and Pavia, are eligible to apply for the housing allowance or the bed. In 2025, 34 housing vouchers were issued and 29 beds were used.
- **Counseling Service:** The service is provided by a multidisciplinary team (psychologist, counselor, social worker) that works in collaboration with local public and private social services. It is available to all employees facing personal or professional difficulties, with the aim of helping employees effectively manage their problems by strengthening their existing and potential personal and professional resources. The aggregate of individual counseling sessions forms the foundation upon which the actions, improvements, and innovations of the corporate welfare system are developed, designed, and implemented. In 2025, 349 individuals who requested the service were assisted, and 59 individuals were referred to the counseling service funded through Formawork.
- **WHP Certification + INAIL PREMIUM:** The initiative provides for a reduction in the average premium rate for exemplary companies that implement measures aimed at improving conditions of well-being, safety, and hygiene, with a focus on prevention. Thanks to its welfare policies and the positive actions implemented by all sectors involved in this area, ATM once again achieved the goal of reducing the premium in 2025.

- **Gender Identity:** As of April 4, 2025, all ATM Group employees may indicate on their company ID card the name they have chosen to affirm their gender identity—that is, their alias—in place of the name registered with the civil registry. Employees who wish to do so may request a replacement ID card. In 2025, three requests for aliases were processed.
- **Equal Opportunity:** ATM is a signatory to the Charter for Equal Opportunity and Equality in the Workplace promoted by Assolombarda and Fondazione Sodalitas, with the support of a Trusted Advisor.
- **Together Against Violence:** ATM is a founding member of PARI – Together Against Violence. This association, established in 2025, brings together national and international companies in the fight against gender-based violence and femicide, with the aim of supporting and promoting a culture of respect and inclusion. In just 12 months, there are over 54 member companies, impacting a total of 500,000 employees. PARI was founded with the goal of promoting equity, inclusion, and sustainability and serving as a collaborative platform to share best practices and co-design inclusive policies.

Thema, a subsidiary of the company, has also adopted several initiatives to support employee well-being and ensure a balanced work environment. These include:

- **Shift management:** Thema has implemented a structured procedure for shift scheduling and the management of requests to change or swap shifts, applicable to all shift-based staff. The process, coordinated by dedicated personnel (Roster Planners or Line Managers, depending on the department), ensures operational continuity, fair shift distribution, transparency in approvals, and greater flexibility in managing work-life balance.
- **Time & Attendance:** Thema has adopted an attendance tracking procedure supported by a digital timekeeping system, applicable to all employees (excluding managerial staff where required by law). The system enables the accurate recording of hours worked, overtime, and absences, ensuring transparency, traceability, and full compliance with labor regulations.

(S1-4 38.c) The Activities of the ATM Foundation

The ATM Foundation is a non-profit organization established in 1999 by ATM S.p.A. and the trade unions (FILT-CGIL, FIT-CISL, UILT-UIL). This foundation fosters a genuine sense of solidarity among employees and retirees, pursuing goals related to welfare, human, social, and cultural development, extracurricular education, and physical and mental rehabilitation. It operates with full autonomy, thanks to the support of its members (current and former ATM employees) and in collaboration with the company.

As of December 31, 2025, there were **9,569** members, of whom 6,386 were employees (67%) and 3,183 were retirees (33%).

The **main activities** of the ATM Foundation fall into four broad categories:

- Supplementary Health Care,
- Social Welfare, with initiatives supporting families, young people, and the elderly,

- Psychological and Physical Rehabilitation,
- Sports and Cultural Promotion.

In the area of healthcare, the ATM Foundation offers **free medical examinations** to beneficiaries during annual prevention campaigns, provides reimbursement for healthcare expenses incurred, and has established agreements with leading healthcare facilities to give members access to high-quality diagnostic tests at an affordable price.

In addition, the ATM Foundation has established its own medical center, which offers over 35 different medical specialties, dental and orthodontic services, as well as physical therapy and rehabilitation clinics supported by modern machines and medical devices.

In the area of social welfare, the Foundation provides highly qualified professionals (social workers, family mediators, psychologists and psychotherapists) to address all the needs of its members. There are numerous **family support services**, such as free counseling services for family conflicts, support for disabilities, and assistance with Specific Learning Disorders; financial aid for school books for young children; and, in the event of bereavement, subsidies for medical expenses incurred; the opportunity for a free consultation with professionals such as lawyers and notaries; multidisciplinary support and guidance for resolving cases of severe debt. Furthermore, for over 10 years, the ATM Foundation has operated its own **Social Housing** service, which is particularly important for addressing the needs of families and workers regarding the practical difficulties of finding affordable housing solutions.

The ATM Foundation's approach has always been to offer concrete solutions to real needs. The ATM Foundation's assistance reaches over **30,000 people** and, in addition to social support, also addresses recreational needs related to vacations and leisure time. Every summer, the opportunity is offered to stay at numerous hotels in Italy and abroad at discounted rates, as well as year-round at the two facilities managed directly by the Foundation: the Riviera Belsoggiorno Hotel (formerly Casa per Ferie) in Bordighera and the Milano Hotel in Trentino. Numerous spa stays are also available for both therapeutic and recreational purposes. The Foundation also offers educational vacations for children at the beach and in the mountains, summer camps in the city, and study vacations abroad for teenagers to learn English. Furthermore, in 2018, the Polisportiva Fondazione ATM, an amateur sports club, was established with the aim of promoting sports through fourteen sections engaged in competitions, championships, and recreational activities, covering a total of nearly 20 disciplines.

(S1-4 38.c) Training and Professional Development

ATM continues to strengthen and evolve its training programs, in line with the People Strategy and with the goal of supporting upskilling and reskilling initiatives through innovative solutions.

In 2025, the **Management Meeting** was consolidated, a strategic event that involved over 300 managers, including for the first time managers from the ATM Group's international companies. The initiative aimed to strengthen the management team's engagement, highlighting its role as a lever for cultural and organizational development.

The Management Workshops were also revived, offering opportunities dedicated to developing key leadership skills. Key topics included training on managerial tools, with a particular focus on the ability to give and receive feedback, in preparation for the structured session scheduled for late 2025.

At the same time, a dedicated training program was launched, involving over 450 people, with the aim of supporting professional growth and promoting the wider dissemination of managerial skills within the organization.

To raise awareness of diversity and equality issues, a course on disability has been developed in collaboration with **Ledha** (League for the Rights of People with Disabilities) and is scheduled to be delivered in January 2026, with the aim of further strengthening the Company's ability to ensure accessibility and respect for diversity. Furthermore, as part of the initiatives related to PDR 125 certification, two training sessions on gender equality were launched: one on cognitive biases and one on the certification itself. The first involved 250 managers, while the second reached a total of 1,632 people.

Finally, ATM promotes skill development through safety training programs, with the aim of engaging all staff at various organizational levels to ensure the highest safety standards for the Group; as well as through the promotion of training and development activities with customized programs (general and technical) designed to foster growth: among the most significant activities are the training and onboarding of new hires, through the implementation of personalized training plans and tailored initiatives based on the role held.

Regarding training and professional development, the Greek company Thema has implemented a structured **induction** process for all new hires, with the aim of ensuring effective and timely integration into the corporate environment. The process involves various company departments, ensuring that new employees receive specific information about their role, health and safety requirements, company policies, and ethical and operational principles from their very first day on the job.

Furthermore, in the event that an employee in the operations or maintenance staff is absent from work for an extended period (e.g., due to illness, injury, maternity leave, or other long-term leave), Thema has established a dedicated **reintegration and training** procedure. Before resuming work, the employee meets with the Occupational Physician to verify fitness for duty and to assess any specific health needs. Only after receiving medical clearance does the operational reintegration and training process begin.

(S1-4 38.a, 38.b, 40a) Employee Health and Safety

With regard to the health and safety of its employees, the Group has identified a negative impact linked to the potential occurrence of accidents or other incidents in the workplace that may affect employees' health, as well as a risk related to assaults against service personnel. In order to minimize the impact and strengthen measures to reduce the occurrence of the risk, ATM has implemented activities and procedures, such as:

- **Identify and assess any occupational health and safety risks**, implementing appropriate preventive and protective measures.
- **Provide safety training programs** to engage all staff at various organizational levels, ensuring that responsibilities and operating procedures are clearly defined, appropriately communicated, and correctly implemented.
- **Communicate information regarding health, workplace safety**, and the environment to internal and external stakeholders to raise awareness and promote understanding.
- **Care Manager**: an innovative project aimed at addressing, in a structured and organized manner, the growing complexity resulting from assaults and/or serious incidents involving on-duty staff. The Care Manager is responsible for providing support in overcoming conditions of need and psycho-emotional distress resulting from such extraordinary events. ATM has also created a cross-functional team that supports the Care Manager in managing assistance activities for employees affected by such events, and which meets periodically to evaluate the most effective actions to take. In 2025, the Care Manager managed and supported 81 cases.
- **Post-traumatic rehabilitation procedure**: Assaults and accidents resulting in death or serious injury are potentially traumatic events that can have extremely harmful psychological and behavioral consequences, with serious repercussions on the professional front. Thanks to this program, in collaboration with Occupational Medicine, it is possible to intervene proactively by offering employees psychotherapy-based rehabilitation programs using the EMDR (Eye Movement Desensitization and Reprocessing) technique at the ATM Foundation Clinic. In 2025, 24 post-traumatic rehabilitation programs were requested and completed.

In recent years, ATM has implemented measures aimed at improving the monitoring and management of infrastructure to ensure operational safety. This plan has involved a series of actions, including:

- a comprehensive inspection of the subway network,
- a comprehensive inspection of the tram infrastructure,
- the hiring and special training of train crew and inspection staff.

Services aimed at passenger safety are also carried out in collaboration with law enforcement agencies and local police in the area, with particular attention to high-risk lines. In the metro system, along the most critical routes, mobile ATM security teams are on duty.

To support its staff and customers, ATM has a “**safety network**” that includes:

- video surveillance systems. Video surveillance systems are standard equipment on all newly acquired vehicles (trams, buses, trolleybuses, and trains) and on M1 trains undergoing refurbishment,
- SOS video intercoms installed in all subway stations,
- SOS intercoms on all trains, through which passengers can communicate directly with the Operations Center, and the ability for station and train crew to connect directly with the Operations Centers of the metro and surface lines.

Traffic on the surface and in the metro is constantly monitored by the Operations Centers, whose systems provide real-time information on the location, spacing, and occupancy of vehicles.

(S1-4 39) In addition to the above, the Prevention and Protection Service, in collaboration with the relevant departments, has undertaken various improvement initiatives—including staff training—in response to the accidents that occurred in 2025, such as:

- drafting of new work procedures and operational instructions for the safe performance of activities carried out in corporate and public settings,
- inspection of workplaces,
- systematic analysis of accident trends and, where necessary, updating of specific risk assessments in light of the protective measures progressively established,
- improvement projects regarding work equipment, PPE, chemicals, and clothing.

(S1-4 38.a) Privacy and Data Protection

ATM has a formalized procedure for managing data breaches, generally applicable to any affected stakeholder. In the event of a personal data breach, the incident is immediately recorded and an internal analysis process is initiated. The procedure involves the preparation of two main documents:

- **Internal assessment document**, which analyzes the nature of the breach, potential impacts, categories of data subjects involved, affected departments, and the severity level of the data breach.
- **Minutes of the meeting** with the affected department, in which the response and mitigation measures adopted are defined, including any corrective and preventive actions.

The procedure is initiated **immediately**, within a few days of becoming aware of the breach. When the internal assessment does not identify high risks to the rights and freedoms of the data subjects, the matter is handled **internally**. If, on the other hand, the severity score is high, ATM notifies **the Italian Data Protection Authority** and, where necessary, informs the data subjects. Historically, ATM has recorded only one data breach that was reported **to the Data Protection Authority**.

ATM has also established a **Privacy Committee** responsible for coordination and oversight. Among its various activities, the Committee analyzes regulatory and operational developments, evaluates significant decisions regarding data protection, and defines internal communications to be disseminated to the various departments. It is composed of the Privacy team, the **DPO**, and a representative from each company department, in order to ensure comprehensive and integrated oversight.

Furthermore, in order to prevent potential data breaches that could be attributed to ATM's activities, the Group invests in comprehensive **training programs on privacy and data protection**, aimed at all departments within the Group. In addition to general training—which is included, for example, in mandatory courses for new hires—specific training sessions are provided, such as for staff responsible for managing data, contracts, or sensitive processes, or following a data breach, in which case the topic is addressed in greater depth with the relevant department.

Metro Service protects personal data with high standards of security and cybersecurity, ensuring that all information—whether related to passengers or employees—is handled responsibly and

transparently. Data collection and processing occur exclusively for defined and legitimate purposes, always in full respect of individual privacy.

The company applies **the principle of data minimization**, collecting only what is strictly necessary and avoiding excessive or irrelevant information. Personal data is processed in a way that limits identification to the shortest possible period, while ensuring high levels of integrity, confidentiality, and availability.

To strengthen internal awareness and digital resilience, employees receive training on the GDPR and cybersecurity through a specialized platform that uses AI-powered simulations and real-time feedback, with the aim of enhancing skills and reducing human error. This approach ensures that staff are prepared to handle digital threats and maintain responsible data processing practices.

By integrating these principles into its operations, Metro Service ensures GDPR compliance and fosters a strong corporate culture focused on cybersecurity and the ethical use of data.

(S1-4 38.d) To assess the effectiveness of the measures mentioned above and ensure that the workforce achieves the expected results, employees are provided with satisfaction surveys for the various services. Particular attention is paid to corporate welfare initiatives and work-life balance measures, including: on-site daycare centers, a counseling service, care managers, housing subsidies, HXO training on unconscious bias, and Formwork counseling.

This allows ATM to monitor the actions implemented and, if necessary, guide future actions.

Other Social Risks

(S1-4 40.a) To address risks related to labor market trends—which could lead to difficulties in recruiting qualified personnel, resulting in operational and reputational impacts as well as training costs—and to strikes by ATM staff seeking improved working conditions in terms of wages, safety, and rights, the Group has strengthened its human resources management strategies.

Given the sharp decline in the number of applications for the role, which continued into 2025, it became necessary to implement new initiatives in both training and employer branding to bridge the gap between the company's demand and the market's supply. In 2025, ATM intensified its investment in employer branding, exponentially increasing local events and initiatives—such as the Job Tour—to attract and recruit new talent, while expanding its network of contacts with institutions and associations linked to the worlds of work and training. The goal is to enhance ATM's image as an employer by directly communicating professional and career development opportunities to potential candidates, as well as sharing corporate values and information about the wellbeing system, designed to improve the well-being of every employee and ensure a better work-life balance.

At the same time, the Group has strengthened its commitment to continuous professional development, training, and the search for specialized professionals, including through partnerships with universities, with the aim of leveraging internal expertise and ensuring the achievement of corporate objectives.

The risk associated with labor disputes is also subject to in-depth and ongoing analysis aimed at ensuring responsible and sustainable management of labor relations, reducing the likelihood of tensions, and fostering a collaborative environment.

To mitigate the identified risks, the Company has established a structured set of mitigation measures, among which the following certainly stand out: the establishment of an **industrial relations protocol** to ensure constant and transparent dialogue with the social partners; the prior sharing of objectives and timelines in **consultation processes to foster a participatory approach**; the **strengthening of labor-management relations** through proactive and preventive dialogue on issues that may lead to disputes, including collective ones; and **full compliance with the mandatory cooling-off and conciliation procedures** required by law to responsibly manage potential disputes.

These measures contribute to a labor governance model based on dialogue, prevention, and social responsibility, in line with ESG principles and the company's commitment to the sustainable management of its human resources.

(S1-4 41) The Group adopts corporate policies and practices designed to ensure that its activities do not have a negative impact on its workforce. SA8000 certification, the role of the Employee Representative, and welfare and safety measures constitute the main safeguards in this regard. Tensions between preventing negative impacts and other business pressures are managed in accordance with the principles of social responsibility and workers' rights.

(S1-4 43) The ATM Group addresses its material impacts on the workforce through information and training **initiatives implemented across the organization**. These initiatives include:

- **Training courses** for internal staff, with up-to-date content on compliance, workplace safety, and ethical and behavioral principles,
- **Periodic and informative communications** distributed through internal corporate communication channels (intranet, newsletters, digital bulletin boards, etc.), with the aim of promoting a shared and informed organizational culture,
- The involvement of **specific dedicated corporate functions** (e.g., SA8000 team, Human Resources, Prevention and Protection) in the design and management of continuous improvement initiatives.

- **Metrics and goals**

S1-5– Objectives related to managing significant negative impacts, enhancing positive impacts, and managing significant risks and opportunities

(ESRS 2 MDR-T 80) In line with the strategic direction outlined in the Sustainability Policy under the "Great Workplace" pillar, ATM has identified objectives aimed at fostering an inclusive, people-centered work environment that values diversity.

Indicators	Base year - 2019	2023 Goal	2025 Goal	2025 Final balance	2026 Goal	2030 Goal
% of female workforce – Group	8,9%	N/A	11,8%	12,7%	N/A	<i>In definition</i>
Reducing the Gender Wage Gap – ATM Italia	N/A	< 3%	< 3%	< 3%	N/A	< 3%
Number of health promotion initiatives / categories involved – ATM Italia	20/2	22/6		21/6		N/A
Increased training hours on DEI topics – ATM Italia	N/A	N/A	Developing 1 course for 2 categories of employees	2 courses for 3 categories + development of courses on disabilities	1 course for 2 categories	N/A
Implementation of a program to prevent discrimination and abusive behavior – ATM Italia	N/A	N/A	Development of 2 initiatives for 3 categories	Carrying out 3 initiatives in 6 categories	Developing 2 additional initiatives for 3 categories	N/A

(MDR-T 80 i) With regard to the targets listed in the table above, which were included in the 2024 report, there have been some updates. In fact, given the early achievement of the previous targets (reducing the pay gap and promoting health initiatives), ATM has decided to set two additional goals for 2025; a goal regarding training hours on DEI topics and a goal for the implementation of discrimination prevention programs have therefore been established.

(MDR-T 80 j) The achievement of objectives and their progress are monitored periodically through a digital platform that allows both the entry of baseline data for KPI calculation and the direct entry of objectives and period-end results. This ensures that everything is tracked and that the history of monitored objectives can be viewed. All objectives and their performance are validated and approved annually by the Board of Directors.

(MDR-T 80 f, S1-5 47) ATM did not directly involve stakeholders in defining the objectives of its Sustainability Policy, but developed a matrix that took into account its business plan in line with certain

strategic documents, ranging from the 2030 Agenda for Sustainable Development and the 2015 Paris Agreement to the Sustainable Urban Mobility Plan (SUMP) approved by the City of Milan.

Finally, further KPIs were defined during 2025 at the level of individual subsidiaries:

KPI	Net		Rail Diagnostics		Gesam Srl		City Link		Metro Service	
	2030 Goal	Performance 2025	2030 Goal	Performance 2025	2030 Goal	Performance 2025	2030 Goal	Performance 2025	2030 Goal	Performance 2025
% Female presence in the company (travelling staff)	8%	5,3%								
1 DE&I training course for all employees per year			one for each year	1	one for each year	1	5	1		
% female presence on the Board of Directors									2025 - 25%	33%
% female presence in senior management positions									2027 - 29%	19%

S1-6– Characteristics of the company's employees

S1-6 - Characteristics of the company's employees					
As of December 31, 2025					
	Women	Men	Other	Not communicated	Total
50. a) Total employees	1.439	9.917	0	0	11.356
50. b) Permanent employees	1.330	9.676	0	0	11.006
50. b) Fixed-term employees	109	241	0	0	350
50. b) Employees on variable hours	0	0	0	0	0
As of December 31, 2024					
	Women	Men	Other	Not communicated	Total
50. a) Total employees	1.258	9.365	0	0	10.623
50. b) Permanent employees	1.207	9.170	0	0	10.377
50. b) Fixed-term employees	51	195	0	0	246
50. b) Employees on variable hours	0	0	0	0	0

Number of employees per country	2025	2024
Total Group employees	11.356	10.623
Italy	10.229	9.687
Denmark	875	715
Greece	252	221

	2025	2024
Total Group employees	11.356	10.623
50. c) Number of terminated employees	823	837
50. c) Employee turnover rate	7,2%	7,9%

(S1-6 50.d) The number of Group employees was recorded as of the reporting period end date, i.e., December 31, 2025. The Full-Time Equivalent (FTE) metric was not used, but employee data was entered using the "headcount" methodology; therefore, no weighting was applied based on workers' contractual hours. During 2025, approximately 1,500 new resources were hired, a result that consolidates the Group's commitment to strengthening its workforce in all the countries in which it operates. (S1-6 50.f) Further information on year-to-year changes and further details on the composition of hires (Italy side) can be found in the Management Report in paragraph 1.2.4 Our People.

S1-7 – Characteristics of non-employee workers in the company's own workforce

(S1-7 55.a, 56) The following categories of non-employee workers were considered: collaborators, consultants, trainees, professionals, and extracurricular internships. The data refers to all ATM Group companies.

S1-7 – Characteristics of non-employee workers in the company's own workforce	2025	2024
55. a) Total number of non-employee workers	318	439

(S1-7 55.b) The number of non-employees was recorded as of the reporting period's closing date, i.e., December 31, 2025. The Full-Time Equivalent (FTE) metric was not used, but the data on non-employees was entered using the "headcount" methodology; therefore, no weighting was applied based on workers' contractual hours.

⁸ Non-employee workers are only reported by ATM S.p.A., Metro Service, and Thema, as Gesam, Rail, CityLink, and NET did not have any non-employee workers in their workforce in 2025.

⁹ Non-employee workers are only reported by ATM S.p.A., Metro Service, and Thema, as Gesam, Rail, CityLink, and NET did not have any non-employee workers in their workforce in 2024. The methodology for quantifying the Group's non-employee workers has been updated to improve data accuracy, refining the methodology for calculating interns. To ensure data comparability, the Group-wide figure for the number of non-employee workers, which was 77 in the consolidated sustainability report as of December 31, 2024, has been restated to 43.

(S1-7 55.c) The number of non-employees decreased due to fewer extracurricular internships, from 32 in 2024 to 18 in 2025. The number of other non-employees remained essentially unchanged.

In addition to the non-employee categories, since the end of 2024, ATM has launched the Drivers Project, an initiative led by a Task Force dedicated to managing the driver shortage, operating continuously and with dedicated specialist resources. As part of its efforts to strengthen the availability of driving staff, the company has introduced **paid training internships** as a structured entry-level tool for the driving profession. The internship is designed as a training program aimed at obtaining qualifying qualifications and subsequent employment, rather than as a substitute or temporary form of employment. The internship allows future drivers to be progressively supported through the various stages of the program (training, medical examinations, obtaining qualifications), increasing the likelihood of completion and the stability of the subsequent employment relationship.

As of 12/31/2025, over 200 driver internships were active, a significant increase compared to 2024, the year in which this structured induction tool was still in its initial phase of adoption (35 activations).

S1-8– Coverage of collective bargaining and social dialogue

	2025	2024
Number of employees covered by collective bargaining agreements	10.910	10.460
Total number of employees	11.356	10.623
60. a) Percentage of total employees covered by collective bargaining agreements	96,1%	98,5%
Number of employees covered by worker representatives	11.126	10.416
63. a) Copertura del dialogo sociale	98,0%	98,1%

(S1-8 60.a) As of December 31, 2025, 96.2% of the ATM Group's employees (10,910 out of 11,356) were covered by collective bargaining agreements.

(S1-8 60.b) Within the European Economic Area (EEA), the ATM Group has collective bargaining agreements in countries where it has a significant presence (defined as at least 50 employees representing at least 10% of the total workforce). Coverage by country is as follows:

- Italy: 100% of employees covered by collective bargaining,
- Greece: 0% of employees covered by collective bargaining,
- Denmark: 79% of employees covered by collective bargaining. Specifically, at the Danish company Metro Service, 181 employees (primarily managers and high-profile technical specialists) are subject to individual rather than collective contracts.

(S1-8 60.c) The ATM Group currently has no employees outside the European Economic Area; therefore, this is not applicable.

(S1-8 61) For employees not covered by collective bargaining agreements, working conditions and contractual terms are established through individual negotiation, in accordance with local regulations

and company standards consistent with those applicable to employees covered by collective bargaining agreements.

(S1-8 62) No specific data is available regarding collective bargaining coverage for non-employee workers. However, for contract and subcontract workers, ATM promotes compliance with the contractual standards set forth in the relevant collective bargaining agreements for the sector.

(S1-8 63.a) **98% of ATM Group employees are represented by employee** representatives in the context of social dialogue. This figure refers to countries with a significant presence within the EEA. Specifically:

- Italy: 99.6% of employees covered by employee representatives,
- Greece: 100% of employees covered by employee representatives,
- Denmark: 79% of employees covered by employee representatives.

(S1-8 63.b) There are currently no agreements in place with employees regarding the establishment of a European Works Council (EWC), a Works Council of a Societas Europaea (SE), or a European Cooperative Society (SCE).

S1-9– Diversity Metrics

S1-9 – Diversity Metrics (66. A, RA 71.) – Senior Management by Gender	66. a) Number in 2025	% 2025	66. a) Number in 2024	% 2024
Women	14	25,45%	12	30%
Men	41	74,55%	28	70%
Other	0	0	0	0%
Not communicated	0	0	0	0%
Total employees	55	100%	40	100%
RA 71. Communicate your definition of senior management used	The ATM Group defines “senior management” as individuals with a management contract.			

S1-9 – Diversity metrics (66. B) – employees by age groups				
2025	<30 years	30-50 years	> 50 years	Total
Management	0	23	32	55
Officials	5	251	235	491
Practice	477	3.609	2.247	6.333
Administration and services	222	570	411	1.203
Plant and workshop maintenance	453	989	799	2.241

Auxiliary services for mobility	45	445	543	1.033
Total	1.202	5.887	4.267	11.356
%	<30 years	30-50 years	> 50 years	Total
Management	-	0,39%	0,75%	0,48%
Officials	0,42%	4,26%	5,51%	4,32%
Practice	39,68%	61,30%	52,66%	55,77%
Administration and services	18,47%	9,68%	9,63%	10,59%
Plant and workshop maintenance	37,69%	16,80%	18,73%	19,73%
Auxiliary services for mobility	3,74%	7,56%	12,73%	9,10%
Total	10,58%	51,84%	37,57%	100,00%
2024	<30 years	30-50 years	> 50 years	Total
Management	0	15	25	40
Officials	4	254	224	482
Practice	401	3.398	2.104	5.903
Administration and services	175	523	397	1.095
Plant and workshop maintenance	355	965	775	2.095
Auxiliary services for mobility	55	451	502	1.008
Total	990	5.606	4.027	10.623
%	<30 years	30-50 years	> 50 years	Total
Management	-	0,27%	0,62%	0,38%
Officials	0,40%	4,53%	5,56%	4,54%
Practice	40,51%	60,61%	52,25%	55,57%
Administration and services	17,68%	9,33%	9,86%	10,31%
Plant and workshop maintenance	35,86%	17,21%	19,25%	19,72%
Auxiliary services for mobility	5,56%	8,04%	12,47%	9,49%
Total	9,32%	52,77%	37,91%	100,00%

S1-10– Adequate wages

(S1-10 69) Through its SA8000:2014-certified Social Responsibility Management System, the ATM Group ensures compliance with **fundamental labor principles**, including the payment of wages in accordance with national legislation and applicable collective bargaining agreements. In line with the requirements of the SA8000 Standard and the sector's National Collective Bargaining Agreements (CCNL), ATM ensures that compensation is always equal to or higher than the established minimums. Furthermore, through second-level bargaining, the Group establishes additional compensation and corporate welfare measures aimed at improving the well-being of its employees. Compliance with

these requirements is subject to periodic verification as part of internal audits and certification renewals.

S1-11- Social Protection

(S1-11 74) All employees of the ATM Group are covered by social protection systems provided for by national legislation in the countries where the Group operates. This coverage guarantees income protection in the event of significant life events, including: (a) illness, (b) unemployment starting from the beginning of the employment relationship, (c) workplace accidents and acquired disabilities, (d) parental leave, (e) retirement.

Therefore, employees' social protection is ensured through mandatory public social security programs, in accordance with the specific national laws in force.

S1-12– People with disabilities

S1-12 – People with disabilities (S1-1 79)	u.m.	2025		2024	
		Man	Woman	Man	Woman
People with disabilities among employees	n	213	45	n.d.	n.d.
	%	1,9%	0,4%	n.d.	n.d.
Total employees with disabilities	n	258		253	
	%	2,3%		2,4%	

(S1-12 RA 76) The data above refers exclusively to the Group's Italian companies, as the data is not tracked by the Danish Company, while the Greek Company does not appear to have any employees with disabilities. The number corresponds to the amount reported annually to the competent authorities in the disability information sheet. This documentation is a request based on Law 68/1999, which establishes, among the employer's obligations, a percentage of disabled employees based on the size of the workforce. A person is defined as disabled following a certification that determines their civil invalidity.

Please note that for 2024, it was not possible to obtain the number and percentage broken down by gender.

S1-13- Training and skills development metrics

(S1-83.a) Starting in 2025, ATM has begun implementing several Performance Management activities for all Italian companies within the Group. The full cycle of this process is expected to be activated in 2026, involving the entire workforce of managers and executives, approximately 500 people. Therefore, to date, data on the percentage of employees who have participated in periodic performance and career development reviews is not yet available. This information will be made available starting with the next reporting period.

The percentages of employees who have participated in Performance Management programs are shown below, with reference to the employees of the foreign subsidiary Metro Service:

S1-13 – Employees who have participated in performance management processes	u.m	2025		2024	
		Ma n	Woma n	Ma n	Woma n
Percentage of employees to total employees (Metro Service)		64	54	N/D	N/D
<i>Managers</i>	%	0	0	N/D	N/D
<i>Officials</i>		66	57	N/D	N/D
<i>Practice</i>		68	69	N/D	N/D
<i>Administration and Services</i>		43	40	N/D	N/D
<i>Plant and workshop maintenance</i>		50	50	N/D	N/D
<i>Auxiliary services for mobility</i>		0	0	N/D	N/D

- (S1-83.b)

S1-13 – Average hours of training	2025		2024	
	Man	Woman	Man	Woman
<i>Managers</i>	23,5	26,3	15,2	24,2
<i>Officials</i>	65,1	44,7	88,0	63,3
<i>Practice</i>	47,6	101,1	25,3	40,8
<i>Administration and Services</i>	12,4	13,8	19,1	19,8
<i>Plant and workshop maintenance</i>	32,7	27,6	36,2	39,3
<i>Auxiliary services for mobility</i>	8,5	11,4	7,00	12,2
TOTAL	38,8	54,9	27,8	31,6

The increase in training hours from 2024 to 2025 is attributable to three main factors:

- a significant increase in hiring, resulting in increased mandatory and technical training for new hires;
- an increase in some mandatory activities related to the new State-Regions agreement on workplace safety, which introduced new training requirements or increased the required training hours;

a greater volume of training and development initiatives, particularly in the area of people managers.

S1-14– Health and safety metrics

S1-14 – Health and Safety Metrics	2025			2024 ¹⁰		
	Employees	Non-employees	Total	Employees	Non-employees	Total
88. a) Percentage of own workers covered by the health and safety management system	100%	n.d.	n.d.	100%	n.d.	n.d.
88. b) Number of deaths due to work-related injuries and diseases	0	n.d.	n.d.	0	n.d.	n.d.
88. c) Number of recordable accidents at work	254	0	254	226	0	226
Hours worked	17.557.782	49.394	17.607.177	16.430.472	66.042	16.496.514
88. c) Recordable occupational injury rate	14,47	0	14,43	13,75	0	13,70
88. d) Number of recordable cases of work-related diseases	13	The data requested by Data Point 89 is not reported by	-	6	The data requested by Data	-

³⁴ The methodology for quantifying the Group's worker health and safety metrics has been updated to improve data accuracy by refining the calculation method. To ensure data comparability, the Group-wide data relating to:

- the number of recordable workplace injuries, equal to 239 in the consolidated sustainability reporting as of December 31, 2024, has been restated at 226.
- the number of hours worked by non-employees (due to the change to the number of non-employees in the ESRS S1-7 indicator for the financial year ending December 31, 2024), equal to 123,832.5 in the consolidated sustainability reporting as of December 31, 2024, has been restated at 66,042;
- the number of days lost due to injuries and deaths at work resulting from accidents, work-related illnesses, and deaths resulting from illnesses, amounting to 6,868 in the consolidated sustainability reporting as of December 31, 2024, has been restated to 6,089;
- the rate of recordable workplace injuries, equal to 0.00197% in the consolidated sustainability reporting as of December 31, 2024, has been restated to 13.75.

³⁵ Please note that the number of occupational illnesses reported in the table refers to the Group companies operating in Italy and the foreign Greek company. Therefore, the data relating to the Danish company is not included, as it is not currently monitored.

		the ATM Group as it is a voluntary Data Point according to the ESRS S1 standard. For this reason, the Group has availed itself of the option not to report it for the reference financial year.			Point 89 is not reported by the ATM Group as it is a voluntary Data Point according to the ESRS S1 standard. For this reason, the Group has availed itself of the option not to report it for the reference financial year.	
88. e) Number of days lost due to injuries and deaths at work resulting from work-related accidents, work-related diseases and deaths resulting from diseases	7.067	-	-	6.089	-	-

Regarding the number of accidents, it should be noted that the increase between 2024 and 2025 is due, on the one hand, to the increase in assaults on vehicles, and on the other, to the increase in falls and slips.

Regarding the deaths referred to in letter b), it should be noted that the number also includes incidents involving workers along the value chain and that, therefore, no deaths were reported as a result of occupational injuries or illnesses involving workers operating on company sites.

S1-15– Work-Life Balance Metrics

(S1-15 93,94) All ATM Group employees are legally and **contractually entitled to family leave**, in accordance with national legislation and applicable collective agreements.

S1-15 – Work-Life Balance Metrics	Women	Men	Other	Not communicated	Total
	2025				
Number of employees entitled to take family leave	1.439	9.917	0	0	11.356
Number of eligible employees who have taken family leave	296	2.124	0	0	2.420
93. a) Percentage of employees entitled to take family leave	100%	100%	n.a.	n.a.	100%
93. b) Percentage of eligible employees who have taken family leave	20,57%	21,42%	n.a.	n.a.	21,31%
S1-15 – Work-Life Balance Metrics	2024				
Number of employees entitled to take family leave	1.255	9.368	0	0	10.623
Number of eligible employees who have taken family leave	239	1.944	0	0	2.183
93. a) Percentage of employees entitled to take family leave	100%	100%	n.a.	n.a.	100%
93. b) Percentage of eligible employees who have taken family leave	19,04%	20,75%	n.a.	n.a.	20,55%

S1-16– Compensation metrics (pay gap and total compensation)

S1-16 – Compensation Metrics	2025		2024	
	Woman	Man	Woman	Man
Average gross hourly wage	€ 27,00	€ 26,96	€ 25,76	€ 25,41
97. a) Pay gap between women and men	-0,17%		-1,38% ¹¹	

³⁶ Please note that the figure for 2024 has been modified in this sustainability statement: in the consolidated sustainability reporting as of December 31, 2024, the same value (1.38%) was reported as positive, whereas the wage gap was negative.

S1-16 – Compensation Metrics	2025	2024
97. b) Ratio of the total annual remuneration of the person receiving the highest remuneration to the median total annual remuneration of all employees (excluding the above-mentioned person)	15,80	15,97

S1-17– Incidents, complaints and serious impacts on human rights

	2025	2024
103. a) Number of incidents of discrimination related to work	71 ¹²	78 ³⁴
103. b) Number of complaints submitted through the channels established for workers within the company to raise concerns (including grievance mechanisms)	89	78
103. (b) Number of complaints lodged with the OECD National Contact Points for Multinational Enterprises, excluding incidents already reported in accordance with point (a);	0	0
103. c) total amount of fines, penalties and compensation for damages resulting from accidents and complaints	0	0
103. c) Reconciliation of the monetary amounts indicated with the most relevant amount recorded in the balance sheet	0	0
104. a) Number of serious human rights incidents related to the enterprise's workforce in the reporting period:	2	0
<i>Cases of non-compliance with the United Nations Guiding Principles on Business and Human Rights</i>	-	-
<i>Cases of non-compliance with the ILO Declaration on Fundamental Principles and Rights at Work</i>	-	-
<i>Cases of non-compliance with the OECD Guidelines for Multinational Enterprises</i>	-	-
104. b) Total amount of fines, penalties and damages for accidents	0	0

(S1-17 103.d) With reference to the data reported in the table above, it is specified that the following cases were considered: i) harassment (14 in 2025); ii) mobbing (17 in 2025); iii) discrimination (40).

As regards serious human rights incidents, two incidents of stalking which occurred in the workplace were considered.

ESRS S2 Workers in the value chain

Table IRO (SBM-3 11.e)

³⁷ Reports were collected via email and WhatsApp by the Trust Advisor, as well as through the channels provided by the SA8000 management system. Since such reports are treated confidentially, it is not possible to definitively rule out potential duplications (double counting).

Sub Topic	IRO	Typology	Value chain	Time horizon
Working conditions	Impact: Negative impact on the health and safety conditions of workers along its supply chain, with particular regard to infrastructure and vehicle maintenance operations, due to inadequate monitoring of the health and safety policies adopted by suppliers	Negative – Potential	Upstream	Medium
Other work-related rights (child labor, forced labor, adequate housing)	Opportunity: Adoption/strengthening of systems for monitoring working conditions along the value chain, in line with the requirements of the Corporate Sustainability Due Diligence Directive (CSDDD), with positive consequences in terms of reputation and operational efficiency.	N/A	Upstream, Own Operations, Downstream	Medium

• Strategy

ESRS 2 SBM-3 – Significant impacts, risks and opportunities and their interaction with the business strategy and model

(SBM 3 11) The disclosure relating to ESRS S2 – Workers in the Value Chain refers to all types of workers in the value chain affected by the Group's operations, both upstream and downstream.

(SBM-3 11.a) For the types of workers in the value chain subject to significant impacts caused by their own operations or along the value chain, it is specified that the most impacted categories are workers of supplier companies, particularly those involved in infrastructure and vehicle maintenance.

(SBM-3 11.b) Given the geographies in which ATM operates (Italy, Denmark, and Greece) and the goods supplied, they are not considered to be highly subject to a significant risk of child labor, forced labor, or compulsory labor. However, the risk may still exist, which is why ATM, as a level of protection and control, formally requires all ATM Group suppliers to comply with the principles contained in the Social Responsibility Policy.

(SBM-3 11.c) The Group has identified the potential for negative impacts on **worker health and safety conditions** along its supply chain, particularly in infrastructure and vehicle maintenance activities performed by suppliers and subcontractors. These impacts may be systemic, resulting from insufficient oversight of suppliers' H&S policies and practices, or **related to specific incidents** that occur in high-risk operational contexts.

(SBM-3 12) *The ATM Group has identified that the workers most exposed to risks in the value chain are those employed in activities characterized by specific operational or environmental conditions. Specifically, workers involved in:*

- work at height;
- operations inside pits and confined spaces;

- work on walkways and in environments with limited escape routes are most vulnerable.

These activities pose high risks to workers' health and safety, which ATM considers a priority in **managing its value chain**. Understanding these risks occurs through an assessment of the operating conditions, tasks performed, and the contexts in which the activities are carried out, with particular attention to protecting the rights and preventing negative impacts on the most exposed workers.

(SBM-3 13) The identified opportunity identifies an opportunity to strengthen ATM's internal systems that will involve all workers in the ATM Group's value chain.

- **Management of impacts, risks, and opportunities**

S2-1 – Policies related to workers in the value chain

(ESRS 2 MDR-P 62) The ATM Group does not currently have Group Policies specifically addressing significant impacts on workers along the value chain. However, it does have several internal documents that, among other topics, also regulate certain rules of conduct towards numerous stakeholders, including workers in the value chain:

- Social Responsibility Policy and SA 8000 Standard
- Conduct Guidelines

For matters not expressly addressed in this chapter with reference to the two documents cited, please refer to chapter **S1 – Own Workers**.

Social Responsibility Policy and SA 8000

(S2-1 17) ATM has not developed a specific Group-wide Human Rights Policy across the value chain. However, the management of this issue for directly controlled subsidiaries that have achieved SA8000 certification (RD, GeSAM, NET, and CityLink) is governed by the **Social Responsibility Policy**, developed as part of the **Social Responsibility Management System**, consistent with the international standards **SA8000:2014** and **UNI ISO 26000**. This Policy expresses a concrete commitment to continuous improvement of its management system, through annual review and monitoring, including through specific tools such as regularly updated risk analyses and ongoing internal audits. The Policy promotes ongoing compliance with social and legislative requirements in the field of safety, the management of relationships with suppliers/subcontractors, favoring, where possible, those attentive to environmental, social, and ethical aspects that share the values of the ATM Group, and, last but not least, the communication of the SA8000 principles externally through social initiatives.

(S2-1 19) The SA8000 standard was created as an aggregation of principles established by other international documents such as the UN Universal Declaration of Human Rights, the United Nations Convention on the Rights of the Child, the ILO (International Labour Organization) conventions and recommendations, and the United Nations Conventions against Discrimination. The ATM Group ensures that its workforce policies comply with internationally recognized instruments on human rights and working conditions. ATM operates in compliance with the Universal Declaration of Human Rights, the conventions of the International Labour Organization (ILO), and United Nations Conventions, as well as national regulations on labor and workplace safety.

The SA8000 certification has been reconfirmed three times: in 2015, 2018, and 2021. In 2023, the renewal process for ATM S.p.A., Nord Est Trasporti S.r.l., GeSAM S.r.l., and Rail Diagnostics S.p.A. for

the period 2024-2027 was successfully completed. The process was finalized in 2024 with a fine-tuning of the findings of 2023, and in May 2024, the new certificates valid for the new three-year period were issued. CityLink S.r.l. joined the already certified companies in December 2024. The SA8000 certification and its management system are part of the Internal Control and Risk Management System. Maintaining certification and periodically assessing the company's performance in this area are promoted through continuous monitoring, internal audits of various company functions, supplier audits, and widespread verification by the Social Performance Team, a dedicated body composed of equal numbers of employee and company representatives.

(S2-1 18) The international standard SA8000, which ATM has chosen to adhere to, aims to improve working conditions and the quality standards of corporate procurement. It defines a model for certain aspects of corporate management related to corporate social responsibility, whose compliance with the standard is verified semi-annually by a certification body. Its content requires compliance with national and international laws on labor and the working environment and compliance with ethical requirements, including freedom of association and the right to collective bargaining. It requires avoiding forms of discrimination based on race, gender, religion, politics, disability, sex, and age, ensuring equal opportunities, ensuring fair pay, and respecting adequate working hours.

The SA8000 standard supports the development, maintenance and application of socially acceptable behaviors in the workplace based on nine fundamental requirements:

Requisito 1	Non impiegare e favorire l'utilizzo di lavoro infantile
Requisito 2	Non ricorrere all'utilizzo di lavoro forzato o obbligato né favorirlo
Requisito 3	Garantire a tutti i dipendenti un luogo di lavoro sicuro e salubre
Requisito 4	Rispettare il diritto delle lavoratrici e dei lavoratori di associarsi e di aderire alle organizzazioni sindacali
Requisito 5	Non attuare discriminazioni di alcuna natura
Requisito 6	Non utilizzare né sostenere pratiche disciplinari quali punizioni corporali, coercizione fisica o mentale, abusi verbali
Requisito 7	Adeguare l'orario di lavoro alle leggi e agli accordi vigenti
Requisito 8	Retribuire i dipendenti rispettando i contratti in vigore
Requisito 9	Implementare e mantenere attivo il proprio Sistema di Gestione della Responsabilità Sociale

Requirement 1: Not employing or supporting the use of child labor

The ATM Group does not employ, and does not intend to employ, or support labor performed by children or minors. To this end, it has developed the "PGD DRU 03 – Child Labor" procedure, which is included in the company information system (called Hegel) to manage cases where work situations that fall within the definition of child labor are identified within the company or within its supply chain. The procedure defines the actions ATM adopts to provide **adequate support to children** who may be involved in work activities, ensuring they are able to attend and remain in school until the legally required age. It also manages the presence of any minors within the organization, ensuring that children or young workers are not exposed to situations that are dangerous or harmful to their physical or mental health, or to their development, both inside and outside the workplace. The ATM Group has maintained its commitment to not resorting to child labor and to protecting young workers between the ages of 16 and 18, both within the Group and in the production chain, over which it can act within its scope of competence. ATM will continue to monitor compliance with these principles by conducting audits at the premises of suppliers and subcontractors and collecting information that can provide confidence to stakeholders and the certification body in compliance with these principles.

Requirement 2: Not resorting to or encouraging the use of forced or compulsory labor

The ATM Group does not resort to or support the use of forced or compulsory labor as defined in ILO Convention 29; furthermore, it does not require employees to pay deposits or leave original identification documents with the company upon commencement of employment. ATM does not tolerate the threat of coercion in obtaining work. To ensure that all services are fully voluntary, the Company is committed to ensuring that **all workers are fully aware of the rights and obligations** arising from their employment contract. Upon hiring, all workers receive and sign a contract letter, which contains a summary of the industry regulations and disciplinary rules they must adhere to. The Company does not grant loans to its employees, but, in compliance with applicable laws and

regulations, applies more favorable terms to meet requests related to specific needs. These requests are reviewed by a support committee which, when deemed appropriate, can authorize the disbursement of severance pay (TFR). The Company has also signed an agreement with a credit institution offering employees treasury services with better current account maintenance terms than those available to private individuals, and an agreement with a financial institution for the provision of loans at favorable interest rates.

Conduct Guidelines

The ATM Group does not have a formal supplier code of conduct, but has established conduct guidelines that apply to all suppliers, as specified below:

- ATM Group suppliers are required to strictly comply with labor laws, respect equal opportunities and human rights, and combat discrimination;
- In procurement of works and services, the ATM Group monitors the supplier's correct application of collective bargaining agreements, as well as strict compliance with regulations regarding child labor, the employment of third-country nationals with valid residence permits, and compliance with wage and social security obligations;
- ATM Group partners are required to strictly comply with labor laws, respect equal opportunities and human rights, and combat discrimination. In procurement of works and services, the ATM Group monitors the partner's proper application of collective bargaining agreements, as well as strict compliance with regulations regarding child labor, the employment of third-country nationals with valid residence permits, and compliance with wage and social security obligations.
- Furthermore, the ATM Group ensures that the partner complies with environmental, health, and safety regulations.

(S2-1 17.b) The ATM Group believes it is crucial to continuously **assess and monitor suppliers' compliance** with the principles and requirements of the SA8000 standard. These dialogue and engagement initiatives aim to explore various key issues, such as transparency and fairness.

To continuously monitor the performance of SA8000-certified companies, the Group uses multiple tools to ensure ethical business management throughout the value chain. In addition to internal audits at its facilities, management systems have been adopted to address any cases of discrimination, harassment, and stalking. For suppliers, the Group has implemented selection criteria based on compliance with SA8000 requirements, also conducting random audits along the supply chain.

(S1-2 17.c) Regarding measures to address human rights impacts, ATM, with reference to its contracts, including service contracts, requires compliance with current regulations and **the internationally recognized SA 8000** ethical principles regarding human and workers' rights.

The Service Contract regulates corporate social responsibility and defines the various commitments to which the company must comply:

- not employ child labor and, if employing workers under the age of 18, allow them to attend school and ensure that the total number of hours of school and hours of work does not exceed 10 hours per day, and refrain from exposing them to hazardous work;
- not resort to forced labor of any kind;
- comply with Italian regulations and laws on worker safety, in particular respecting the right of all employees to join trade unions and comply with the relevant laws, and not apply discriminatory principles of any kind;
- not apply disciplinary sanctions, except those permitted by the relevant sector's collective bargaining agreement;
- comply with regulations regarding working hours, rest periods, and holidays, and the minimum wage set by collective bargaining agreements;
- do everything within its power to ensure that its subcontractors/subsuppliers meet the requirements of the SA8000 standard.

For the purposes of continuous discussion and improvement, ATM may conduct meetings and/or on-site inspections with its staff and in coordination with the supplier/subcontractor involved to verify compliance with the social responsibility requirements set forth in the SA8000 standard. If areas for improvement are identified with respect to the requirements set forth in the standard, ATM will invite the company to implement the necessary remedial actions agreed upon with ATM.

Furthermore, if serious non-conformities with the requirements of the SA8000 standard are detected, even by third parties, ATM will immediately terminate all relationships and the Contract will be automatically terminated.

(S2-1 19) In 2025, the Group did not detect any reports of non-compliance with the United Nations Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, or the OECD Guidelines.

S2-2 – Processes for Engaging Workers in the Value Chain on Impacts

(S2-2 24) The Group does not currently have a structured process for engaging workers along the value chain.

S2-3 – Processes for Remedying Adverse Impacts and Channels for Workers in the Value Chain to Raise Concerns

(S2-3 27.a) The ATM Group ensures that the suppliers it collaborates with respect human rights and guarantee working conditions compliant with the relevant regulations. It expects compliance with the highest standards of prevention and control in the area of health and safety, in order to avoid any type of negligent or malicious behavior that could cause harm to people and/or property, as outlined in the ATM Group's Conduct Guidelines for its suppliers and business partners.

ATM Group also requires suppliers to adopt adequate workplace accident prevention tools and to train and raise awareness among their employees regarding safe behavior and the proper use of protective equipment. ATM Group believes compliance with the obligations and prohibitions set forth in the Code of Conduct is essential and, to this end, has also adopted a specific sanctions system, the details of

which are specified in the express termination clause contained in existing contracts with ATM and/or ATM Group companies.

In the process of adapting to the SA8000 standards, particular attention is paid to the ability of suppliers/subcontractors and subsuppliers to comply with the requirements of the standard itself, with the aim of extending compliance with its principles to the various stakeholders involved in the production chain. To ensure compliance with the standard, suppliers are selected based on their SA8000 certification or their signature of a declaration of compliance with the principles set forth in the standard. ATM is also given the opportunity to audit them and implement any necessary corrective actions. These audits are carried out in particular on suppliers with certain characteristics such as highly labor-intensive sectors or the previous existence of reports.

(S2-3 27.b) The ATM Group has established several dedicated channels for reporting concerns from workers in the value chain, including:

- an **online form**, the **dedicated email address SA8000@atm.it**, and mailboxes located at various company locations for the SA8000 standard;
- the email address segnalazioniCDF@atm.it for reports to the trusted advisor;
- an **IT whistleblowing tool**;
- **the whistleblowing channel** of the Municipality of Milan, highlighted by ATM for contracts funded by the Municipality.

These channels allow for receiving assistance and reporting concerns in a secure and confidential manner.

Reports about workers in the value chain are analyzed, assessed, and managed like any other reports received.

(S2-3 27.c) The Group promotes and supports the adoption of communication channels also at its suppliers' workplaces, particularly in the context of the SA8000 standard. The company requires suppliers to adhere to standards that include the presence of dialogue, reporting, and remediation mechanisms, including through audits and document requests. This process allows the company to foster the availability of channels within suppliers' operational structures.

(S2-3 27.d) Reports received relating to the SA8000 standard are recorded and monitored by the SA8000 Team, which collaborates with company departments to investigate cases, while respecting confidentiality. With the support of the Information Systems Department, the SAP ERP has been identified as the official tool for the centralized management of such reports and for the preparation of periodic reports. This allows the progress of reports to be monitored, their resolution assessed, and the effectiveness of the channels measured. Any violations by business partners or consultants are sanctioned through specific contractual clauses, particularly with reference to Model 231, the Group ACT Model, the Code of Ethics, and the Guidelines of Conduct.

(S2-3 28) The documents governing workers' rights in the value chain, reporting procedures, and the protections provided are shared with suppliers and published on the ATM Group website to ensure accessibility for all affected workers. The Group believes awareness and trust in these tools are essential, and therefore promotes transparency and ensures their visibility. Whether workers in the value chain are aware of the existence of these structures or processes is not assessed.

For further information on the Whistleblowing system and Model 231, as well as specific whistleblower protections, please refer to section G1-1. For more detailed information on the SA 8000 standard, please refer to section S1 – Own Workforce.

S2-4– Interventions on relevant impacts for workers in the value chain and approaches for managing relevant risks and achieving relevant opportunities for workers in the value chain, as well as the effectiveness of such actions

(ESRS 2 MDR-A 68) Below are the actions and initiatives that ATM implements to manage its impacts, risks and opportunities in relation to workers along the value chain.

ACTION	SCOPE OF APPLICATION	TIME HORIZON	TARGET	PERFORMANCE 2025	CAPEX / OPEX 2025	FUTURE CAPEX / OPEX
Supplier selection and evaluation	Suppliers of the Group	Continuous	N/D	N/D	50.000 €	50.000 €
Supplier Audits	Suppliers of the Group	Continuous	N/D	N/D	N/D	N/D

Supplier Selection and Evaluation

(S2-4 32.a) Direct involvement of supply chain partners is a strategic pillar, and for this reason, the ATM Group pursues a sustainable development strategy that requires continuous improvement of the environmental, health, and occupational safety aspects of its operations. This prioritizes attention to all stakeholders, including the performance of its suppliers. Indeed, these principles are intrinsic to the purchasing process of each Group company. Furthermore, to prevent any negative impacts on workers in the value chain, the ATM Group adopts **environmental**, social, and governance reward criteria. These criteria are included in tender notices based on the subject matter and nature of the tender. Specifically, in the social sphere, the ATM Group considers the Lost Time Injury Frequency Rate (LTIFR) Index and related corporate initiatives to promote the health of its employees. The indicators proposed below can be considered individually or combined to reach a maximum of 5 reward points per bid.

The various criteria are listed below:

ENVIRONMENTAL	SOCIAL	GOVERNANCE *
CO2 reduction plan (e.g. Scope 1 calculation; carbon footprint)	Sustainable Procurement Criteria	ISO 14001
> 30% energy from renewable sources (verifiable from energy bills)	Corporate Diversity and Inclusion (DE&I) objectives	SA 8000
Accession to the Global Compact	Safety at Work (LTIFR Index - Lost Time Injury Frequency Rate)	ISO9001
Accession to the Science Based Targets (SBT) initiative	Accession to the Human Rights Impact Assessment	ISO 50001
ISO 14001	SA8000	ISO14067
Electric/hybrid company fleet	>50% of employees receiving training and skills upgrading programmes	Sustainability Report/DNF/Integrated Balance Sheet
Documentable green projects (e.g. planting) (e.g. printing)	Corporate welfare system (e.g. insurance coverage/supplements)	
EMAS certification	Company initiatives to promote the health of its employees	
Ecolabel	Documentable work/life balance tools (e.g. company brochures)	
Premium CAM		

* Certification system already present in the First KPI of the Supply Chain



In 2024, ATM adopted the **EcoVadis** platform, aiming to assess and monitor its suppliers' ESG performance according to internationally recognized standards. In its first year of operation, ATM successfully engaged **over 10% of its total suppliers**, confirming the effectiveness of its approach and the growing interest of its supply network in sustainable business management models. At the same time, significant improvements in **measuring Scope 3** emissions were initiated, moving from a spend-based approach based on expenditure by product category to a more accurate, **activity-based** model capable of providing a true and detailed picture of actual impacts along the value chain. This methodological evolution will enable a more precise identification of priority areas of intervention and the definition of credible and measurable objectives for reducing indirect emissions.

Overall, 2025 marked further progress in building **an increasingly resilient, transparent, and sustainability-focused supply chain**, in which suppliers are considered active partners in the transformation process. Thanks to the integration of ESG criteria in tenders, the launch of the decarbonization project, and the use of innovative digital tools for performance monitoring, we are gradually consolidating a responsible purchasing model capable of generating shared value throughout our entire value chain. In 2025, ATM structured a training course for its 300 managers, including executives and middle managers, focused on sustainable supply chain choices as a key driver of competitiveness and coordinated growth. The course will be delivered in early 2026.

Metro Service also implements a structured supplier evaluation process that includes assessing environmental and social performance. The Contracts department prepares a report that is reviewed by senior management and approved by the CEO and CFO. Contract performance and alignment with the Supplier Code of Conduct are assessed using standardized forms, and adjustments are made when necessary, including contract termination.

The assessment covers Category A, B, and C suppliers. All Category A suppliers (Railway Safety and physical presence on sites) are assessed annually—approximately 100 suppliers. Each year, 10 suppliers are also selected for assessment from Category B (systems, elevators, etc.) and Category C (all others). The assessment is conducted annually.

Supplier audits

(S2-4 32.d) If actual negative impacts on workers in the value chain are detected, the ATM Group plans to conduct supplier audits, with particular attention to those operating in labor-intensive sectors or those already subject to reports. In accordance with the SA8000 standard, any detected non-conformities result in the request for corrective action, which is monitored by the SA8000 team in collaboration with the relevant company functions. Contractual clauses stipulated with suppliers also provide for **sanctions in the event of violations**, including termination of the contract. The Group monitors and monitors any non-compliance/irregularities, reports them, and recommends compliance with safety regulations. **Actions taken are monitored** through the SAP ERP system, which serves as a centralized repository for received reports and suggestions, enabling the production of periodic reports. Reports are analyzed by the SA8000 Team, which interfaces with company functions to

evaluate the measures adopted and the effectiveness of corrective actions, in compliance with the principle of confidentiality. The company verifies, including through inspections, whether the recommendations have been properly followed.

(S2-4 33.a) The ATM Group assesses the need for and appropriateness of action based on the severity and nature of the report, the assessment of potential or actual risk, and the characteristics of the supplier. If critical elements are identified, a dedicated audit may be arranged, followed by requests for corrective actions, where necessary. Furthermore, legal regulations define health and safety obligations and requirements. *(S2-4 33.b)*

In relation to specific negative impacts on workers, ATM can intervene through:

- supplier audits (particularly in the case of previously reported problems),
- requesting compliance with SA 8000 standards,
- application of contractual penalty clauses,
- and, where possible, promoting best practices through rewarding criteria in procurement.

These interventions are part of an integrated approach involving the relevant internal functions and the entities in the value chain.

(S2-4 33.c) The Group ensures the availability and effectiveness of remedies through multiple reporting channels (SA8000 online form, dedicated mailbox and SA8000 mailboxes, whistleblowing, and the Municipality of Milan channel). Monitoring reports, analyzing and managing responses ensure that remedies are concrete and traceable, with verification of implementation and results achieved.

(S2-4 34.b, 35) The ATM Group adopts responsible practices in its procurement processes, integrating ESG criteria into tenders. All information relating to the condition of workplaces is described in detail and provided both during the tender phase and before the start of any activity. These practices aim to avoid causing or contributing to negative impacts in the value chain, particularly regarding health, safety, and workers' rights, with positive consequences in terms of reputation and operational efficiency.

(S2-4 36) During the reporting period, no serious human rights issues or incidents were reported in connection with the ATM Group's upstream or downstream value chain.

(S2-4 38) Management of significant impacts involves the SA8000 Team, which is responsible for monitoring, analyzing reports, and communicating with suppliers.

• Metrics and goals

S2-5– Objectives related to the management of significant negative impacts, the enhancement of positive impacts and the management of significant risks and opportunities

(ESRS 2 MDR-T 80) In line with the strategic direction outlined by the Sustainability Policy within the Sustainable Supply Chain Governance Pillar, ATM has strengthened its commitment to proper supply chain management, increasingly integrating environmental, social and governance criteria into its procurement processes.

Indicators – ATM Italy	Base year	2025 Goal	2025 Final balance	2030 Goal
% of the most economically advantageous tenders that include the evaluation of the possession of environmental and social certifications in the award criteria	2019- 7%	84%	87,5%	90%
% of companies awarded the most economically advantageous tender that possess more than one ESG requirement	2022- 5%	> 46%	78%	100%

The adoption of responsible purchasing practices, combined with growing collaboration with suppliers, has enabled the consolidation of a procurement system focused on transparency, quality, and the reduction of environmental and social impacts. In this process, the integration of ESG criteria into tender procedures plays a central role: in recent years, the percentage of tenders awarded according to the most economically advantageous tender criterion, which includes rewarding parameters linked to the possession of environmental and social certifications, has progressively increased. At the same time, the share of successful tenderers meeting multiple ESG requirements continues to grow.

(MDR-T 80 j) The achievement of objectives and their progress are monitored periodically through a digital platform, which allows both the entry of basic data for calculating KPIs and the direct entry of objectives and period-end results. This ensures the monitoring of targets and the ability to view the historical achievement of objectives.

(S2-5 42) ATM did not directly involve stakeholders in defining the objectives of its Sustainability Policy, but developed a matrix that took into account its industrial plan in line with some strategic documents such as: the 2030 Agenda for Sustainable Development, the 2015 Paris Agreement, the National Integrated Plan for Energy and Climate (PNIEC) and, more at a local level, the Sustainable Energy Action Plan (PAES) and the Sustainable Urban Mobility Plan (SUMP) approved by the Municipality of Milan.

ESRS S3 Affected communities

IRO table (SMB-3 9.b, 9.c)

Sub Topic	IRO	Typology	Value chain	Time horizon
Impacts related to the territory	Impact: Contribution to the socio-economic development of local communities through the development of training and professional opportunities in collaboration with universities and research centers	Positive – Current	Downstream	Brief
	Impact: Promoting a better quality of life in urban areas and contributing to collective well-being by reducing private traffic, strengthening connections between regions, and developing a collective and	Positive – Current	Downstream	Brief

	integrated mobility system that is accessible and sustainable for all citizens.			
	Impact: Positive contribution to the safety of local communities where ATM-managed infrastructures are located, thanks to adequate monitoring of such infrastructures in terms of controls	Positive – Current	Own operations Downstream	Brief
Freedom of expression	Risk: Dissemination of negative news against the company (for example by internal staff/unapproved statements, or due to externally visible disservices, or due to attacks by associations (e.g. CODACONS) or dissemination of fake news) with consequent reputational damage and increased costs for managing services	N/A	Downstream	Brief

- **Strategy**

ESRS 2 SBM-2– Stakeholder interests and opinions

(SBM-2 7) The opinions, interests, and rights of affected communities are integrated into the ATM Group's strategy and business model through specific engagement and dialogue activities. Specifically, organizations and institutions, universities, and local communities are involved both in the stakeholder engagement process conducted during the Double Materiality analysis and through additional opportunities for discussion and dedicated initiatives.

ESRS 2 SBM-3– Significant impacts, risks and opportunities and their interaction with the business strategy and model

(SBM-3 9.a) The disclosure relating to ESRS S3 – Affected Communities refers to all local communities affected by the Group's operations, both upstream and downstream in the value chain. Specifically, the identified stakeholders belonging to local communities are:

- all people who are part of the communities in which the Group operates, and therefore those who live or work within the affected cities (for example, Milan, Thessaloniki, or Copenhagen)
- Universities with which the Group collaborates to create jobs for younger generations and raise community awareness of ESG issues
- Bodies and institutions with which the Group engages in ongoing dialogue as part of its operations.

(SBM-3 9.d, 11) The risk associated with the dissemination of negative news does not arise from the Group's dependence on communities, but could be a consequence of the Group's activities in relation to local public transport. This risk can apply to all types of communities affected by ATM's operations, and not to specific communities.

- **Management of impacts, risks and opportunities**

S3-1– Policies relating to affected communities

(ESRS2 MDR-P 62) Currently, the ATM Group does not have a formalised Group policy governing relations with local communities.

S3-2– Processes for engaging affected communities on impacts

(S3-2 21) Since its inception, the ATM Group has aimed to contribute positively to the development of cities and play a central role in the communities in which it operates, as well as for the entire country system in the development of Local Public Transport, gradually positioning itself as a point of reference in terms of institutional, operational (mobility services), economic, social, and environmental sustainability.

(S3-2 21.a, 21.b) Aware of the role the Group plays in the communities in which it operates and the significant impacts of its business activities on the community, ATM believes it is essential to engage local communities, which directly and indirectly benefit from the impacts the Group generates through its activities. Each year, the ATM Group organizes initiatives aimed at involving local communities in corporate life, stimulating dialogue between the organization and the local community. In particular, **ongoing dialogue and collaboration takes place** between ATM S.p.A. and public administrations, including the Municipality of Milan, through multiple working groups. Furthermore, ATM S.p.A. offers its expertise in managing local public transport systems to various research centers and universities through **educational partnerships**, such as the "Mobility: Infrastructures & Services" course in collaboration with the Polytechnic University of Milan. ATM S.p.A. also has numerous agreements with universities and schools for curricular internships and work-based training programs. Through these experiences, the company comes into direct contact with students in training, contributing to their educational journey, benefiting from their contributions within the organization, and creating a pool of talent already integrated into the company. As part of these active partnerships, ATM S.p.A. participates in, and constantly increases its presence with the active support of various company departments, events and projects such as Career Days, Open Days, round tables, and orientation meetings. Finally, it proposes and organizes ad hoc initiatives aimed at welcoming students to its offices, stimulating dialogue between the organization and the local community.

Furthermore, ATM participates in Council Committees to report to institutional representatives on issues related to service management, specific projects, and more generally on its activities and their impact on the local area and its communities. Hearings in Council Committees are a key opportunity to gather useful feedback for the continuous improvement of the services offered.

This ongoing exchange allows for the systematic integration of local community needs into decision-making processes, strengthening the principles of transparency and accountability that guide the Group's actions.

(S3-2 21.c, 21.d) The ATM Group implements local community engagement initiatives and monitors their effectiveness. Specifically, it conducts periodic customer satisfaction surveys and organizes focus groups on sensitive issues of concern to passengers/citizens. The results of these engagement initiatives are shared with operational areas and Group management to identify potential areas for

improvement. Likewise, monitoring customer/citizen reports provides additional insight and evaluation of community engagement.

(S3-2 22) With the aim of understanding the opinions of specific groups within local communities, the ATM Group also engages with local associations, with particular attention to associations representing people with disabilities, such as Ledha (Lega per i diritti delle persone con disabili), APS (Association for the Rights of People with Disabilities), and UICI (Italian Union of the Blind and Visually Impaired), with a view to fostering dialogue and continuous improvement of the service offered.

Furthermore, by joining the Municipality of Milan's Employment Pact, a collaboration has been initiated with external organizations (municipal companies owned by the Municipality) **to promote diversity and inclusion**, both within the company and in the city community, through various actions, including, for example, the sharing of welfare initiatives. In particular, the consolidated collaboration with LEDHA – with which a dedicated protocol has been active since 2024 – constitutes a structured channel for working and discussing issues of accessibility and inclusion, encouraging a constant exchange of experiences and proposals for improvement.

In addition, ATM participates in the Accessibility Roundtable, coordinated by the City of Milan and AMAT, a significant opportunity for dialogue where ATM shares updates, presents ongoing projects, and gathers valuable input for developing increasingly inclusive solutions for urban mobility.

S3-3– Processes for remediating adverse impacts and channels for affected communities to express concerns

(S3-3 27.b, 27.c, 27.d, 28) All individuals within the communities in which ATM operates have the opportunity to report any discontent, concerns, or make observations of any kind. To this end, they can use ATM's reporting mechanism. For more information on how this channel works, please refer to the section **Governance G1-1 – Policies on Corporate Culture and Business Conduct**.

S3-4– Interventions on significant impacts on affected communities and approaches for managing significant risks and achieving significant opportunities for affected communities, as well as the effectiveness of such actions

(ESRS 2 MDR-A 68) Below are the actions and initiatives that ATM implements to manage its impacts and risks in relation to the communities affected, as well as to achieve its strategic objectives, such as the safety of staff and passengers, the promotion of social innovation and the provision of job opportunities.

ACTION	SCOPE OF APPLICATION	TIME HORIZON	TARGET	PERFORMANCE 2025	CAPEX / OPEX 2025	FUTURE CAPEX / OPEX
Business security and protection	Staff, passengers and company assets	Annual	N/D	N/D	~ 7,3 mln €	~ 9,4 mln €
The ATM Group for local development	Metropolitan City of Milan	2024	N/D	N/D	112.500 €	N/D

Professional opportunities for communities	Ethnic communities and specialized technicians	2024	N/D	N/D	132.300 €	140.000 €
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(S3-4 32.c)

Corporate Security and Protection

The protection of corporate assets, ATM S.p.A. personnel, and passengers is ensured by the Security function, in conjunction with local law enforcement agencies (Local Police, State Police, Carabinieri, and Guardia di Finanza), with particular attention to high-traffic transport lines, ATM-managed parking lots, and interchange areas with the railway network.

In recent years, fleet modernization and the adoption of increasingly innovative technological solutions have allowed the progressive expansion of corporate capabilities, monitored through CCTV equipment installed on board vehicles and at stations. This has enabled improved security activities to protect ATM personnel, passengers, and assets.

The **Security Operations Center (SOC)**, the Security Control Room, has been operational since 2019. It operates closely with the operations centers for metropolitan and surface operations and law enforcement agencies. The Security Operations Center is active 24/7 and employs at least three specialized security operators. They monitor and manage the more than 12,000 video surveillance cameras installed in stations, offices, and on vehicles, as well as the more than 4,000 alarms that are managed in the field through over 200 interventions per day by security personnel, with the possible support of law enforcement. Since 2020, Security has also acquired the criminal complaints management process for the ATM Group's property sector, further intensifying its relationships with local law enforcement agencies to further ensure the timeliness of their **prevention, control, and repression actions** against illegal activities affecting ATM. Security benchmarking among major public transport companies has continued throughout 2025, through participation in remote meetings between company managers in the sector, primarily focused on sharing best practices. Metro Service A/S has also implemented a railway safety management system to ensure compliance with applicable laws, regulations, and contractual provisions. The company annually records and assesses railway safety risks and defines quantitative and qualitative objectives that are subject to review during the annual management review.

Finally, to consolidate its commitment to ensuring safety on its fleet, in 2025 ATM **invested over €500,000 in hiring new resources to ensure safety measures on surface lines.**

The ATM Group for Local Development

The ATM Group, as an integral part of the community in which it operates, promotes local development through its participation in social and cultural initiatives. This includes projects, activities, or events promoted or organized by the Municipality of Milan, local associations, or entities. Among the main initiatives supported in 2025 are Stramilano, Radio Italia Live – Il Concerto, Back to the City Concert, Fà la cosa giusta, Festival dell’Ingegneria, and Millemila bici. Furthermore, for 2025, ATM

confirms its commitment to promoting sustainable mobility; to this end, the company participated in the 9th National Electric Mobility Conference, e_mob 2025, held in Milan. ATM also supported several important awareness campaigns on health and prevention issues, including Milano4Mental Health and the Make Sense Campaign.

In 2025, ATM brought its metro stations to life with **Sound Underground**, featuring live music performances in hi-tech stations. The aim is to enhance the travel experience for customers and make public transport spaces places of entertainment, social interaction, and inclusion. In 2025 alone, 1,021 artists performed in 1,365 concerts at three major Milan metro stations, confirming the metro as one of the city's most important stages.

Continuing with the aim of promoting culture and enhancing its spaces, ATM has confirmed its collaboration with the Municipality of Milan for the **BiblioExpress** project, the smart library located in the Porta Venezia station that offers passengers and residents a free loan service for books, audiobooks, comics, and DVDs.

On the International Day for the Elimination of Violence against Women, which falls on November 25, ATM renewed its commitment to the issue with all stakeholders, both internal and external, through an awareness campaign conducted in collaboration with the City of Milan and the City's Anti-Violence Network. The campaign transformed the names of several symbolic stops—Lotto, Centrale, Duomo, and Isola—into messages encouraging reflection on the importance of joint action and shared responsibility. The campaign was disseminated throughout the month through dynamic and static advertising on board ATM vehicles,

- posters on bus shelters,
- posters in subway stations and on trains,
- corporate social media channels (Instagram, LinkedIn, and X).

A dedicated QR code linked to a page with practical information on how to recognize the various forms of abuse and how to contact Milan's Anti-Violence Centers. On November 25, the campaign messages were reinforced with audio announcements on the subway promoting 1522, a 24-hour toll-free number for victims of violence and stalking.

Within its corporate community, in addition to spreading the campaign's messages, ATM inaugurated a new red bench at the Precotto depot in memory of fellow tram driver Alessandra Cità and, symbolically, of all women victims of violence. The installation joins the two others already present at the Leoncavallo and San Donato depots, serving as a tangible sign of memory preservation and shared commitment. This initiative, designed to offer a moment of collective reflection, represented a further step in the company's journey to promote a culture of respect, awareness, and prevention within the organization.

Thanks to the above-mentioned initiatives, and by maintaining a systematic and proactive approach to managing its relationships, ATM has contributed to:

- raising community awareness on the issue of gender-based violence,
- promoting social value by strengthening collective awareness,
- strengthening community ties by leveraging the transportation network as a civic and inclusive platform,

- generating positive impacts through the dissemination of useful information, the promotion of the 1522 hotline, and support for the local network of anti-violence centers.

In terms of social awareness, the company collaborated with the Municipality of Milan and the L'abilità association to create **a campaign dedicated to disability and neurodiversity**, distributed throughout the metro network through audio messages and informational materials, with the aim of fostering understanding and acceptance.

Alongside these activities, ATM has confirmed its support for **social solidarity** projects, including the Angels' Bus, created with City Angels to support the homeless during the winter months by distributing hot meals, drinks, clothing, and blankets. The company also provided the mezzanine of the Porta Venezia station for the Christmas Eve Mass and Christmas dinner organized by Ronda della Carità.

In 2025, ATM also launched "Sicuramente – A Game for Living the Road Together," an educational project in collaboration with the Lorenzo Guarnieri Onlus association and Giunti Scuola. By creating a kit including a book and a game for children aged 8 to 10, the initiative aims to promote road safety education, starting with the youngest children, teaching them to recognize the opportunities and risks of the road, the importance of using public transportation, and always respecting others, for participatory mobility accessible to all. Over 500 copies of the "Sicuramente" kit were distributed to primary schools in Milan and the Metropolitan City and to the company's stakeholders.

In Denmark, the operating company Metro Service is committed to ensuring **that donations and social contributions generate tangible benefits for the surrounding local communities**. Each year, the company allocates over DKK 250,000 to community initiatives. In 2025, these contributions supported Copenhagen-based organizations that provide assistance to vulnerable people.

These initiatives demonstrate ATM's ongoing commitment to promoting **inclusiveness, respect, culture, and solidarity**, confirming the company's role as a responsible player, attentive to the needs of the Milanese community.

Professional opportunities for communities

Each year, ATM launches a major hiring plan to **strengthen its workforce**: the need for surface line drivers is particularly significant. Among these initiatives is ATM's desire to promote its hiring campaign among ethnic communities throughout Italy. To this end, it has considered launching **a recruiting campaign on the Stranieri** in Italian website, a job, training, and inclusion portal in five languages. This online reference point for ethnic communities in Italy provides guidance on regulations and visibility into national training and career opportunities.

As part of its efforts to attract and develop talent, a new edition of the "**ATM Job Tour**" initiative was launched in 2025, designed to raise awareness of training and career opportunities at ATM and increase the number of applications. Unlike previous editions, which involved shopping centers in the outskirts of Milan, the Job Tour 2025 took place in the heart of the city, with two stops in Piazza XXV Aprile and Piazza 24 Maggio. These central, highly visible locations facilitated broader and more effective interaction with residents.

During the event, potential candidates met ATM staff, received information about training programs and career prospects, and, most importantly, had an on-site interview. The initiative was further

enhanced by the presence of a driving simulator, which allowed candidates to realistically experience the role of a driver, transforming the interview into an immersive and hands-on experience.

The decision to bring the Job Tour to Milan's squares strengthened the company's connection to the city and its citizens, helping to reach a more diverse audience and significantly expanding the pool of applicants. The initiative confirmed the effectiveness of a local and participatory approach, aimed at raising awareness of ATM's social role and the value of the professions that contribute every day to the functioning of urban mobility.

(S3-4 32.d) The ATM Group evaluates the effectiveness of its activities through periodic monitoring initiatives: customer satisfaction surveys, focus groups, and complaints trends, with particular attention to sensitive issues, such as travel information and the ease of purchasing tickets and passes. In 2025, 98% of respondents said they were very or fairly satisfied (percentage of those who gave a rating between 6 and 10) with the ease of purchasing tickets and passes, with an average rating of 8.0. Also in 2025, 95% of respondents said they were very or fairly satisfied with communication and information, with an average rating of 7.3.

(S3-4 34.a) Due to the nature of its activities, ATM is often exposed to the risk of negative news spreading against the company (for example, by internal personnel/unapproved statements, or due to externally visible service disruptions or the spread of fake news on social media). This is also because all stakeholders are constantly guaranteed freedom of expression, whether positive or negative, including on public platforms. To prevent and mitigate this risk, ATM has implemented tools such as:

- **Internal Regulations**, which govern the rules of conduct, as well as the Code of Ethics and Charter of Values, which require employees to comply with certain standards of conduct in their external communications;
- **Implementation of rectification** and official position procedures, involving the legal department to evaluate any warnings.

To verify the effectiveness of these measures, ATM constantly monitors its reputation on the media and social media, and based on the results of this monitoring, it initiates a process to evaluate remedial actions in the event of damaging events.

(S3-4 36) No serious human rights incidents were reported in relation to the affected communities during 2025.

(S3-4 38) All activities and initiatives involving communities are managed primarily by the Trade Relations and Communications functions.

- **Metrics and goals**

S3-5– Objectives related to the management of significant negative impacts, the enhancement of positive impacts and the management of significant risks and opportunities

(ESRS 2 MDR-T 80)

Indicators – ATM Italy	Base year -2019	2025 Goal	Performance 2025	Performance 2024	2025 Goal
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% of vehicles equipped with video surveillance systems out of the total vehicles available to ATM	93,6%	N/A	97,7%	97,4%	100%
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(MDR-T 80 a) ATM, as part of its Sustainability Policy and Strategic Plan, has defined a goal to strengthen safety measures on its vehicles, which falls within the Sustainability Policy Pillar of Inclusive Mobility.

The scope of application covers ATM vehicles operating within Italy (excluding minibuses, but including subcontractor vehicles). In 2025, 1,104 buses were equipped with video surveillance (the same as in 2024). Furthermore, among subcontractor buses, 103 were equipped with video surveillance systems (106 in 2024).

(MDR-T 80 j) Achievement of the objective and its progress are monitored periodically through a digital platform that allows both the entry of basic data for calculating KPIs and the direct entry of objectives and period-end results. This ensures that everything is tracked and the history of monitored objectives can be viewed.

(S3-5 42) The objective is defined in the Service Contract with the Municipality of Milan, expected by the contracting entity, and against which the improvement proposals included in the technical offer must be measured.

ESRS S4 Consumers and end users

IRO Table(SBM-3 10.c)

Sub Topic	IRO	Typology	Value chain	Time horizon
Information for consumers and end users	Impact: Transparent and quality information for the Group's customers, thanks to the adoption of advanced information and communication systems (such as real-time service information, use of user-friendly websites and apps)	Positive - Potential	Own operations Downstream	Medium
	Impact: Violation of customer security and privacy and existence of incidents of cyber attacks resulting in the loss of customer data by the Group	Negative - Potential	Downstream	Medium
	Impact: Contribution to customer satisfaction by offering an efficient, integrated, and personalized mobility solution	Positive - Current	Own operations Downstream	Brief
Personal safety	Impact: Countering crime through proper management of services and constant coordination with law enforcement to ensure the physical safety of passengers	Positive - Current	Own operations Downstream	Brief

Social inclusion	Impact: Contribution to greater usability of the service for all, through initiatives to improve the quality and accessibility of public transport , for all users	Positive – Potential	Downstream	Medium
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Strategy

ESRS 2 SBM-2– Stakeholder interests and opinions

(SBM-2 8) The interests, opinions, and rights of consumers and end users are integrated into the ATM Group's strategy and business model through specific listening and engagement activities. Specifically, customers are involved both in the stakeholder engagement process conducted during the Double Materiality analysis and through ad hoc initiatives for discussion and feedback collection regarding the Group's services.

ESRS 2 SBM-3– Significant impacts, risks and opportunities and their interaction with the business strategy and model

(SBM-3 10.a) The disclosure relating to ESRS S4 – Customers and End Users refers to all types of customers affected by the Group's operations, both upstream and downstream in the value chain. The Group's customers and end consumers are all those who use the Local Public Transport services operated by ATM in various regions. This category of stakeholders is subject to impacts that may concern, for example, privacy rights and personal data protection, accessibility of services for all types of customers and consumers, as well as clarity and transparency of information.

(SBM-3 10.b) The only negative impact identified during the materiality analysis concerns the potential and potential violation of customer privacy due to cyber attacks on the Group's platforms. This type of impact can be linked to ATM's systemic management, which, in order to provide its services, is required to collect data from its customers and end users.

(SBM-3 11) Thanks to continuous listening activities, the ATM Group has developed the ability to understand how certain consumers with specific characteristics, typically the most vulnerable, may be more negatively impacted in the event of, for example, service disruptions. Listening activities are conducted through focus groups and in-depth analysis of reports, during which operational areas are also involved to identify areas for improvement and prevention of potentially harmful situations. Furthermore, recognizing that some passengers have greater difficulties, the ATM Group provides personalized support and assistance to more vulnerable passengers, such as those with disabilities or greater mobility difficulties, to suggest accessible routes in the event of service disruptions. The ATM Group guarantees a real-time information system regarding the service via the app, website, social media, and call center.

- **Management of impacts, risks and opportunities**

S4-1– Consumer and end-user related policies

(ESRS 2 MDR-P 62) Currently, the ATM Group does not have a formalised Group policy governing the relationship with consumers and end users of its services.

S4-2– Consumer and end-user engagement processes regarding impacts

(S4-2 20) For the Group, the sustainability of its offering begins with consideration of the needs and expectations of its stakeholders and represents a strategic lever of fundamental importance for ATM's positioning in the Local Public Transport (LPT) market. Constant attention to the environmental, social, and governance aspects of its business makes the ATM Group more attentive and able to respond promptly to changing customer needs and behaviors.

ATM systematically integrates consumer and end-user engagement into its material impact management processes: the company uses feedback collected through its various channels—customer care, app, website, and social media—to identify relevant issues related to service quality, safety, accessibility, and passenger information. This data is analyzed and transmitted to the relevant operational functions. The findings emerging from user engagement are then integrated into corporate decisions, influencing network planning, corrective actions, and investments aimed at improving service. Furthermore, ATM regularly evaluates the effectiveness of these processes through indicators such as passenger satisfaction, complaint reduction, and response times, thus ensuring a continuous cycle of listening and improvement.

(S4-2 20.a; 20.b, 20.c) The Institutional Relations and Communications Department of the ATM Group implements periodic general customer engagement processes. These engagements are conducted directly with customers without the assistance of consumer representatives or associations.

Specifically, customer satisfaction surveys are conducted at least once a year through face-to-face interviews on company vehicles and/or premises. The related questionnaires are updated annually and, where necessary, implemented with a specific focus on sensitive issues.

Focus groups are organized four times a year on particularly critical or topical issues.

(S4-2 20.d) The effectiveness of customer engagement is monitored through customer satisfaction interviews (6,000 in 2025) and focus groups (50 participants in 2025).

Satisfaction KPIs are communicated annually to the Municipality of Milan and the relevant operational areas.

(S4-2 21) All consumers can contact the ATM Infoline at 02.48.607.607, a call center coordinated by the Customer Relations department, open daily from 7:30 am to 7:30 pm for information on service timetables, line routes, and travel fares. **For passengers/consumers with disabilities, the Infoline is open until midnight to offer assistance**, thanks to the support of operators who can help these passengers plan their journey with useful information on: accessibility of stations and stops, real-time status of systems (in service, out of service for maintenance), facilitated routes and devices on vehicles and stations, real-time information on the line of interest. To improve information on accessibility to metro transport, ATM has created **the Informazioni Senza Barriere web platform**, available on the website www.atm.it and on the ATM Milano app, which provides real-time information, updated every 10 minutes, on the operation of elevators and stairlifts in metro stations. The platform is also available in English and is accessible to passengers with visual impairments. For this project, the Company conducted a pilot project with **a group of passengers with mobility impairments** and LEDHA to develop the system's functionality, starting with the customer's travel experience. Throughout 2025, contacts and discussions with LEDHA (Lega per i diritti delle persone con disabili APS) continued on various accessibility issues.

S4-3– Processes for remediating adverse impacts and channels for consumers and end-users to express concerns

(S4-3 25.a) ATM has a **formalized procedure for managing data breaches**, generally applicable to any affected stakeholder. In the event of a personal data breach, the event is **immediately recorded** and an internal analysis process is activated. The procedure involves the preparation of two main documents:

- **Internal assessment document**, which analyzes the nature of the breach, potential impacts, categories of data subjects involved, affected departments, and the severity level of the data breach.
- **Minutes of the meeting** with the affected departments, which define the response and mitigation measures adopted, including any corrective and preventive actions.

The procedure is activated **immediately**, within a few days of becoming aware of the breach. If the **internal** assessment does not identify significant risks to the rights and freedoms of data subjects, management remains internal. If the severity score is high, ATM notifies the **Italian Data Protection Authority** and, where necessary, communicates the situation to the data subjects. Historically, ATM has recorded **only one data breach notified to the Authority**.

In addition to the above, with a view to improvement, security measures are generally strengthened through an analysis involving various functions, including those affected by the incident. Furthermore, audits are always conducted both internally within the relevant departments and with suppliers where the breach has occurred in their systems.

Finally, the status of any data breaches that have occurred is shared with the Audit Department on a monthly basis for monitoring.

(S4-3 25.b, 25.c, 25.d) The ATM Group has general **reporting mechanisms** that are also accessible to consumers and end users. Furthermore, there is a formalized internal complaint management mechanism, the purpose of which is to define the procedures for managing external complaints, as feedback to improve customer satisfaction. Compliance with this procedure ensures the correctness of the process for responding to reports from customers or other interested parties, allowing us to improve the production and delivery of services, identify the right people to address the problem, and attempt to eliminate the root causes of the complaint.

Within the Group, the functions responsible for managing incoming complaints, as well as communicating with the customer and involving other internal functions to ensure their resolution, have been identified. This mechanism is based on a Customer Relationship Management (CRM) system accessible to all company departments and the call center. The system optimizes the reliability of the **entire process** and **ensures complaint tracking** and **timely monitoring of response times**. The CRM provides a stable management platform that ensures correct and continuous access to complaints, as well as their archiving.

There are multiple ways to file complaints, and all reports received directly (letter, email, web form) or by telephone (to Customer Relations or the call center), through institutional channels or social media, are considered and forwarded to Customer Relations.

Complaints are then processed based on urgency, severity, importance, and availability of response information, adhering to the required response times.

The results of complaint management are monitored and reported annually in the ATM Mobility Charter and the NET Mobility Charter. Furthermore, they are shared with operational areas and management as indicators of sensitive issues for the community and to identify areas for improvement.

(S4-3 26) With regard to the reporting and complaint mechanism, all complaint channels (web form, call center, free card) are clearly indicated on the ATM website, app, and Mobility Card.

Passenger complaints are identified by name to allow the ATM Group to contact them and respond. For whistleblowing reports, there is a dedicated section on the ATM website, conveniently separated from the complaints section to ensure and protect anonymity.

To monitor satisfaction on these channels, the ATM Group conducts customer satisfaction surveys with dedicated items. In 2025, 95% of respondents declared themselves very or fairly satisfied (percentage of those who gave a rating between 6 and 10) with communication and information, with an average rating of 7.3.

S4-4– Actions on relevant impacts for consumers and end-users and approaches for managing relevant risks and achieving relevant opportunities in relation to consumers and end-users, as well as the effectiveness of such actions

(ESRS 2 MDR-A 68) Below are the actions and initiatives that ATM implements to manage its impacts, risks and opportunities in relation to consumers and end users, as well as to achieve its strategic objectives, such as consumer safety and greater accessibility of services.

ACTION	AMBITO DI PPLICAZIONE	ORIZZONTE TEMPORALE	TARGET	PERFORMANCE 2025	CAPEX / OPEX 2025	CAPEX / OPEX FUTURI
ATM information and communication channels towards customers and consumers	Downstream value chain	Annual	N/D	N/D	~ 1.7 mln/€	~ 1.4 mln/€
Customer Satisfaction	Downstream value chain	Annual	Voto medio: ≥7	7,4	170.000 €	245.000 €
Accessibility for people in vulnerable conditions	Downstream stakeholders with particular needs	Annual	N/D	N/D	Focus group: 25.000€	
Customer data protection	Downstream value chain	Annual	N/D	N/D	~ 1,1 mln/€	~ 1,4 mln/€
Passenger and consumer safety	Downstream value chain	Annual	N/A	N/A	~ 7,3 mln €	~ 9,4 mln €

ATM's information and communication channels for customers and consumers

Communication and interaction with customers and end consumers is maintained primarily through the shared ATM and NET Mobility Charter.

Mobility Charters

The ATM Mobility Charter, published annually, describes the services entrusted to ATM S.p.A. by the City of Milan through the Service Contract for the management, within its territory, of Local Public Transport, DRT, on-street parking and connecting car parks, and vehicle removal and storage. It also includes the O&M Operation & Maintenance contracts for the management of Metro Line 4 on behalf of SPV Metro 4 S.p.A. and the management of Metro Line 5 on behalf of Metro 5 S.p.A. It declares the performance results achieved in the past year (2025) and discloses the objectives for the current year

(2026) based on the key quality indicators set out in the Service Contracts. The Charter also provides stakeholders with information on the Company's profile, the calendar, timetables, and frequencies of the Local Public Transport service, activities and projects aimed at improving transport accessibility, how to submit a complaint, and the Customer Satisfaction survey.

The Mobility Charter is available:

- online on the ATM website, where it can be downloaded,
- at ATM Points, for free distribution.

The NET Mobility Charter refers to the public transport service that NET provides, pursuant to the applicable Service Contracts, in the Metropolitan City of Milan, the Province of Monza and Brianza, and the Municipality of Monza. It states the performance results achieved in the past year (2025) and publishes the objectives for the current year (2026) based on the main quality indicators established by the Contract of September 27, 2007 with the then Province of Milan. It contains key information about the company, the performance of the service, its environmental policy, and publishes the service calendar, contact information, and information for receiving information and submitting reports.

- The NET Mobility Charter is available:
- online on the NET website, where it can be downloaded,
- free of charge at the NET Point in Monza and ATM Points in Milan,
- at authorized ticket and pass sales outlets in the area served.

In addition, the following are additional communication and information channels used by the Group:

- **the ATM Milano app**, available in Italian and English, can be downloaded free of charge. It provides information on lines, stops, schedules, and wait times, real-time service status updates, travel tickets and STIBM fares, parking and parking in the city, and accessibility to subway vehicles and stations.
- **campaigns to promote the service or new services**, corporate campaigns, including those dedicated to recruiting and those aimed at promoting the use of public transport and raising awareness of the company's concrete commitment to sustainable mobility, and social responsibility campaigns, including one for the International Day for the Elimination of Violence against Women.
- **social media**: through the @atm_informa account, the Company disseminates updates and provides real-time responses on service status. On Instagram, LinkedIn, and YouTube, it discusses projects, activities, and development plans in the fields of sustainability, technological innovation, and transportation service improvement.
- **digital & influencer marketing**: planning on local and social media is complemented by campaigns on the main digital platforms (Meta, Google, Spotify, YouTube) on strategic corporate and service-related topics (for example, contactless payment, subscription options, hiring, sustainability, real estate, business development).

- **ATM Points:** information and customer service offices located at the Cadorna FN M1-M2, Duomo M1-M3, and Centrale FS metro stations.
- **at surface line stops:** line plans and timetables, electronic displays providing real-time information on waiting times and service changes, flyers, and dedicated signage, such as network changes or the introduction of new services. At some stops along the busiest surface lines, large tablets are available to customers, providing real-time information on service status, service changes, a map of the metro lines, and access to Channel X.
- **on surface transport:** audio announcements, handrail alerts, and double-sided monitors (on buses and new trams) provide real-time information on traffic, service promotions, and travel regulations.
- **in subway stations:** audible announcements, displays, and monitors along the platforms of the main stations, line plans and timetables, subway network diagram, map of Milan, travel regulations, and dedicated signs and signals, for example, in the event of network maintenance.
- **onboard subway trains:** subway network diagram, travel regulations, audible announcements, and digital monitors provide real-time information on traffic status.
- **Infoline:** operator-operated service from 7:30 a.m. to 7:30 p.m., for passengers with disabilities until midnight. 24/7 IVR. Real-time passenger information, with priority given to passengers with disabilities.
- **Complaints form:** available on the ATM website and app.
- **Direct mailings,** especially aimed at loyal customers, to inform them of changes and innovations to the service.
- **Information guides:** Customers are provided with guides from the "ATM for..." series, aimed at specific customer groups such as families, young people, seniors, businesses, municipalities, and schools. These guides also include guides on travel fares and the transportation of bicycles and micromobility devices on ATM lines. All guides can be viewed and downloaded from the website.
- **Brochures and/or flyers:** When network improvements are made, the Company produces brochures and/or flyers to inform passengers about planned service changes and to provide useful travel information. These materials are published online and distributed at affected surface and station stops.
- **Metro network map:** published on the website and app, at subway stations, and at surface stops.
- **ATM viaggiare informati newsletter:** emails subscribers with information on news, services, promotions, season tickets, and planned service changes.
- **Lineadiretta.atm.it magazine:** this is the Company's online magazine on the Medium platform, a newspaper that periodically publishes news, stories, and insights on ATM's activities and initiatives.
- **Customer Service:** A team of agents present both on the surface and in the metro stations, providing information to traveling customers regarding the transport network, timetables, routes, fares, and travel tickets. They also attend construction, trade fair, and sporting events.

In emergencies, they intervene immediately to manage critical issues in the event of service interruptions, providing the necessary information on any changes to the route or issues reported by the metro and surface operations rooms, and the Customer Relations Office.

Throughout 2025, the multi-year plan to renew the M2 infrastructure, aimed at improving line service and station accessibility, led to the opening of several construction sites along the network. Throughout the duration of the works, ATM ensured advance and continuous communication regarding scheduled interventions, route changes, and travel alternatives through its app, website, X and Instagram accounts, all mobility information channels, and direct mail to loyal customers. At the same time, it activated institutional communication aimed at key stakeholders and mobility managers to ensure timely and coordinated information in order to minimize disruption.

Specifically, for the work on the Cadorna FN-Garibaldi FS line (July 19-September 7), the Company developed and disseminated a comprehensive and comprehensive information campaign aimed at mitigating the impact of the construction work on customer travel, providing a comprehensive and easily understandable overview of the changes to facilitate travel during the work. The categories of users involved included regular passengers, residents, commercial and manufacturing businesses, and workers in the areas surrounding the stations affected by the work, as well as occasional users and tourists. The campaign, which integrated tools and content designed to ensure the information was accessible, was distributed through all ATM channels. Throughout the duration of the work, the Company ensured the presence of stewards at the affected stations to offer passengers assistance and guidance on alternative routes. In support of and in synergy with this information presence, dedicated signage was also installed at the stations, designed to facilitate passenger orientation and ensure orderly flow management. This activity was ensured on a stable basis thanks to the deployment of two dedicated resources. The adoption of this widespread communication model made travel management during construction periods more fluid.

As part of the extensive plan to improve metro transport accessibility, the Company has continuously informed customers throughout 2025 via its website, app, and with signs at stops affected by the ongoing work on the M3 line, aimed at replacing elevators and escalators at all stations on the line. In parallel with the progress of the construction work, it has published the schedule of facility closures. Similarly, with regard to surface transport and the various tramway renewal projects that involved Via Palizzi, Via Mambretti, Piazza Oberdan, Via Piave/Via Bixio, and Piazza Cordusio between January and November 2025, the company ensured customers were kept constantly informed of service changes through its app and website, where it published updated route maps for the affected lines, via its X and Instagram accounts, through all mobility information channels, and through direct mail to loyal customers. The goal, again, was to mitigate the impact of the works on customer travel.

Through all these activities, ATM confirmed its commitment to customer information, a key element in ensuring a reliable and accessible public service, and with the aim of reducing inconvenience, improving travel planning, and ensuring ongoing dialogue with the most affected stakeholders.

(S4-4 31.b) Customer Satisfaction

The Institutional Relations and Communications Department conducted a Customer Satisfaction survey in 2025, obtaining an average score of 7.4 and a 97% satisfaction rate (% of votes ≥ 6). 6,328 face-to-face interviews were conducted at stops/stations and on board vehicles to investigate:

- Ease of purchasing tickets and passes,
- Communication and information,
- Quality of driving by surface drivers,
- Staff courtesy,
- Ease of access to vehicles,
- Service offering (punctuality, frequency),
- Vehicle cleanliness,
- Cleanliness of stops and stations,
- Personal safety.

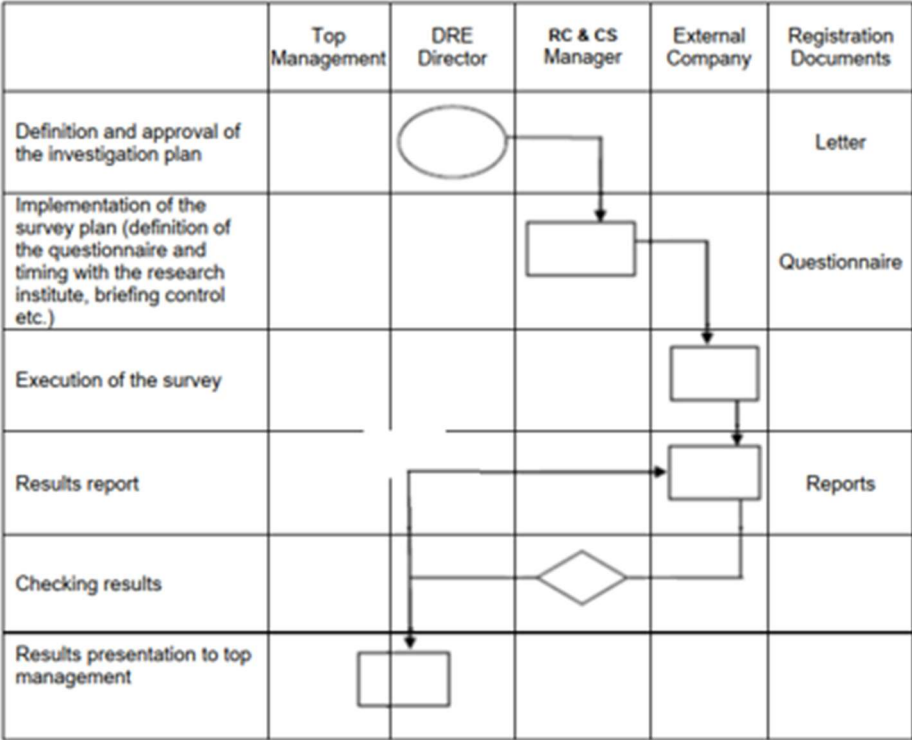
35 surface lines and 5 subway lines were monitored.

As part of these activities, Mystery Client surveys are conducted, both with reference to product line certification (UNI EN 13816) and to address any specific company needs. The Customer Satisfaction procedure governs ATM/NET's Customer Satisfaction and Mystery Client surveys, conducted to assess customer satisfaction with the services provided.

To ensure the protection of rights during the survey, the procedure is supported by the following reference documents:

- GDPR EU Regulation no. 2016/679 (General Data Protection Regulation),
- UNI EN ISO 9001, UNI EN ISO 14001, UNI ISO 45001,
- UNI EN 13816 (describes how to define, achieve, and measure public transport service quality, providing guidelines on the objectives to be achieved and the measurement systems to be applied),
- Service Contracts,
- Mobility Charters,
- Code of Ethics,
- PGD DRIC 03 Complaints.

The Customer Relations and Customer Satisfaction Manager is responsible for ensuring the implementation of the survey plan, defining and preparing the plan, monitoring its implementation, and sharing it with the relevant boards and departments. The following is the activity planning flowchart:



To define the *Customer Satisfaction* survey plan, the quality factors investigated are identified based on an analysis of customer needs. The reference pool for *Customer Satisfaction* surveys coincides with the entire service user base to ensure the statistical significance of the results.

When defining the guidelines for developing the surveys, senior management also takes into account the results of previous surveys for the purpose of continuous process improvement. The annual survey plan is designed to best capture the **evolution of customer satisfaction** dynamics, even in the face of changes and innovations in the service offered and changes in the context.

The Head of Complaints & Customer Service, working with the appointed market research firm, prepares the questionnaire in line with the objectives of measuring customer satisfaction. Once the questionnaire is defined and approved, the appointed market research firm conducts the surveys.

The survey results are evaluated and discussed by senior management and the heads of the relevant departments. Each manager involved, based on the information received, is required to evaluate the results and propose appropriate improvement actions. The Head of Complaints & Customer Service conducts, where appropriate, comparisons and integrated analysis of Complaints Report and *Mystery Client* data to optimize the results of these three *marketing levers*.

In 2025, the Institutional Relations and Communications Department organized focus groups with passengers to enhance their engagement with the service, particularly involving passengers with disabilities.

(S4-4 31.c) Accessibility for People in Vulnerable Conditions

Accessibility is a fundamental principle for ensuring equal opportunities for all people to use public transport, particularly the elderly, people with disabilities, and occasional users. In this context, signage in metro stations and at surface stops plays a strategic role as it aims to ensure clear and comprehensible information, facilitates passenger orientation, facilitates network access, and improves customer experience. In 2025, signage maintenance and updating was carried out consistently with the permanent employment of two dedicated resources.

In 2024, ATM signed a memorandum of understanding with Ledha Milano Città Metropolitana to strengthen its commitment to promoting the right to accessibility and transportation for people with disabilities and reduced mobility; this agreement consolidates the long-standing collaboration between the two entities to develop new projects and raise awareness of these issues. The agreement between ATM and Ledha Milano provides for periodic technical discussions to share their experience and expertise with the aim of developing concrete solutions to **improve transportation accessibility** and **eliminate architectural barriers**. It also includes Ledha's involvement in training courses for ATM employees who work directly with customers, to help them improve their relationships and provide support to passengers with motor, sensory, or cognitive disabilities and people with reduced mobility. The Group is also working to increase the percentage of accessible stops, stations, and vehicles by implementing specific initiatives, including:

- Installation of **tactile pathways and protective measures**, such as LOGES (Orientation, Guidance, and Safety Lines) and automatic doors that protect against the risk of falling, to ensure accessibility to services for passengers with visual impairments.
- **Refurbishment or reconstruction** of bus, tram, and trolleybus stops.
- Acquisition of **new trains** for the metro fleet with reserved spaces for wheelchair users, similar to trains already in operation.
- Acquisition in recent years of trams, buses, and trolleybuses equipped with low floors, reserved spaces for wheelchair users, and a manually operated elevator or folding platform for boarding and exiting the vehicle. Furthermore, the revamping of some vehicles also includes the installation of a wheelchair elevator.
- Regarding the program for the renovation and new installation of vertical transport systems on the M1, M2, and M3 metro lines, to date, all 16 **escalators** and 42 **elevators** planned for the M3 metro line have been put into service. Furthermore, 48 new **elevators** out of the 60 planned for the M1 and M2 lines have been installed during 2025. Regarding **stairlifts**, work has been completed to date with the installation of 27 stairlifts, contracted for the Villa San Giovanni, Pasteur, Lima, Conciliazione, Buonarroto, QT8, Wagner, Primaticcio, and Caiazzo stations.
- The ATM Group carries out awareness-raising and training activities for Front Line staff and newly hired personnel on managing relations with disabled customers. Newly hired personnel, in particular, receive training on the devices used on vehicles for transporting passengers with mobility difficulties or in wheelchairs.
- The ATM Group's official website, in the Accessible Transport section, provides information on station accessibility. Customers can find information on the availability of elevators, stairlifts,

escalators, and accessible restrooms, station by station. Elevators, stairlifts, and escalators are also indicated on the metro network map published on the website, on the ATM app, and in stations. These maps are distributed free of charge to customers at all ATM Points and in station staff booths. The Lines and Timetables section, available directly from the website's homepage, provides information on the availability of elevators and stairlifts and their location relative to the surface. The accessible version of the section, featuring a simple format to facilitate the visually impaired, offers route calculation functionality. It works with major screen readers, allowing users to obtain route results simply by listening to the program's calculations. The Accessible Transport page also provides a list of surface lines served by low-floor vehicles. To improve information on metro accessibility for people with mobility disabilities and provide it in real time, ATM has created the web platform Informazioni Senza Barriere (Barrier-Free Information), illustrated in the dedicated box. In 2025, a new app functionality was launched to provide real-time information on the accessibility of surface lines, adding to the existing functionality for the metro. The ATM Group involved passengers with disabilities and LEDHA in the development of this new service.

(S4-4 31.a, 32, 34) Customer Data Protection

ATM has adopted a specific Policy that governs the management of digital information and aims to ensure the protection and security of information held by ATM, and the IT services that manage it, from internal or external, intentional or accidental threats within the scope of business activities. For more information on the Policy and on managing impacts regarding customer data and the management of potential cyber attacks, please refer to the Entity Specific – Innovation and Digitalization section.

Metro Service is committed to protecting passenger data and reducing information security risks. To strengthen this commitment, the company has obtained ISO 27001 certification, which guarantees the adoption of robust measures to protect data and reduce the potential impacts associated with security breaches.

Regarding the protection of personal data, Metro Service strictly complies with all requirements set forth in the General Data Protection Regulation (GDPR). Access to video surveillance systems is regulated by strict procedures, allowing viewing of recordings only by authorized personnel and only when necessary.

(S4-4 31.b) Passenger and Consumer Safety

The Security Operations Center (SOC), the Security Control Room, has been operational since 2019. It operates closely with the operations centers of the metro and surface operations and law enforcement agencies. The Security Operations Center is active 24/7 and employs at least three specialized security operators. They monitor and manage the more than 12,000 video surveillance cameras installed in stations, offices, and on vehicles, as well as the more than 4,000 alarms that are managed in the field through over 200 interventions per day by security personnel, with the possible support of law enforcement. The ATM Security Committee maintains close, daily collaboration with the bodies managed by the Public Security Authorities (Prefecture and Police Headquarters) and with all the

institutional bodies involved in the area: Local Police, State Police, and Carabinieri. In the exchange of information, issues arising from the various experiences and reports from various company departments are analyzed. Specifically, since 2023, joint services have been intensified both in metropolitan areas and on the surface, aimed at resolving these recurring critical issues and ensuring a better perception of safety for staff and passengers.

Since 2020, Security has also acquired the process for managing criminal complaints for the ATM Group's property sector, further intensifying relationships with local law enforcement agencies to further ensure the timeliness of their prevention, control, and repression actions against illegal activities affecting ATM. Security benchmarking among the major public transport companies has continued throughout 2025, through participation in remote meetings between company managers in the sector, primarily focused on sharing practices. Metro Service A/S has also implemented a system for managing railway security issues to ensure compliance with applicable laws, regulations, and contractual provisions. The company annually records and assesses railway safety risks and defines quantitative and qualitative objectives that are subject to review during the annual management review.

Finally, to consolidate its commitment to ensuring safety across its fleet, in 2025 ATM invested over €500,000 in hiring new resources to ensure safety measures on surface lines.

To prevent disruptions and minimize their impact when they occur, Metro Service conducts preventative maintenance activities across the entire metro infrastructure and ensures the presence of stewards at stations who can respond to incidents within ten minutes. Furthermore, maintenance personnel ensure the availability of essential services, such as elevators and escalators, to prevent breakdowns. If a station is under operational supervision, passengers are advised to take a taxi to the next station. The cost of the taxi will be reimbursed by Metro Service upon presentation of a receipt and a request for reimbursement.

This guarantee applies 30 minutes after the start of the breakdown. To ensure effective communication with passengers, service availability and disruptions are communicated via voice announcements on the platforms and through Rejseplanen.

Metro Service also provides passenger protection in the event of accidents through insurance coverage. When an accident occurs, the parties involved follow strict procedures and cooperate with authorities, including the police. Psychological support is also provided for those who witness such events. To conclude the process, all incidents involving passengers must be reported to Metroselskabet.

(S4-4 31.d) The actions and initiatives described above are monitored through comprehensive reputational surveys to monitor public opinion among those familiar with the company and through customer satisfaction surveys and focus groups for qualitative insights. For example, with regard to the accessibility of services, in 2025, 97% of respondents declared themselves very or fairly satisfied (percentage of those who give a rating between 6 and 10) with the ease of access to transport, with an average rating of 7.6.

Regarding accessibility complaints, there are fewer than three reports per million passengers transported.

(S4-4 35) In 2025, no serious human rights issues or incidents related to consumers and end users were reported.

(S4-4 37) Customer and end-user engagement activities are primarily managed within the Institutional Relations and Communications Department, which includes a Customer Relations and Customer Satisfaction team, fully dedicated to listening to passenger opinions through complaint monitoring, customer satisfaction activities, and focus groups.

- **Metrics and goals**

S4-5– Objectives related to the management of significant negative impacts, the enhancement of positive impacts and the management of significant risks and opportunities

(ESRS 2 MDR-T 80) In line with the strategic direction outlined in the Sustainability Policy, ATM S.p.A. has identified five objectives linked to the Inclusive Mobility pillar, which concern travel comfort, accessibility to public transport and subway stations, and digitalization. Furthermore, within the "Responsible Governance" pillar, two additional targets are set, relating to Customer Satisfaction and monitoring the company's external perception.

Indicators – ATM Italia	Base year - 2019	Base year - 2023	2025 Goal	Performance 2025	2030 Goal
% of dematerialized travel tickets	50%		80%	81%	80%
% of travel tickets sold via digital channels	-		45%	49,9%	65%
% of km operated with UNI EN13816 certified lines for lines in the relevant territory	0%		58%	59,3%	100%
Accessibility of vehicles – surface ¹³	84%		87%	89,4%	93,5%
Accessibility of transport - subway ¹⁴	70,2%		97,8%	84%	100%
Customer Satisfaction Level	-	7,6	≥7	7,4	≥7
Level of perceived corporate reputation	-	64/100	65/100	64,7/100	65/100

(MDR-T 80 j) With regard to targets, given the early achievement of the target for the percentage of dematerialized travel tickets, ATM has decided to set an additional goal for 2025: the new objective of increasing the percentage of travel tickets sold via digital channels has been defined.

The achievement of these objectives and their progress are monitored periodically through a digital platform, which allows both the entry of basic data for calculating KPIs and the direct entry of objectives and period-end figures. This ensures that everything is tracked and the history of monitored objectives can be viewed.

It is noted that the digitalization of travel tickets brings numerous environmental benefits, thanks to the reduction in material used.

- Plastic avoided (digital passes)
305,000 digital passes × 5.5 g = approximately 1,678 kg of PVC saved.
- Paper avoided (digital tickets via app)
4,110,855 digital tickets × 1.8 g ≈ 7,399 kg of paper saved.
- Paper avoided (digital top-ups COP)
14,254,536 digital top-ups × 1.78 g ≈ 25,658 kg of paper saved.

In 2025, therefore, a total paper saving of approximately 33,000 kg and a plastic saving of approximately 1,700 kg was achieved, contributing to an overall saving of physical material of over 34 tons in one year.

(S4-5 41) ATM did not directly involve stakeholders in defining the objectives of its Sustainability Policy, but developed a matrix that took into account its industrial plan in line with several strategic

¹³ The scope of reference only considers transport within Italy and regulated under the Service Contract.

¹⁴ The reference perimeter considers only transport on Italian territory and regulated within the scope of the Service Contract.

documents such as: the 2030 Agenda for Sustainable Development, The 2015 Paris Agreement, the National Integrated Energy and Climate Plan (PNIEC), and, more locally, the Sustainable Energy Action Plan (SEAP) and the Sustainable Urban Mobility Plan (SUMP) approved by the City of Milan.

Finally, additional KPIs were defined for individual subsidiaries during 2025:

KPI	NET		City Link		Metro Service	
	2030 Goal	2025 Performance	2030 Goal	2025 Performance	2025 Goal	2025 Performance
% of km operated with UNI EN13816 certified lines for lines in the relevant territory	Monza: 100% Trezzo: 100%	Monza: 79% Trezzo: 44%				
Number of new digital subscribers			75%	35%		
Customer Satisfaction	Monza: ≥ 7.9 Trezzo: ≥ 7.5	Monza: ≥ 8 Trezzo: ≥ 7			90%	95%

Goals

NET MOBILITY CHARTER

Services for travellers with disabilities Indicator	Minimum contractual target 2025 vs. company commitment 2025	2025 Final balance	Minimum contractual target 2026	Impegno aziendale 2026
% low-floor vehicles	70% vs 83%	83%	70%	84%
% of vehicles with reserved spaces for passengers with motor disabilities	75% vs 100%	100%	75%	100%