

INTEGRATED MANAGEMENT SYSTEM POLICY

QUALITY, HEALTH AND SAFETY IN THE
WORKPLACE AND ANTI-BRIBERY

2021



**A4 TRADING'S INTEGRATED MANAGEMENT SYSTEM POLICY:
QUALITY, HEALTH AND SAFETY IN THE WORKPLACE AND ANTI-BRIBERY**

A4 HOLDING GROUP

The A4 Holding Group, which operates in the motorway mobility and related services sector, consist of the Parent Company A4 Holding S.p.A. and its subsidiaries:

- **Autostrada Brescia Verona Vicenza Padova S.p.A.**, Concessionary for the A4 motorway section from Brescia to Padova and the A31 of Valdastico motorway section,
- **A4 Trading S.r.l.**, operating in the services and real estate sector and related activities,
- **A4 Mobility S.r.l.**, focused in the field of technologies related to mobility and the management of activities with high information, technological and telecommunication content,
- **Globalcar Service S.r.l.**, active on the market in the provision of long-term rental services for cars, commercial vehicles and vehicles to customer specifications and in the sale of used cars and commercial vehicles;

since its establishment, it has managed its activities with a view to efficiency, protection of workers' health and safety, prevention of pollution, respect for the ethical aspects that regulate employment relationships and prevention of crimes that could bring benefits to the Group or to some of its companies that are part of it.

For this reason, the Group has adopted certified Management Systems that allow to constantly verify compliance with the mandatory regulations and the internal rules established, as well as special "Models of Organization, Management and Control, pursuant to Legislative Decree 231/01", which are periodically updated and which make it possible to keep the aspects relating to the administrative responsibility of each company under control. It has also prepared a Group "Code of Ethics", to which all personnel are obliged to comply.

This allows, in accordance with the Rules that govern the Company's Management Systems, to identify, asses and consequently satisfy, where founded, the expectations of internal and external Stakeholders, in relation to the Context in which the Group operates.

The Management of the A4 Holding Group expresses and testifies its commitment through constant attention to the management of the Systems adopted, exercising, as required by law, an effective and timely Leadership activity, in agreement with the top figures of each subsidiary and in line with the directives and mission of the ABERTIS Group, international leader in the management of motorway infrastructures.

THE COMPANY

A4 Trading S.r.l. with registered office in 71 F. Gioia street, Verona (VR), manages, on behalf of the Concessionaire Company of the A4 Holding Autostrada BS-VR-VI-PD S.p.A. Group, the contractual relationships of (sub) concession of the service areas, guided by the conviction that the services offered are both a business card and an expression of the level of civilization of the country.

A4 Trading mainly operates in four business lines:

- Motorway concessions and related activities; services to motorway concessionaires for the management, promotion and enhancement of motorway service area.
- Management of owned fuel distribution plants, managed by sector operators.
- Facility Management services, aimed at properties belonging to the A4 Holding Group.
- Management of the Brescia Est car park; coordination of all services aimed at users of the property complex, some managed directly by A4 Trading, others entrusted to third parties through the leasing of portions of the Property.

The Company's **mission** is:

- "To contribute to improve the services to the users within the markets in which we operate through the promotion and the realization of new ideas and projects that A4 Trading S.r.l. elaborates proposing tailor-made solutions, strong of a deep knowledge of the reference markets. The interest and the satisfaction of the Customer are essential for us and guide our work".

A4 Trading assumes the responsibility and the will to promote and maintain an Integrated Management System including a:

- Quality Management System, in accordance with the "UNI EN ISO 9001" standard.
- Workplace Health and Safety Management System, in compliance with the "UNI ISO 45001" standard.
- Anti-Bribery Management System, in compliance with the "UNI ISO 37001" standard, with the following scope of certification:

"MANAGEMENT OF OIL AND NON-OIL SUB-CONCESSION CONTRACTS. PROVISION OF INSPECTIONS OF SERVICE AREAS. PLANNING AND COORDINATION OF FACILITY MANAGEMENT SERVICES. MANAGEMENT OF PARKING AREAS EQUIPPED WITH SERVICES FOR PEOPLE AND VEHICLES. COORDINATION OF ROAD AND FREEWAY MAINTENANCE SERVICES"

POLICY

A4 Trading S.r.l., in compliance with the requirements of UNI EN ISO 9001:2015, UNI ISO 45001:2018 and UNI ISO 37001:2016 standards and in relation to the context in which it operates, focuses its Quality Policy, health and safety and prevention of corruption on the provision of integrated services, qualitatively high, aimed at achieving the complete satisfaction of the requests and expectations of the Customer and, where relevant, of the other Stakeholders, operating in full compliance with the mandatory regulations and the requirements concerning the protection of health and safety of workers.

The Integrated Management System Policy applied by A4 Trading is based on the concept of continuous improvement in full application of the "Deming Cycle" (PDCA), implementing the principles that include the objectives and commitments for quality, health and safety and prevention of corruption, as well as ensuring that it is understood, implemented and supported at all levels of the company including new employees.

A4 Trading therefore has the following general objectives:

- to take charge of the identification and evaluation of **Stakeholders'** expectations, identifying and satisfying those that result as "compliance obligations" for the Company and in particular those concerning corporate governance;
- to guarantee **Customer** satisfaction by ensuring the Company's commitment to the continuous improvement of the service offered and of the health and safety performance, also through the design of targeted solutions, in harmony with the guidelines of the A4 Holding Group;
- implementing a continuous monitoring of the quality and costs of the service offered to the Customer, in relation to the market trend, with the immediate handling of any complaints;
- identify and assess the **risks** and **opportunities** related to the company's "core" processes, with a consequent analysis of the criticalities and related documentation, going on to plan appropriate prevention, management or mitigation actions
- continuously monitor the performance of its **business processes**, including aspects related to the health and safety of workers and the prevention of corruption, in order to improve their effectiveness and efficiency;
- encourage the motivation and professional empowerment of **employees**;
- to manage **suppliers** operationally, carrying out constant monitoring of their work, making them aware of the importance of their contribution to the achievement of the objectives defined by the Company and requesting compliance with the mandatory regulations and the company rules provided for in the contract, concerning the protection of the health and safety of workers and the prevention of corruption;
- pursuing **regulatory compliance** and ensuring compliance with the consequent legal prescriptions and other requirements applicable to the Company for the protection of health and safety in the workplace and in the fight against corruption;
- identify in the health and safety of workers a founding element of the company policy that allows for a constant increase in the wellbeing of people, guaranteeing suitable and ergonomic working environments for the performance of activities in safe and healthy working conditions, and at the same time preventing possible injuries and reducing occupational accidents and illnesses affecting workers;
- ensure a continuous commitment to the elimination of hazards and the assessment and reduction of risks related to its processes and the implementation of appropriate prevention and protection measures;

- stimulate internal communication and ensure the constant participation, involvement and consultation of its workers and their representatives, so that they play an active role in the prevention of accidents and the improvement of health conditions, encouraging correct lifestyles of personnel and improving the contexts and living conditions relevant to health;
- adopt and apply, in line with the directives of the Parent Company, an "INTERNAL POLICY" – "Privacy and Data Security in the Company" containing the requirements for the use of the company's computer and telematic resources by staff;
- prohibit all forms of corruption (active/passive, direct/indirect) and indeed encourage all personnel to report suspicions in good faith without fear of retaliation, also through the use of the institutional "Whistleblowing" channel made available by the A4 Holding Group (<https://a4holding.integrityline.org/>), and consider transparency and legality as an added value, integrating into their own processes the controls and improvement actions necessary to manage the prevention of corruption;
- take appropriate action against individuals who have behaved illegally in contrast with the principles of this policy and/or in particular with the Anti-Bribery Management System;
- set up, through its parent company A4 Holding, a special **Compliance Function** for the prevention of corruption endowed with authority and independence in order to:
 - supervise the design and implementation by the A4 Group of the anti-bribery management system,
 - advise and guide staff on the anti-bribery management system, and corruption-related issues
 - ensuring that the anti-bribery management system complies with the relevant standard,
 - report on the performance of the anti-bribery management system to the Governing Body, Senior Management and other A4 Group Functions as appropriate;
- integrate the Quality/Health and Safety/Anti-Bribery Management System, understood as the set of activities that are fundamental to achieving the Company's aims, regardless of where they materially take place and who they are carried out by, into the Company's business.

The Management, aware of the importance of all the company structures for the achievement of the principles of its Policy, considers it fundamental to be the driving force behind the process of motivation and involvement of the internal operating personnel, at all levels, as well as external collaborators. The company managers are therefore supported by the constant contribution and active participation of the Management and have the task of applying and enforcing the provisions of the System to their collaborators.

With the aim of growth and continuous development of A4 Trading towards the improvement of its own processes, of the service offered to the Customer and of its own performances in the field of health and safety at work, the Management also urges all employees to work with a spirit of collaboration and proactivity, in accordance with the principles of the Integrated Quality/Health and Safety/Anti-bribery Management System.

On the basis of its strategic objectives, the Management annually approves a **company improvement plan**, which translates the commitments of the Integrated Management System into analytically measurable objectives, correlated to the various company processes and activities for the individual internal structures, the achievement of which is periodically monitored and communicated to all personnel in accordance with the respective reference procedures.

It is the Company's intention that the Policy, the "Organisation, Management and Control Model, pursuant to Legislative Decree 231/01" and the Group's "Code of Ethics", disseminated to interested parties also via the corporate website, be adopted by all corporate bodies and employees, at all levels, as well as the suppliers involved.

General Manager

(Pier Giovanni Pisani)

Chairman of A4 Holding

(Alcalde Gonzalo Rodríguez)