POLICY FOR THE INTEGRATED MANAGEMENT SYSTEM OF THE A4 HOLDING GROUP

QUALITY, ENVIRONMENT, HEALTH AND SAFETY IN THE WORKPLACE, INFORMATION SECURITY AND PREVENTION OF CORRUPTION

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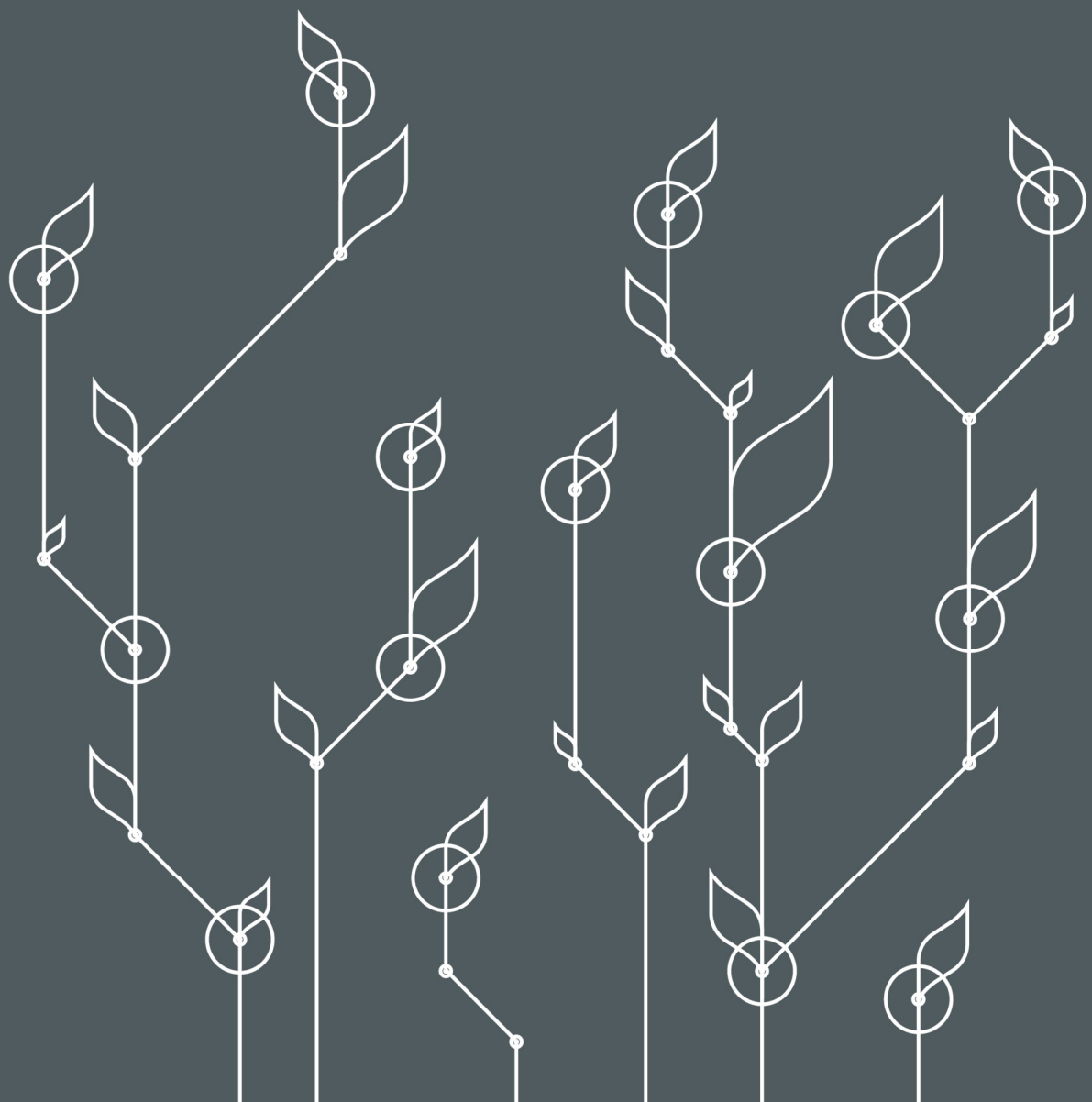

POLICY FOR THE INTEGRATED MANAGEMENT SYSTEM OF THE A4 HOLDING GROUP: QUALITY, ENVIRONMENT, HEALTH AND SAFETY IN THE WORKPLACE, INFORMATION SECURITY AND PREVENTION OF CORRUPTION

THE A4 HOLDING GROUP

*For over 70 years the A4 Holding Group has been active in the design, construction and management of large road infrastructures and related services; it consists of the parent company **A4 Holding S.p.A.** and its Subsidiaries:*

- ***Autostrada Brescia Verona Vicenza Padova S.p.A.**, concession holder of the A4 Brescia-Padova and A31 Valdastico motorway sections;*
- ***A4 Trading S.r.l.**, operating in the customer services sector and related activities;*
- ***A4 Mobility S.r.l.**, specialising in the field of technologies connected to mobility and the management of activities with a high information and technological content;*
- ***Globalcar Service S.r.l.** is active on the market in the provision of long-term rental services for cars, commercial vehicles and other motor vehicles according to customer specifications, and in the sale of used cars and commercial vehicles.*

*The Group's **Vision** is to create a future in which mobility is smart, sustainable and integrated, combining physical and digital networks in order to improve people's quality of life and steer the transformation of mobility into a connected and resilient ecosystem capable of adapting to global challenges and promoting inclusive and responsible development.*
*The Group's **Mission** is to manage and develop modern mobility infrastructures with a sustainable approach, focusing on safety, efficiency and innovation with the aim of ensuring optimal travel experiences, anticipating future needs and contributing to the harmonious growth of the territories it serves.*
*The Group also embraces the following **Values** in its business activities:*
- Safety and a people-centred approach.
- Continuous innovation.
- Environmental and economic sustainability.
- Integrity and transparency in its actions.
- Local community and social responsibility.

In keeping with the above, the Group manages its activities with a focus on the customers and on the quality of the services provided, with a view to operational efficiency, protection of the health and safety of workers, protection of the environment including pollution prevention, respect for the ethical aspects that regulate labour relations and the prevention of crimes that could benefit the Group or some of the companies forming part of the same.

For this reason, the Group has adopted certified Management Systems that allow for constant verification of compliance with the mandatory standards and established internal regulations, and specific 'Organisation, Management and Control Models, pursuant to Legislative Decree 231/01', which are periodically updated, and which make it possible to keep the aspects concerning the administrative responsibility of each Company under control. It has also drawn up a Group 'Code of Ethics', which all personnel are obliged to adhere to.

Pursuant to the regulations governing the Integrated Management System, this allows for identifying, evaluating and consequently satisfying, where justified, the needs and 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 demonstrates its commitment through constant attention to the management of the System adopted, exercising, as required by the regulations, effective and timely leadership, in concert with the top management of each Subsidiary, and in line with the orientation of the ABERTIS Group, international leader in toll road management.

POLICY

The A4 Holding Group, pursuant to the requirements of the UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018, UNI ISO 37001:2025 e ISO/IEC 27001:2022 standards within the scope of the Certifications in place for each Company belonging to the Group, and in relation to the Context in which it operates, focuses its Policy on the provision of integrated, cutting edge services, aimed at achieving the complete satisfaction of its stakeholders, operating in full compliance with the mandatory regulations and requirements regarding environmental protection, health and safety of workers, and information security in a general framework designed to prevent corruption.

The Integrated Management System Policy adopted by the Group is based on the concept of continuous improvement in full application of the 'Deming Cycle' (PDCA – Plan-Do-Check-Act), implementing the principles that include the objectives and commitments for quality, health and safety, the environment and the prevention of corruption, as well as ensuring that it is understood, implemented and sustained at all levels of the company.

The A4 Holding Group therefore aims to:

- define and periodically review the general **CONTEXT** and its internal and external factors in which the Parent Company and its Subsidiaries operate, taking charge of identifying and evaluating the needs and expectations of the **STAKEHOLDER**, identifying and satisfying those that result in being 'Compliance Obligations' and in particular, those concerning corporate governance, as well as specifically those of the Concessionary company 'Autostrada BS-VR-VI-PD S.p.A.' for guaranteeing the safety of the service and infrastructure by accepting responsibility for the relevant environmental and territorial aspects;
- promote the Group's presence at a national level in the business sectors in which the Parent Company and its Subsidiaries operate, and in particular regarding the economic, environmental and social development of the territory;
- specifically for the Parent Company 'A4 Holding S.p.A.', provide constant guidance to its Subsidiaries through ongoing coordination and sharing activities;
- ensure the availability of the financial resources necessary for the implementation of the industrial plans drawn up by the Parent Company and its Subsidiaries, including more specifically what is defined in the Economic and Financial Plan of the Concessionary company 'Autostrada BS-VR-VI-PD S.p.A.';
- in particular, for the Concessionary company 'Autostrada BS-VR-VI-PD S.p.A.':
  - to respond to the needs of the territory and/or by order of the Ministry, promote the design, construction and operation of mobility infrastructures,
  - to undertake initiatives, including within the scope of national, regional and local programmes, aimed at maintaining and improving the road system and related safety;
- guarantee the satisfaction of its **CUSTOMERS**, making its commitment to continuous improvement in all its forms and to health, safety and environmental performance a primary value, also through the design of targeted solutions, and through continuous monitoring of quality, costs and related feedback (e.g. complaints) on the services offered in relation to the market performance of the Subsidiaries of reference;
- continuously monitor the performance of its **BUSINESS PROCESSES**, including aspects related to environmental protection, health and safety of workers, information security and prevention of corruption, in order to improve their effectiveness and efficiency, using available technologies as indispensable tools for achieving the objectives;
- systematically identify and assess the **RISKS** and **OPPORTUNITIES** of company processes in relation to the services provided, evaluating critical issues and planning appropriate actions to prevent, manage or mitigate the same, and, more specifically for Subsidiaries with ISO 14001 certification, the significance of direct and indirect **ENVIRONMENTAL ASPECTS AND IMPACTS** generated by Suppliers;

- promote the motivation, professional empowerment and active involvement of **EMPLOYEES**, encouraging the development of their skills and knowledge over time, and committing to the adoption of strategies aimed at enhancing individual abilities, also with a view to strengthening the corporate culture in the various areas of reference and encouraging the diffusion of the Integrated Management System within the Group;
- operationally manage the Group's **SUPPLIERS**, constantly controlling and monitoring their work, making them aware of the importance of their contribution to the achievement of the objectives defined by the Company and requiring compliance with mandatory regulations and company rules provided for in the contract concerning the protection of the environment, the health and safety of workers and information security, and the prevention of corruption;
- always pursue **REGULATORY COMPLIANCE**, ensuring respect for the consequent legal requirements and other requirements applicable to the Group for the protection of the environment, health and safety in the workplace, information security and the fight against corruption;
- carry out activities based on the principle of sustainable development with particular regard to the **protection and safeguarding of the environment, corporate governance and the social context** in accordance with the statements of the UN 2030 Agenda, specifically committing to promoting ecological transition and mitigating its impact, reducing pollution in compliance with applicable environmental regulations in compliance with its growth objectives and orienting the services provided towards the development of environmentally virtuous solutions;
- specifically for the Concessionary company 'Autostrada BS-VR-VI-PD S.p.A.':
  - design new works with eco-sustainability criteria and with the involvement of local communities,
  - implement and maintain the works minimising the consumption of natural resources and systematically monitoring their condition and the surrounding environment, preventing the occurrence of emergency situations as far as possible, and providing for effective and timely management methods should they occur;
- periodically monitor the consumption of raw materials, resources and energy, as well as environmental performance (for example: waste, noise, emissions, water discharges, hazardous substances), including those of suppliers where necessary, with a view to optimising the same;
- consider, as far as applicable, the Life Cycle Perspective in the environmental management of the activities carried out;
- place the **health and safety of workers** at the centre of the company's mission and policy by:
  - promoting the constant improvement of their well-being in suitable and ergonomic work environments,
  - ensuring safe and healthy conditions for carrying out their activities,
  - applying effective measures to prevent injuries, reduce accidents and limit the onset of occupational diseases;
- ensure a continuous commitment towards eliminating hazards and assessing and reducing the risks associated with their processes (with particular reference to road transport), as well as implementing adequate prevention and protection measures; in particular by:
  - preventing risks at the source, adopting the best available and economically sustainable techniques,
  - designing and implementing information, education and training interventions with respect to the jobs performed and concerning responsibilities and tasks and health and safety risks, right from the recruitment phase and for the entire duration of the employment relationship,
  - protecting the health of workers in every operational phase through continuous health monitoring and periodic evaluation,

- providing Personal Protective Equipment (PPE), work equipment and tools, as well as chemical substances and products in compliance with current legislation, ensuring their correct functioning, verification and maintenance over time;

- stimulate internal involvement among the operational staff and external involvement with stakeholders, also in the aim of achieving the established objectives, promoting consultation and participation, in particular with workers, also through periodic meetings with managers, supervisors, workers, the Prevention and Protection Service, the Company Doctor and the Workers' Safety Representative, so that they all play an active role in accident prevention and in improving safety conditions, promoting a healthy lifestyle for the personnel and improving the contexts and living conditions that are important for health;
- promote the adoption of social responsibility policies by pursuing ethical and morally upright behaviour and supporting initiatives aimed at improving the environment, health, and safety;
- refuse the availing of child labour and juvenile labour, and in general, forced or compulsory labour;
- respect human freedom and dignity, the right to a salary in accordance with the National Collective Labour Agreement which is equal for men and women, to ordinary and extraordinary working hours that respect mandatory regulations and without discrimination, and to union freedom and collective bargaining;
- ensure the freely identified representativeness of employees, and the possibility of bringing their expectations, reports and complaints to the attention of the Company to which they belong;
- implement, evolve and continuously improve processes to guarantee the **security of data and the assets of information** for which it is directly or indirectly responsible through third parties in order to guarantee data integrity, availability and confidentiality;
- adopt and apply a **Cybersecurity** and **Privacy Policy** system aimed at guaranteeing data protection and the correct use of company IT resources by personnel;
- **prohibit all forms of corruption** (active/passive, direct/indirect) by adopting the principle of 'Zero Tolerance';
- encourage all personnel, and where relevant, other parties outside the Group, to report suspicions or violations in good faith without fear of retaliation, also through the use of the appropriate institutional 'Whistleblowing' channel (https://a4holding.integrityline.com/), reports are handled confidentially by the 'Whistleblowing' Ethics Committee, an autonomous and independent internal body, and they may also be made anonymously;
- promote transparency and legality, integrating appropriate controls and actions into its processes to prevent corruption;
- develop, maintain and support a **strong anti-corruption culture** at all organisational levels, based on integrity and accountability, including through exemplary leadership behaviour;
- take appropriate action against internal individuals and outside the Group who have engaged in unlawful behaviour contrary to the principles of this policy and/or in particular the Anti-Bribery Management System; such actions may include, in compliance with applicable mandatory regulations, disciplinary measures up to termination of employment and/or contractual measures against third parties, as well as any reports to the competent authorities where necessary;
- identify, declare and promptly manage any actual or potential conflict of interest that could compromise the impartiality of company decisions or encourage corrupt practices;

- establish a special **ANTI-BRIBERY FUNCTION** endowed with expertise, status, authority and independence, as well as adequate resources, with direct and timely access to the Governing Body and Top Management, for:
  - ensuring that the anti-corruption management system complies with the reference standard,
  - reporting on the performance of the anti-corruption management system to the Governing Body, Top Management and other functions of the A4 Group, as appropriate,
  - supervising the design and implementation by the A4 Group of the corruption prevention management system,
  - providing advice and guidance to staff and stakeholders on the corruption prevention management system and corruption-related issues;
- integrate the Integrated Quality/Environment/Health and Safety at Work/Information Security/Anti- Bribery Management System into the company's business, understood as the set of fundamental activities aimed at achieving the Group's goals, regardless of where these are physically carried out and by whom they are implemented.

The Management of the Parent Company A4 Holding, aware of the importance of all its corporate structures for the achievement of the principles of its Policy, considers it essential to be the driving force behind the motivation and involvement of internal operational personnel at all levels, as well as external collaborators. The company managers and senior figures of each subsidiary are therefore supported by the constant contribution and active participation of the top management and are responsible for applying and ensuring that their co-workers apply the System's requirements.
With the objective of the Group's growth and continuous development towards the improvement of its processes, the services offered to customers and its performance in the environmental, health and safety at work and information security sectors, the Management also urges all employees to work with a spirit of collaboration and pro-activity, in accordance with the principles of the Quality/Environment/Health and Safety in the Workplace/Information Security/Anti-Bribery Integrated Management System.

Every year, as part of the review process, the Management approves a **COMPANY IMPROVEMENT PLAN** based on its strategic, tactical and/or operational **OBJECTIVES** defined with a 'SMART' criterion. This plan translates the commitments of the Integrated Management System into analytically measurable key performance indicators related to the various company processes and activities for the individual internal structures, and the achievement of which is periodically monitored and communicated to all personnel as reported in the respective reference procedures.

It is the intention of the A4 Holding Group that the Policy, the 'Organisation, Management and Control Models, pursuant to Legislative Decree 231/01' in place at each Subsidiary and the Group's 'Code of Ethics', disseminated to Stakeholders also through the company's institutional websites, be adopted by all corporate bodies and Employees, at every level, as well as by the Suppliers involved.

CEO

(Bruno Chiari)

"A4 TRADING S.R.L." ANNEX

THE COMPANY

A4 Trading S.r.l., with registered office in Via F. Gioia 71, Verona (VR), manages, on behalf of the Concessionary Company of the A4 Holding Autostrada BS-VR-VI-PD S.p.A. Group, the contractual (sub)concession relationships of the service areas, in the aim of guaranteeing high standards in the quality and efficiency of the services offered to travellers.

A4 Trading mainly operates in four business areas:
- motorway concessions and related activities; services for motorway concessionary companies for the management, promotion and development of motorway service areas.
- Management of company-owned fuel distribution facilities, granted on lease to sector operators.
- Facility Management services aimed at properties of the A4 Holding Group.
- Management of Truck Park Brescia Est; coordination of all services for the customers of the real estate complex, some managed directly by A4 Trading, others entrusted to third parties through the leasing of portions of the property.

A4 Trading's activity is oriented towards the enhancement and continuous improvement of the services offered in the sectors in which it operates, through innovative ideas and personalised solutions, where attention to the needs of customers is the cardinal principle that inspires every project of the Company.

A4 Trading, with reference to what is stated in the Policy and applicable to the Company, accepts the responsibility and the commitment to promote and maintain an Integrated Management System including:
- Quality Management System, pursuant to the 'UNI EN ISO 9001' standard.
- Workplace Health and Safety Management System, pursuant to the 'UNI ISO 45001' standard.
- Anti-Bribery Management System, pursuant to the 'UNI ISO 37001' standard,

with the following certification objective:
'SUB-CONCESSION MANAGEMENT OF OIL AND NON-OIL CONTRACTS. PROVISION OF INSPECTION ACTIVITIES IN PETROL STATIONS. MANAGEMENT AND COORDINATION OF THE FACILITY MANAGEMENT SERVICES. MANAGEMENT OF PARKING AREAS EQUIPPED WITH SERVICES TO PEOPLE AND TRUCKS'

The Managing Director

(Pier Giovanni Pisani)