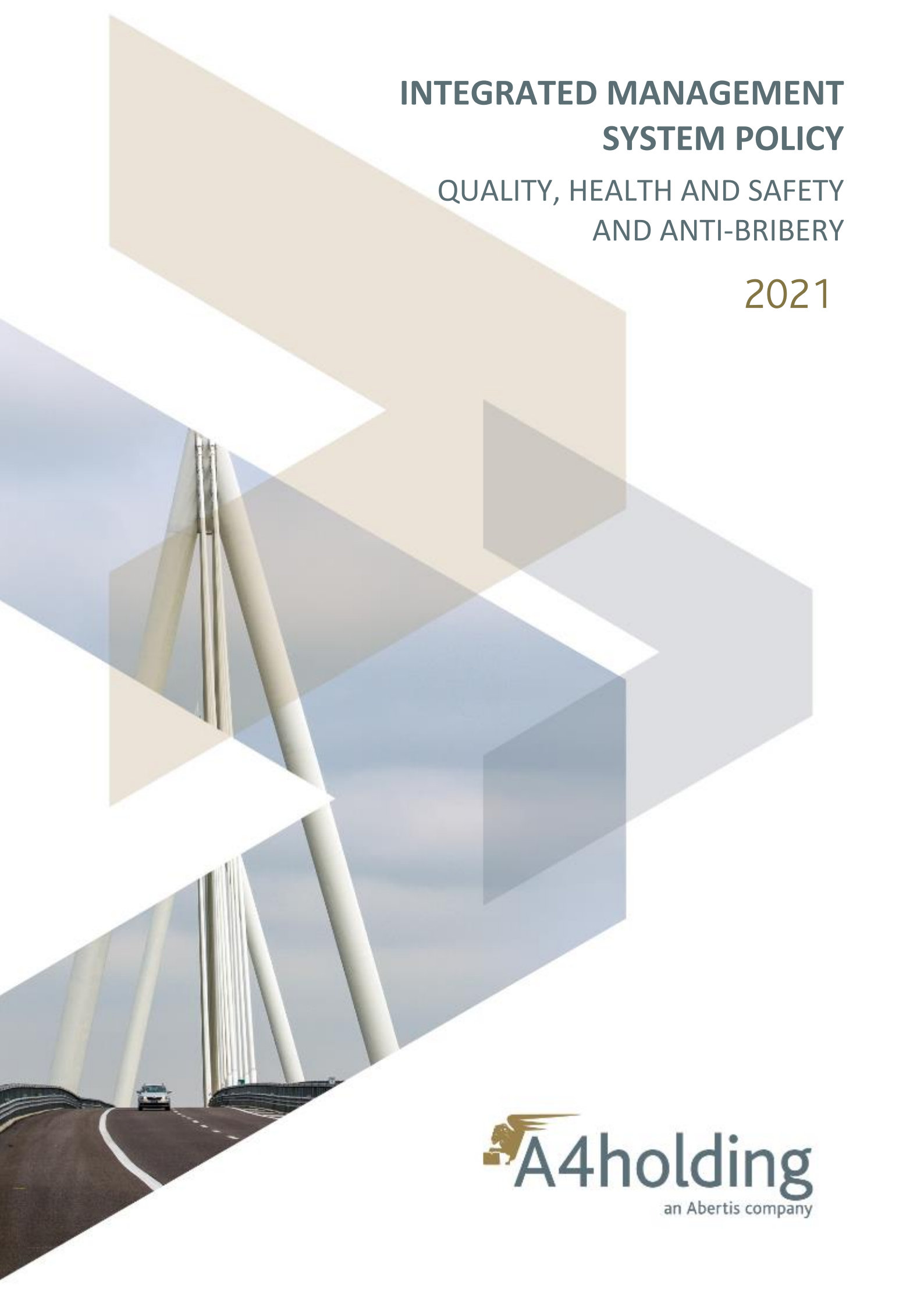


INTEGRATED MANAGEMENT SYSTEM POLICY

QUALITY, HEALTH AND SAFETY
AND ANTI-BRIBERY

2021



A4 HOLDING'S INTEGRATED MANAGEMENT SYSTEM POLICY: QUALITY, HEALTH AND SAFETY 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 Valdistico 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 personell 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 Holding S.p.A. with registered office in 71 F. Gioia street, Verona (VR), established in December 2011, operates mainly in the areas of motorway mobility and related services through control relationships; it guarantees and provides centralized services related to legal, organizational, administrative and procurement support activities to its subsidiaries.

In 2016, the A4 Holding Group was acquired by the ABERTIS Group, an international benchmark in the management of transport and telecommunications infrastructures.

The Company has an organizational configuration that allows it to face the challenges of the Italian reference market.

The **Company's mission** is:

- "To be recognized by the market as a point of reference in the creation, management and valorisation of infrastructures and services in the field of mobility, technologies and telecommunications, combining innovation and sustainability in the development of territories, exploiting its know-how and the specific activities of the subsidiaries to create added value for the Group's Stakeholders."

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

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

with the following object of certification:

"PROVISION OF COMPLIANCE SERVICES, COMMUNICATION MANAGEMENT AND INSTITUTIONAL RELATIONS, ADMINISTRATION, FINANCE AND MANAGEMENT CONTROL, PROCUREMENT AND TENDERS, PERSONNEL MANAGEMENT AND ORGANIZATION, LEGAL ASPECTS, CORPORATE AFFAIRS AND INSURANCE"

POLICY

A4 Holding S.p.A., in compliance with the requirements of the 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 Policy for quality, health and safety and the prevention of corruption on the provision of integrated, high quality services, aimed at achieving complete satisfaction with the requests and expectations of its Stakeholders, operating in full compliance with the mandatory regulations and requirements concerning the protection of the health and safety of workers.

The Integrated Management System Policy applied by A4 Holding 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 the prevention of corruption as well as ensuring that it is understood, implemented and supported at all company levels including new hires.

A4 Holding therefore has the following general objectives:

- define the general context in which the Company and its subsidiaries operate, taking charge of identifying and assessing **Stakeholders** and identifying and satisfying what is found to be "compliance obligation" and in particular those concerning corporate governance;
- to promote at national level the presence of the A4 Holding Group in the business sectors in which the Parent Company and the subsidiaries are inserted;
- to provide its subsidiaries with constant guidance, through constant coordination and sharing activities;
- to ensure the availability of the financial resources necessary for the implementation of the industrial plans prepared by the Company and its Subsidiaries;
- to increase the **Customer** satisfaction by assuming as its primary value the commitment to continuous improvement in all its forms and in particular of the service provided;
- identify the **Risks** and **Opportunities** of business processes in relation to the services provided to its Subsidiaries, assessing critical issues and planning appropriate prevention, management or mitigation actions;
- monitor and promote the improvement of the effectiveness and efficiency of its quality, health and safety **processes** and those of its subsidiaries, including specific aspects related to the protection of the health and safety of workers and the prevention of corruption;
- motivate and empower Group **employees**;
- involve the Group's **suppliers**, making them aware of their contribution to the achievement of quality, health and safety objectives also in the context of the prevention of corruption, carrying out a systematic control over the activity carried out;
- pursue **regulatory compliance** and ensure compliance with the consequent legal requirements and other requirements applicable to the Company for the protection of health and safety in the workplace and in the fight against corruption;
- identify workers' health and safety as a fundamental element of the company policy that allows a constant increase in the well-being of people, ensuring suitable and ergonomic work environments for carrying out activities in safe and healthy working conditions and at the same time going to prevent any injuries and to reduce accidents and occupational diseases 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 communication within the Group and ensure the participation, involvement and constant consultation of workers and their representatives, so that they play an active role in the prevention of accidents and in the improvement of health conditions, promoting correct lifestyles of staff and improving contexts and living conditions relevant to health;
- promote, also within the subsidiaries, the adoption of social responsibility policies with particular reference to the health and safety of workers;
- prohibit any form of corruption (active /passive, direct / indirect) and indeed encourage all staff to report suspicions in good faith without fear of retaliation, also through the use of the appropriate institutional channel of “Whistleblowing” made available by the A4 Holding Group (<https://a4holding.integrityline.org/>), and consider transparency and legality an added value, integrating into its processes the controls and improvement actions necessary to manage the prevention of corruption;
- take appropriate actions against subjects who have behaved unlawfully in contrast with the principles of this policy and / or in particular of the Anti-Bribery Management System;
- establish a dedicated **Compliance Function** for the prevention of corruption with authority and independence to:
 - supervise the design and implementation by the A4 Group of the management system for the prevention of corruption,
 - provide advice and guidance to staff on the management system for the prevention of corruption and corruption-related issues,
 - ensure that the management system for the prevention of corruption complies with the reference standard,
 - report on the performance of the management system for the prevention of corruption to the Governing Body, Top Management and other Functions of the A4 Group, as appropriate;
- integrate the Quality/Health and Safety/Anti-Bribery Management System, intended as a set of all those activities that are fundamental to achieve the Company’s purposes, regardless of the place where these materially take place and the subjects from which they are implemented, in the Company and Group’s business.

A4 Holding also promotes **respect and protection of the environment** in every activity carried out directly and in those of its subsidiaries, inspired by the following principles and general objectives:

- Ensure a continuous commitment to environment protection and pollution reduction.
- Design new works with eco-sustainability criteria and with the involvement of the Communities, paying particular attention to the environmental requests expressed by the Stakeholders.
- Realize and maintain the works minimizing the consumption of natural resources and systematically monitoring the state of the environment, preventing as far as possible the occurrence of emergency situations, and providing effective methods of managing them, should they occur.
- Monitor the consumption of raw materials, resources, energy and environmental performance (for example: waste, noise, emissions, water discharges, hazardous substances), including those of Suppliers, with a view to their optimization.

The Management of A4 Holding, aware of the importance covered by all its corporate structures and the respective Subsidiaries of the Group for the achievement of the principles of its Policy, considers it essential to be the driving force behind the process of motivation and involvement of internal operating personnel, at all levels, as well as external collaborators. The company managers themselves and the top management of each subsidiary are therefore supported by the constant contribution and active participation of the Management and have the task of applying and enforcing the requirements of the System to their collaborators.

With the aim of growth and continuous development of A4 Holding towards the improvement of its processes, the service offered and its performance in the field of health and safety at work, the Management also urges all Group's employees to operate in a spirit of collaboration and proactivity, in accordance with the principles of the Integrated Quality/Health and Safety/Anti-Bribery Management System.

Annually the Management approves, based on its strategic objectives, a **business improvement plan**, which translates the commitments of the Integrated Management System into analytically measurable objectives, related to the different company processes and activities for the individual internal structures and whose achievement is periodically monitored and communicated to all staff as reported in the respective reference procedures.

It is the will of the Company that the Policy, the "Organization Model, Management and Control, pursuant to Legislative Decree 231/01" and the "Code of Ethics" of the Group, disseminated to interested parties also through the company website, are adopted by all corporate bodies and employees, at all levels, as well as by the suppliers involved.

Chairman

(Alcalde Gonzalo Rodríguez)