



A4 MOBILITY'S INTEGRATED MANAGEMENT SYSTEM POLICY:

*QUALITY, ENVIRONMENT, HEALTH AND SAFETY IN THE
WORKPLACE, INFORMATION SECURITY
AND ANTY-BRIBERY*

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SECURITY AND ANTI-BRIBERY**

A4 HOLDING GROUP

For over 70 years A4 Holding Group has been active in the design, construction and management of big road infrastructures and related services; 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 customer services 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 and technological 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.

The Group has always 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 toll roads.

THE COMPANY

A4 Mobility S.r.l. with registered office in 71 F. Gioia street, Verona (VR), A4 Mobility operates in the design, development and maintenance of integrated solutions for mobility and security at the service of the territory, and it faces the market as a company that can boast the valuable wealth of experience, processes and know-how of over fifteen years of activity in the field of Infomobility with ITS approach.

Specifically, A4 Mobility develops and integrates systems, applications and devices for all Intelligent Transportation Services (ITS) representing a laboratory of excellence in the Infomobility market in all its forms; the set of partnerships and relationships with the territory and the most accredited operators in the sector make A4 Mobility the privileged interlocutor of companies and public and private institutions.

The Company's **mission** is:

- "To serve the motorway sector, the territory and the public and private entities that constitute it, in the management of mobility and traveller with innovative, integrated, intelligent, resilient and increasingly eco-sustainable solutions, suitable for the continuous improvement of competitiveness, becoming synonym of excellence and therefore the ideal subject for the achievement of the ambitious goals of the various Stakeholders".

The knowledge that A4 Mobility has to act in these areas is linked to traffic control, payment management and security/access control, thanks to information assets of the Company and the close synergies with the Parent Company A4 Holding S.p.A. and the ABERTIS Group.

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

- Quality Management System, in compliance with the "UNI EN ISO 9001" standard.
- Environmental Management System, in compliance with the "UNI EN ISO 14001" 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 certification object:
"DESIGN, DEVELOPMENT, MANUFACTURE, INSTALLATION AND MAINTENANCE OF MOBILITY SYSTEMS, INCLUDING RELATED INFRASTRUCTURES AND SUBSYSTEMS FOR TICKETING, AUTOMATION, DATA COLLECTION, DATA TRANSMISSION AND DATA PROCESSING. DESIGN, DEVELOPMENT AND MAINTENANCE OF SOFTWARE APPLICATIONS AND INTEGRATED SYSTEMS".
- Information Security Management System, in compliance with the "ISO/IEC 27001" standard, in the following specific certification scope:
"DEVELOPMENT AND MANAGEMENT OF THE PROPRIETARY PLATFORM FOR THE PROVISION OF SERVICES FOR THE COLLECTION, CONTROL, PROCESSING, STORAGE AND DISTRIBUTION OF BUSINESS DATA, INCLUDING THE MANAGEMENT OF TRANSITS TOLL ROAD".

POLICY

A4 Mobility S.r.l., in compliance with the requirements of UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018, ISO/IEC 27001:2013 and UNI ISO 37001: 2016, and in relation to the Context in which it operates, focuses its Quality Policy, environment, health and safety in the workplace, information security and prevention of corruption in the provision of high-quality integrated services, aimed at achieving complete satisfaction of the requests and expectations of the Customer and, where relevant, of other Stakeholders, operating in full compliance with mandatory regulations and requirements relating to environmental protection, health and safety of workers and information security.

The Integrated Management System Policy applied by A4 Mobility 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 to quality, health and safety, environment and prevention of corruption, as well as ensuring that it is understood, implemented and supported at all levels of the company including new employees.

The primary objective of A4 Mobility, and in particular of all the personnel operating in the Company, is constantly directed to the minimization of response times to the Customer at every stage of the relationship management (from pre-sales, delivery, technical troubleshooting, after-sales service) and the proper management of suppliers, optimizing economic performance in a context of health and safety of its workers and environmental sustainability.

A4 Mobility has exploited in recent years the skills and platforms gained in the motorway sector to operate across the market (domestic and international), and expand the business by bringing its capabilities and services to a larger number of stakeholders in the Smart Mobility field.

A4 Mobility focuses its attention mainly on the **Companies of the A4 Holding Group** and on the **market of motorway concessionaires** that can generate economies of scale as the company's core business, through:

1. the establishment qualified and strategic partnerships and collaborations with companies and/or local public bodies;
2. a focus on innovation through research and maintenance of a level of constant and competitive updating with high specialization on technologies that can confer benefits in economic, ecological and qualitative terms on the products and services offered through a progressive approach oriented to the "Digital Transformation" and inspired by EU directives;
3. a development within the company of a culture oriented to be proactive in achieving the objectives for the activities carried out with reference to all phases of design, implementation and maintenance, in the general principles of prevention of accidents and occupational diseases, accidents and dangerous situations/behaviors, corruption and management of environmental aspects with the prevention/protection against possible damage to the environment.

A4 Mobility therefore has the following general objectives:

- to take charge of identifying and assessing **Stakeholders'** expectations, identifying and satisfying those that prove to be "compliance obligations" for the Company, in particular those concerning scientific and technological aspects, as well as corporate governance;
- to ensure an immediate and punctual management of every **Customer's request**, guaranteeing his satisfaction and the Company's commitment to the continuous improvement of the service offered and of the health and safety and environmental performances, also through the design of targeted solutions, in harmony with the A4 Holding Group's guidelines;
- to identify and assess the **Risks, Opportunities** and significance of direct **environmental aspects** and impacts, related to the company's "core" processes, and indirect ones generated by suppliers/contractors, with a consequent analysis of the criticalities and the related documentation, going on to plan appropriate prevention, management or mitigation actions;
- Continuously monitor the performance of its **business processes**, including aspects related to environmental protection, workers' health and safety, information security and prevention of corruption, in order to improve their effectiveness and efficiency, using the available technology as an indispensable tool for achieving the objectives;
- 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's contractual rules concerning the protection of the environment, the health and safety of workers and the security of information and the prevention of corruption;
- pursuing **regulatory compliance** and ensuring compliance with the consequent legal requirements and other requirements applicable to the Company for the protection of the environment, health and safety in the workplace, information security and the prevention of corruption;
- to carry out its activities according to the principle of sustainable development with particular regard to the environmental protection, corporate governance and the social context;
- undertake to reduce pollution in compliance with the applicable environmental regulations, in particular by orienting its services towards the development of environmentally virtuous solutions and by focusing its planning activities on a "green" perspective, for example by offering the motorway and road management market services that allow for the optimization of monitoring activities, which are also preparatory to providing users with information useful for avoiding queues, suggesting alternative routes, providing timely information on traffic problems and thus reducing waste and pollution;
- take into account the "Life Cycle Perspective" in the environmental management of the activities carried out by the Company, and the complex of relations with the Stakeholders;
- to identify the health and safety of workers as a fundamental element of the company's mission and policy, allowing 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, while at the same time preventing possible injuries and reducing 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; in particular:
 - prevent risks at source, adopting the best available and economically sustainable techniques;

- planning and implementing informative, educational and training measures in relation to the job carried out and concerning the responsibilities and tasks and the risks for health and safety, right from the recruitment phase and for the entire duration of the working relationship;
- protect the health of workers through continuous health monitoring and its periodic evaluation;
- provide users with P.P.E., work equipment and supplies, as well as chemical substances and products that comply with current regulations, and guarantee their operation, verification and maintenance over time in compliance with health and safety conditions in the workplace.
- stimulate internal communication among operating personnel, and external communication, with the customer and its representatives, promoting consultation and participation of workers also through periodic meetings with staff, managers, supervisors, workers, Prevention and Protection Service, Competent Doctor, Worker Safety Representative, so that they play an active role in the prevention of accidents and improvement of health conditions, promoting proper lifestyles of staff and improving the contexts and living conditions relevant to health;
- implement specific processes to ensure the security of data and information assets, including those entrusted to third parties;
- ensure the integrity of data, so that it is not altered by unauthorized users or unsecured software or hardware;
- guarantee data availability, i.e., the ability to access data at any time even if the network is operating under extreme conditions;
- guarantee data confidentiality, i.e., the ability to access data only by authorized users;
- adopt and apply, in line with the directives of the ABERTIS Group, Policies on **Cybersecurity** and **Privacy** also addressed to the correct use of the company's IT resources by personnel;
- 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 management system for the prevention of corruption,
 - advise and guide staff on the management system for the prevention of corruption and corruption-related issues,
 - ensuring that the management system for the prevention of corruption complies with the relevant standard,
 - report on the performance of the management system for the prevention of corruption to the Governing Body, Senior Management and other A4 Group Functions as appropriate;
- integrating the Quality/Environment/Health and Safety in the Workplace and Information/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 implemented 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 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 Mobility towards the improvement of its processes, of the service offered to the Client and of its environmental, health and safety at work and information security performance, the Management also urges all employees to work in a spirit of collaboration and proactivity, in accordance with the principles of the Integrated Management System Quality/Environment/Health and Safety at Work/Information Security/Anti-Bribery.

Every year the Management approves, on the basis of its own strategic objectives, 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 will of the 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 level, as well as by the suppliers involved.

General Director

(Paolo Balan)

Chairman of A4 Holding

(Alcalde Gonzalo Rodríguez)