

INTEGRATED MANAGEMENT SYSTEM POLICY

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

2021



AUTOSTRADA BRESCIA VERONA VICENZA PADOVA'S INTEGRATED MANAGEMENT SYSTEM POLICY: QUALITY, ENVIRONMENT, 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 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

Autostrada Brescia Verona Vicenza Padova S.p.A. with registered office in 71 F. Gioia street, Verona (VR), operates under the concession of the Italian "DGVCA" for the construction and operation of the motorway section of the A/4 between Brescia and Padova, 146.1 km long, and of the A/31 Trento - Valdadige - Vicenza - Riviera Berica - Rovigo, 128 km long (the section from Badia Polesine to Piovene Rocchette is currently in operation for 89.5 km), as well as the bypasses of Lonato, Verona, Vicenza, Padova and other minor junctions.

On the motorway section under its responsibility there are:

- 25 bus stations
- 4 Service Centres for commercial assistance
- 2 maintenance centers
- 8 Traffic Auxiliary Centres
- 14 service areas for refuelling and refreshments
- 6 service areas for parking and refreshments and 7 areas for parking only
- 1 car park.

On the ring roads there are 19 service areas.

The Company's **mission** is:

- "To encourage mobility and economic development in the area by building and managing safe roads, consistent with environmental protection. To provide the customer with a service that is satisfactory in terms of safety, mobility management and assistance."

The Company also intends to enhance, by promoting ethical-social values, its internal and external collaborators, encouraging their professional and human growth in a context of safeguarding their health and safety.

Autostrada Brescia Verona Vicenza Padova, in doing business, as stated in its **Service Charter**, therefore assumes the following fundamental principles:

- **Equality**
- **Impartiality**
- **Continuity**
- **Freedom of choice**
- **Participation**
- **Effectiveness and efficiency**
- **Protection of privacy**
- **Respect for the environment**
- **Health and Safety**

Autostrada Brescia Verona Vicenza Padova 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:

"MANAGEMENT OF MOTORWAY SERVICES WITH TRAFFIC ASSISTANCE, TOLL COLLECTION, COMMERCIAL ASSISTANCE, MAINTENANCE OF ROAD INFRASTRUCTURES AND FACILITIES. DESIGN AND MANAGEMENT OF WORKS FOR THE CONSTRUCTION OF ROAD INFRASTRUCTURES".

POLICY

Autostrada Brescia Verona Vicenza Padova S.p.A., in compliance with the requirements of UNI EN ISO 9001:2015, UNI EN ISO 14001:2015, UNI ISO 45001:2018 and UNI ISO 37001: 2016 and in relation to the context in which it operates, focuses its Quality Policy, environment, health and safety and prevention of corruption on the continuous research and provision of integrated services, qualitatively high, aimed at achieving complete satisfaction of the demands and expectations of the customer and, where relevant, of other stakeholders, operating in full compliance with mandatory regulations and requirements relating to environmental protection and health and safety of workers.

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

Autostrada Brescia Verona Vicenza Padua 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 and, in particular, those concerning the safety of the service and infrastructure, environmental and territorial aspects, as well as corporate governance;
- to promote community efforts for economic, environmental, social and educational development, as part of the Company's commitment to the context in which it operates
- to promote the presence of the Company and the Group in the sectors of construction and operation of road and motorway infrastructures;
- to ensure the availability of the financial resources needed to fully implement the provisions of its own Economic and Financial Plan;
- take initiatives, also within the scope of national, regional and local programmes, aimed at maintaining and improving the road system and the related safety;
- guarantee **Customer** satisfaction by ensuring the Company's commitment to the continuous improvement of the service offered and of health, safety and environmental performance, also through the design of targeted solutions, in harmony with the guidelines of the A4 Holding Group;
- 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 actions to prevent, manage or mitigate them;
- continuously monitor the performance of its **business processes**, including aspects related to environmental protection, health and safety of workers and prevention of corruption, to improve their effectiveness and efficiency;
- motivate and empower **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 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 the environment, health and safety in the workplace and in the fight against corruption;

- to carry out its activities according to the principle of sustainable development with particular regard to the environment and the social context;
- to undertake to reduce pollution in compliance with the applicable environmental regulations, in particular by directing its objectives towards the reduction of energy consumption, the protection of water and the management improvement of the waste produced, both directly and indirectly;
- to take into consideration the “Life Cycle Perspective” in the environmental management of the activities carried out by the Company, and the complex of relations with the Stakeholders;
- identify the health and safety of workers as a founding 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 interventions with respect 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;
 - make available to users 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 the operating personnel, and external, with the Customer and its representatives, promoting consultation and participation of workers also through periodic meetings with the 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 correct lifestyles of the staff and improving the contexts and living conditions relevant to health;
- commit to developing strategies to increase personal capacity to improve their own health;
- pursue ethical and morally upright behavior, supporting initiatives aimed at improving the environment and health and safety;
- reject the use of child labor and child labor in general, forced or compulsory labor;
- respect the freedom and dignity of man, the right to a salary that complies with the National Collective Labour Agreement and is equal between men and women, to ordinary and overtime working hours in compliance with the regulations and without discrimination, to trade union freedom and collective bargaining;
- ensure that employees are freely represented and that they are able to bring their expectations, reports and complaints to the attention of the Company;
- adopt and apply, in line with the directives of the Parent Company, an “INTERNAL POLICY” – “Privacy and Data Security in the Company” containing the provisions for the use of the company’s IT and telematic resources by personnel;

- prohibit all forms 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 institutional channel of “Whistleblowing” made available by the A4 Holding Group (<https://a4holding.integrityline.org/>), and consider transparency and legality as an added value, integrating into their 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 the Anti-Bribery Management System;
- establish, through its Parent Company A4 Holding, a special **Compliance Function** for the prevention of corruption endowed with authority and independence 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 pre-stationing of the anti-bribery management system to the Governing Body, senior management and other A4 Group Functions, as appropriate;
- integrate the Quality/Environmental/Health and Safety/Anti-Bribery Management System into the company’s business, understood as the set of activities that are fundamental to achieving the Company’s aims, regardless of where they are physically carried out and by whom they are implemented.

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 Autostrada Brescia Verona Vicenza Padua towards the improvement of its processes, of the service offered to the Customer and of its performance in the environmental and health and safety at work fields, the Management also urges all employees to work in a spirit of collaboration and proactivity, in accordance with the principles of the Integrated Quality/Environment/Health and Safety/Anti-corruption 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 Director

(Bruno Chiari)

Chairman of A4 Holding

(Alcalde Gonzalo Rodríguez)