

INTEGRATED MANAGEMENT SYSTEM POLICY

QUALITY AND ANTI-BRIBERY

2021



**GLOBALCAR SERVICE'S INTEGRATED MANAGEMENT SYSTEM POLICY:
QUALITY 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

Globalcar Service S.r.l. with registered office in 5 A. Duminutti street, Verona (VR) manages, on behalf of all the Companies of the A4 Holding Group, their respective fleets of cars, trucks and special vehicles on a long-term rental basis. The long-term rental activity is also addressed to third parties, i.e., to the market on which it carries out, at the same time, a car trade activity.

Globalcar Service operates mainly on four lines of business:

- Long term rental addressed both to A4 Holding Group Companies and to third parties, private and public, also through participation in tenders.
- Sale of motor vehicles in general, car division.
- Sale of used vehicles from rental return.
- Mechanical workshop activities for the repair and maintenance of motor *vehicles (only for the Group's vehicle fleet and/or own vehicles)*.

The Company's **mission** is:

- "To contribute to the improvement of services to users within the markets in which we operate through the promotion of new ideas that Globalcar Service S.r.l. elaborates by proposing tailored 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."

Globalcar Service assumes the responsibility and the will to promote and maintain an Integrated Management System including a:

- Quality Management System, in accordance with the standard "UNI EN ISO 9001", with the following certification object:
"LONG-TERM RENTAL SERVICES OF CARS, COMMERCIAL VEHICLES AND MOTOR VEHICLES TO CUSTOMER SPECIFICATIONS; SALE OF USED CARS AND COMMERCIAL VEHICLES".
- Anti-Bribery Management System, in compliance with "UNI ISO 37001", with the following certification object:
"LONG-TERM RENTAL SERVICES FOR CARS, COMMERCIAL VEHICLES AND MOTOR VEHICLES BASED ON CUSTOMER SPECIFICATIONS; SALE OF USED CARS AND COMMERCIAL VEHICLES; FOR THE GROUP'S OWN FLEET AND/OR CARS ONLY, MECHANICAL WORKSHOP ACTIVITIES FOR THE REPAIR AND MAINTENANCE OF MOTOR VEHICLES".

POLICY

Globalcar Service S.r.l., in compliance with the requirements of UNI EN ISO 9001:2015 and UNI ISO 37001:2016 and in relation to the context in which it operates, focuses its Quality and Anti-Bribery Policy in the 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.

The Integrated Management System Policy applied by Globalcar Service 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 and prevention of corruption, as well as ensuring that it is understood, implemented and sustained at all levels of the company including new employees.

Globalcar Service therefore has the following general objectives:

- to take charge of the identification and assessment of **Stakeholders'** expectations, identifying and fulfilling what turn out to be "compliance obligations" for the Company and, in particular, those related to corporate governance;
- guarantee **Customer** satisfaction by ensuring the Company's commitment to the continuous improvement of the service offered, 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 management of any complaints;
- identifying and assessing **risks** and **opportunities** related to the company's "core" processes, with consequent analysis of criticalities and related documentation, proceeding to plan appropriate prevention, management or mitigation actions;
- constantly monitor the performance of its **business processes**, including aspects related to the prevention of corruption, in order to improve their effectiveness and efficiency;
- Encourage the motivation and professional empowerment of **employees**;
- to manage **suppliers** operationally, by constantly 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 the mandatory regulations and the company rules laid down in the contract, also with regard to the prevention of corruption;
- stimulate internal communication and ensure the participation and involvement of its workers, also with a view to achieving the established **objectives**;
- to 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 the personnel;
- guarantee the constant commitment to carrying out its activities in full compliance with **regulatory obligations**, constantly checking the correct and adequate application of the regulations on the fight against corruption and the requirements of the Anti-Bribery Management System;
- 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 "Whistleblowing" made available by the A4 Holding Group (<https://a4holding.integrityline.org/>) , and consider transparency and legality as an added value, integrating in 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 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/Anti-Bribery Management System, understood as the set of all those 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 the internal operating staff, 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 objective of growth and continuous development of Globalcar Service towards the improvement of its processes and the service offered to the Customer, the Management also urges all employees to work in a spirit of collaboration and proactivity, in accordance with the principles of the Quality/Anti-Bribery Management System.

Every year the Management approves, on the basis of its 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 Company's intention that the Policy, the "Model of Organization, Management and Control, ex Legislative Decree 231/01" and the Group's "Code of Ethics", disseminated to interested parties also via the company website, be adopted by all corporate bodies and employees, at every level, as well as by the suppliers involved.

General Manager
(*Pier Giovanni Pisani*)

Chairman of A4 Holding
(Alcalde Gonzalo Rodríguez)