



# INTEGRATED MANAGEMENT SYSTEM POLICY

Approved by the Board of Directors of SINELEC S.p.A. on 29 July 2021

Sinelec, a technology company of the ASTM Group, collects the technological skills of the Group in the field of electronic tolls, intelligent transport systems (roads, tunnels and bridges), telecommunications and IT solutions.

Sinelec is also actively involved in the digitalization process of transport infrastructures in Italy, which will allow road operators to face the challenges of future mobility such as the introduction of autonomous vehicles, electric cars and new mobility models based on digital connections of transport services.

The development of innovative solutions for the safe and intelligent management of traffic and transport infrastructures is one of Sinelec's priorities because we believe, in line with our Group's vision, that the creation of a sustainable mobility model is a key prerequisite for the growth of the country and for the well-being of citizens.

The provision of technological and innovative solutions, with high standards of quality and reliability, requires a constant commitment. The attitude to continuous improvement, together with the involvement of people, represents for Sinelec S.p.A. a fundamental principle.

The choice to create sustainable solutions, ensuring safety at work and protecting the security of information, is recognized through our commitment to develop an increasingly integrated management system in accordance with international standards that Sinelec adopts, as its management system.

In line with the mission, vision and values shared by the Companies of the ASTM Group, Sinelec operates with the intent to strengthen the sector in which it works thanks to its know-how and its infrastructures, seizing new development opportunities both in the national and international territory.

Sinelec performs and periodically reviews the analysis of the reference context and the expectations coming from the various stakeholders, internal and external. The Society identifies and analyzes its core processes, assessing risks and opportunities with reference to the various factors of the reference context.

In accordance with the strategic guidelines, the Group policies and the results of the above analysis, Sinelec is committed to providing and ensuring its services to customers, through an organization attentive to the needs and constantly aimed at service quality, efficiency, innovation, data protection and environmental protection in order to ensure and improve the satisfaction of its customers and stakeholders, environmental protection and health and safety needs of citizens and its workers. It is also strongly committed to road safety and to the fight against corruption in line with Group policies.

In compliance with the principles of economic, environmental and social sustainability, Sinelec is constantly committed to ensuring that its action is aimed at achieving the following objectives:

- **compliance with applicable legal and other requirements and obligations;**
- research and adoption of all the technological, organizational and procedural solutions functional to the **continuous improvement of the regularity and quality of the services provided, as well as environmental protection, health and safety of workers and road**

**safety, use of sustainable resources** in compliance with the economic and management balance of the Company;

- **focus on the customer** by listening and identifying his needs and expectations, in compliance with the contractual requirements agreed or defined by the competent authorities;
- **environmental protection**, including the prevention and reduction of pollution, environmental impacts and other specific commitments relevant to the organization's context;
- **safe and healthy working conditions** for the prevention of work-related injuries and illnesses;
- elimination of dangers and **reduction of health and safety risks**;
- **reduction of road traffic risks**;
- adoption of an **Integrated Management System** in compliance with international standards and reference protocols/documents and **integration of the relevant requirements** with business processes and awareness of personnel on the implementation of related documents and requirements;
- use of the **process approach, plan-do-check-act** and **risk-based thinking** in business/operational planning and management at all levels;
- **continuous improvement** of the effectiveness of the Integrated Management System and consequently of its performance;
- incentive to **consultation** and **active participation** of workers and workers' representatives for the continuous improvement of the management system;
- communication and dissemination of economic, environmental and social performance to customers, suppliers and all external stakeholders, **raising** their **awareness and involving** them, as collaborators in the development process, in the sharing of **business objectives** in synergy with those of the ASTM Group;
- **attention to the community, open dialogue** with all interested parties and constant **collaboration with the authorities** and all people working within the company or on its behalf;
- respect for professional secrecy and **protection of the personal and sensitive data** of those involved, in accordance with the relevant regulations on the processing of personal data and security of information.

This Policy shall provide the framework for establishing and reviewing the goals and objectives, at every level, of the Company, involving all stakeholders.

Management promotes, implements and disseminates the Integrated Management System Policy Document to its employees through the appropriate functions and undertakes to communicate and disseminate this Policy, gradually and as necessary, also to external collaborators and subcontractors.

The whole personnel must collaborate for the pursuit of the general objectives indicated above and for the specific ones that are periodically defined, aware that the commitment to quality, environment, health and safety, road safety and sustainability is an integral part of its job.

Management is responsible for ensuring and monitoring that this Policy is adhered to, implemented, and maintained and that the Integrated Management System is therefore supported, implemented, updated, and continuously improved **in accordance with applicable compliance obligations**.

Top Management undertakes, within the framework of Group policies, to determine and provide the necessary resources to implement, maintain and improve the management systems adopted, to periodically review this Policy document in order to keep it consistent with the strategic choices and guidelines of the Company and the Group, as well as to disseminate it as widely as possible both within and outside the Company.

*The Chief Executive Officer*

Andrea Nicolini

Review	Description	Date
First Review	First issue	29.07.21