

Anti-Corruption, Compliance & Integrity Policy (ACCI)

Q-Park creates added value for customers and other stakeholders. Our reputation is and will continue to be based on integrity. Openness and transparency in communication, as well as ethical, accountable and reliable behaviour are of great importance.

The ACCI Policy provides rules on offering and accepting entertainment, gifts, speaking engagements, conflicts of personal and business interests, property transactions, confidentiality, ancillary positions, use of Q-Park property and the obligation to report malpractices.

Objectives and scope

The objective of the ACCI Policy is to help employees to conduct business with integrity and outlining the standards to which all employees of Q-Park are held.

All Q-Park employees are obliged to comply with the ACCI Policy & *will participate in periodic anti-corruption compliance training programs offered by Q-Park.*

Company employees who violate the ACCI-Policy may be subject to disciplinary action, up to and including termination.

Furthermore, third parties are obliged to comply with the ACCI Policy if they represent Q-Park or act on behalf of Q-Park.

Supervisor

The Corporate Director Legal of Q-Park is appointed as Head Supervisor ACCI Policy ('Head Supervisor').

In each country, Q-Park appointed a local Supervisor of the ACCI Policy ('Local Supervisor') who is responsible for the compliance with the ACCI Policy in their country.

The Head Supervisor is appointed as the Local Supervisor of the head office of Q-Park.

The Local Supervisors fulfil a position of trust and exercise the greatest possible care in dealing with the issues brought to his/her attention.

Local Supervisors can consult the Head Supervisor for advice if deemed necessary.

Zero tolerance on corruption and bribery

Q-Park will not tolerate bribery, kickbacks, or corruption of any kind, directly or through third parties, whether or not explicitly prohibited by this Policy or by law. Similarly, Q-Park employees may not solicit or accept such payments.

Q-Park employees are not permitted to give or offer anything of value, directly or indirectly, to any public official.

Furthermore, Q-Park employees are not permitted to give or offer anything of value, directly or indirectly, to a commercial party for the purpose of improperly obtaining or retaining a business advantage.

“Anything of value” should be broadly interpreted to include cash, gifts to family members, forgiveness of a debt, loans, personal favours, entertainment, meals and travel, among other items. Specific rules on gifts and offers of entertainment are set out in this Policy.

Q-Park employees are also prohibited from making “facilitation payments,” those relatively insubstantial payments made to facilitate or expedite routine governmental action.

Offers of entertainment

Offers of entertainment may be accepted or made where they are necessary to develop and maintain good business relationships. Offers of entertainment include for example: dinners, invitations to events and travels.

- It is not allowed to provide offers of entertainment to public officials.
- It is not allowed to provide offers or entertainment in order to receive a service in return.
- Offers of entertainment to business contacts¹ must have the offering Q-Park employee to attend in order to host his guest(s). The offer must have a business element. For example, it promotes good relationships, or it follows a meeting.
- Offers of entertainment by a Q-Park employee to business contacts cannot be made if this could lead to a conflict of interest between the invitee and his or her employer or client.

- Offers of entertainment that might be seen as excessive, as putting somebody under an obligation, should be avoided.

When offering entertainment, Q-Park employees must state that Q-Park assumes that acceptance of the entertainment is in accordance with the compliance rules within the company where the person concerned works.

Gifts

Business gifts² may be exchanged to reinforce good relationships. Employees must take care to ensure that such gifts cannot be considered as an incentive for future favourable reference or a reward for a certain service.

- It is not allowed to provide gifts to public officials.
- It is not allowed to provide gifts in order to receive a service in return.
- Gifts cannot be offered if this could lead to a conflict of interest between the receiver and his or her employer or client.
- Whether given or received, gifts must remain within reasonable limits.
- Gifts given by an employee or by Q-Park will only be sent to the business address of the person concerned.
- When offering gifts, Q-Park employees must state that Q-Park assumes that acceptance of the gift is in accordance with the compliance rules within the company where the person concerned works.

Speaking engagements

As a general rule, invitations to speak at a commercially sponsored conference should only be accepted when it provides a good opportunity for Q-Park to interact with a relevant audience.

Where fees, entertainment and/or gifts are offered, it should be dealt with in accordance with the Q-Park ACCI Policy. These rules also apply to the publication of articles and to media appearances.

Confidentiality

Employees must maintain complete confidentiality to third parties regarding all confidential business matters in so far as this does not conflict with a statutory duty to disclose that information. The duty to observe confidentiality remains in force even

after termination of the employment contract. The Local Supervisor may grant a written exemption.

Conflicts of personal and business interests

Without prior written permission from the Local Supervisor employees may not enter into private transactions with any person or organisation with whom they maintain contact as part of their job at Q-Park. Private transactions are also understood to include transactions for spouses, partners, relatives and relatives by marriage up to and including the third degree.

In order to avoid the semblance of a conflict of interest the Local Supervisor may impose further restrictions on a transaction.

Property transactions - confidential information

Employees may not conduct any parking property transactions without prior written consent from the Local Supervisor³. Property is also understood to include property investment funds in the widest sense; transactions are understood to include acquisition, development, disposal or participation. Conducting transactions using confidential information of Q-Park is forbidden under all circumstances.

Ancillary positions

Employees may only accept a paid or unpaid ancillary position after obtaining written permission from the Local Supervisor if this might raise the semblance of a conflict of interests with those of Q-Park.

Use of Q-Park property

Employees may only use Q-Park property for business purposes and/or other purposes after obtaining written permission from the Local Supervisor⁴. Q-Park property includes computers, debit and credit cards.

Unforeseen cases

If a specific situation arises that is not described here but is in conflict with the spirit of the ACCI Policy, the Local Supervisor will decide on the application of the policy and if necessary, will recommend the employer to take sanctions.

Obligation to report

Employees are obliged to report irresponsible, unethical or unsound conduct of other Q-Park employees. In this, a distinction may be made between notification of incidents or of abuses. If unintentional, a breach of the ACCI Policy will be treated as an incident. An employee is expected to report such an incident him/herself.

However, should that not be the case, other employees will be expected to report the incident. Any incitement to breach the ACCI Policy must also be reported. A deliberate breach of the ACCI Policy will be considered as abuse.

In certain countries, a local Q-Park whistle-blower scheme may be applicable and set out in a separate policy. Employees in those countries should solely rely on such local Q-Park whistle-blower scheme with regard to reporting (suspected) incidents and abuses.

Responsibility on behalf of the person reporting

Employees must not be discouraged from reporting an incident or an abuse. The employee must be confident that his/her report will be treated very carefully and confidentially at a sufficiently high level in the organisation and that it will eventually lead to a decision. Nor may a report made in good faith lead to negative consequences for the individual who made that report.

The individual making the report will always be informed of the major conclusions of the final investigation, even if it transpires that the notification was unjustified. If the investigation concludes that the individual making the report acted otherwise than in good faith and deliberately made a false notification, disciplinary measures will be taken.

Who to report to

Incidents and abuses should preferably be reported to the Local Supervisor, but an employee may instead report the incident to his/her immediate superior or a manager with a higher position in the organisation. The latter will inform the Local Supervisor in consultation with the individual making the report.

Procedures on receipt of a report

Registration

As soon as a report of an incident or abuse is made known to the Local Supervisor, he/she will document the report in writing in a confidential incident register internal to the company. In documenting the report, the Local Supervisor will treat the details of the individual making the report with the utmost care. The progress of the investigation, including the meeting reports, the names of those involved in the matter, the decisions taken during the investigation and the major and other conclusions will be documented in the register. The Local Supervisor will report on his/her work to the Head Supervisor and Country Director on a yearly basis.

Internal or external investigation

The Local Supervisor will conduct the investigation into the report him/herself or will draw up an investigation plan, with or without the assistance of a third party. Depending on the gravity of the report and the organisation's relevant policy, the Local Supervisor will involve external investigating bodies in the investigation. The Local Supervisor will decide after approval by the Head Supervisor and in coordination with the country director whether to start legal action. This can be civil, criminal, or a combination of both. The Local Supervisor will decide on the relevant sequence after approval by the Head Supervisor and in coordination with the country director.

Sanctions

In the event of a breach of the ACCI Policy by an employee, Q-Park may impose sanctions on any company employee who violates the ACCI Policy & may be subject to disciplinary action, up to and including termination, depending on the gravity of the matter.

1. *Business contacts may of course also be personal friends. However, if any hospitality is in conflict with the spirit of Q-Park's ACCI Policy, seek guidance accordingly.*
2. *Sometimes it would be rude to refuse a gift. It helps to have thought about this in advance and have guidance prepared. For example, the gift could be accepted but returned later with a letter of explanation. Or, its value might be donated to charity. But the giver should be told what you have done and why, to avoid gifts of value being presented on other occasions.*
3. *An exception is made for the acquisition, development and disposal of a private parking space for personal use.*
4. *An occasional private e-mail or phone call is not considered to be in breach of the policy.*