

# WHO WE ARE

## VISION & MISSION



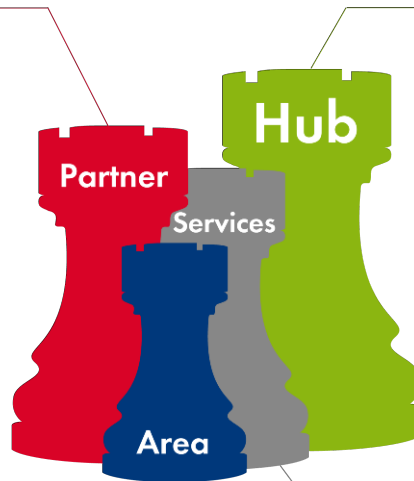
### Operator to Partner

Q-Park moves from traditional parking operator to sustainable **mobility partner**



### Location to Area

Q-Park moves from parking facility perspective to **area perspective**



### Facility to Hub

Q-Park moves from operating parking facilities to building **Mobility Hubs**



### Space to Services

Q-Park moves from providing parking spaces to enabling **mobility services**.

We are one of Europe's leading parking infrastructure owner and operator with more than 677,000 parking spaces in over 3,400 well-managed commercial parking facilities across seven Western European countries.

We mainly operate off-street parking spaces owned by us as well as parking spaces under concessions and long-term leases from public and private landlords.

We demonstrate that effective regulated and paid parking make an economic and sustainable contribution to cities and society, and that a positive parking experience impacts how people enjoy their visit, journey, shopping, commute or residence.

We have numerous mobility hubs which provide access to a variety of sustainable mobility services. Supporting urban accessibility, sustainability and liveability.

We provide sustainable mobility services such as:

- | last mile logistics and locker walls;
- | EV charging points and EV fleet charging hubs;
- | public transport, car sharing and bicycle parking.

### Sustainable Mobility

#### Mobility hubs are the solution

We seek to combine public and private modes of transport with public and private parking facilities. When transport nodes converge, they form a hub, making individual and sustainable mobility feasible. Meeting the needs of residents, commuters, visitors and the economic function of an urban area.

#### Sustainable Mobility Partner (SMP)

As sustainable mobility partner, Q-Park helps get SUMP moving in the right direction. We contribute our considerable knowledge and experience. Together with our partners we seek ways to make sustainable mobility in urban areas successful. Measures we can help introduce include:

- | transitioning from on-street to off-street parking;
- | transforming search traffic to destination traffic with smart navigation and pre-booking;
- | facilitating EV charging and shared mobility;
- | providing bicycle parking solutions;
- | offering logistics services at the edge of the city and before low- and zero-emission zones.

### Vision

We aim to be the most preferred and recommended parking partner at strategic locations in Western Europe, based on functional quality, operational

# POLICIES & CODES

Monday, 16 March 2020

## Introduction

This document sets out the Privacy Policy of the Q-Park Group ('Q-Park'). This Privacy Policy document ('the Privacy Policy') specifies how Q-Park handles personal data.

The purpose of the Privacy Policy is to provide principles and guidelines on how to manage and protect personal data. The Privacy Policy is also intended to clearly define tasks and responsibilities involved in the protection of Personal Data (also known as privacy governance). The policy is formulated more specifically in operational documents, work procedures and work agreements for each department.

## Privacy as an aspect of the mission statement

Q-Park's mission statement reads as follows: Q-Park improves the quality of life by providing clean and safe parking facilities that are operated according to the pillars of convenience, reliability and hospitality. Privacy comes under the reliability pillar. Ensuring that Q-Park takes a responsible approach to how it handles the personal data of its customers, employees and suppliers not only enhances the company's trustworthiness, but also ties in with the company's ultimate goal: Quality in parking.

## The use of Personal Data

Q-Park collects and uses the personal data of its customers, employees, contacts, suppliers and other business relations. One defines personal data as data relating to an identified or identifiable natural person.

Q-Park has drawn up this Privacy Policy so that people working for Q-Park can take note of it. Q-Park requires them to comply with the provisions of this Privacy Policy. Q-Park's aim is to ensure that each person acts as carefully as possible in conformity with national data protection law, and other national and European legislation governing privacy, including the General Data Protection Regulation ('GDPR').

Q-Park informs its customers and business relations about how it handles Personal Data in its Privacy Statement. The Privacy Statement is published on Q-Park's website.

Q-Park has appointed Privacy Officers ('PO'). The PO is the internal and external contact for all privacy-related matters and ensures that Q-Park processes the Personal Data in accordance with the relevant legislation. The PO prepares an annual report on his or her activities and maintains contact with the national privacy regulatory, the Data Protection Authority.

## Definitions

The following terms are defined in keeping with and in addition to national law:

- | Controller: the natural person, legal entity or any other party or administrative body that determines the purpose and means of processing Personal Data, acting alone or with others.
- | Data Protection Authority: The national regulatory authority that oversees the implementation of and compliance with the various privacy laws and regulations.
- | Data Subject: The Data Subject is the person whose Personal Data is processed by an organisation. This is the person to whom the Personal Data is related.
- | File: a structured set of Personal Data, regardless of whether this data set is centralised or functionally or geographically distributed, which can be accessed according to certain criteria and relates to various people.
- | Personal data: all data relating to an identified or identifiable natural person.
- | Employees: people employed by or working for the Controller.
- | Privacy Officer: the person who internally supervises the processing of Personal Data.
- | Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording,

organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- | Processor: the person who processes Personal Data for the Controller, without being subject to the Controller's direct authority.
- | The Act: national data protection law / General Data Protection Regulation (GDPR).

### **Scope**

This Privacy Policy covers all fully or partially automated processing of the Personal Data of Data Subjects (customers, suppliers, employees) and the underlying documents that Q-Park keeps in a file and data for which Q-Park is responsible. This policy also covers the non-automated processing of Personal Data that is kept in a file or is intended to be kept in a file.

### **Document structure**

The structure of the Privacy Policy is based on the General Data Protection Regulation (GDPR) and the guidelines and policy rules of the Data Protection Authority.

### **Concluding remarks**

Q-Park reserves the right to amend the Privacy Policy in the future. The latest version of the Privacy Policy is held by the PO and available upon request. That latest version is the binding version.

This Privacy Policy is published on the corporate website.

### **Term of validity**

The Privacy Policy is approved by the Executive Board under the articles of association. This document is also assessed at least once a year and reviewed by the internal owner of the compliance area if necessary and approved by the national director. The policy may also be reviewed on an interim basis if there is a reason to do so (major reorganisation, legislative amendment, results of risks analyses, etc.).

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## 1. What Personal Data does Q-Park process?

Q-Park processes the data of its customers and employees. It determines the purpose and means of processing the Personal Data, which makes Q-Park the Controller within the meaning of the GDPR.

Q-Park may process the following Personal Data (not necessarily in every country):

- | Contact details (name and address, telephone number, e-mail address)
- | Bank account number (IBAN)
- | Creditcard details
- | Vehicle registration number
- | Photos (for general parking facility bans)
- | Details concerning unlawful or objectionable behaviour in relation to a ban resulting from that behaviour
- | Date and place of birth of persons causing nuisance
- | Criminal data
- | Location details (Q-Park App, Track & Trace system for company cars)
- | Video recordings
- | Voice recordings
- | Certificate of good conduct
- | Human Resources data (performance interviews, salaries, administration, sickness absence, etc.)

### **Sensitive Personal Data**

Q-Park collects and processes sensitive Personal Data including: Social Security Number and personal data concerning race, health, religious beliefs and sexual orientation by processing CCTV images. The GDPR also defines other data as sensitive Personal Data. However, this data is not processed by Q-Park and is therefore not mentioned here.

## 2. Reasons for processing Personal Data

Q-Park processes Personal Data only for one or more of the following reasons:

- I The Data Subject has granted unambiguous consent for the data to be processed.
  - I Personal data may be processed if the Data Subject has given explicit consent (preferably in writing, such as by e-mail) for this to be done. Consent must be granted for the specific processing for which consent is required. If the data is being processed for several purposes, separate consent is required for each type of processing. The consent must be kept as evidence.
  - I This relates to matters such as:
    - I Direct marketing
    - I Newsletters
    - I The use of cookies on the Q-Park websites
    - I Q-Park App
  - I Data Subjects can refuse or withdraw their consent at all times. If a Data Subject refuses or withdraws consent, the processing of that person's Personal Data must stop immediately.
- I The data needs to be processed to perform an agreement to which the Data Subject is a party or to take pre-contractual measures in response to a request made by the Data Subject and which are necessary to conclude an agreement.
  - I This is the reason why Q-Park processes data in the most cases. This includes processing Personal Data for:
    - I Parking in one of the Q-Park parking facilities.
    - I Effecting a season ticket.
    - I Executing an employment contract.
- I The data needs to be processed to be compliant with a legal obligation affecting Q-Park.
  - I This could include issuing Personal Data under a warrant issued by the judicial authorities or the Tax and Customs Administration.
- I The Personal Data needs to be processed to protect a vital interest of the Data Subject.
  - I This could relate to a vital medical interest of the Data Subject being at stake; a situation that will not generally arise at Q-Park.
- I The Personal Data needs to be processed to protect a legitimate interest of Q-Park or a third party to which data has been issued.
  - I The following additional criteria must be met before this legal ground for processing is applicable:
    - I Q-Park or the third party will be unable to pursue its activities correctly if it does not process the Personal Data;
    - I Q-Park or the third party has no other or less drastic ways of achieving its legitimate interest;
    - I The infringement of the rights of the Data Subject (right to the protection of privacy) does not outweigh the interest of Q-Park or the third party.
  - I This could include:
    - I Customer surveys;
    - I Preventing and investigating actual or suspected legal violations;
    - I The rights, freedoms, health or safety of Q-Park employees.

The PO should be consulted upfront if there are doubts about whether there is a valid legitimate ground to process Personal Data.

### 3. Purposes of processing Personal Data

Q-Park processes Personal Data solely for the purpose for which it was obtained. The purpose must be clearly defined and the Data Subject must be informed of it in advance.

Q-Park processes the collected data for the following purposes:

- | Processing customer data in order to perform an agreement with the customer (for example number plate registration and season tickets);
- | Prevention of nuisance, registering alleged crime and denying access to the parking facilities: registering the Personal Data of Data Subjects for the prevention of nuisance and crime and to make it available to participating car park organisations to ascertain whether a person can be denied access to the parking facilities or has previously been issued with a warning;
- | Denying access to the parking facilities: the general parking facility ban is the method used by the participants to jointly deter burglars and people causing nuisance from their business premises in order to stop the increasing nuisance in and around parking facilities;
- | Improving safety/security in and around parking facilities;
- | Combating/preventing car break-ins and nuisance;
- | 'Projecting' prevention;
- | Discouraging people from causing nuisance at parking facilities;
- | Improving the business climate;
- | Raising the organisational level of entrepreneurs;
- | General parking facility bans.

Personal data may be processed for a purpose other than that for which it was collected, provided the PO has given his or her prior written permission. However, it is important to ensure that the two purposes are related and that there are no adverse effects on the Data Subject or on the guarantees given in this regard, e.g. through:

- | Limiting access to the Personal Data;
- | Additional confidentiality obligations;
- | Additional security measures;
- | Informing the Data Subject about the processing of his Personal Data for other purposes;
- | Offering an opt-out against processing Personal Data for other purposes;
- | Obtaining prior permission (opt-in) from the Data Subject.

Always consult the PO to check whether additional measures should be taken and, if so, which measures. In cases where Personal Data is used for another purpose, this must always be documented and extra guarantees must be put in place.

#### 4. Quality of the processing of Personal Data

Personal data may only be processed in a way that is necessary to meeting the purpose of collecting it. This implies that:

- a. No details may be processed if this is not necessary to meet the intended purpose (no excessive data processing);
- b. All data needed for the purpose must be processed (not processing insufficient data);
- c. No data is processed if it is not required for the purpose. Only the data necessary to achieve the purpose may be processed.

The Personal Data must be correct, accurate and complete and must be kept up to date where necessary to the purpose. Q-Park periodically takes action to ensure that the quality of the processing of Personal Data is maintained at the required level.

#### 5. Retention period and destruction of Personal Data

The retention periods applicable to the data processing are laid down in a separate 'retention period' document.

Q-Park retains Personal Data exclusively:

- a. Where necessary in view of the relevant purposes;
- b. Where doing so can reasonably be considered necessary to comply with current statutory obligations;
- c. Where doing so is advisable in view of a current time limit;
- d. Where doing so is advisable in view of disputes (or dispute settlement).

The Personal Data is no longer used after the retention period/destruction period. At the end of the retention/destruction period, the Personal Data must be carefully and protectively destroyed or anonymised in such a way that it can no longer be traced back to a person. This will be monitored by means of random checks.

Q-Park ensures that Personal Data of the Data Subjects (also if third parties are involved) is destroyed if:

- a. The Personal Data is no longer needed for the purpose for which it was processed;
- b. The Data Subject has withdrawn permission for the data to be processed and there is no other legitimate ground for processing it;
- c. The permissible retention period has expired and there is no other legitimate ground for processing the data;
- d. The processing does not meet the legislative requirements.

This will be monitored by means of random checks coordinated by the PO.

## 6. Information sources

Q-Park only processes Personal Data that originates from the following sources:

- a. Data obtained from the Data Subject;
- b. Data obtained from employees;
- c. Data obtained from the police.

The PO's explicit permission is required to process Personal Data that originates from other sources.

## 7. Direct marketing

Q-Park will not use the Personal Data for direct marketing purposes without the explicit consent (opt-in) of the Data Subject. Direct marketing is defined as: contacting a Data Subject by means of e-mail, letter, SMS, MMS, telephone, social media or paying visits or other forms of contact for commercial purposes. The fact that commercial information is involved will be clearly communicated to the Data Subject. In the case of direct marketing, Q-Park will clearly inform the Data Subject about their right to opt out (free of charge) and how they can exercise it.

The consent outlined above is not required if:

- a. Q-Park has obtained the necessary Personal Data directly from the Data Subject; and
- b. it was obtained no longer than one year prior to the direct marketing for the sale of an identical or similar product or service.

It should be noted that Q-Park entities are able to make use of this exception only for direct marketing to its own customers, such as users of a Q-Park season ticket.

Q-Park keeps a database of which Data Subjects have made use of their opt-out or opt-in or have registered with Do Not Call Registers or Post Registers. Q-Park will clean up the files of Data Subjects who have been selected for direct marketing using Postfilter (linked to National Registers of Death and Post Registers). Q-Park will only contact Data Subjects who are listed in Do Not Call Registers by telephone if they have granted their consent for this.

In the case of direct marketing or other commercial communications, the name, address and contact details of the relevant entity of Q-Park will always be made recognisable to the Data Subject.

Q-Park is responsible for the direct marketing carried out by a third party engaged by Q-Park and will make agreements with that third party and lay them down in a processor's agreement on complying with the relevant laws and regulations and complying with Q-Park's



instructions. Q-Park will not sell Personal Data to third parties without the Data Subject's consent.

## 8. Right to inspect, amend, delete and object

The PO must be informed if a Data Subject wishes to exercise their rights. These are the Data Subject's rights to inspect, amend, delete and object to Personal Data. A Data Subject's request to exercise one of these rights will always be processed in line with the instructions of the PO.

### Access request

All Data Subjects have the right to apply to Q-Park for a summary of their Personal Data processed for or on behalf of Q-Park. This request must be met in writing within four weeks. Where reasonably possible, this summary must include:

- a. A complete summary of which data of the Data Subject is processed by Q-Park;
- b. A description of the purpose or purposes of processing the data;
- c. The categories of processed data;
- d. The names of third parties that have received the Personal Data;
- e. If available, information about the origin of the Personal Data.

Q-Park is also obliged on request to provide information about the system used to automatically process the data.

Q-Park must ascertain that the person requesting the information is also the person about whom information is being requested. If the Data Subject is under the age of 16 or has been placed under guardianship, an access request can also be made by the legal representative.

### Request to correct/supplement/delete Personal Data

If the Personal Data is incorrect or incomplete or not compliant with the current laws and regulations, the Data Subject has the right to have it corrected, supplemented, protected or deleted. If data is corrected, Q-Park must inform third parties who have been issued with the Data Subject's incorrect data of the amendments.

### Objection by the Data Subject

The Data Subject also has the right to object to the processing of their Personal Data on the basis of compelling personal grounds unless the Personal Data needs to be processed for one of the reasons provided for in Article 2 of this document.

### Refusal of a request

Q-Park can refuse a Data Subject's request if:

- a. The request is not sufficiently specific;
- b. It is not possible to establish the Data Subject's identity with reasonable certainty;
- c. The data processing is permitted in the context of a fraud investigation, a statutory obligation or a legal procedure;
- d. The request follows a previous request within an unreasonable interval or the request constitutes an abuse of the Data Subject's rights. An interval of six months or less will generally be regarded as unreasonable.

The Data Subject will be informed that a request has been turned down in accordance with the PO's instructions.

## 9. Security

### Personal Data security

Q-Park has put appropriate technical and organisational measures in place to protect the Personal Data against abuse and unlawful or unauthorised destruction, loss, amendment, disclosure, acquisition or access.

### Access to Personal Data

Q-Park has a management system based on roles and rights to ensure that only authorised users have access to a defined set of data, including Personal Data, which they need for the performance of their duties. The management system is tested annually during the routine audit cycle. Employees with access to Personal Data are subject to a non-disclosure agreement. Also, all employees need to work in accordance with the Code of Conduct.

### Data breach/security breach

All data breaches involving Personal Data must be reported internally and documented by the PO. Any employee or Processor can report a data breach. The matter can also be reported by somebody from outside of the company to a Q-Park employee. The report must be made directly by telephone to the PO and confirmed in writing. The PO aligns with the internal owner of the GDPR compliance area and establishes. The owner of the GDPR compliance area decides on the measures to be taken to resolve the breach and its implications in consultation with the Executive Board under the articles of association and the Legal department. For the complete procedure, see 'Data Breach Procedure'.

## 10. Transfer of Personal Data to third parties

Q-Park is permitted to transfer Personal Data to third parties or to grant third parties access to Personal Data held in Q-Park's systems provided that the following requirements are met:

- a. The third party processes the Personal Data on behalf of Q-Park and the Personal Data is obtained and processed by Q-Park in accordance with this Privacy Policy;
- b. Q-Park has concluded an appropriate processor's agreement with the third party, which has been approved by Q-Park's Legal department;
- c. Before transferring the Personal Data to the third party, Q-Park has verified that the third party has taken sufficient technical and organisational measures to protect the Personal Data against loss or any form of unlawful processing (including unnecessary collection or further processing);
- d. Q-Park performs risk-based monitoring on the main Processors;
- e. Q-Park remains responsible for the Personal Data processed by a third party within the meaning of national legislation and the GDPR.

## 11. Data Privacy Impact Assessments (DPIA)

Q-Park performs Data Privacy Impact Assessments ('DPIA') to document the infrastructure and performance of the ICT systems it uses to process Personal Data.

By performing a DPIA, Q-Park tests, assesses and identifies the risks involved in processing Personal Data. Q-Park also performs DPIAs to establish whether previous or potential measures are or will be effective. High-risk processing operations include:

- a. Processing sensitive Personal Data;
- b. Processing large amounts of Personal Data;
- c. Automated decisions made by systems regarding Data Subjects;
- d. Processing the Personal Data of children and genetic or biometric Personal Data;
- e. Behavioural targeting (registering the digital viewing behaviour of website visitors to obtain information about their interests and behaviour) and profiling;
- f. Other processing operations requiring the prior approval of the regulatory or PO.

The PO indicates whether a DPIA is to be performed and helps the designated DPIA manager to perform it. The Privacy Officer designates the manager responsible for performing the DPIA. The PO assesses the content of the DPIA and asks additional questions or proposes measures if necessary.

### Privacy by default

Q-Park plans to set up new infrastructure that only processes essential Personal Data that is needed for a certain purpose and period of time. When setting up the new infrastructure, attention will also be paid to the accessibility of Personal Data: only employees who need access for the performance of their duties and who have signed a non-disclosure agreement will have access to Personal Data.

## 12. Privacy Officer (PO)

Q-Park has appointed a Privacy Officers ('PO') to oversee compliance with this Privacy Policy. The PO is in all cases responsible for:

- a. Overseeing compliance with Q-Park's Privacy Policy;
- b. Keeping records of the systems used to process Personal Data at Q-Park and managing these records;
- c. Answering internal and external questions regarding the processing of Personal Data as described in this Privacy Policy;
- d. Handling inspection requests from Data Subjects;
- e. Handling complaints from Data Subjects;
- f. Granting permission to process Personal Data for purposes other than those for which they were collected and, if necessary, deciding on additional guarantees in this regard;
- g. Granting permission to process special Personal Data under a national or international obligation;
- h. Acting as the first point of contact at Q-Park for the national regulator, the Data Protection Authority;
- i. Commissioning external audits on compliance with this policy in consultation with with the Head of Compliance and the internal owner of the GDPR compliance area;
- j. Organising and giving training on the Privacy Policy and current developments;
- k. Supervising the documenting and reporting of data breaches;
- l. Conducting and monitoring of DPIAs;
- m. Drawing up and managing annual reports on the Privacy Policy and its pursuance for the Executive Board.

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### 13. Privacy management

Privacy is embedded in the Q-Park organisation in the sense that the final responsibility is placed with Q-Park's Executive Board under the articles of association. The Executive Board has appointed an internal owner of the GDPR compliance area to draw up, monitor and rectify the Privacy Policy (possibly together with others) and POs for local implementation supported by a project team. Each Q-Park Region / country also provides one or more employees to draw attention to, support and implement the privacy project.

The PO informs and instructs the organisation on the importance of privacy and creates awareness of the Privacy Policy and its legal framework. Employees are informed by means of workshops, meetings and newsletters.

#### Processes

The privacy risks of all new business processes are recorded by testing the project plans against a DPIA Quickscan. A full DPIA is carried out if a DPIA Quickscan scores 5 or more (out of 10). All existing business processes involving Personal Data processing are also periodically assessed and any necessary measures are taken to raise the privacy level.

A DPIA Quickscan is added to the project plan for all new projects. A DPIA Quickscan is carried out to determine on the basis of ten simple questions whether it is useful, desirable or necessary to carry out a full DPIA.

A full DPIA is carried out if the DPIA Quickscan has a high score (5 or more questions answered with 'yes'). A DPIA is used to assess the privacy risks of a new application, service or product. How the risks are to be mitigated is determined for each project on the basis of the identified risks.

#### Continuous monitoring

Q-Park sets out to meet its privacy compliance objectives by mapping out its current business processes more clearly and assessing the privacy aspects of new projects. This forms the basis of a transparent

monitoring system in which processes are evaluated at predetermined times and the privacy aspects of projects are evaluated on commencement.

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#### 14. Complaint procedure

Data Subjects have the right to use Q-Park's complaints procedure to file complaints about compliance with the laws and regulations governing the protection of Personal Data. The Customer Service department registers complaints about privacy and settles them in accordance with the complaints procedure. The Customer Service department informs the PO about the complaints it has received on a weekly basis.

#### Compliance with the Privacy Policy

The PO promotes compliance with this Privacy Policy by providing training for Q-Park employees who have access to Personal Data. The first-line management bears initial responsibility for the measures to be taken to protect Personal Data. If necessary, the Privacy Officer can advise the department in question on the measures to be taken to ensure compliance with this Privacy Policy. The PO also ensures that the department puts these measures in place.

Q-Park employees who act contrary to this policy may face disciplinary measures.

#### 15. Privacy & Cookie statement

The Privacy Statement is published on Q-Park's website. The Privacy Statement, like the General Terms and Conditions, is issued for all legal acts with natural persons. Accordingly, the correct links to the statement are given on all Q-Park websites. All Q-Park websites are required to provide a link to the statement on the main website. The PO manages and makes any necessary amendments to the Privacy Statement. The Privacy Statement makes reference to the Privacy Officer. Each country will include their national Q-Park privacy e-mail address in their national Privacy Statement. The PO is the person to contact for questions, comments and complaints.

The same applies to the Cookie Statement as to the Privacy Statement, in that its content is also managed by the PO.

## 16. Camera surveillance, access passes and visitors

### Camera surveillance

Q-Park uses cameras at its premises and parking facilities. Q-Park does not keep recordings for any longer than required. There is a separate procedure for viewing and sharing these recordings with third parties. For more information, see the Camera Policy.

### Access passes

Q-Park employees can be issued with an access pass that they use to open doors of Q-Park Offices. The passes are registered by name and the use of the passes is logged in the system. There is a separate procedure for obtaining these details and log files.

### Visitors

Visitors of Q-Park Offices must always sign in before being admitted to a Q-Park Office. Visitor records must be deleted within three months of the visit.

### Concluding remarks

Q-Park reserves the right to amend the Privacy Policy in the future. The latest version of the Privacy Policy is held by the PO and available upon request. That latest version is the binding version.

#### Summary:



This Privacy Policy document ('the Privacy Policy') specifies how Q-Park handles personal data.

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# COMPETITION LAW POLICY

Monday, 16 March 2020

## Introduction

Q-Park adheres to its commitment to comply with the laws and principles of national and international competition law. The reputation and long-term success of Q-Park is and will continue to be based on integrity. This comes with competitive practices that are both fair and lawful.

The purpose of competition regulation is to ensure and maintain effective competition. As such, competition law prohibits companies from engaging in activities that have the object or effect of preventing, restricting or distorting competition.

Infringement of competition law may lead to:

- | Heavy fines by competition authorities (e.g. up to 10% of Q-Park's annual revenue by the European Commission).
- | Damage claims by third parties in addition to fines imposed by competition authorities.
- | Individual sanctions against employees. National competition authorities can impose fines on employees for participating in competition law infringements.
- | Reputational damage to Q-Park.

This Competition Law Compliance Policy (the '**Policy**') provides rules and guidelines on:

- | Interactions with competitors
- | Abuse of a dominant position
- | Mergers and acquisitions

## Objectives and scope

This Policy is a tool to assist Q-Park's employees in identifying and reporting situations that may raise concern from a competition law perspective. More specifically, this Policy aims to:

1. emphasise Q-Park's continuous awareness to comply with international and national competition regulations,
2. create awareness among Q-Park employees regarding competition issues and
3. give guidelines helping Q-Park and its employees to act within the boundaries of competition law.

This Policy does not aim to provide definite answers to competition law questions and cannot therefore be regarded as legal advice. Please consult the legal department when any questions or doubts arise regarding matters discussed in this policy.

## Reporting / Questions

Please contact the legal department if you have any questions about potential compliance issues. The legal department is always available for any questions regarding this Policy.

Immediately inform the Executive Board if Q-Park becomes the subject of an investigation under competition law or whenever any evidence or allegations of a potential breach of competition law by Q-Park, its affiliates or employees arise.



### Interactions with competitors

Competition law recognises that companies develop their commercial policy independently of competitors. The fact that many Q-Park employees will from time to time interact with competitors potentially puts this principle at risk. As a result of the interactions between Q-Park and competitors, there are concerns that they may enter into agreements with each other or share commercially sensitive information and as such coordinate their market behaviour.

Some of the risks of interactions with competitors are discussed hereafter.

### Agreements with competitors

Competition law prohibits agreements or coordinated practices between companies with the object or effect of restricting competition. The concept of 'agreement' in this context is broad and covers many types or arrangements between competitors. For instance, simply receiving commercially sensitive information from a competitor may amount to an 'agreement'. In any arrangements with competitors, it is important to be aware of the following:

- | The form of the agreement is irrelevant. Oral agreements, 'gentlemen's agreements' and even informal agreements or actions that are taken with a 'common understanding' in mind (so-called 'concerted practices') may fall under the prohibition.
- | The intention of the agreement is irrelevant. It may be enough that the effect of an agreement prevents, restricts or distorts competition.

When a Q-Park employee interacts with a competitor they should especially avoid making any kind of arrangements concerning the following topics:

- | Prices and conditions
- | Market allocation (e.g. of territory or customers)

Always consult the legal department before entering into an agreement with a competitor.

### Information exchange between competitors

Competition law prohibits the exchange of commercially sensitive information that undermines the independent market conduct of companies. It may sometimes be difficult to determine whether information is 'commercially sensitive'. The following guidelines should be taken into account:

- | Specific information is more likely to be considered commercially sensitive information than general information.
- | Information that is current is commercially more sensitive than historical information.
- | Confidential information is, as a rule, more likely to be commercially sensitive than information that is publicly available.

In particular, always avoid exchanging information regarding:

- | Prices, discounts and profit margins
- | Customers
- | Operational plans, costs, etc.
- | Current or future commercial strategy (e.g. upcoming projects)
- | Joint purchasing (only when competitors buy many of the same products from one supplier)

Competition law recognises that cooperation and the exchange of information between competitors can sometimes be beneficial to competition and for consumers. However, competitors should be careful to act within the boundaries of competition law.

Always consult the legal department before sharing information regarding the discussed topics with competitors.

### Participation in trade associations

Particular care is required when employees participate in trade associations. Although gathering with competitors in this form is generally permissible, such meetings always come with the risk that regular conversations turn into discussions concerning illegal (commercially sensitive) topics. To avoid this, always try to meet members of the trade associations in a formal setting.

The following guidelines should be taken into account when participating in trade association meetings:

- | Agenda
  - | Set up and share an agenda for every trade association meeting so that it is clear for all participants which topics will be discussed. Incorporate any changes to the agenda into the minutes of the meeting. Do not discuss any topics that are not on the agenda.
- | Inform the legal department
  - | Contact the legal department before a meeting when you suspect that an item on the agenda may raise any competition concerns. If the meeting has started and you are still unsure whether a certain topic can be discussed, postpone any discussion on the topic until you can consult with the legal department to verify the issue.
- | Minutes
  - | When drafting the minutes make sure that they are accurate and complete.
- | Avoid commercially sensitive topics
  - | If a commercially sensitive issue is addressed during a meeting, terminate the discussion. The fact that you are present during this discussion can constitute an infringement of competition law.
- | Public distancing
  - | If the discussion on an anti-competitive topic does not stop
    - | leave the meeting,
  - | make sure this is reported in the minutes of the meeting and
  - | report the incident to the legal department immediately.

## (Informal) Tenders

Tender processes (formal or informal) are characterised by an organised sale or purchasing process. The organising party invites multiple parties to submit a bid. Each party then specifies the price and conditions against which it is willing to carry out the project.

These bidding processes are subject to competition regulations. The parties that (consider to) submit a bid are prohibited from colluding with competitors in any way.

Q-Park is not allowed to influence the outcome of a bidding process. The general principles related to dealing with competitors also apply to bidding processes. This means that Q-Park is for example prohibited from:

- | Discussing the terms of Q-Park's offer with competitors
- | Allocating the market (i.e. dividing tenders between competitors, for example by customer type or geographic territory)
- | Bid rigging (i.e. aligning the bidding behaviour of participating parties resulting in some parties knowingly submitting non-competitive bids)
- | Receiving a (financial) compensation to withdraw from the tender

Please consult the legal department if you have any questions regarding Q-Park's participation in a bidding process.

## Abuse of a dominant position

Having a dominant position on a relevant market is not illegal. The relevant market may, depending on the market characteristics be local, national or wider. It cannot be excluded that the relevant market for Q-Park may be considered local.

A dominant position allows a company to act to an appreciable extent independently of customers, competitors and suppliers. These companies therefore have a special obligation not to engage in anti-competitive conduct. If Q-Park has a dominant position, it may not abuse this position by driving competitors out of the market or exploiting its customers.

Market shares and market power are the two main criteria for determining whether a company has a dominant position. In general, dominance is unlikely when a company has a market share of less than 40%.

However, this would have to be assessed on a case by case basis.

Abusive behaviour by companies with a dominant position can take different forms. Examples of anti-competitive conduct are:

- | Practices related to pricing (e.g. charging excessive or loss-making prices)
- | Exclusive purchasing (i.e. requiring customers to purchase only from the dominant company)
- | Discriminating between customers (e.g. different prices for different customers)
- | Loss-making offers for tenders

Please consult the legal department to verify whether Q-Park has a dominant position and, if so, discuss the implications.

## Mergers and acquisitions

Q-Park may decide to merge with or acquire another company in the future. Competition authorities in the relevant countries may have to be notified of mergers and acquisitions so they can review if there are any competition concerns. Merger control regimes require approval of transactions (mergers and acquisitions) if certain thresholds are met.

In most cases, the main criteria applied by the competition authorities during a review are:

- | The merger or acquisition must not lead to the creation or reinforcement of a dominant position.
- | The merger or acquisition should not have the potential to reduce competition.
- | The merger (or parts of the merger) should not be implemented before merger control approval has been obtained.
- | The merging parties should not share commercially sensitive information before approval.

If a transaction fails to meet the first two criteria, the competition authority may prohibit the transaction or accept the transaction subject to certain conditions being fulfilled. Infringement of the last two criteria can result in heavy fines by the competition authority.

Please consult the legal department early in the discussion of contemplated mergers or acquisitions to evaluate whether the transaction has to be reported to a competition authority.

Parties that fail to report a qualifying transaction run the risk of being fined and/or having the transaction declared null and void.

This Policy is a tool to assist Q-Park's employees in identifying and reporting situations that may raise concern from a competition law perspective.

### Summary:



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# INTEGRITY POLICY

Sunday, 15 March 2020

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 Integrity 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 Integrity 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 Integrity Policy.

Furthermore, third parties are obliged to comply with this Integrity 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 Integrity Policy ('Head Supervisor').

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

## 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 contacts<sup>1</sup> 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 gifts<sup>2</sup> 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 Integrity 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

<sup>1</sup> Business contacts may of course also be personal friends. However, if any hospitality is in conflict with the spirit of Q-Park's Integrity Policy, seek guidance accordingly.

<sup>2</sup> 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.

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 property transactions without prior written consent from the Local Supervisor<sup>3</sup>. 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 Supervisor<sup>4</sup>. 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 Integrity Policy, the Local Supervisor will decide on the application of the policy and if necessary will recommend the employer to take sanctions.

<sup>3</sup> An exception is made for a private residence.

<sup>4</sup> An occasional private e-mail or phonecall is not considered to be in breach of the policy.

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### **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 Integrity 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 Integrity Policy must also be reported. A deliberate breach of the Integrity 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 Integrity Policy by an employee, Q-Park may impose sanctions which may vary from a warning to instant dismissal, depending on the gravity of the matter.



The Integrity Policy provides rules on offering and accepting items, the use of Q-Park property and the obligation to report malpractices.

### Summary:

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# TRADE SANCTIONS POLICY

Saturday, 14 March 2020

## I. Introduction

Q-Park BV and its subsidiaries ("Q-Park" or the "Company") are committed to conducting all aspects of its business in keeping with the highest legal and ethical standards and expects all employees and other persons acting on its behalf to uphold this commitment. In accordance with this commitment, the Company has adopted this Trade Sanctions Policy (this "Policy"), which is applicable to all directors, officers, and employees, as well as to agents, distributors, representatives, and other associated persons when acting on behalf of the Company (collectively "Company Personnel"). In brief, Company Personnel shall comply with all applicable trade sanctions laws, including the EU sanctions regulations, Office of Foreign Assets Control ("OFAC") sanctions regulations, the Export Administration Regulations ("EAR"), as well as the various UK Statutory Instruments which implement EU sanctions regulations and the UK Export Control Act 2002 (collectively "Trade Sanctions Laws"). Please note that Trade Sanctions compliance is also addressed separately in the Q-Park investment document.

This Policy and the internal controls herein have been designed to prevent violations of Trade Sanctions Laws from occurring, to avoid the appearance of wrongdoing, and to enable the Company to respond promptly and effectively to any inquiries about its conduct. The pages that follow provide a general guide to compliance with Trade Sanctions Laws, but do not address every potential scenario that may implicate issues bearing on compliance with this Policy.

Due to the serious consequences of violation of Trade Sanctions Laws, any employee who violates this Policy will be subject to disciplinary action, up to and including dismissal and immediate termination. Any Company Personnel who have questions concerning the requirements of this Policy should consult with the local General Manager of Q-Park. Company Personnel in the Q-Park head office should consult with Leo Stikkelbroeck (Corporate Director Legal) directly (Leo.Stikkelbroeck@q-park.com).

## II. European Union Sanctions

The Council of the European Union (the "Council") has adopted guidelines to impose sanctions within the framework of the Common Foreign and Security Policy ("CFSP"). Sanctions are imposed independently or to implement binding Resolutions of the U.N. Security Council. Depending on the specific sanctions regime, the competent authorities of the EU member states and the European Commission have unique responsibilities for implementing, enforcing and monitoring violations of the applicable sanctions.

The Council imposes EU sanctions through a CFSP Council decision adopted unanimously. Economic sanctions require additional legislation, in the form of a Council regulation, to give full legal effect to the sanctions. EU Regulations are directly applicable in EU Member States, so that entities incorporated or constituted under EU law, and persons and entities doing business in the European Union (including non-EU nationals) are subject to their provisions.

The EU sanctions regime includes arms embargoes, economic and financial sanctions, and restrictions on admission. Sanctions may target governments of third countries, non-state entities or individuals.

The competent authorities of Member States of the European Union are typically responsible for a wide range of enforcement activities, including determining penalties for sanctions violations, granting exemptions, reporting implementation of sanctions regimes, and liaising with U.N. Security Council sanctions committees for specific exemptions and de-listing requests.

Company Personnel should not assume a transaction is permissible pursuant to an exception or license without first consulting the local General Manager of Q-Park. Company Personnel in the Q-Park head office should first consult with Leo Stikkelbroeck (Corporate Director Legal) directly (Leo.Stikkelbroeck@q-park.com).

### III. United States Sanctions

OFAC is an office within the U.S. Treasury Department that has responsibility for administrating, implementing, and enforcing economic sanctions. There are two general categories of OFAC sanctions: (1) country-based sanctions programs and (2) list-based sanctions programs. Currently, OFAC administers comprehensive country-based sanctions targeting Cuba, Iran, North Korea, Syria, and the Crimea region of Ukraine (collectively "Embargoed Countries"), though this list may change from time to time. The prohibitions in the regulations generally prohibit U.S. persons (both juristic and natural) from doing business with the Embargoed Countries absent a license from OFAC. OFAC also administers non-comprehensive country-based sanctions programs that apply to targeted individuals and entities in specific countries (e.g., Belarus, Libya, Zimbabwe, and others). By contrast, OFAC's listed-based sanctions target individuals and entities participating in certain activities (e.g., narcotics trafficking, terrorism, and proliferation of weapons of mass destruction). OFAC's sanctions regulations prohibit transactions between U.S. persons and individuals and entities included on OFAC's Specially Designated Nationals and Blocked Persons List ("SDN List") and/or individuals owned or controlled by individuals or entities on the SDN List (collectively "Blocked Persons"). OFAC updates the SDN List on a regular basis.

OFAC's sanctions regulations also prohibit U.S. persons from "facilitating" activities by a non-U.S. person with Embargoed Countries or Blocked Persons that would be violative of the sanctions regulations if conducted by a U.S. Person. This means that U.S. persons may not assist or support transactions that would be prohibited if carried out by a U.S. person.

Through a licensing process, OFAC can authorize U.S. persons to engage in certain transactions that would be otherwise prohibited by the sanctions regulations. Additionally, certain exceptions codified in the sanctions regulations may allow the Company to do business with Embargoed Countries and Blocked Persons in certain

circumstances. Company Personnel should not assume a transaction involving an OFAC-restricted party is permissible pursuant to an exception or license without first consulting the local General Manager of Q-Park. Company Personnel in the Q-Park head office should first consult with Leo Stikkelbroeck (Corporate Director Legal) directly (Leo.Stikkelbroeck@q-park.com).

#### IV. United Kingdom Sanctions

The Foreign & Commonwealth Office has overall responsibility for the UK's policy on sanctions, arms embargoes and trade restrictions. Her Majesty's Treasury ("HM Treasury") has primary responsibility for administering, implementing, and enforcing the UK financial sanctions regime.

There is no single Act of Parliament that sets out the UK sanctions regime. Instead, sanctions are contained in a number of separate UK Statutory Instruments and/or EU Regulations. EU Regulations are directly applicable in EU Member States, so that entities incorporated or constituted under EU law, and persons and entities doing business in the EU (including non-EU nationals) are subject to their provisions. UK Statutory Instruments implement the sanctions imposed by EU legislation and apply to any person in the UK, all UK nationals and any entity incorporated or constituted in the UK.

The UK sanctions regime includes embargoes and trade and finance restrictions. Certain items and services are subject to qualified restrictions which require a license before they can be provided. Sanctions may be comprehensive and imposed against a particular country. For example, there are financial sanctions against Afghanistan, Iran, Iraq, Sudan, Zimbabwe, and North Korea (among others) that subject the government, all corporate entities and residents of a sanctioned country to an asset freeze. Additionally, sanctions measures may target specific individuals, entities and organizations (including Al-Qa'ida and the Taliban). In all cases, the nature of the sanction and the identity of the sanctions targets will be set out in the relevant UK and/or EU legislation. Individuals and entities which are the subject of targeted financial sanctions are also identified in H.M. Treasury's Consolidated List. Sanctions targets may be resident in the UK or elsewhere.

Breach of UK sanctions is a criminal offence, unless an appropriate license or authorization has been obtained from H.M. Treasury or the Export Control Organisation as appropriate. Company employees

should not assume a transaction is permissible pursuant to an exception or license without first consulting the local General Manager of Q-Park. Company Personnel in the Q-Park head office should first consult with Leo Stikkelbroeck (Corporate Director Legal) directly (Leo.Stikkelbroeck@q-park.com).

## V. Our Policy

Company Personnel must conduct their activities in full compliance with this Policy and all applicable Trade Sanctions Laws. Under this Policy, the Company and Company Personnel (when acting on behalf of the Company), without prior approval from the local General Manager of Q-Park or, for Company Personnel in the Q-Park head office, Leo Stikkelbroeck (Corporate Director Legal) are not permitted to:

- I engage in any business or dealings with Embargoed Countries, Blocked Persons, or individuals or entities listed as a sanctions target by EU, UK, or U.S. legislation; or,
- I facilitate transactions with third parties that involve Embargoed Countries, Blocked Persons, or individuals or entities listed as a sanctions target by EU, UK, or U.S. legislation.

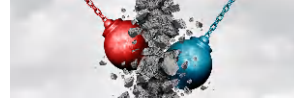
Please note that this Policy prohibits both *direct and indirect* business and dealings with Embargoed Countries and Blocked Persons. This means that the Company will not enter into any agreement with end users or other customers whereby the Company agrees to export products or services to or import products or services from Embargoed Countries. Additionally, Company Personnel will not authorize distributors or agents to resell Company services to customers in Embargoed Countries or to Blocked Persons. To the extent that Company employees learn that third parties are providing services to or in an Embargoed Country, they are required to immediately notify the local General Manager of Q-Park. Company Personnel in the Q-Park head office should notify Leo Stikkelbroeck (Corporate Director Legal).

## VI. Compliance Procedures and Training

As part of the Company's ongoing commitment to trade sanctions compliance, relevant employees must receive and review a copy of this Policy. All such employees must then certify in writing that they (1) have reviewed the Policy; (2) agree to abide by the Policy; and (3) agree to report any potential violations of the Policy to the local General Manager of Q-Park. Company Personnel in the Q-Park head office should report potential violations

to Leo Stikkelbroeck (Corporate Director Legal). The certification is attached to this Policy as Exhibit A.

In addition, the Company will provide periodic trade sanctions compliance training programs to educate employees about the requirements and obligations of Trade Sanctions Laws and this Policy. All relevant employees must participate in this training and the Company will retain attendance records establishing compliance with this requirement.



This Policy has been designed to prevent violations of Trade Sanctions Laws.

## VII. Reporting Requirements and Whistleblower Protection

The Company takes its commitment to trade sanctions compliance very seriously and expects all Company Personnel to share that commitment. The Company therefore expects and requires any Company Personnel who have knowledge of, or reason to suspect, any violation of this Policy to directly report this to the local General Manager of Q-Park. Company Personnel in the Q-Park head office should report to Leo Stikkelbroeck (Corporate Director Legal) directly (Leo.Stikkelbroeck@q-park.com).

Company Personnel can also rely on the chapter on reporting incidents and abuses in the Q-Park Integrity Policy or (when available) on the local Q-Park whistleblower scheme. If any Company Personnel fail to report known or suspected violations, then the relevant Company Personnel may be subject to disciplinary action, up to and including termination.

It is the Company's policy that, if the report of known or suspected violations is made honestly and in good faith, no adverse employment-related action will be taken against any Company Personnel in retaliation for reporting a violation or suspected violation of Trade Sanctions Laws or this Policy.

All questions regarding this Policy should be directed to the local General Manager of Q-Park. Company Personnel in the Q-Park head office can direct any questions regarding this Policy to Leo Stikkelbroeck (Corporate Director Legal) directly (Leo.Stikkelbroeck@q-park.com).

### Summary:

# CCTV & ANPR CODE

Friday, 13 March 2020

This CCTV & ANPR Code covers the use of closed circuit television (CCTV) in Q-Park facilities, both for security purposes and for automatic number plate recognition (ANPR). While the code sets out the company's policies and understanding of international good practice, different countries may have particular regulatory provisions that Q-Park operators need to take into account in developing their operating procedures.

The code incorporates a company-wide set of standards the objective of which is to ensure that good practice standards are adopted throughout Q-Park, that customers are confident that Q-Park operates within the law and to high standards, and that the business derives maximum benefit from available technology.

All Q-Park operators are required to comply with this code.

Because CCTV can record the activities of individuals, its use is regulated by the EU Data Protection Directive, as transposed into law in all EU countries. There are some differences in how the law applies in different countries. In all cases, however, the rights of the people recorded (the data subjects) must be respected.

## Principles of data protection

The person or organisation that is legally responsible for the data captured by CCTV is the data controller.

The data controller determines exactly what is to be recorded and at what level of detail, how the images may be used, and the circumstances in which they may be disclosed.

Q-Park data controllers are responsible for ensuring that the following principles of data protection (as enshrined in the EU Directive) are upheld.

- | Consent: A person's data should not be disclosed without their consent.
- | Security: Data that is captured or collected should be securely stored.
- | Disclosure: People should be told who is collecting their data.
- | Access: People should be allowed to access their data and make corrections to any inaccurate data.
- | Accountability: People should be able to hold collectors accountable for following these principles.

## Installing and operating

In relation to the installation and operation of CCTV, Q-Park takes the following guidelines into account.

### Identification of specific and legitimate purpose

The CCTV system is designed to satisfy a specific and legitimate purpose – such as recording the entry and leaving time of vehicles. In designing our systems, we take into account how the images will be processed – for example, it may be necessary to include wider details of the car or driver.

### Use of suitable and proportionate technology

The technology we use – cameras, servers, software and so on – is adequate for the purposes for which we intend to use it, and it is configured in such a way that it gathers only the data we need, and at a resolution or quality that is adequate. We ensure that cameras are located so that they do not capture images that are not relevant to our purposes.

### Provision of clear signage

Where we install cameras, we make it clear to people that they or their cars are on camera. We place the signs in places where they are most likely to be seen – for example, at car park entrances – and the signs are large enough to be readable from the arriving driver's position. The signs clearly state the purpose of the CCTV recording and include details of who is responsible for managing the system and how they may be contacted.

There may, however, be circumstances in which we install CCTV cameras to gather evidence of specific activities that we intend to bring to the attention of the police – in this case we do not need to provide signage. However, we do not use any other data captured by such a camera for any other purpose.

### Registration with data protection authorities

Images of people and their identifiable property captured by CCTV are personal data, and acting as a data controller involves serious legal responsibilities. In some countries, individuals or organisations that capture CCTV data are required to register with their national data protection authority. Q-Park operators liaise with their local regulatory authorities to ensure compliance with regulatory obligations.

### Managing captured data

Once Q-Park has captured data via CCTV, we have legal responsibilities to ensure its confidentiality and safe custody. We also have responsibilities for making the data available in particular circumstances.

### Clear policies and procedures

Our installation of CCTV systems is underpinned by strong governance arrangements that ensure accountability, transparency and secure custody of the private data we are capturing. To achieve this we have clearly documented policies and procedures, and we ensure that all staff are trained to meet their responsibilities and obligations. Our policies and procedures in this respect apply both to those who manage the cameras and other equipment and to those responsible for any image processing – for example, in relation to billing.

### Retention of images for only as long as needed

As well as capturing only the data that we need for our specified purposes and keeping it secure, we also ensure that we do not keep data for any longer than required to meet those purposes. However, we do not delete data that is the subject of an access request from the police or other legal authorities, or from someone seeking access to their own data.

### Restricting access to captured data

Data captured from CCTV is stored securely and in such a way that the integrity of images is maintained. Access to data is restricted to authorised people and in clearly defined circumstances. The data controller in each Q-Park facility is responsible for granting access to data to third parties, including the police.

### Clear procedures relating to disclosure

Data is disclosed only in very particular circumstances (usually to the police) and this is done in a secure manner that ensures that only the intended recipient can view the images. There may be circumstances where disclosure of images to a third party is warranted – for example, someone making an insurance claim may request footage of their car being damaged in a Q-Park facility. In such cases, we must be satisfied that no uninvolved person is included in the images; and if there is, we edit the images before releasing them.

### Automatic number plate recognition (ANPR)

ANPR is a technique that may be used to record the entrance and exit of cars. In facilities where Q-Park uses ANPR, we acknowledge that this involves capturing private data, and for that reason we do so in a way that is reasonable, consistent and transparent, and we comply rigorously with the data protection principles outlined in this CCTV and ANPR code.

In cases where Q-Park uses ANPR for billing, we take good care to ensure that the reference data we use to connect number plates to car owners is accurate and up to date.

#### Summary:



This CCTV & ANPR Code covers the use of closed circuit television (CCTV), both for



security purposes and for automatic number plate recognition (ANPR).

# CSR CODE

Friday, 13 March 2020

The current Corporate Sustainable Responsibility (CSR) landscape is complex and multi-faceted. It is creating hundreds of initiatives, often with their own code or set of standards and principles, each offering guidance on environmental, social and governance (ESG) issues.

When developing their own CSR approaches, businesses are guided by standards, principles, frameworks, conventions as well as legislation and regulations developed and formally agreed upon by governments. These are derived from standards set by the Organisation for Economic Co-operation and Development (OECD), United Nations Global Compact (UNGC), United Nations Sustainable Development Goals (SDGs), EU Green Deal and the International Labour Organisation (ILO).

## Compliance

Q-Park has decided to use the OECD Guidelines and the UNGC Principles, these being two of the world's foremost corporate sustainable responsibility reporting conventions and these both complement and reinforce each other in many ways. Furthermore, they can readily be used in conjunction with other instruments.

Explanatory materials have been developed to outline their relationship with the Global Reporting Initiative (GRI) standards.

Q-Park's responsible business conduct is primarily based on one of the most broadly accepted definitions of sustainable development published by the former World Commission on Environment and Development (the Brundtland Commission) in 1987.

"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs".

## CSR vision

### Part of sustainable urban mobility

Q-Park stands for 'Quality in parking'. This fundamental choice for quality forms the core of our vision on our corporate sustainability efforts. With our parking facilities and associated services for our parking customers, commercial and public partners, Q-Park wants to be an integral part of the Sustainable Urban Mobility Plans (SUMP) of cities. Regulated and paid parking, preferably in clean and safe facilities, offer an answer to current and future challenges posed by the urban environment. It is on these topics that we engage in dialogue with stakeholders.

### Economy

The global population is still growing and urbanisation continues. This increasing economic activity also has consequences for the quality of life in urban areas. Cities have to contend with congestion, traffic searching for a place to park, reduced accessibility, air pollution, and unattractive and unsafe streets and squares which are full of parked cars. To prevent economic activity coming to a standstill, it is essential to develop and pursue an integral sustainable urban mobility plan (SUMP) together.

### Mobility

Cities have to contend with limited space to facilitate mobility, while the number of cars continues to grow. Together with its partners, Q-Park is committed to a coherent mobility policy in which economic growth, quality of life, sustainable development, and environmental protection go hand in hand. A regulated parking and well-thought-out parking capacity management, as part of a sustainable urban mobility plan, helps to manage the growing mobility demand. A smart SUMP should also shift costs to the user and contributes to limiting unnecessary car use.

Good information provision about available parking spaces, pre-booking options and parking tariffs encourages smart mobility choices. Additionally, linking

parking facilities to public transport, for instance, by creating sufficient parking spaces for those who continue their journey by public transport and by combining paid parking and public transport season tickets, also offers opportunities. Interoperable and digital mobility ecosystems which include parking facilities work in large cities as mobility machines.

### The ideal parking tariff

Ideal parking tariffs are part of the mobility policy. They encourage motorists to look for economic alternatives, such as another means of transport (public transport or active mobility, such as walking or cycling) or to park away from the centre. Parking tariffs set by demand dynamics help to distribute parking spaces efficiently, so there is always sufficient space for those who want to pay to park in the inner city. Q-Park has extensive knowledge of this topic and advises city councils in this regard.

### Attractive facilities

Parking facilities form a 'reception area'. They are often the first impression a visitor gets of a city, shopping centre, station or hospital. And it's even better if parking facilities offer hospitality too, because it is an art to make them both functional and attractive. Q-Park is committed to operating parking facilities which are accessible and easy to find, available and easy to use, and which are also clean and safe and fit in with their surroundings.

### Part of the attractive city

The user or the local authority pays for the facilities which are essential to an attractive, accessible and viable city. Parking is not an end in itself. It is the shops, cafés and restaurants, culture, nightlife, centres of education and good hospitals that attract people. Visitors want to park their car near their destination. For them, the price is less important than being able to park nearby. Currently, some cities are developing into magnets, and for these centres, offering free parking is not the solution.

### **Society**

Parking facilities are more expensive yet more sustainable than on-street and open-air parking. Compared to the higher cost of construction, operation and maintenance, a car park contributes to people-friendly and high-quality public spaces.

### Viable public space

A well-organised urban area offers ample public space. It encourages people to move around on foot, by bicycle or by public transport, which has a positive influence on their health and well-being. Q-Park is not in favour of unnecessary car usage, but promotes good parking facilities which function as nodes. Squares and streets change from traffic areas to places where people can move informally, safely and socially. In addition, a clean and safe parking facility seems to encourage responsible behaviour, not only in the facility but also in the surrounding area.

### Jobs for practical people

As parking company, Q-Park offers interesting and attractive work for people who like to take a practical approach. Our Parking Hosts, Parking Attendants and call centre employees are the local face or the familiar voice of Q-Park. They have direct contact with the customer and make the difference for Q-Park. We ensure that our employees are well-trained and have customer focus. We also work on improving their resilience to aggression and violence, because that occurs from time to time.

### **Environment**

#### Air quality

Paid parking helps reduce car usage in urban areas, and so also contributes to reducing CO<sub>2</sub> emissions and fossil fuel consumption. Smart traffic flows have a positive effect on air quality. Dynamic parking tariffs – higher during peak hours – can help to channel car usage.

### Electric cars and shared vehicles

Customers can recharge their electric car in an increasing number of Q-Park parking facilities. Partners

who offer Mobility as a Service (MaaS) concepts - car sharing, micro-mobility sharing, et cetera - can also use specially reserved parking spaces.

### Own operating activities

Q-Park endeavours to improve the environmental performance of its own parking facilities, its fleet, and its offices.

### **CSR policy**

For Q-Park, corporate sustainable responsibility (CSR) means being prepared to include financial, environmental, social and governance aspects in our strategy. But we go further, we actually incorporate these aspects in the decisions we make. Q-Park offers openness regarding the consequences of our actions for people, society and the environment. Our CSR focuses on sustainable development and performance within our chain: Q-Park as a whole, our financial stakeholders, our partners, each country in which we operate, our customers and society.

For Q-Park, complying with legislation and prevailing standards is a minimum requirement. In our view, CSR is exactly that which an organisation does of its own volition.

### **People, Planet, Profit**

Through its CSR policy, Q-Park endeavours to achieve a balance between the three Ps of the Triple P principle: the economical ('Profit'), societal ('People') and environmental ('Planet') consequences of its activities in the short and longer terms.

Here, we distinguish between indicators that Q-Park decides for itself, such as our own operating activities in the parking facilities we own, have in concession or long lease, and the indicators on which Q-Park can only exercise its influence.

### **Policy choices**

Our CSR policy forms part of the long-term business plan. The policy choices we make are based on our own quality promise and our CSR vision. These are

in line with developments in the European economy and the car parking market, and with the UN Sustainable Development Goals (SDG), EU Green Deal including CSRD and the TCFD, and ESG needs from financial markets.

### **Ambitions**

Q-Park selects ambitions that fit in with our own strategy and that are applicable throughout the organisation. By defining specific goals and targets, critical success factors (CSFs) and performance indicators (PIs), we ensure that our performance can be compared from one year to the next. Only in this way can we take specific action and adjust direction where necessary.

### **Stakeholders**

Stakeholders' opinions and expectations are essential input to Q-Park to evaluate and improve the quality and continuity of our services and operating activities. This is why we continually consult our country management teams, employees, urban mobility partners in the cities in which we operate, commercial and public partners, investors and shareholders and why we involve them in our activities.

In addition, for each specific project we decide with which relevant stakeholders we will enter into dialogue. Communicating with these stakeholders is also a good way to keep abreast of trends and developments, to share knowledge and experience, to build confidence, and to prevent or resolve issues.

### **Reporting**

We answer legitimate questions and accept our accountability through our Annual CSR Reports. In this, we follow the guidelines given by the GRI Standards as well as the EU SDS and UN SDGs.

### **CSR governance**

Responsibility for the CSR policy and its implementation lies with the executive board. Q-Park has a CSR committee which makes recommendations to the executive board concerning the CSR policy,

including stakeholder involvement. The CEO chairs this committee.

The Head of CSR is responsible for keeping abreast of CSR developments, trends, rules and regulations as well as the process of gathering consistent and accurate data on time for the accountability of the policy. By providing interactive feedback to the countries and business units, the Head of CSR generates greater understanding of the performance indicators and greater involvement to improve overall performance.

The CEO and managing directors of the country organisations are responsible for the result-oriented execution of the policy.

The CSR committee endorses the principles of corporate governance with proper supervision and transparent reporting. The duties and responsibilities of its management are carefully defined in the Q-Park Governance Code. The rules applied by the legislator applicable to two-tier board companies are anchored in the articles of association.

### CSR remuneration

Our CSR vision forms an integral part of our strategy and our core activities. We manage the organisation based on a balanced scorecard, which also includes the non-financial aspects, and this is linked to the remuneration policy. In this way, we ensure both financial and non-financial performance is correctly managed, which is important for the realisation of our overall strategic objectives. The remuneration system has been approved by the executive board and supervisory board.

### CSR accounting framework

#### Contents and relevance

The Q-Park Annual CSR Reports provide information about the financial, environmental and societal value that Q-Park creates from the resources we use. The reports are intended for all our stakeholders: customers, employees, shareholders, banks and

(financial) business partners, suppliers, governments, those living in the vicinity of our parking facilities, as well as societal organisations. We consolidate relevant information and show what Q-Park and all its subsidiaries have achieved during the reporting year.

#### Material issues

We apply the Global Reporting Initiative (GRI) standards, placing the materiality principle centre stage. To fully comply with GRI standards, we conduct a comprehensive external materiality analysis every three years.

#### Reporting process

At the end of each reporting year the Holding extracts most of the necessary CSR data from the back-office systems, the HRM dashboard and requests any remaining data from the country organisations. Using a specially developed and standardised data collection tool, the countries gather their data and check it before forwarding it to the Holding where it is subsequently consolidated and evaluated. The reporting process is standardised and the structure of the data requested can easily be checked for completeness and reliability. The whole process has already been prepared for future external verification.

#### External verification

External verification increases the confidence stakeholders have in our accountability. It has a disciplinary effect on our internal organisation, yet it also entails extra costs. Furthermore, it is essential we are confident that we have the right evidence and sufficient data maturity, which in itself places certain demands on an organisation of our size.

In Q-Park's current phase, the executive board wishes to focus on developing the company and our position in the market, requiring our full attention. The executive board has therefore decided not to apply for external assurance. We will, of course, continue to structure our reporting in accordance with the quality standards that stakeholders expect from us.

## Online reporting

Digitisation is not only important in our primary processes, communication increasingly takes place online. For this reason, we publish our Annual CSR Report online. In our report we no longer provide the more 'static' information as we publish static and/or generic information on our corporate website. However, we do create links and referrals where applicable and appropriate.

## CSR reporting principles

### Report scope and boundary

Our Annual CSR Report concerns Q-Park BV and all group companies in so far as these are majority holdings. For details please refer to the financial Annual Report. The scope of the Annual CSR Report has been established based on the materiality analysis. The materiality matrix shows both the concerns of our stakeholders as well as the impact or influence of Q-Park on the various aspects.

We report on the elements on which we have direct influence and on which we have an impact. We do not report about issues on which we have no significant direct influence. One exception is made for the emissions within scope 3, of which the effects lie outside our organisation.

We primarily gather data from parking facilities which are owned, in concession or long-leased by Q-Park, because we can exercise the most influence. If we have measured our performance for a more limited portion of our facilities, this is explicitly stated.

When calculating the carbon footprint of our fleet we have included all our lease cars.

### Reporting standards and testing criteria

We report according to the GRI standards and progress towards CSRD Compliance over the reporting year 2025.

Q-Park's policy is based on the EU SDS, ISO 26000 self-declaration, ICC Code, OECD Guidelines and UNGC Principles. For our energy consumption, our greenhouse gas emissions and our CO<sub>2</sub> calculations we use the GHG Protocol.

### Data gathering and control

The data about non-financial performance is gathered annually from the countries in which we operate and the holding company. We also report quarterly on a selection of performance indicators. The questions and definitions were drawn up in 2010 in cooperation with external experts and since then have been further improved and adjusted. Where possible, corrections have also been made to data from previous years.

In addition, we have drawn up a manual with a clear explanation of our performance indicators and definitions, to avoid any misunderstanding.

To ensure the quality of the information, the reporting process is standardised and the data reporting structure is checked for completeness and reliability. For some parts of the models, such as data collection and the carbon footprint calculation, we have made use of experts' opinions and estimates. There is therefore a degree of inherent uncertainty to these calculations. The figures we report are the best possible estimates. We continue to improve our methodology as our insights continue to evolve.

#### Summary:



Q-Park's sustainable business development, conduct and policy is primarily based on one of the most broadly accepted definitions by the former World Commission on Environment and Development, and the GRI standards.

# SPONSORING CODE

Thursday, 12 March 2020

## Sponsorship is romantic! – Or not?

In many companies sponsorship is treated that way, it is romanticised. But for Q-Park, sponsorship is an investment. An investment in a commercial partnership through which we wish to achieve quantifiable corporate marketing and/or country marketing returns. Sponsorship must be a strategic fit, it must meet multiple strategic objectives.

With sponsoring, Q-Park intends to engender loyalty and/or find new customers, because sponsorship uses an event or activity that interests our target market. We identify and acknowledge the specific emotional and functional reasons that interest our target market and ways to improve and enhance their experience. With sponsorship we want to add value to our customers' experience and create a real impact.

Sponsorship is a means for Q-Park to enhance the relevance of our parking facilities to our target market and our customers' lives. We use sponsorship as a vehicle to strengthen relationships, enhance our reputation, educate the marketplace or to underpin our positioning. We accomplish this by aligning one or more of our key attributes with attributes of the event that are important to our target market.

This code sets out the general framework of our commitment to sponsorship, internal responsibilities and reporting. It also details how sponsorships are to be conducted. This sponsorship code will be reviewed, evaluated and updated regularly.

## Q-Park definitions

### Sponsoring

Sponsoring is an investment in sport, the arts, a charitable cause, an educational organisation, a community or municipal event or programme, an individual or a broadcast. Sponsorship investments have a reasonable expectation of achieving at least three marketing and/or communication objectives and are generally funded from a marketing budget.

### Philanthropy

Philanthropy is a donation made with no expectation of commercial return and is generally not funded from marketing budgets.

### Q-Park sponsoring & philanthropy objectives

- | Add value to current and potential customers, commercial partners and/or other stakeholders.
- | Create a focal point for promotions.
- | Create a quality parking experience.
- | Foster an endorsement by an individual or organisation.
- | Increase employee morale and/or knowledge level and/or retention.
- | Create opportunities for networking, creating, building and/or retaining business relationships.

### Sponsorship focus

- | Q-Park will focus on the strongest part of sponsorship – its ability to build and enhance relationships. Raising awareness or creating exposure is of lesser importance.
- | Q-Park will focus on enhancing trust, on a market's tendency to use our parking services, on underpinning the localness of Q-Park and/or on solidifying the positioning of Q-Park.
- | Q-Park will sponsor an event if it fits strategically and delivers on multiple objectives including product and/or service exclusivity. And only after a stringent, objective assessment based on corporate strategy as we are answerable to shareholders, boards, employees, customers and society.
- | Q-Park, as we all, feels for worthy causes but will only engage in sponsorship if the cause is extremely powerful and the investment is justified. If the investment is not a good fit but we still want to contribute – we will do so with a philanthropic perspective.
- | Q-Park will not sponsor an event to appease critics, but if we can use the expertise or resources of the sponsored event to make some meaningful changes or if a sponsorship can be very helpful

in influencing a more informed and responsible public opinion, we will do so.

### Managing sponsorship

Q-Park has a semi-centralised management structure for sponsoring as it provides a high degree of ownership in the market and in consultations with key stakeholders while at the same time ensuring an expert approach. This semi-centralised structure is managed by Q-Park's Brand Custodian (QBC).

- I QBC is responsible for the health of the Q-Park brand, corporate reputation, sponsorship portfolio and maximising the effectiveness of sponsorships. QBC is also responsible for the strategic focus regarding overall marketing and/or brand plans, approving and negotiating strategic sponsorships, and linking opportunities to optimise sponsorships.
- I The country marketing & sales teams are directly responsible for their 'national, regional, and local' results, implementation and integration of sponsorship across marketing activities, selecting and recommending opportunities, maximising effectiveness and involving stakeholders.

### Accountability for sponsorship

- I The country marketing & sales teams are responsible for selecting sponsorship targets; local, regional or national.
- I Sponsorship (local, regional or national) can only be approved by the country directors team (MD & FD). Basic information regarding approved sponsorships must be sent to QBC within a week after approval.
- I If the sponsorship is intended to attract broad national or international media exposure, QBC must co-sign.
- I If a sponsorship crosses national borders, the sponsorship request must be forwarded to QBC who will then take responsibility for selection and final approval/rejection.
- I Responsibility for managing the sponsorship process, managing the relationship with the sponsored event, quantifying sponsorship

objectives and stakeholder education lies with the country marketing department.

- I Responsibility for representing sponsorship issues to the board lies with QBC.

### Proposal guidelines

Q-Park will consider sponsorships in all categories, but as a company with a focus on quality, we will not sponsor any event or programme where safety or cleanliness might be an issue. A sponsorship may in no way be controversial or divisive, nor may it violate any law. Q-Park will not sponsor nor make donations to any event or organisation with a religious or political goal, student travel and/or festivities or private initiatives.

We require sponsorship exclusivity in the parking category and generally need a minimum of six months lead time. We consider logo exposure a bonus, not an objective. We expect relevant sponsorship partners to invest a minimum of 10% of the total value of the sponsorship, and to contribute to pro-actively maximising the sponsorship.

In the market, Q-Park provides quality parking solutions at strategic locations. We therefore prefer sponsorships that directly or indirectly help support the occupancy of our parking facilities. In order to enhance the relevance of our parking facilities to people in our target market and their lives, a crucial element of sponsorship selection is based on the alignment of key attributes of the event to be sponsored with some or all of our key attributes: clean, safe, convenient, reliable and hospitable.

As Q-Park seeks to develop strong long term partnerships, we embrace sponsorships that focus on business synergies and include associated companies or organisations that target a similar marketplace with a complementary product, service or cause. We particularly embrace the sponsorship participation of other quality brands and seek opportunities for cross promotion, loyalty programmes and in-kind leverage.



As Q-Park operates quality parking facilities, markets a range of customised products and services and employs hospitable people, we favour sponsorships that value and appreciate our in-kind resources, knowledge and expertise. This non-cash contribution minimises cash expenditure while maximising mutual benefits. In our negotiations with events to be sponsored we tend to look for benefits in the form of access to markets, use of marketing vehicles, third party synergies, ancillary events, hospitality opportunities, database and/or relationship marketing, cause tie-in and the like.

Q-Park will evaluate the results of a particular sponsorship against the objectives set for that sponsorship. These results will be quantified by the responsible manager. The evaluation of the relationship with the event sponsored will be conducted separately, based on:

- I Whether or not all benefits were delivered as promised.
- I The timeliness and relevance of reports concerning:
  - I The degree to which the event added value;
  - I Whether or not we were kept in the loop;
  - I The overall ease of the working relationship.

Q-Park will spend no more than 20% of its marketing budget on sponsorships; this includes maximisation that does not exceed '2-to-1'. Q-Park will not engage in sponsorship contracts exceeding three years. Our investment is commonly based upon an upfront fee paid in installments plus a performance-based incentive. Q-Park has set aside opportunistic funds of no more than 5% of the total sponsorship budget for interesting yet unplanned opportunities.

To be eligible for consideration, sponsorship proposals must include key details of the opportunity, an overview of the confirmed marketing plan, list of sponsors who have committed to date, and a comprehensive list of benefits. A timeline of important deadlines and credentials of the organisation and key subcontractors

must be included in the proposal. Q-Park will review all proposals to assess suitability, feasibility and resources required (human and monetary). Q-Park will notify the event to be sponsored of its disposition regarding the proposal within four weeks.

While every care was taken in establishing our sponsorship guidelines and establishing our sponsorship strategies accordingly, it is possible that issues might occur that when considered within the diversity of stakeholders a conflict of interests materialises. In that event, Q-Park will actively interact with all the parties concerned, seek cooperation with all the business departments involved and exert its influence to find an appropriate solution which is acceptable to all.

#### Summary:



Sponsorship is an investment in a commercial partnership through which we wish to achieve quantifiable corporate marketing and/or country marketing returns.