



EUROPEAN PARKING ASSOCIATION

Positively promoting parking solutions for sustainable mobility

European Parking Association (EPA) Code of Conduct

VERSION 1, January 2024

EPA Code of Conduct

Introduction

The proposed Code of Conduct below is intended to complement the EPA Articles of Association and the EPA internal rules, as each organisation or company which becomes a member of EPA is bound by Belgian law to respect both abovementioned documents. This Code of Conduct shall become part of the EPA internal rules and will be directly applicable to EPA's own staff (*i.e.* its employees), contracted external experts and service providers, directors of EPA as well as any person or entity (i) representing an EPA member within the bodies of the Association or (ii) acting in the name and/or on behalf of EPA, to the extent it has been validly authorized to do so. The aforementioned persons/entities are hereinafter referred to as "EPA's Representatives".

General Principles

This Code of Conduct shall be binding on all EPA's Representatives. EPA's Representatives shall commit themselves to respect EPA's values and ethics as demonstrated through this Code and all other governing documents, such as the Articles of Association and internal rules as well as the 'Mission Statement' and other documents made public on the EPA website.

EPA and EPA's Representatives conduct their business in a socially responsible and ethical manner, adopting fair employment practices, protecting safety in the workplace, supporting and fostering environmental consciousness, in full compliance with the applicable laws of each country in which individual EPA members operate.

All business relationships will be established and maintained with integrity and loyalty, and without any conflict of interest between business and personal affairs. To achieve this, EPA requires that all EPA's Representatives comply with the highest standards of business conduct in the performance of their duties as set out in this Code and in compliance to its policies and guidelines.

A. Core values

Respecting human dignity

EPA respects human dignity and champions the observance and protection of human rights. All EPA's Representatives are under an obligation to ensure that these universally recognized fundamental rights are observed. EPA will also not tolerate any violation of these principles by its business partners.

Occupational health and safety

EPA and EPA's Representatives recognise health and safety in the workplace as a fundamental right of employees and a key element of the sector's sustainability. All choices made by EPA and EPA's Representatives must respect the health and safety in the workplace according to the applicable laws. EPA shall adopt and continue to improve an efficient occupational health and safety policy which implements preventive measures, both at the individual and collective level, to minimize the potential for injury at the workplace.



Environmental impact and safety

EPA and EPA's Representatives are committed to promote, in full compliance with legal and regulatory requirements, parking and mobility services of the highest standard in terms of environmental and safety performance. Moreover, EPA and EPA's Representatives endeavour to promote and implement innovative technical solutions to minimise environmental impact and maximise safety.

B. Guidelines for behaviour

Equal opportunities

EPA is committed to providing equal opportunities to all its employees, both on the job and in their career advancement, without any form of discrimination, in particular discrimination based on race, gender, sexual orientation, social and personal position, physical and health condition, disability, age, nationality, religion or personal beliefs.

Rejection of child labour

EPA does not tolerate child labour or any form of exploitation of children or young people. The minimum age for employment must not be below the age at which compulsory schooling ends, and in no case may it be below the age of 15. EPA expects its business partners and EPA's Representatives adhering to the minimum employment age which is valid in the country where the affected business partner or EPA Representative maintains its business establishment.

Rejection of forced labour

EPA rejects all forms of forced labour, slavery, and human trafficking according to article 4 of the European Convention on Human Rights. EPA only supports voluntary employment within its organisation. No employee may be obliged to work by the direct or indirect use of force and/or intimidation. Only people who voluntarily make themselves available for work may be employed. All EPA's Representatives are expected to report any indications on modern slavery to the appropriate manager. EPA takes all adequate measures to prevent cases of forced labour and modern slavery.

Embargo and trade control regulations

EPA complies with international trade laws and embargoes that restrict or prohibit the import, export, or domestic trading in goods, technologies or services, the handling of certain products, as well as capital and payment transactions. EPA will not engage in trade or business dealings with countries, organisations or individuals, who are under sanction control by any government (including the United States of America) or supra-national body (e.g., the European Union and the United Nations).

Competition law compliance

EPA and EPA's Representatives recognise the paramount importance of a competitive market and are committed to fully comply with any competition and other pro-consumer legislation in force in the countries where they operate.



Any agreement or concerted practice between companies or any decision of an association of companies that may prevent, restrict or distort competition (e.g., illegal information exchanges that artificially increase transparency between competitors in the market and enable them to collude on their market conduct) are highly likely to infringe competition law.

EPA and EPA's Representatives are committed to conducting their activities in strict compliance with the applicable EU and national competition laws and have therefore identified a number of general guidelines which will form part of every agenda as "Guidelines for meetings".

Export control

EPA and its business partners are committed to ensuring that their business activities do not violate applicable domestic or international embargoes and export control laws established within or applied by the countries where they operate.

Bribery and illicit payments

EPA and EPA's Representatives are committed to the highest standards of integrity, honesty and fairness in all internal and external affairs, in compliance with national and international anti-corruption laws, with particular reference to the OECD Convention on Combatting Bribery of Foreign Public Officials in International Business Transactions, the OCSE Guidelines and the Foreign Corrupt Practices Act ("FCPA").

EPA and EPA's Representatives will not tolerate any kind of bribery (i.e. paying, or offering to pay, to obtain an improper business advantage) to public officials or representatives of international organisations or any other party connected with a public official and to private entities/individuals, which is otherwise prohibited by applicable laws.

Money laundering prevention

EPA and EPA's Representatives will not be engaged or involved in any activity which may imply the laundering of proceeds of criminal activities in any form or manner whatsoever. Before establishing any business relationship with a third party, EPA and EPA's Representatives shall check available information on their proposed business partners and suppliers to ensure that they are reputable and involved in a legitimate business.

C. Business practices

Insider Rules

It is not permissible to derive personal advantage or advantages for others through the use of non-public information. The same applies to unauthorized disclosure of such knowledge. All EPA's Representatives are required to observe the insider rules of the European Market Abuse Directive or any national law implementing the Directive, for instance the prohibition of insider dealing, or the insider rules laid down in any other applicable national laws. Inside information includes, inter alia, all precise information not known to the public that is directly or indirectly related to an issuer or its financial instruments and that could significantly influence the price of these financial instruments.



It is also prohibited to disclose non-public information about other companies and persons. This applies especially where the information in question could significantly influence investment decisions by third parties.

Dealing with internal knowledge

EPA's Representatives are required to ensure a swift, smooth exchange of information within the association. Knowledge that is relevant for EPA's activities must not be wrongfully withheld, falsified or selectively communicated. Apart from cases in which other interests take priority (*e.g.*, confidentiality), information must be forwarded internally correctly and in full.

Documentation of business transactions

All business transactions must be fully and properly documented in accordance with statutory regulations and internal EPA rules.

D. External relations

Conflicts of interest

EPA's Representatives must avoid every possible conflict of interest when conducting business which falls under EPA's field of activities (as per its Articles of Association). Particular regard is paid to personal, financial or family considerations which might influence the decision-maker's independence of judgment when deciding what is in EPA's best interest – including the interests of individual members and EPA's membership as a whole – and what is the most appropriate way to pursue such interests. EPA's Representatives shall refrain from purposefully harming other members' legitimate interests, outside of the scope of normal business relations and in full compliance with EU and national competition laws (see relevant headings). Each EPA Representative is responsible for declaring actual or potential conflicts or the reasonable perception of such conflicts and these should be declared at the start of each meeting.

Confidentiality

No EPA Representative shall ever make use of information which it obtained in the framework of EPA meetings, where it was clearly stated that this information belongs to the internal sphere of the association and thus not in the public domain (*e.g.*, when meetings, especially with external guest-speakers, fall under the "Chatham House rules")¹.

Information obtained as a result of a member's position within EPA shall not be used to obtain a personal advantage, or to favour third parties.

Privacy

In the conduct of their normal business operations, EPA collects a significant amount of

¹ When a meeting, or part thereof, is held under the Chatham House Rule, participants are free to use the information received, but neither the identity nor the affiliation of the speaker(s), nor that of any other participant, may be revealed (<http://www.chathamhouse.org/about-us/chathamhouserule>).

personal data and proprietary information. Personal data is generally defined as any information, either on its own or in combination with other information, which can be used to identify a natural person, either directly or indirectly. Where EPA accesses and/or processes such data, it agrees to do so in accordance with all existing data protection laws in force in each jurisdiction in which it operates.

External relationships

EPA and EPA's Representatives are committed to conducting and enhancing their relationships with all categories of stakeholders acting in good faith, with loyalty, fairness, transparency and with due respect for the Association's core values.

With regard to members, suppliers and public institutions, EPA considers it essential that they are always treated fairly and honestly and therefore demands of EPA's Representatives that each and every relationship and contact with members, suppliers and public institutions be characterized by honesty, professional integrity and transparency.

Communications and media relations

EPA recognises the vital role that clear and effective communication plays in sustaining internal and external relationships, ensuring the highest standards in reporting financial and non-financial information to provide a clear and transparent presentation of its performance in economic, social and environmental matters. The communication of information to the media plays an important part and therefore all information concerning EPA must be supplied in a truthful and comprehensive manner.

Donations and sponsoring

A donation by or to EPA is only allowed if it is granted in good faith for a cultural, scientific, humanitarian, or social purpose and its value is reasonable and appropriate under the special circumstances. EPA does not make any direct or indirect donations to political organizations, parties, or individual politicians. EPA does not grant a donation to individuals, profit-making organizations, organizations which do not have charitable or tax-privileged status, or organizations which do not comply with the principles set out in the Code of Conduct. A donation by EPA must be made transparently and is only allowed if it is tax deductible and granted in a form that ensures tax deductibility. Any exceptions to these rules must be clarified beforehand with the Board.

The following rules apply for donations:

- Applications for donations from individuals have always to be declined;
- All donations have to be documented (especially recipient, amount, and purpose of the donation);
- Donations to and from business partners are prohibited;
- Donations to private accounts or offshore accounts are prohibited;
- Donations which aim at influencing or manipulating business decisions are prohibited;

Sponsoring and donations to other, non-political recipients must not be used to circumvent the rules of this Code of Conduct.

E. Enforcement

Implementation and assurance

EPA and EPA's Representatives are committed to achieving the highest standards of best practice in relation to their moral, social and business responsibilities towards the people concerned. This Code sets out common expectations with respect to EPA's employees, representatives and other third parties with whom they have a business relationship towards EPA and the responsibility they must take for transforming these policies into reality. EPA encourages employees to solicit guidance from their Legal Advisers and/or HR Advisers in any situation regarding the Code in which they may be in doubt as to the most appropriate behaviour.

Compliance and enforcement

Compliance with this Code of Conduct shall be observed in accordance with Article §6.16. of the EPA Articles of Association: *"In case of a breach, injurious conduct or failure, the President notifies the Member thereof and gives it the possibility to remedy the breach, injurious conduct or failure (if capable of being remedied) within a reasonable period which shall not be less than thirty (30) days. In the absence of adequate remedy, the President submits a proposal for exclusion to the Board of Directors, stating the reason for the exclusion. The relevant Member is invited to the Board of Directors and is given the opportunity to present its defense. The decision to exclude a Member from the Association shall be motivated and shall take effect immediately."*

Responsibilities

The ethical principles and rules set out in this Code of Conduct form a core element of EPA's culture as an association. The task of implementing the Code of Conduct falls within the competencies of the Board of Directors.

All other stakeholders are likewise required to strictly observe all applicable local and international laws and regulations and follow all ethical guidelines or principles set out in this Code of Conduct when representing EPA or acting for, in the name or on behalf of EPA or doing business with EPA. Any EPA representative handling the relationship with such stakeholders is responsible for communicating the significance and the contents of this Code of Conduct to such stakeholders, binding them to these rules and monitor observance.

The Code of Conduct forms the basis for all directives and other internal stipulations within EPA; these address specific issues and must therefore also be observed.

Whistleblowing

EPA's Representatives are invited to report any concerns or queries relating to potential breaches of EPA's policies, including the Code of Conduct. EPA does not permit any form of retaliation for the act of raising concerns in good faith or for taking part in an inquiry relating to a report.