

CODE OF ETHICS

pursuant to (It.) Legislative Decree no. **231** of 8 June 2001, as amended and supplemented



ITALSEMPIONE Spa Group
International Freight Forwarders

Version of 15.09.2023

Organisation

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Section 0 - General introduction

0.1 Foreword

This document, called the Code of Ethics, regulates the set of rights and responsibilities that the company expressly assumes towards those with whom it interacts in the performance of its activities

The organisation is aware that with its actions, with a sense of responsibility and moral integrity, it contributes to the development process of the Italian economy and to the civil growth of the country

The company believes in the value of work and considers lawfulness, fairness and transparency of action to be essential prerequisites for achieving its economic, production, and social objectives

The company affirms the appropriateness of its Code of Ethics in the pursuit of its corporate mission

The Code of Ethics also aims to introduce and make binding for the company the principles and rules of conduct relevant to the reasonable prevention of the offences indicated in (It.) Legislative Decree no. 231/2001

The Code of Ethics, taken as a whole and together with all the specific implementation procedures approved by the company, is considered an integral part of the employment contracts in place and to be entered into, pursuant to art. 2104 of the (It.) Civil Code (Diligence of the employee)

Violation of its provisions shall, therefore, constitute an offence of a disciplinary nature and, as such, shall be prosecuted and sanctioned by the company pursuant to and for the purposes of art. 7 (Disciplinary sanctions) of (It.) Law no. 300/1970 (Workers' Statute - Rules on the protection of the freedom and dignity of workers, trade union freedom and trade union activity in the workplace and rules on employment) and may entail compensation for damage caused to the organisation

With regard to collaborators, consultants and self-employed workers (specified below among the addressees) who work for the company and other third parties, signing this Code of Ethics or an extract from it or, in any case, subscribing to its provisions and principles is a *conditio sine qua non* for the stipulation of contracts of any kind between the company and these subjects. The provisions thus subscribed to or, in any case, approved, even by concluding facts, form an integral part of the contracts themselves

In view of the foregoing, any violations by the persons referred to in the preceding paragraph of specific provisions of the Code of Ethics, depending on their seriousness, may legitimise the termination by the company of existing contractual relations with said persons and may also be identified *ex ante* as grounds for automatic termination of the contract pursuant to art. 1456 of the (It.) Civil Code (express termination clause)

0.2 Addressees of the Code of Ethics of the company

By adopting the Code of Ethics, the company intended to define moral values, clear rules and procedures to be complied with

The Code of Ethics is aimed at:

- **Members of collective bodies**
- **Employees (both fixed-term and permanent)**
- **Project collaborators**

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- **External and internal consultants**
- **Suppliers of goods and services**
- **Any other person who may act in the name of and on behalf of the company either directly or indirectly, permanently or temporarily, or those who establish relations or relationships with the company and work to pursue its objectives**

The addressees of this Code of Ethics are required to learn its contents and comply with its precepts.

The Code of Ethics will be made available to them as follows

The Management, or a proxy, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination within and outside the organisation

Company employees, in addition to compliance per se with current regulations and the provisions of collective bargaining agreements - where applicable -, undertake to adapt their working methods to the purposes and provisions of this Code of Ethics

This is true both in intra-company relations and in relations with parties outside the company and, in particular, with the Public Administration and other public authorities

An essential requirement of any profitable relationship with the company is compliance by the other addressees with the principles and provisions contained in this Code of Ethics

To this end, when entering into contracts or agreements with other addressees, the company provides its interlocutors with a copy of this document.

Section 1 - Principles of conduct for the organisation

1.0 Foreword

The principles listed below are considered fundamental, so our organisation is committed to respecting them vis-a-vis everyone

It is, however, essential that these values do not remain mere utterances but are translated into conduct and behaviour that is inherent to the company

As an organisation and as individuals, all recipients in the working environment are expected to apply them correctly in both internal and external operations and relationships

The core values on which the company's activities are based are

- 1.1 Integrity in compliance with Laws and Regulations**
- 1.2 Repudiation of all discrimination**
- 1.3 Centrality, development and valorisation of human resources and fairness of authority**
- 1.4 Connection to the territory**
- 1.5 Transparency and business ethics**
- 1.6 Quality**
- 1.7 Diversity**
- 1.8 Lawfulness and fighting against terrorism and crime**

The company expects these values to define its identity, to unite employees and collaborators to the global organisation.

1.1 Integrity of behaviour and compliance with Laws and Regulations

The company is committed to performing and providing quality services and to competing on the market in accordance with principles of fair and free competition and transparency, maintaining fair relations with all public, governmental and administrative institutions, citizens, and third party companies

Everyone is expected to act, in any situation, with integrity, transparency, consistency, and fairness, conducting every business relationship with honesty

The company operates in strict compliance with the Law and ensures that all personnel act accordingly: people must behave in accordance with the Law, whatever the context and the activities carried out and wherever they work

This commitment must also apply to consultants, suppliers, customers and anyone dealing with our organisation

The company will neither initiate nor continue any relationship with those who do not wish to align themselves with this principle.

1.2 Repudiation of all discrimination

In decisions affecting relations with stakeholders (personnel management and work organisation, selection and management of suppliers, relations with the surrounding community and its representative institutions), our organisation avoids any discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions, and religious beliefs of its interlocutors.

1.3 Centrality, development and valorisation of human resources and fairness of authority

The company recognises the centrality of human resources and believes that an essential success and development factor is the professional contribution of its people

The company has always placed the professionalism and individual contribution of its people at the centre of its operations, giving continuity to a style of relations that aims to recognise the work of each person as a fundamental element of corporate and personal development

At the same time, the company places dialogue, the exchange of information - at whatever level -, the empowerment and professional development of its employees and the establishment of a corporate identity and sense of belonging at the centre of its daily work

This value translates:

- **In the creation of a working environment that enhances the contribution and potential of the individual through the gradual empowerment of personnel**
- **In the implementation of a relationship system that privileges teamwork over hierarchical relationships**
- **In the daily effort to share skills and knowledge also through the use of innovative systems**

The company attaches the utmost importance to those who work within its organisation, contributing to its development, since it is precisely through human resources that the company is able to provide, develop, improve and guarantee optimal management of its services

Without prejudice to legal and contractual provisions on workers' duties, professionalism, dedication to work, loyalty, spirit of cooperation, mutual respect, sense of belonging, and ethical conduct are required of employees

In the management of contractual relationships involving the establishment of hierarchical relations, our company undertakes to ensure that authority is exercised fairly and correctly and that all forms of abuse are avoided: in particular, the company ensures that authority does not turn into the exercise of power detrimental to the dignity and autonomy of the individual

These values must in any case be safeguarded when making choices about the organisation of work.

1.4 Connection to the territory

The company's aim is to carry out projects aimed at directly involving citizens, public and private institutions, businesses and associations in everything related to health education, prevention and taking charge of one's own well-being. The company takes and will continue to take steps to ensure that its collaborating entities comply with the same rules of conduct and direct their activities towards the same principles and values

The company also promotes local development through a strong connection with the various actors in the local community. It acts, therefore, in the local community for the development of a rich and productive society, capable of recognising and enhancing the resources that make it up, the skills and potential present, gender, cultural and ethnic differences, promoting well-being, integration and social development and enhancing their recognition by the users and those who materially offer the service.

1.5 Transparency and business ethics

The organisation's history, identity and values are embodied in a business ethic founded on:

- **Reliability**
intended as a guarantee of absolute seriousness in the projects launched, the negotiations, and commitments made
- **Solidity**
relating to an entity with a defined asset base, as evidenced by its prolonged activity
- **Transparency**
consequent to the understanding of the social role that requires not only respect for ethical principles and work, but also the implementation of modalities that allow the communities of reference and social actors to have the information to be able to reconstruct its actions
- **Fairness in contractual matters**
avoiding that, in existing relationships, anyone acting in the name and on behalf of the company tries to take advantage of contractual gaps or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the position of dependence or weakness in which the interlocutor has found themselves
- **Protection of competition**
refraining from collusive, predatory behaviour and abuse of position.

1.6 Quality

Quality is a hallmark of our company. The organisation is committed to and responsible for quality assurance in every activity, consistent with its long-term strategy

Activities are implemented by the company through a set of processes managed by means of a quality management system that offers uniformity, transparency, and service improvement to the outside world.

1.7 Diversity

The company demands that its directors, employees and collaborators behave in such a way as to ensure absolute respect for the dignity of persons; the organisation therefore:

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- Ensures the most scrupulous observance of regulations on the protection of child labour, workers' freedoms and rights
- Does not tolerate violations of human rights
- Promotes integration as a form of collective enrichment in the complex social fabric

In particular, the company condemns any form of discrimination on the basis of gender, ethnicity, politics and religion.

1.8 Lawfulness and fighting against terrorism and crime

The company believes deeply in democratic values and condemns any activity that may be geared towards terrorism or subversion of the democratic order

The organisation also condemns any activity involving

- Forgery, counterfeiting, altering and/or spending of coins, public credit instruments, and tax stamps
- Acceptance and processing of proceeds from criminal activities (money laundering)
- Unauthorised access to external computer systems
- Unauthorised possession of access codes
- Damage to equipment and data
- Fraud in the handling of electronic signature certification
- Interceptions, obstructions and interruptions of computer communications
- Dissemination of ideas of tolerance and the code of silence related to drug use or any addictive substance
- Incitement to commit unlawful acts or acts contrary to moral sense
- Negligence in combatting violence, damage to public property and compliance with internal regulations.

Section 2 - Social actors

2.1 Customers

The company's primary objective is to fully meet the needs of its customers

Within this framework, the organisation ensures the best execution of the tasks entrusted by the customer and is constantly oriented towards proposing increasingly advanced and innovative solutions with a view to integration, effectiveness, efficiency, and cost-effectiveness

The company provides accurate, complete, and truthful information so that the customer can make a rational and informed decision. It protects the privacy of its customers in accordance with the regulations in force, undertaking not to disclose or disseminate their personal data, without prejudice to legal obligations

The company also adopts a communication style based on efficiency, cooperation, and courtesy.

2.2 Financial institutions

The organisation maintains relations with financial institutions based on fairness and transparency, with a view to creating value for the company itself

For this reason, financial institutions are chosen on the basis of their reputation, including for their adherence to values comparable to those expressed in this Code of Ethics.

2.3 Suppliers

Suppliers of goods and services

The company establishes collaborative relationships with its suppliers, in compliance with current regulations and the principles of this Code of Ethics, paying attention to the best professional standards, best practices in ethics, health and safety protection, and respect for the environment

Internal and external consultants

Consultants are chosen on the basis of professionalism and reputation as well as reliability and adherence to values comparable to those expressed in this document

Relations with consultants are based on transparent agreements and a constructive dialogue aimed at achieving common goals, consistent with the regulations and principles of this Code of Ethics.

2.4 Public administration

The term Public Administration refers to any person, entity, interlocutor qualifying as a Public Official or Person in Charge of a Public Service who acts on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, EU Institutions, as well as private partners who are concessionaires of a Public Service

The company informs and adapts its conduct, in its relations with the Public Administration, by and to the principles of fairness and honesty. On this basis, the persons entrusted by the company to follow any negotiation, request or institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason seek to improperly influence its decisions nor engage in unlawful conduct, such as offering money or other benefits, that may alter the impartiality of the Public Administration representative's judgement

Persons entrusted by the company's organisation with the management of relations with any authority of the Public Administration must verify that the information provided in any manner and for any reason is true, accurate, and correct. The only persons permitted to have direct contact with the public administration on behalf of the company are those expressly designated by the company for that purpose

No other employee may have any relationship whatsoever with the public administration for activities related to the company's corporate purpose

When participating in tenders, the parties appointed by the company must comply with the law and the relevant regulations

Labour relations with former employees of the Public Administration

The recruitment of former employees of the public administration who, in the course of their duties, have had relations with the company or persons who are related to them by blood or by marriage takes place in strict compliance with the standard procedures defined by the organisation for personnel selection

The establishment of other employment and/or consultancy relationships with former public administration employees or persons who are related to them by blood or by marriage also takes place in strict compliance with standard procedures

Grants and financing

Grants, subsidies, or financing obtained from the European Union, the State or another public body, even if of small value and/or amount, must be used for the purposes for which they were requested and disbursed

The company prohibits the addressees of this Code of Ethics from using funds received from public administrations and/or inter-professional funds for purposes other than those for which they were disbursed

Similarly, in the event of participation in public tenders, the addressees of this Code of Ethics are required to operate in compliance with the law and proper business practice, avoiding in particular inducing public authorities to operate unduly in favour of the company

The organisation undertakes to prevent acts that lead the addressees of this Code of Ethics to engage in actions likely to procure unlawful advantage

The use of altered or falsified declarations or documents or the omission of information or, in general, the use of artifices or deception, aimed at obtaining concessions, authorisations, financing, contributions from the European Union, the State or another Public Entity also constitutes unlawful conduct.

2.5 Public supervisory authorities

The company institutes dialogue in a transparent manner with all political forces, associations in the area and public institutions (territorial and national) in order to duly represent its positions on topics and issues of interest.

2.6 Political forces, associations and stakeholder institutions

The addressees of this Code of Ethics undertake:

- To scrupulously observe the provisions issued by the competent institutions or public supervisory authorities for compliance with the regulations in force in the sectors related to their respective areas of activity
- No applications or requests containing untrue declarations are submitted in the context of investigations with Public Supervisory Institutions and/or Authorities in order to obtain public grants, contributions or subsidised loans or to unduly obtain concessions, authorisations, licences or other administrative acts
- To comply with any request from the above-mentioned institutions or authorities within the scope of their respective supervisory functions, providing - where requested - full cooperation and avoiding obstructive behaviour.

Section 3 - Principles of conduct to be followed by personnel

3.1 Professionalism

Each person performs his or her work and services with diligence, efficiency, and fairness, using the tools and time at his or her disposal to the best of his or her ability and assuming the responsibilities associated with performance.

3.2 Loyalty

Individuals are expected to be loyal to the company.

3.3 Honesty

Within the scope of their work, the people of the company are required to know and diligently comply with the Model 231 and the laws in force. Honesty is the fundamental principle for all the company's activities and initiatives and is an essential value of organisational management. Relations with stakeholders, at all levels, must be characterised by fairness, cooperation, loyalty, and mutual respect. Under no circumstances may the pursuit of corporate interest justify dishonest conduct.

3.4 Lawfulness

The organisation undertakes to comply with all national and international standards, laws, directives, and regulations and all generally recognised practices. Moreover, its decisions and conduct are informed by care of the public interest entrusted thereto.

3.5 Fairness and transparency

Individuals shall not use for personal purposes any information, property and equipment at their disposal in the performance of their assigned function or task. No one shall accept or apply, on his or her own behalf or on that of others, any pressure, recommendation or report that could be detrimental to the company or bring undue advantage to him or herself, the company or third parties. Everyone rejects and does not make promises of undue offers of money or other benefits. The company is committed to operating in a clear and transparent manner, without favouring any interest group or individual.

3.6 Confidentiality

Individuals ensure the utmost confidentiality with regard to news and information constituting the company's assets or inherent to the company's business, in compliance with the provisions of the law, current regulations, and Internet procedures. In addition, the company's people are obliged not to use confidential information for purposes unconnected with the conduct of their activity.

3.7 Responsibility towards society

The company, aware of its social role on the reference territory, on economic and social development and on the general well-being of society, intends to operate in respect of the national and local communities, supporting initiatives of cultural and social value in order to improve its reputation and legitimacy to operate.

3.8 Resolution of conflicts of interest

In performing work-related activities, individuals pursue the general objectives and interests of the company. They shall inform their superiors or contact persons without delay of situations or activities in which there may be an interest in conflict with that of the company, on the part of the persons themselves or of their close relatives, and in any other case in which there are relevant reasons of self-interest. Individuals respect the decisions taken by the company in this regard.

3.9 Sense of belonging

Individuals pursue, in the performance of their work activities, everything that does not hinder or prejudice in any way the creation of a sense of belonging of people to their organisation, work group or to third parties.

3.10 Mutual respect

Persons collaborating with the company in any capacity shall demand and actively manifest respect for the tasks, skills, and manner of performing the duties also through the omission of personal remarks to third parties.

3.11 Specific obligations

Company employees must follow the instructions given:

Transparency

It is a good rule that all information relating to the activities carried out within the company is within everyone's reach. Each employee has the duty to liaise with his or her supervisor and colleague in relation to the work he or she carries out. In the event of misunderstandings or problems, it is everyone's duty to first liaise with his or her supervisor or contact person

Behave in a scrupulously loyal manner and independently of influences of any kind that may affect their actions both towards their Principal and towards external Organisations in relation with them

Not engage in improper economic relations or accept gifts of value or favours of any kind from Organisations, suppliers of their Principal

Report, at the time of acceptance of the professional assignment or during its execution, any relationship or interest in common with external organisations that have relations with their Principal that may lead to conflicts of interest.

Consistency

Once a commitment is made, it is completed. Employees and collaborators must never leave a job unfinished and must never take on commitments they already know they will not be able to fulfil.

Courtesy and kindness

Courtesy and kindness are and must be the basis of every day-to-day activity; they must also be a constant in interpersonal relationships, both inside and outside the company.

Punctuality

If late for an appointment, it is good practice to give notice before the agreed time expires; to do so afterwards is rude

Punctuality is a form of respect for those who are waiting for us.

Confidentiality

All information and data handled in the workplace are company property and confidential, and must be treated as such. In particular, one should never talk about problems or work situations in public places where one can be overheard, or in the presence of people who have no right to be involved in the information in question.

Professionalism

Being professional means knowing all the appropriate behaviours, all that is needed to do one's job in the best possible way, taking into account the needs of customers and the company

Whatever the activity, it is always necessary to be professional.

Working environment

Everyone should have the ability to understand the phenomena underlying interpersonal relations and adopt a behaviour consistent with the context of reference, always trying to maintain a courteous, cordial and cooperative climate with their colleagues.

Loyalty and corporate respect

It is everyone's duty to share company policies and to ensure that they are adhered to

During daily work, each employee should always preserve the interests and image of the company , as well as have the utmost respect for company property

When carrying out one's activity, one should always assess the economic implications of one's choices and avoid waste.

Respect for the customer

The company, like all free market companies, lives thanks to its customers

Respect, kindness and courtesy should be a constant in the relations of those who make contact with the organisation

Workstation

Each employee is responsible for his or her own workstation. Everyone is responsible for the care and cleanliness of the tools at their disposal.

Personal computer

The personal computers provided must be kept in the best possible condition and no programs other than those provided for in the company configuration may be installed

The hardware equipment made available by the company constitutes to all intents and purposes working tools and may not be used for personal purposes

In particular, the files they contain constitute company assets and may not be arbitrarily damaged and/or destroyed

The use of hardware equipment for copying and/or storing files and data, such as USB mass storage devices, laptops, optical discs, burners and any other electronic storage media, is strictly prohibited, unless expressly authorised by the company.

Internet

The Internet connection is a working tool and must be used as such

Internet use for private purposes is only permitted outside working hours

Surfing the Internet:

- It is not permitted for those sites that do not directly relate to the performance of the duties assigned, especially those that may reveal the employee's political, religious or trade union views
- No financial transactions of any kind are permitted, including remote banking, on-line purchases and the like, except in cases directly authorised by the company and in compliance with normal purchasing procedures
- Downloading and installing free (freeware), shareware, P2P and/or FTP software from Internet sites is not permitted, unless expressly authorised by the company
- Any form of registration to sites whose content is not work-related is prohibited
- Participation, for non-professional reasons, in forums, or the use of chat lines is not permitted, nor is the storage of computer documents of an insulting and/or discriminatory nature on grounds of sex, language, religion, race, ethnic origin, opinion and trade union and/or political affiliation, etc.

Electronic mail

E-mails are a business tool and are not to be regarded as private correspondence; therefore:

- Any e-mail message (as it relates to work) may be copied and/or made public at any time
- E-mails (internal and external) may not be used for reasons unrelated to the performance of the tasks assigned
- It is not permitted to send or store messages (internal or external) of an insulting nature, discriminatory on grounds of sex, language, religion, race, ethnic origin, opinion or trade union and/or political affiliation, etc.
- It is not permitted to set up and use e-mail accounts external to the company.

Mobile phones

The use of mobile phones is subject to rules of good behaviour that should always be respected

Given that they are business tools, mobile phones should always be kept silent during meetings and encounters with customers, especially when at their premises

The use of mobile phones for personal purposes should be kept to a minimum and only in emergencies.

Company cars

The company car is the total responsibility of the person to whom it has been assigned, and, like all company assets, it should be used and maintained with the utmost care

It must be driven in full compliance with the requirements of the Highway Code

Any fines arising from traffic offences remain the responsibility of the driver.

Private cars

The use of the private car for business purposes is envisaged and, as in the case of the company car, the driver must operate in full compliance with the requirements of the Highway Code

Any fines arising from traffic offences remain the responsibility of the driver .

Section 4 - Criteria for conduct

4.0 Introduction

The rules contained in this section are intended to indicate to the addressees of this Code of Ethics the attitudes and behaviour to be observed when carrying out the various company activities in accordance with the values that inspire this document

All the addressees of this Code of Ethics (identified in Chapter 0 of this document) must observe proper and transparent conduct in the performance of their duties, thereby contributing to the effectiveness of the internal control system to protect corporate value

In compliance with the law, all addressees must maintain an attitude of helpfulness towards the corporate bodies and supervisory authorities.

4.1 Personnel relations

For further details, please also refer to the relevant Procedures of the 231 Management System. In general:

▪ **Personnel selection**

The evaluation of staff to be recruited, or in collaboration, is carried out on the basis of the correspondence of the candidates' profiles with the expected profiles and internal needs, while respecting equal opportunities for all concerned. The information requested is strictly related to the verification of the aspects envisaged by the professional and behavioural/aptitude profile, while respecting the candidate's privacy and opinions. In its selection activities, the Management adopts appropriate measures to avoid favouritism and facilitations of any kind and makes a careful selection based not only on the mandatory aspects, but also on preferential aspects decided by the Board of Directors

▪ **Establishment of the employment relationship**

Staff are employed under regular employment, professional service or internship contracts: no form of irregular employment is tolerated

▪ **Integrity and protection of the individual**

In the context of personnel management and development processes, as well as in the selection stage, decisions made are based on the match between expected profiles and the profiles possessed by people and/or on merit considerations. Access to roles and assignments is based on competence and ability. In addition, consistently with general work efficiency, flexible forms of work organisation are favoured

▪ **Empowerment and training of resources**

The company provides its people with information and training tools with the aim of enhancing the specific skills and preserving the professional value of staff. Institutional training is envisaged, provided at certain times during a person's professional life, specific to the person (e.g. an introduction to the business for new employees) and recurring training aimed at operational staff (e.g. training on safety in the workplace, on managing 231 and the code of ethics).

4.1.1 Health and safety

The company is committed to providing a working environment that protects the health and safety of its personnel by disseminating and consolidating a safety culture, developing risk awareness, and promoting responsible behaviour by all members of staff

The company also works to preserve, especially through preventive actions, the health and safety of workers

One of the main objectives is to protect human resources by constantly seeking the necessary synergies not only internally but also with suppliers, external consultants and customers involved in the company's activities

All employees are required to comply with internal rules and procedures on risk prevention and health and safety protection and to promptly report any shortcomings or non-compliance with the applicable regulations

The company adopts the general occupational health and safety protection measures prescribed by law, with particular reference to the provisions of (It.) Legislative Decree no. 81/08 as amended and supplemented. The organisation is committed to scrupulous compliance with all regulations concerning occupational health and safety for employees, collaborators, and users. In particular:

- **It lays down operational procedures to be followed and coordinates occupational health and safety activities**
- **It ensures the application of current regulations, including through the creation of risk assessment documents and by putting in place working procedures in line with applicable safety standards**

- **It constantly monitors legislative innovations and works towards their implementation**

The company also undertakes to ensure:

- **The assessment of all health and safety risks**
- **Prevention planning, aimed at a set of rules that coherently integrates operational conditions, as well as the influence of environmental factors and work organisation into prevention**
- **The elimination of risks and, where this is not possible, their reduction to a minimum in relation to knowledge acquired as a result of technical progress**
- **Respect for ergonomic principles in the organisation of work, in the design of the workstations, in the choice of equipment and in the definition of work and service delivery methods, particularly with a view to reducing the health effects of monotonous and repetitive work**
- **Reducing risks at source**
- **Replacing what is dangerous with what is not or is less dangerous**
- **Limiting to a minimum the number of workers who are or may be exposed to risk**
- **The limited use of chemical, physical and biological agents in the workplace**
- **The priority of collective protective measures over individual protective measures**
- **The health monitoring of workers**
- **The removal of the worker from exposure to risk for health reasons relating to his or her person and transfer to another job where possible**
- **Adequate information and training for workers, managers, supervisors, the Workers' Representative for Safety and all personnel**
- **Appropriate instructions to workers**
- **The participation and consultation of workers and the Workers' Representative for Safety**
- **The planning of measures deemed appropriate to ensure the improvement of safety levels over time, including through the adoption of codes of conduct and good practices**
- **Emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and serious and immediate danger**
- **The use of warning and safety signs**
- **The regular maintenance of rooms, equipment, installations with particular regard to any safety devices in accordance with the instructions of the respective manufacturers**
- **Appropriate instructions to employees, collaborators and users and training for them in accordance with the law and the national collective bargaining agreement applied to personnel.**

4.1.2 Protection of privacy

When processing the data of its staff, the company complies with the provisions of European Regulation 679/2016. People are given a privacy policy that identifies:

- **The purpose and means of processing**
- **The persons to whom the data are disclosed, if any**
- **The information necessary for the exercise of the right of access under art. 15 of the GDPR**

In cases where legislation requires it, individuals are asked for specific consent to the processing of their personal data. Any investigation into the ideas, preferences, personal tastes and in general the private life of employees and collaborators is excluded

The same procedure is also applied for the telematic management of information and personal data.

4.1.3 Protection of the environment

The organisation is committed to pursuing the protection of the environment through compliance with national and EU legislation and regulations

It is committed to implementing pollution prevention and raising awareness of environmental issues among employees and collaborators.

4.2 Duties of personnel

Please also refer to the 231 management system procedures for further details

People must act loyally in order to comply with the obligations entered into in the employment contract and the provisions of the Code of Ethics by ensuring the required performance.

4.2.1 Proxies and responsibilities

The duties, responsibilities and powers of directors, employees and collaborators are defined through specific resolutions and/or procedures

These tasks, responsibilities and powers must be known, accepted and respected.

4.2.2 Obligations of the Heads of Departments with regard to the Code of Ethics

Each head of department, identified as such in the organisation chart, job description and/or proxy system, must:

- **Ensure compliance with the Code of Ethics by those directly or indirectly subject to his or her responsibility**
- **Set an example to his or her employees/collaborators by his or her behaviour**
- **Ensure that employees understand that the provisions contained in this Code of Ethics form an integral part of their work performance**
- **Promptly report to the Management or any delegate or to the Supervisory Board any reports or special needs of his or her subordinates**

Failure by heads of department to comply with the obligations set out in this chapter may lead to the application of disciplinary sanctions, as envisaged by the sanctions system.

4.2.3 Obligations of all employees towards the Code of Ethics and the documents produced by the company

Every employee is required to be familiar with the provisions contained in the Code of Ethics or referred to therein, as well as with the reference laws governing the activities carried out within the scope of his or her post, which form an integral part of each employee's work performance

An employee who becomes aware of alleged unlawful conduct is obliged to communicate the information he or she has concerning such conduct only to his or her superiors or to the Supervisory Board and/or Management in the manner provided for by the internal system

Employees are also obliged to

- **Refrain from conduct contrary to these provisions and standards**
- **Contact their superiors or the Supervisory Board and/or delegate responsible for managing the prevention model for any necessary clarifications on how to apply the Code of Ethics or reference regulations**
- **Promptly report to at least one of the above-mentioned persons any information regarding possible violations of the Code of Ethics**
- **Co-operate with the organisation in the event of any investigations aimed at ascertaining and possibly sanctioning possible violations**

These behavioural requirements are also required of external consultants and collaborators of all kinds.

4.2.4 Protection of corporate assets

Each addressee is required to act diligently to protect corporate assets from improper or incorrect use

Individuals must know and implement internal information security policies to ensure integrity, confidentiality and availability

Information and know-how must be protected with the utmost confidentiality. The most significant data that the company acquires or creates in the course of its business must be considered confidential information and given appropriate attention: this also includes information acquired from and concerning third parties (customers, contacts, partners, employees, etc.)

Individuals who, in the performance of their duties, come into possession of confidential information, materials or documents must inform their superiors

Both during and after termination of the employment relationship with the company, individuals may use confidential data exclusively in the interest of the company and never for their own benefit and/or that of third parties.

4.2.5 Confidential information on third parties

Company personnel must refrain from using unlawful means to acquire confidential information about other organisations and third parties

Individuals who, within the framework of a contractual relationship, become aware of confidential information on other persons shall be obliged to use it exclusively for the purposes provided for in the contract in question

Without due authorisation, individuals may not request, receive or use confidential information concerning third parties. Should they learn confidential information about another person that is not already subject to a non-disclosure agreement or other form of protection, they should contact your manager for assistance in handling such information.

4.2.6 Use of company assets

Everyone is required to act with diligence in order to protect the company assets through responsible behaviour and in line with the operating procedures drawn up to regulate their use, accurately documenting their utilisation.

In particular, each staff member must:

- **Use the assets entrusted to him or her scrupulously and sparingly**
- **Avoid improper use of company assets that may cause damage or reduced efficiency or are otherwise contrary to the company's interest**
- **Properly guard the resources entrusted to him or her and promptly inform the competent units of any threats or harmful events to the company**

As far as computer applications are concerned, everyone is expressly required to:

- **Scrupulously adopt corporate security policies so as not to compromise the functionality and protection of the information systems**
- **Refrain from sending threatening or insulting e-mail messages or using low-level language or making inappropriate comments that may offend persons and/or damage the company's image**
- **Refrain from surfing websites with indecorous and offensive content and in any case not related to professional activities.**

4.3 Relations with customers

Please also refer to the operating procedures of the management system for further details.

4.3.1 Impartiality

The company is committed to offering its products and services without any discrimination between private customers or potentially holding grants, with special attention to the latter.

4.3.2 Contracts and communications to the customers

Contracts and communications to customers by the company must always be:

- **Clear and simple, formulated in language as close as possible to that normally used by the interlocutors**
- **Compliant with applicable regulations and such as not to constitute circumvention or otherwise unfair practices**
- **Complete so as not to overlook any element relevant to the customer's decision .**

4.3.3 Style of personnel behaviour towards customers

The style of conduct of the company's people towards customers is characterised by helpfulness, respect and courtesy, with a view to a collaborative and highly professional relationship.

4.3.4 Data processing

When processing customers' personal data, the organisation complies with the provisions of European Regulation 679/2016.

A privacy policy is delivered that identifies

- **The purpose and means of processing**
- **The persons to whom the data are disclosed, if any**
- **The information necessary for the exercise of the right of access under art. 15 of the GDPR**

In cases where legislation requires it, individuals are asked for specific consent to the processing of their personal data; any investigation into the ideas, preferences, personal tastes and in general the private life of customers is excluded

Personnel are obliged to handle data with the utmost discretion and confidentiality, especially towards internal staff; the same procedure is also applied to the handling of information and personal data by data transmission means.

4.4 Relations with suppliers

Please also refer to the management system procedures for further details.

4.4.1 Choice of supplier

Purchasing processes are informed:

- **By the search for maximum competitive advantage for the company**
- **By granting equal opportunities to suppliers**
- **By loyalty**
- **By impartiality**

The selection of suppliers and the determination of purchasing conditions are based on an objective assessment of the quality, price of the good or service, its actual availability and guarantees of service and timeliness

A further selection criterion is the exclusion of suppliers with ongoing criminal or other mafia-related proceedings.

4.4.2 Integrity and independence in relationships

Relations with suppliers, including those concerning financial and consultancy contracts, are constantly monitored by the company

The conclusion of a contract with a supplier must always be based on a relationship of extreme clarity, avoiding, where possible, forms of dependence

The documents exchanged with suppliers must be appropriately archived: in particular, those of an accounting nature must be retained for the periods stipulated by the regulations in force.

4.5 Relations with the Public Administration

This section deals with relations between the company and the public administration.

4.5.1 Fairness and loyalty

The company intends to conduct relations with the Public Administration with the utmost transparency and ethical conduct. These relations, which must take place in compliance with the regulations in force, are informed by the general principles of fairness and loyalty so as not to compromise the integrity of both parties.

4.5.2 Gifts, gratuities and benefits

No one in the company may give money or offer financial or other benefits to persons in the public administration for the purpose of obtaining appointments or other advantages for themselves or for the company

No form of gift that may be construed as exceeding normal business or courtesy practices or otherwise aimed at acquiring favourable treatment in the conduct of any activity related to the company is permitted

In particular, it is forbidden to make any form of gift to Italian and foreign public officials or their relatives that may influence their independence of judgement in order to obtain more favourable treatment or undue benefits or advantages of any kind

A gift means any kind of benefit: not only material goods but also, for example, free attendance at conferences, training courses, the promise of a job offer, etc.

The above cannot be circumvented by resorting to third parties: in this respect, not only illicit payments made directly to entities or their employees are considered acts of corruption, but also illicit payments made to persons acting on behalf of such entities

On festivities, anniversaries and/or holidays, donations of goods are permitted, provided they are of a modest size and in any case within the limits decided by the Board of Directors or the Management, subject to prior notification to the Supervisory Board, suitably documented in order to allow the appropriate checks to be carried out

On the other hand, if a person in the company receives explicit or implicit requests for benefits from a member of the Public Administration, he or she shall immediately inform the Board of Directors or the person to whom he or she is required to report for the adoption of appropriate checks and initiatives.

4.6 External relations

This section deals with details of the company's external relations.

4.6.1 External effectiveness of the Code of Ethics

Anyone acting in the name and on behalf of the company who comes into contact with third parties with whom the organisation intends to enter into business relations, or is required to have institutional, social, political or any other kind of relations with them, is obliged to:

- **Inform them of the commitments and obligations imposed by the Code of Ethics**
- **Demand compliance with the obligations of the Code of Ethics in the performance of their activities**
- **Take the necessary initiatives in the event of refusal by third parties to comply with the Code of Ethics or in the event of failure or partial performance of the commitment undertaken to comply with the provisions contained in the Code of Ethics, informing the Management or its proxies and the Supervisory Board.**

4.6.2 Conflict of interest

All addressees must ensure that every decision made in the course of their activities is made in the interest of the company

All addressees are required to avoid any activity or situation of personal interest that constitutes or may constitute, even potentially, a conflict between their own interests and those of the organisation and, in any case, shall comply with the specific procedures adopted by the company on the matter

All addressees of the Code of Ethics must refrain from taking advantage of their relationship with the company in order to favour themselves or third parties to the detriment or disadvantage of the organisation itself

It is forbidden for any employee to take part, directly or indirectly, in any capacity whatsoever, in commercial initiatives that are in direct competition with the company, unless such participation has been communicated in advance to the competent Board of Directors and approved thereby, after consultation with the Supervisory Board

In the event that situations of conflict of interest, even if potential, are identified, whether internal or external to the Company's activity, each person involved is required to refrain from engaging in the conflicting conduct by promptly notifying the Supervisory Board, which is responsible for assessing the existence, case by case, of any incompatibility or prejudicial situations.

4.6.3 Competitive practices

It is of paramount importance to the company that the market be based on fair competition

The company is committed to scrupulously observing the relevant laws and cooperating with the market regulatory authorities. In particular:

- **It undertakes to carry out activities in compliance with the rationale of the law for the supply of goods and services that are entrusted through express agreements with public entities, including economic entities and joint-stock companies with public participation**
- **It competes fairly on the market by respecting the rules of competition**
- **It undertakes to provide correct information about its activities both internally and externally or in response to legitimate requests**
- **It ensures the truthfulness and correctness of corporate data in relation to financial statements, reports and other official documents.**

4.6.4 Gifts and benefits

See chapter 4.5.2 above

Section 5 - Enforcement mechanisms of the Code of Ethics

5.1 Organisational principles

The company ensures that the organisational system is based on the criterion of separation between decision-maker, executor and controller.

In particular, the organisation makes all operations verifiable because they are recorded

The company binds those performing the audit function to the truthfulness and correctness of the data and information

Every operation and/or activity must be lawful, authorised, consistent, documented, verifiable, in accordance with the principle of traceability and company procedures in accordance with the criteria of prudence and protection of company interests

Company procedures must allow for checks to be carried out on operations, authorisation processes and the execution of said operations

Any employee who carries out transactions involving sums of money, goods or other utilities that can be economically evaluated as belonging to the company must reasonably provide appropriate evidence in order to allow the verification of such transactions.

5.2 Accounting transparency

The company's accounts meet the generally accepted principles of truthfulness, accuracy, completeness and transparency of the recorded data

The addressees of this Code of Ethics undertake to refrain from any conduct, whether it consists in action or omission, that directly or indirectly violates the regulatory principles and/or internal procedures concerning the formation of accounting documents and their external representation

The addressees of this Code of Ethics are also required to keep and make available adequate supporting documentation for each operation or transaction carried out, so as to ensure:

- **Accurate bookkeeping thereof**
- **The immediate identification of the underlying characteristics and motivations thereof**
- **The easy formal and chronological reconstruction thereof**
- **The verification of the decision-making, authorisation and implementation process, in terms of legitimacy, consistency and appropriateness, as well as the identification of the various levels of responsibility**

Recipients of this Code of Ethics who become aware of cases of omission, falsification or negligence in accounting records or supporting documents are required to promptly report them to their superior or to the Supervisory Board and/or Management

The company promotes (refresher) training in order to make the addressees of this Code of Ethics aware of the rules (laws or regulations, internal prescriptions, provisions of trade associations) that govern the formation and management of accounting documents.

5.3 Checks and audits

The company ensures its willingness, through the competent persons, to provide all necessary information and production of documents and necessary requests to the audit and supervisory bodies

The company guarantees the accessibility of all information and documents to those entitled to them and provides, through the willingness of its directors and employees, who are responsible for their department, all information that favours the exercise of supervisory functions

The organisation prohibits its directors and employees and/or collaborators from making false declarations and submitting false documents or certifying untrue situations, including by means of computer systems, with the aim of unduly receiving public funds and/or obtaining and retaining possible benefits.

5.3.1 Supervision of the implementation of the Code of Ethics

The task of verifying the implementation and enforcement of the Code of Ethics falls to:

- **the Board of Directors**
- **the Management**
- **the Coordinators**
- **the Supervisory Body: this body, in particular, in addition to monitoring compliance with the Code of Ethics, having access to all the company's information sources for this purpose, suggests appropriate updates to the Code, also on the basis of reports received from members of staff**

The Supervisory Board has the following tasks:

- **Communicating to the Management, for the adoption of appropriate measures, reports received concerning violations of the Code of Ethics**
- **Expressing binding opinions on the revision of the most relevant policies and procedures to ensure consistency with the Code of Ethics**
- **Contributing to the periodic review of the Code of Ethics: to this end, the Supervisory Board makes appropriate proposals to the Board of Directors, which assesses them and, if necessary, approves and formalises them**

The Supervisory Board maintains the requirements of autonomy and independence, assumes powers of investigation and control, as well as powers of initiative for the performance of the assigned functions.

5.3.2 Reporting problems or suspected violations

Violations of the Code of Ethics by the addressees, if any, are subject to the disciplinary system provided for in the corporate Model 231

It should be noted, in fact, that in the event of violations of the Code of Ethics, the company will take disciplinary measures against those responsible for such violations, where deemed necessary for the protection of the interests of the organisation, which may go as far as the removal from the company of those responsible, in addition to compensation for any damage resulting from the violations

Non-compliance with the rules of the Code of Ethics by members of the corporate bodies may lead to the adoption, by the competent corporate bodies, of the most appropriate measures provided for and permitted by law

Violations of the rules of the Code of Ethics by employees constitute a breach of the obligations arising from the employment relationship, with all contractual and legal consequences, also with reference to the relevance thereof as a disciplinary offence

Violations committed by suppliers and external collaborators will be sanctioned in accordance with the provisions of the relevant contractual assignments, notwithstanding more serious violations of the law

Particular attention is paid to the handling of computer data through internal systems: any problems and suspected breaches must be reported immediately to the Head of IT Services and/or Management for appropriate action.

5.3.3 Disciplinary measures resulting from violations

The provisions of this Code of Ethics form an integral part of the contractual obligations undertaken by personnel, as well as by persons having business relations with the company

Violation of the principles and conduct set out in the Code of Ethics compromises the relationship of trust between the company and the perpetrators of the violation, be they directors, employees, consultants, collaborators, customers, or suppliers

For details of the disciplinary system and sanction mechanisms, please refer to the Model 231 adopted by the company.

In general, violations will be prosecuted in the following terms:

- **With regard to employees (including members of the corporate bodies and the Supervisory Board itself) by means of appropriate disciplinary measures, regardless of the possible criminal relevance of the conduct and the institution of criminal proceedings in cases where the conduct constitutes an offence. In particular, sanctions will be in accordance with the rules and logic of the employment contract applied. Before a disciplinary measure is taken, the person concerned is given the opportunity to explain his or her behaviour**
- **With regard to consultants, collaborators, customers, suppliers and other parties having contractual relations with the company, specific procedures will be activated for the termination of the contractual relationship**

This is also without prejudice to any compensation for damage that the company may suffer as a result of the violation by the above-mentioned persons of the provisions contained in the Code of Ethics.

5.4 Entrustment of public service

The company applies the following conduct when performing public service activities:

- **Compliance with the principles of impartiality, typical of the Public Administration**
- **Non-acceptance of advantages, money and benefits**
- **Not accepting illegitimate influences from third parties**
- **Avoid conflicts of interest of its appointees.**

5.5 Confidentiality

Addressees are required to observe the utmost confidentiality on information, documents, studies, initiatives, projects, contracts, known for services rendered

The company puts in place measures to protect the information it handles and prevent it from being accessed by unauthorised personnel.

5.6 Dissemination, communication and training

This Code of Ethics forms an integral part of and implements the 231 Model adopted by the company for the purpose of preventing offences committed in the interest or to the advantage of the organisation itself by the persons indicated by (It.) Legislative Decree no. 231/01

In order to prevent violations of the regulations in force, as well as of the Code of Ethics itself, the company envisages the adoption of specific procedures by all those involved in the operational process, aimed at identifying the persons responsible for the processes of decision-making, authorisation and performance of the operations themselves. This Code of Ethics is brought to the attention of all internal and external parties concerned or in any case involved in the company's mission through appropriate communication and training activities.

5.7 Operational procedures and decision-making protocols

This Code of Ethics forms an integral part of and implements the 231 Model adopted by the company for the purpose of preventing offences committed in the interest or to the advantage of the organisation itself by the persons indicated by (It.) Legislative Decree no. 231/01

In order to prevent violations of the regulations in force, as well as of the Code of Ethics itself, the company envisages the adoption of specific procedures by all those involved in the operational process, aimed at identifying the persons responsible for the processes of decision-making, authorisation and performance of the operations themselves.

5.8 System of proxies

Apart from the already qualified persons (Management), the company uses a system of proxies on the basis of which certain activities can only be carried out by persons expressly authorised to do so because they have been granted the power by means of an official delegation of authority and/or notarised power of attorney

In fact, it is necessary that the individual operations be carried out in their various stages by different persons, whose competences are clearly defined and known within the organisation so as to avoid unlimited or excessive powers being attributed to individual persons.

Section 6 - Final provisions

6.1 Conflicts with the Code of Ethics

In cases where even one of the provisions of this Code of Ethics conflicts with the provisions of internal regulations or procedures, the Code of Ethics shall prevail over any of these provisions.

6.2 Approval process and amendments

This Code of Ethics was originally approved by the company's Board of Directors on the following date.

Date of approval of the Code of Ethics **29.09.2023**

Any change and/or addition to this Code of Ethics will be approved by the Board of Directors after consultation with the Supervisory Board and promptly disseminated to all the addressees thereof, in particular:

- **The Supervisory Board periodically reviews the Code of Ethics and proposes amendments and/or additions;**
- **The Board of Directors examines the SB's proposals and decides accordingly, making the approved changes immediately operational.**