

CODE OF ETHICS AND CONDUCT

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0. Introduction

0.1. Targets

EMPOL is aware of contributing with its work, with a deep sense of responsibility and moral integrity, to the development of the Italian economy and the civil growth of the country.

EMPOL believes in the value of work; legality, fairness and transparency are their key elements to achieve its economic, productive and social objectives. This Code of Ethics is a set of principles and rules whose observance is of fundamental importance for the proper functioning and improvement of the Company's reliability. It represents the "Fundamental Charter of Rights and Duties" through which the Company: clarifies its ethical and social responsibilities towards the various internal and external stakeholders, such as employees, collaborators, suppliers, Public Bodies, Customers, etc.; seeks forms of balance and/or points of balance between the multiple interests and the legitimate expectations advanced by the stakeholders.

0.2. Implementation

The implementation of this Code has the primary objective of satisfying in the best possible way the needs and expectations of the Company's interlocutors, aiming to recommend and promote a high level of professionalism and to prohibit those behaviours which are not only in conflict with the rules in force in a specific moment, but also with the values that the Company intends to promote.

Upon approval, this Code was adopted by EMPOL on the date of its signature. The present document integrates with the various internal procedures which have been set up in response to UNI EN ISO 9001 and IFS LOGISTIC standards, which are also referred to in this document.

Following the implementation of this document, EMPOL has established a set of rules:

- rules of conduct governing the relationship with external interlocutors, collaborators, the market and the environment. These rules of conduct are implemented both internally and externally by requiring all collaborators, consultants and, as far as they are concerned, external interlocutors, to comply with them;
- organizational and management rules, aimed at creating an efficient and effective planning, execution and control of activities capable of ensuring constant compliance with the rules of conduct and prevent them from being violated by any person working for EMPOL.

The provisions of this Code of Ethics and of the company protocols (limited to their applicable aspects) aimed at preventing crimes, are explicitly extended to the whole EMPOL personnel.

0.3. Diffusion

The Code of Ethics is widely distributed internally and is available to any EMPOL interlocutor. Every EMPOL employee (both those working internally and those working externally) is required to know and keep with the provisions of the Code; EMPOL carefully monitors compliance with the Code, providing the adequate information, prevention and control tools and taking corrective actions, if needed.

0.4. Update

The Code can be amended and supplemented, also basing on the suggestions and indications coming from the internal Supervisory Body, EMPOL employees or any other third body.

0.5. Temporary provisions

This Code enters into force after 30 days from the day following its approval and will be subject to periodic updates. The company management ensures the widest possible spread of this code by publishing it on the company website and on the intranet or company bulletin board. A copy of the code will be provided to all the personnel, as well as to EMPOL customers and providers and it will be afterwards verified whether it has been received; the copy of the code will be of course provided also in the event of signing a new employment contract or at the time of conferment of a new role.

1 Rules of conduct

1.1 Relationship with the outside world

1.1.1 Competition

EMPOL deeply believes in respect for legality, in free and fair competition and act to obtain competitive results which reward capacity, experience and efficiency.

EMPOL and its collaborators must behave in a proper way with its customers.

Any action aimed at altering the conditions of fair competition is against EMPOL company policy and is prohibited to any person acting on its behalf.

In no case can EMPOL pursuit of its own interests justify its managers or employees to act unrespectfully towards the current legislation and the provisions of this Code.

In any kind of communication with the outside world, all the information regarding EMPOL and its activities must be truthful, clear and verifiable.

1.1.2 Relationship

1.1.3 External interlocutors

EMPOL relationship with any interlocutor must be conducted in compliance with the current legislation and the principles of correctness, transparency and verifiability.

Gifts that may appear to exceed standard commercial or courtesy practices, or aimed at obtaining favorable treatment in the management of any working activity, are absolutely not allowed.

As regards customer managers, the search for and establishment of personal relationships aimed at obtaining favours or at having some kind of influence or interference with the clear purpose of directly or indirectly effect on the outcome of the working relationship, are prohibited; making promises and offering goods or other benefits to representatives, officials or employees, including by means of third parties, are also prohibited, except in the case of

modest value gifts which are meant for a specific working purpose and cannot be in any way confused as a way to obtain undue favours.

EMPOL does not provide contributions or benefits neither to political parties and workers' trade unions, nor to their representatives, unless they are allowed and established by the current and applicable legislation.

1.1.4 Customers

EMPOL bases its activity on the criterion of quality, to be intended as the fully satisfaction of customer's needs.

Relationships with customers are based on fairness, loyalty, diligence and clarity both in commercial negotiations and in the fulfillment of and compliance with the contractual obligations.

At the time of establishing any commercial relationship, EMPOL carefully evaluates the adequacy and feasibility of the requested services, with particular focus on the technical and economic conditions, on the safety of transport and goods themselves, and on all the environmental aspects, promptly detecting, where possible, any anomalies.

The quotation proposed will be in compliance with adequate quality standards, appropriate remuneration levels for employees, current safety and environmental protection regulations.

EMPOL resorts to litigation only when its legitimate claims do not find their due satisfaction in the interlocutor.

In any negotiation process, it must always be avoided situations in which the involved parties are or may appear to be in conflict of interest.

1.1.5 Suppliers

Relationships with suppliers are governed by mandatory regulations and by this Code and are subject to constant and careful monitoring by EMPOL.

EMPOL suppliers and sub-carriers operate in compliance with current regulations (as regards trucks and trailers, transport mode and drivers) and with the rules and provisions listed in this Code.

1.2 Environment

Production activities are managed by EMPOL in compliance with current environmental protection regulations.

The Management also monitors the performance of its vehicles also in terms of pollutants released into the environment, setting continuous improvement targets where possible and practicable.

EMPOL is committed to spreading and consolidating the environmental protection culture and pollution prevention among all its collaborators and sub-carriers, so that they can develop risk awareness and go for a more and more responsible behaviour. As regards to the above, see also the Carrier Manual on the dedicated area of our website.

1.3 Relationship with collaborators

1.3.1 Human resources

EMPOL believes in the importance of human resources, as the main key of success of any company that aims to create a relationship of mutual loyalty and trust between employer and employee. All EMPOL staff are hired directly with a regular employment contract.

The work performance is carried out in full compliance with both the current collective contractual regulations of the sector and the current social security, tax and insurance laws.

EMPOL promotes the continuous improvement of the professionalism of its employees, also through the organization of training activities.

1.3.2 Safety and health

EMPOL guarantees the physical and moral integrity of its collaborators, working conditions being respectful of personal dignity, safe and healthy work environments, compliance and periodic check of trucks and trailers, all the previous in full compliance with the current legislation on the prevention of accidents and worker protection in the workplace.

EMPOL carries out its work activities in technical, organizational and economic conditions which ensure adequate accident prevention and a healthy and safe working environment.

EMPOL commits to spread and consolidate a culture of safety among all its collaborators and sub-carriers, leading them to develop risk awareness and promoting responsible behaviour from them all, especially when driving, which equals to the full respect of the traffic laws.

1.3.3 Mobbing

Anyone who feels to be victim of mobbing will receive the due assistance. On the other hand, serious measures will be taken towards those who dare to perpetrate any kind of harassment (mobbing).

1.3.4 Protection of personal data (privacy)

Each employee or collaborator has the right to the protection of his private sphere and protection from the abuse of his personal data.

Any employee or collaborator who feels to have been abused in the above sense, can immediately turn to EMPOL managers.

1.3.5 Child labour

At EMPOL we ensure that workers are of the minimum legal age required by current legislation to be able to carry out work.

1.3.6 Coercion and Harassment

Each worker is treated with dignity and respect without the use of punishment, threats, verbal harassment, abuse, intimidation or other forms of physical, sexual or psychological violence.

1.3.7 Discrimination

At EMPOL, no discrimination is made in the hiring process and management of personnel (including, but not limited to, salary, the granting of allowances, career advancement, the assignment of tasks, dismissal or retirement) on the basis of: race, religion, age, nationality, language, social background, ethnicity, sexual orientation, sex, political or other opinion, wealth, birth, disability or other personal conditions not related to the experience or ability in carrying out a specific task (as required by no. 100 and 111 ILO conventions on Equality). EMPOL implements an equal opportunities policy in employment, aimed at promoting gender equality in work and ensuring that men and women receive equal compensation and treatment for the same job position.

1.3.8 Freedom of association

EMPOL respects the right of workers to participate, peacefully and in compliance with the law, in trade unions, as well as the right to negotiate collective agreements, without engaging in discrimination or interference of any kind. Where permitted by law, EMPOL agrees to facilitate and not hinder the development of aggregation methods that allow employees to meet independently and discuss employment-related issues.

1.3.9 Corruption and abuse of office

EMPOL respects local laws and does not engage in any illegal practices such as, but not limited to, extortion, fraud and abuse of office. Practices involving public or private corruption, illegitimate favoritism and collusive behaviour are prohibited without any condescension.

1.3.10 Working hours

EMPOL complies with applicable laws and industry standards regarding working hours, driving times, holidays and vacations.

1.3.11 Salary

EMPOL respects the right of personnel to an appropriate and sufficient salary which meets the basic needs of employees and is at least equal to the minimum wage or the prevailing wage recognized as adequate in the relevant sector, whichever is higher, in accordance with the applicable laws. EMPOL pays workers without delay and guarantees them the benefits required

by law, including (but not limited to) paid leave, sick pay, as well as maternity leave and parental leave benefits, in compliance with the provisions of applicable laws. Reductions in pay as a form of disciplinary measure are not tolerated, just as any other reduction is not permitted unless provided for and permitted by the applicable national legislation or, if not provided for by such legislation, exclusively following the explicit consent of the worker. All overtime work is paid with an increase, according to the methods established by national legislation, collective bargaining or the prevailing standards in the reference sector, depending on which is the most favorable treatment for the worker.

1.3.12 Protected categories

According to current legislation (L. 68/99), the following categories are to be considered protected:

- civilian invalids with disability equal to or greater than 46%;
- work disabled people with disability equal to or greater than 34%;
- blind;
- deaf;
- war invalids;
- civilian war invalids;
- service invalids;
- orphans and surviving spouses of those who died due to work, war or service in public administration and similar subjects;
- repatriated Italian refugees.

The same rights as all other employees are reserved for workers hired under a protected category, including remuneration.

The EMPOL Management ensures that the tasks assigned to any employees in the protected category are compatible with their state of health and, if necessary, rescheduled in the event of worsening of their state of health or inability to carry out the task for which they have worked until that moment.

Workers with disabilities, holders of Law 104 article 3 paragraph 3 (severely disabled) are reserved the following rights:

- use of 3 days of paid monthly leave (they are paid by INPS, you will advance them in your pay slip) which can also be divided by the hour (2 hours a day if full time and 1 hour a day if part time);
- refusal of transfer;
- choice of the closest work location;
- exemption from night shifts and on-call duty.

2. Implementation methods

2.1 Prevention

In compliance with current legislation and in order to plan and manage company activities so that they meet the criteria of efficiency, correctness, transparency, quality and safety of assets, EMPOL adopts organizational and management measures aimed at preventing any activity which is illegal or against the regulations of this Code, carried out by any person

acting on its behalf.

Due to the articulation of activities and organizational complexity, EMPOL uses a system of delegation of powers and functions, assigning specific tasks in explicit and specific terms only to those people with adequate skills and competences.

Taking into account its size and the extension of the delegated powers, EMPOL adopts and implements models of organization and management based on specific measures which are meant to ensure the work performance is carried out in compliance with the current legislation and the rules of conduct of this Code, and to discover and eradicate risk situations promptly.

2.2 Supervision

EMPOL adopts specific methods to check the compliance of the behaviour of anyone acting on its behalf.

2.3 Penalties

Compliance with the rules of the Code of Ethics by EMPOL employees must be considered an essential part of the contractual obligations, pursuant to art. 2104 of the Italian Civil Code. The violation of the rules of this Code by EMPOL employees may be considered as a breach of the primary obligations of the employment relationship or even a disciplinary offense, punishable according to the law provisions.