



Experience helping with transportation



CODE OF ETHICS



Experience helping with transportation



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1. INTRODUCTION

Although the A.D.R. Group (hereinafter also referred to as the “**A.D.R. Group**” or the “**Group**”) is composed of companies based in various countries, including non-European countries, it intends to adopt uniform lines of conduct and rules of conduct aimed at the responsible, ethical and friendly development of the company. The Group, which has always placed people at the centre, has already adopted a “*Human Rights Policy*”, and with the present document confirms and expands its commitment in this respect.

1.1 Code of Ethics

The A.D.R. Group adapts the management of its activities to the observance of the principles and standards of conduct expressed in this Code of Ethics and in the applicable national regulations. In this respect, each company of the Group, where necessary, implements and supplements this Code of Ethics based on the regulations of its own country.

Through the Code, the Group intends to create a kind of charter of moral rights and obligations that define the ethical and social responsibility of each participant in the organisation.

The Code of Ethics expresses the responsibility and ethical commitments assumed by all persons who, in various capacities, cooperate in achieving the Group's objectives, in relation to: employees, collaborators, external consultants, suppliers, clients and other entities, which



as a whole are referred to as stakeholders, as having interests related to the activities of the A.D.R. Group companies.

The A.D.R. Group, in managing the organisation's activities, recognises the importance of ethical, social and environmental responsibility and, to this end, promotes management oriented towards balancing the legitimate interests of its stakeholders and the community in which it operates.

This Code has been developed in such a way as to preserve the interests of the stakeholders.

This Code of Ethics consists of four main parts:

- System of values: defines the reference values;
- Criteria of conduct: defines the criteria of conduct to be observed in relations with stakeholders;
- Internal control system: defines the implementation and control mechanisms established for the correct application of the Code of Ethics and its continuous improvement;
- Sanction system.

1.2 Mission and values

The A.D.R. Group intends to carry out its mission with absolute respect for the following fundamental values and principles:

- **RESPECT;**
- **TEAMWORK;**
- **SATISFACTION;**
- **EQUAL OPPORTUNITIES;**

- **FLEXIBILITY.**

All employees and external collaborators must respect and share the Group's values, and are obliged to show respect for the Group and all those who, in various ways, make its operations possible (customers, suppliers, etc.). Their skills, knowledge and experience must serve everyone in respecting and achieving common goals. The goals must be implemented and achieved in a way that satisfies everyone, in particular, end customers, employees, collaborators and partners. Access to equal opportunities for employees and collaborators is ensured, as well as flexibility in managing their tasks, always in compliance with internal rules and regulations or policies.

1.3 Addressees and scope of application of the Code of Ethics

The addressees of the Code of Ethics are:

- managers,
- employees,
- collaborators

of the A.D.R. Group, as well as all persons who, directly or indirectly, permanently or temporarily, establish relationships or contacts with it. The Group promotes the dissemination of the Code of Ethics among all interested parties and the correct interpretation of its content, and provides the most appropriate tools to facilitate its application.



2. VALUE SYSTEM

2.1 Responsibility and compliance with the law

The fundamental objective of the A.D.R. Group is to comply with applicable legal regulations. It requires its managers, collaborators and employees in general, as well as anyone who performs representative functions in any capacity, even informally, to comply with the law and all applicable regulations and the rules and procedures established for this purpose, as well as ethical conduct that does not compromise their moral and professional credibility.

2.2 Standards of conduct

The A.D.R. Group conducts its business in accordance with the law, in a fair, honest and transparent manner and with respect for the rights and interests of its employees.

2.3 Respect in the workplace

The A.D.R. Group believes in diversity and a working environment in which trust and mutual respect prevail and in which everyone feels responsible for the Group's performance and reputation. Employees are recruited, employed and promoted solely on the basis of the qualifications and skills required for the position. The A.D.R. Group is committed to working with its employees to develop and improve the skills and abilities of all individuals. It strives to provide all employees with healthy and safe working conditions. Unacceptable treatment of employees, such as child exploitation, physical punishment, abuse or forced servitude, is not tolerated.



No Group company employs children, i.e. anyone younger than the age of employment permitted by the law of the place where the work is performed, and in any case anyone younger than sixteen years of age.

If child labour is detected, either at the suppliers of any goods or services or at the Group itself, the child employee will be immediately removed from work. The subsequent measures taken will be assessed on a case-by-case basis, with the understanding that the point of reference for the measures taken must be the welfare and protection of minors.

Information about any child labour detected will be communicated to all collaborating companies that request it.

If child labour is detected in one of the Group companies, an internal investigation will be initiated immediately to determine the causes and to create new procedures to prevent its recurrence. The persons responsible for the internal investigation are the HR Director and other persons deemed necessary in a given case. The results of the internal investigation will also be communicated to collaborating companies that have requested it.

The A.D.R. Group respects the right of employees to freedom of association, consultation with third parties and collective bargaining where permitted by the law. Suppliers and contractors with whom the Group does business must adhere to the same principles.

2.4 Employment of young persons

However, the A.D.R. Group's campaign against child labour must not discriminate against young persons' work. Employment of young persons refers to work performed by persons aged between 16 and 18. In order to protect these age groups, it is required that the work assigned to young employees does not adversely affect their mental and physical development. For this reason, they should be deployed in tasks that do not involve exposure to



noise, vibration or manual lifting of heavy loads. Examples of tasks to which a young employee may be deployed include minor maintenance work, checking and inspecting incoming goods or assisting with office work.

Young persons employed at the company will be supervised by a guardian, appointed individually depending on the department of the company in which they will work, who will train them and help them in their professional development in the company.

The group does not have a negative attitude towards the employment of young persons and takes into account applications from people belonging to this category.

2.5 Product safety

The Group ensures the safety of its products, respecting its employees, consumers and the environment. It considers this to be a mandatory requirement for conducting business in a responsible manner and an essential element in gaining and maintaining public trust.

2.6 Environmental responsibility

The A.D.R. Group believes that economic development must coexist harmoniously with the natural environment and land protection, which is why environmental protection forms the basis of every company policy. In this respect, the Group is committed to continuously improving the management of its environmental impact and to pursuing the long-term goal of developing a sustainable business.

2.7 Sustainable development

The Group works for sustainable development, integrating economic progress, social responsibility and environmental care in order to improve the quality of life for everyone, including present and future generations. The Group companies directly contribute to



sustainable development by providing services that improve the quality of life of consumers, including health, hygiene and comfort.

2.8 Combating corruption

The A.D.R. Group prohibits corruption in all its forms, including active, passive and commercial corruption aimed at obtaining improper advantages and excessive or illegal conduct in the company. All employees are prohibited from offering, giving, requesting or receiving any form of compensation that could be interpreted as corruption. It is also prohibited to accept gifts exceeding 100.00 euros. If it is not possible to refuse a gift, it must be reported immediately to the managers, who will take appropriate measures.

Anyone who learns or suspects the existence of a situation of active, passive or commercial corruption is obliged to immediately notify the company's management, which will launch all appropriate controls.



3. CRITERIA OF CONDUCT

3.1 Personnel

The A.D.R. Group considers its employees to be a fundamental asset in achieving the company's objectives. To this end, the Group establishes and maintains relationships based on mutual trust and loyalty, maximally enhancing the potential of each employee. The individual Group companies promote training of the personnel members, supporting their professional development, refraining from any discrimination and guaranteeing equal opportunities. The term “personnel” refers to employees, collaborators and managers.

In the performance of their duties, both internally and with external partners, the personnel must comply with applicable law, the employment contract and the principles contained in the Code of Ethics, also by expressly declaring their full acceptance of this document.

3.2 Personnel management policy

Employees are employed on the basis of regular employment contracts and the Group does not allow any form of unlawful employment. Furthermore, any form of discrimination against individuals is prohibited. All decisions taken in the field of personnel management and development are based on meritocracy, guaranteeing equal opportunities. In the management of hierarchical relationships, power is exercised in a fair and correct manner, avoiding any abuse. It is an abuse of power to demand personal favours and any behaviour that constitutes a breach of this Code of Ethics as actions to which the supervisor claims they have the right. The personnel is fully valued by activating the available tools to promote their development, potential and career. In this respect, the relevant departments must:



- recruit, employ, train, reward and manage employees or collaborators without discrimination;
- create a working environment in which personal characteristics cannot be a reason for discrimination;
- apply merit, competence and, in any case, strictly professional criteria to all decisions concerning an employee or collaborator;
- guarantee a healthy and safe working environment for all employees, collaborators and managers;
- create a working environment in which employees and collaborators can freely express their ideas and beliefs in order to “enrich” the company and improve its results.

People who believe they have been offended or discriminated against may report the incident to management or the appropriate department.

3.3 Protection of human dignity

Employees have the right to a safe, peaceful working environment that promotes interpersonal relations, on a level of equality, mutual justice and respect for freedom and personal dignity.

Everyone has the right to perform their duties in an environment that guarantees respect for human dignity, without any discrimination and inappropriate and undesirable behaviour.

The A.D.R. Group rejects and opposes sexual and moral harassment, any form of mobbing or stalking, as well as any other form of discrimination that aims to marginalise people for cultural, political, trade union, religious, ethnic, territorial, sexual orientation or other reasons.

Such behaviour, including aggressive, hostile, denigrating, persecutory or harassing actions, is unacceptable because it violates human dignity.

Any violation of the dignity of employees found to be a disciplinary offence, and the sanctions provided for in collective agreements or in the relevant national legislation apply to it. In this respect, the Management Board ensures the adoption of diversified, rapid and impartial measures aimed at guaranteeing the victim the necessary protection and support if they decide to file a complaint, providing clear and comprehensive instructions on the procedure to be followed, maintaining confidentiality and preventing any possible retaliation. Similar guarantees are extended to any witnesses.

3.4 Occupational health and safety

The Group considers issues related to the health and safety of employees as very important, being aware of the risks related to safety in the workplace. It is therefore committed to enforcing health and safety standards in the workplace by guaranteeing employees and their collaborators appropriate working conditions.

The A.D.R. Group calls on all employees to implement this policy and fully comply with the content of job descriptions and instructions within the scope of their competences and responsibilities, taking into account, among other things, that aspects related to environmental protection, achieving appropriate quality standards, as well as protecting the health and safety of employees are achieved primarily through the cooperation and collaboration of those performing the various activities, and not those who control them.

In the field of occupational health and safety and in relation to specific national regulations, the personnel should:

- take care of their own health and safety and that of other people present at the workplace who are affected by the consequences of their actions or omissions, in accordance with the training, instructions and measures provided by the employer;



- contribute, together with those responsible for this (e.g. employer, managers,, supervisors), to the fulfilment of the obligations established to protect health and safety at the workplace;
- comply with the regulations and instructions issued by those responsible for collective and individual protection;
- use work tools and safety devices correctly;
- immediately report to the responsible persons any deficiencies in the aforementioned means and devices, as well as any dangerous situations of which they become aware, taking action, in case of emergency and within the scope of their competence, to eliminate or limit situations of serious or immediate danger, informing the representatives of the employees for safety and/or the persons responsible in the various companies of the Group;
- not to remove safety, signalling and control devices without authorisation;
- not to carry out on their own initiative actions or manoeuvres that do not fall within the scope of their competence or that may endanger their safety or that of other employees;
- participate in training and education programmes organised by the Group;
- undergo medical examinations as provided for in the regulations in force or, in any case, ordered by the competent doctor.

All employees, collaborators and managers are obliged to scrupulously comply with the principles and obligations arising from occupational health and safety regulations, as well as to comply with all the measures specified in internal procedures and regulations. Particular



attention must be paid to pregnant women in order to ensure working conditions appropriate to their psychophysical needs.

4. INTERNAL CONTROL SYSTEM

4.1 Internal control system

The aim of the A.D.R. Group is to disseminate at all levels a culture characterised by awareness of the existence of control and the adoption of a control-oriented mentality.

By internal controls we mean all the tools necessary or useful to direct, manage and verify the company's activities in order to ensure compliance with regulations and procedures, protect the company's assets, the health and safety of people, effectively manage operations and provide accurate and complete accounting and financial data.

The internal control system as a whole must reasonably enable:

- compliance with applicable laws, the Company's procedures and the Code of Ethics;
- compliance with the Company's strategies and policies;
- protection of the Company's resources, both tangible and intangible;
- effectiveness and efficiency of management;
- credibility of internal and external financial, accounting and management information.

The responsibility for implementing an effective internal control system is shared at every level of the organisational structure; therefore, all employees, within their functions, are responsible for defining and properly functioning the control system.

4.2 Communication and training

The Code of Ethics is disseminated to all interested parties, both internal and external, through appropriate information activities.

In order to ensure proper understanding of the Code of Ethics, the HR Department prepares and implements a periodic communication, training and information plan aimed at raising awareness of the ethical principles and standards contained in the Code. Training initiatives may vary depending on the roles and responsibilities of employees and collaborators.

4.3 Reporting

Each Group company establishes communication channels through which interested parties can direct their reports regarding the Code of Ethics or possible breaches thereof directly to the HR Department.

All interested parties may report in writing and **anonymously** any breach or suspected breach of the Code of Ethics.

In particular, where required by national regulations, the Group companies have also adopted a whistleblowing procedure to receive reports from internal and external parties regarding incidents specified in the relevant regulations and occurring in the workplace, guaranteeing confidentiality and protection against retaliatory action.

4.4 Breach of the Code of Ethics

In the event of a breach of the Code of Ethics, the HR Department and/or the internal supervisory bodies, if any, within their competences, report it and request the application of any sanctions deemed necessary to the Directors and, in the most significant cases, to the Management Board.

5. SANCTION SYSTEM

5.1 Guidelines for the sanction system

A breach of the principles set out in the Code of Ethics and internal procedures compromises the relationships of trust between the Group and its employees, consultants, collaborators of various types, suppliers, business partners, etc.

Such breaches will therefore be combated decisively, promptly and immediately through disciplinary measures.

5.2 Sanctions against management

In the event of a breach of the Code by managers, the HR Department and/or internal supervisory bodies will inform the entire Management Board, which will take the appropriate steps provided for by the applicable law.

5.3 Sanctions against managers

If managers breach the internal procedures set out in this Code or, as part of performance of activities in risk areas, behave in a manner that is contrary to internal recommendations, the most appropriate measures will be taken against the persons responsible, in accordance with the provisions of national collective agreements or the relevant national regulations.

The governing body is authorised to take the most appropriate measures against managers.

Any other internal supervisory bodies, within their competence, must be duly informed of the application of any sanctions.

5.4 Sanctions against employees

Following notification of a breach of the Code of Ethics by an employee, disciplinary procedure must be initiated to confirm the violation. The sanctions provided for in collective agreements or relevant national regulations apply to employees.

The HR Director is responsible for managing the entire formal and communication process related to imposing sanctions.

The same Director must then inform the internal supervisory authorities of the disciplinary sanctions applied. The type and scope of the sanction will be determined on a case-by-case basis, taking into account the following elements:

- the intentionality of the unlawful or improper conduct;
- the degree of negligence, carelessness or inexperience in relation to the foreseeability of the event;
- the general conduct of the employee (e.g. any previous such incidents) or the existence of extenuating circumstances (as well as aggravating circumstances), with due regard to the professionalism of the employee and their work history;
- the role and task assigned to the employee;
- the level of hierarchical, functional and/or technical responsibility/position;
- any division of responsibility with other employees who contributed to the improper conduct.