



FRANCESCO PARISI - Forwarding Company Ltd, TRIESTE
Company controlled by Francesco Parisi LP, Trieste

ETHICAL CODE

- 1.1 Francesco Parisi – Forwarding company S.P.A. (Ltd) (hereinafter referred to as the “Company”) is part of Francesco Parisi Group S.a.s. (LP) (hereinafter referred to as the “Group”) founded in Trieste in 1807 and therefore shares the behaviours, values and principles outlined in the ethical code (hereinafter referred to as the “Code”) of the Group.
- 1.2 The Code summarizes all the rules of conduct that partners, directors, managers, employees, suppliers and contractors at all levels have to follow when performing any type of job for the Company and more broadly the Code illustrates the rules that regulate the relationships with the Company.
- 1.3 The Code is available online through the Company’s webpage, on the intranet and in paper form at request.

GENERAL PRINCIPLES

- 2.1 **HUMAN RIGHTS:** The Company promotes and defends the respect of the inalienable human rights and rejects all kind of discrimination based on sex, ethnic belonging, language, religious or political belief, social class and personal status.
- 2.2 **LEGISLATION COMPLIANCE:** The Company respects all laws and regulations at local, regional, national and international level in the counties in which it operates. In order to ensure this goal and avoid illegal procedures, the Company has established an organizational model to monitor and control the good practice of its business (the “MOG” model).
- 2.3 **ENVIROMENTAL SUSTAINABILITY:** The Company fully supports the sustainability guidelines and eco-friendly ideas, implementing energy efficient solutions at its production sites. The Company is also careful in choosing the most proficient logistical solution and means of transport for its businesses.
- 2.4 **FINACIAL INTEGRITY AND ANTI-FRAUD:** All the Company and Group’s financial and economic activities are conduct in compliance with the principles of transparency and integrity.
- 2.5 **ANTI – CORRUPTION:** The Company rejects corruption as a means to manage business. It is therefore unacceptable to suggest or promote any kind of favour or bribe towards any elected public administrator or public officer as well as all private entities. Nor it is possible to accept the reception of such favours or advantages for personal gain in the conduct of business practices.
- 2.6 **COMPETITION:** The Company recognizes the principles of fair competition in the free markets and respects the antitrust regulations each time it is applicable and in no case pursues behaviours that could go against a free and fair competition.
- 2.7 **SECRECY AND CONFIDENTIALITY:** The Company observes the highest levels of confidentiality, secrecy and privacy regarding its clients, suppliers and partner’s information while carrying out its business. The Company guarantees that the IT system is adequately protected from unauthorized access or intrusion from third parties.

- 2.8 **PROTECTION OF INDIVIDUAL DIGNITY:** It is fundamental for The Company to guarantee the protection of the individual dignity on the workplace; therefore, it forbids in Italy and abroad, any kind of work exploitation, especially underage or child labour. Accordingly the Company commits to employ workers that have 16 years of age or older.

CLIENT RELATIONSHIP

- 3.1 **CLIENT DEFINITION:** The Company operates in the logistic service sector for industrial and commercial enterprises, thus usually excluding private citizens and final consumers.
- 3.2 **IMPARTIALITY:** The Company guarantees a fair and equal treatment to all existing and future prospect clients. Rates and regulations differences may apply from case to case only if based on objective and verifiable conditions.
- 3.3 **BEHAVIOUR AND ATTITUDE:** Active Listening, willingness, honesty, courtesy, loyalty, professionalism and all the principles contained in this ethical code are all requirements that the Company beholds towards its clients.
- 3.4 **CLIENT SATISFACTION:** The satisfaction of all clients is of pivotal importance. Evaluation measures and procedures are in place to constantly monitor and improve the levels of client satisfaction and promptly act when these are not met.
- 3.5 **EFFICIENT AND CORRECT FLOW OF INFORMATION:** All communication with the clients has to be prompt, true, loyal and precise. The Company shall refrain from any deceitful behaviour.
- 3.6 **PRIVACY:** The Company takes all measures necessary for the safekeeping of all client data and information.
- 3.7 **INNOVATION:** The Company constantly pursues service innovation and places great attention to the client's needs, constantly trying to anticipate future market trends.
- 3.8 **LAW COMPLIANCE:** The Company strictly abides the laws and shall not try to brake or bend them under client pressure.
- 3.9 **GIFTS:** All forms of homages, gifts, or benefits that exceed the usual practice of a respectful relationship conduct and could be interpreted as a way to acquire preferential treatments from a client shall not be tolerated by the Company. All gifts and benefits that differ from small promotional gadgets of reasonable economic value have to be authorized from the management and adequately reported.

SUPPLIER RELATIONSHIP

- 4.1 **SUPPLIER DEFINITION:** The Company considers a supplier anyone who provides products or services that are functional to the business final output and become part of the service provided to the clients. This also includes other companies that are part of the Group.
- 4.2 **SELECTION CRITERIA:** The Company chooses its suppliers on the base of economic, quality and ecological factors and therefore guarantees its neutrality in the choice of the suppliers. The supplier has to guarantee the compliance to the criteria adopted by the Company and the Group, including this Ethical Code.
- 4.3 **EVALUATION:** The Company has in place specific procedures for a transparent, fair choice and evaluation of its suppliers.
- 4.4 **GIFTS:** The acceptance of gifts, homages or benefits from suppliers is tolerated as long as they do not exceed the usual practice of a respectful relationship

conduct and are not capable of bias when selecting and evaluating a potential supplier.

EMPLOYEE AND PARTNER RELATIONSHIP

- 5.1 **DEFINITION:** An employee or partner are all those subjects that establish a business relation or business partnerships with the Company, finalized to obtain the Company's business objectives. The Company officialises these relations in rigorous obedience and in respect to all wage and retributive regulations and legislation.
- 5.2 **GENERAL GUIDELINES:** The Company rejects all kind of discrimination based on sex, ethnic belonging, language, religious or political belief, social class and personal status. The Company promotes equal opportunity and guarantees a carrier growth based on merit, independently of gender and age differences.
- 5.3 **VOCATIONAL TRAINING:** The Company values training as a means to improve and develop one's carrier and organizes training courses and encourages continuous training activities.
- 5.4 **HEALTH AND SAFETY REGULATIONS:** The Company applies and respects all the norms, regulations and guidelines regarding the health and safety of all workers and applies strict measures to ensure the safe being of all personnel.
- 5.5 **CONFLICT OF INTEREST:** The employees and partners work and operate for the Group and Company's goals and interests. If a conflict of interest arises or may arise, employees and partners are compelled to promptly inform their senior, higher-ranking manager about such condition. This applies even if such conflict of interest is affecting family members or relatives.
- 5.6 **USE OF THE COMPANY'S ASSETS:** The guidelines for the usage of the assets of the Company are of safekeeping in order to ensure an optimal asset life cycle. Employees and partner have to keep a mindset oriented to energy and resource saving to ensure the respect ecologic and economic principles. The utilization of company assets for personal purposes is forbidden, with the exception of specific cases that have to be formalized by written contracts.
- 5.7 **CONFIDENTIALITY:** Employees and partners have to guarantee total confidentiality on all information and data acquired while working for the Company.

RELATIONSHIP WITH THE COMMUNITY

- 6.1 **POLITICAL PARTIES:** The Company does not financially support any political party or movement.
- 6.2 **INSTITUTIONS:** It is intended by Institution all the entities that are part of the Public Administration and the Public figures that belong to the political environment. The company holds the principle of a honest and lawful relationship with such bodies and rejects any kind of relationship based on a mutual exchange of favours.

METHOD OF IMPLEMENTATION

- 7.1 **COMUNICATION:** The present Ethical Code is brought to the acknowledgement of all employees and, to the best extent, to the all external stakeholder of the Company via:
- The delivery of a copy of the Ethical Code to the employees and commercial partners

- The formal declaration of the Ethical Code and its binding disciplinary action for all employees is available online in the Company's intranet and posted on the message board in the recreational area accessible to all workers
- The introduction of a briefing note in all the contracts signed by the Company informing on the adhesion to the Ethical Code.
- The on-line publication of the Code on the Company's website
- The insertion of specific clauses, based on the principles and guidelines expressed in the Ethical code, that will result in the resolution of the contracts with suppliers.

7.2 INFORMATION: In order for all new employees and partners to learn the correct comprehension of the Ethical Code, the Company commits to implement training initiative tailored for each role and responsibility covered in the workplace. Such initiatives shall take place within the first trimester from the start of the working contract.

7.3 REPORTS AND ALERTS: All end users (recipients) of the Ethical Code have to report and notify any breach or suspect of misconduct of the Code. The notification can be made to the Supervisory Body (odv@francescoparisi.com) or to the administrative personnel and does not have follow a hierarchical procedure. The Supervisory Body and the Company will then proceed to investigate and verify the report, if necessary listening to the person who is allegedly responsible of the breach of conduct. In all cases, the Supervisory Body and The Company are committed to ensure the anonymity and guaranteeing the safety of the notifying person, in compliance with the "whistleblowing" legislation.

7.4 BREACH OF THE ETHICAL CODE: The Supervisory Body or, if such body has not been nominated yet, the Company's administration, will ascertain the breaches to the Ethical Code and adopt the appropriate sanctions.

7.5 IMPLEMENTATION OF THE ETHICAL CODE: FRANCESCO PARISI – Forwarding Company S.p.A. (LTD) in adopting this Ethical Code has defined the methods of its implementation in accordance with the decree law N231/2001 on administrative responsibilities of the organizations.

Accepted by the Board of Francesco Parisi – Forwarding Company Ltd in Trieste on 01/04/2019