



## **Code of Ethics and of Behavior**

## *Code of Ethics and Behaviour*

### *Premise*

The Ethical and Behaviour code has the main function of spreading within and outside of our organization the fundamental values and principles that characterize the activity of the ALLTRANS Group (hereinafter also ALLTRANS or the Company).

It proposes the orientation of individual behaviour in order to enhance the image of correctness, prestige and good reputation that have always been associated with our image, according to a general system of values and principles so profoundly shared by every employee to allow us the conviction that such a system drives our entire business.

The system therefore assumes that each manager, employee, or collaborator at any level of the group is aware of its responsibility to observe the principles expressed by the Code in the exercise of its activities and the fact that this obligation constitutes an essential part of their contractual duties.

## *The Mission, the Vision, the shared Values*

### *Our Mission*

#### **We are an Italian company**

Despite our development is Multinational, the identity of our roots is Italian. We have a reputation worldwide for our seriousness and for our ability to solve problems with availability, professionalism, creativity, and style, in full compliance with the rules.

#### **Our people are our value**

Beyond our commitment to give our people a productive use and a perspective of stability and security, we invest in their character development and their professional growth, through the continuous enhancement of technical skills, the ability to solve the problems, respecting corporate values.

#### **Offering innovative services**

Our business is to offer economic operators and producers of consumer goods, international shipping and logistics services aimed at improving the quality of the market globalization process, in the full security of processes and services.

#### **We promote quality**

We want to offer our contribution to the development of the qualitative level of the market, promoting the awareness that the adoption of measures to protect safety and the environment and in general, the attention to quality are virtuous behaviours that by providing benefits, increase competitiveness and the value of companies who pursue them.

### *Our Vision*

#### **We are global**

We are a multinational Group, articulated and integrated, with a common heritage based:

- On our ability to work as a team
- On our professionalism and competence
- On the strength of our global coverage
- On the strength of our customers
- On the value of our brand

### **We work with our customers**

We privilege the choice of serving customers active in industrial production who, sharing our goals in quality and safety, are ready to establish with us a partnership in order to achieve a common and higher level.

### **Our service marks the difference**

The competitive differential that must characterize our Company from its competitors is represented by the quality of our service, or:

- our ability to understand customer needs
- our time of response
- the integrity of our work.
- our professional competence

### **We are autonomous and independent**

We are an autonomous and independent Company that operates freely on the market either directly or through relationships, agreements, partnerships, and synergies with other organizations for development and innovation of the services produced.

### **We pursue growth and profitability over time**

Our action is aimed at producing results that generate a correct and stable productivity over time so that we can:

- Maintain our autonomy and our independence
- Allow us to fulfil our mission
- Finance the ongoing business development
- Remunerate the invested capital and the work produced

## *Our Values*

### **Partnering with the customer**

The relationships with our Client are based on the correctness and the coincidence of objectives, well aware that the success of the Customer will be at the base of our success.

### **Responsibility**

At every level of our Organization, we fully assume the responsibility of the quality of the work done by us and we fully realize the impact that our activity has towards the customer.

### **Our staff**

Aware of the importance that the work of all our collaborators has for the development of the Company, we respect its diversity, favouring the individual development and the learning level.

### **Compliance with the Rules**

We rigorously apply and we demand from all, behaviours consistent with the laws in force and the regulations established by ALLTRANS for the protection of our image, our reputation and the quality of our service .

## *The Rules of Conduct*

### *Internal relations*

#### **Our exclusive Staff**

ALLTRANS undertakes not to make use of, nor to encourage, forced labour or juvenile work, contrasting with every mean harassment, abuse, and the discrimination of all kinds. The company also undertakes to ensure the safety and healthiness of the workplace, the respect of the right of association and collective bargaining, the allocation of salaries, allowances, and respect of working time in accordance with the rules of law and the awarding of prizes with an equity character.

#### **Working Relationship Management**

Working relationships in ALLTRANS are based on ways inspired by internal procedures and practices that relate in particular to:

- Determination of the need for the insertion of new resources that are defined in the annual budgets and approved by the General Direction
- Internal selection procedures, respecting equal opportunities, avoiding cronyism and unjustified favour.
- Working relationships that are managed in full compliance with employment contracts, of the laws and regulations in force
- Intolerance of any irregularity or unlawful contractual, social, or sanitary security in the working relationship

The company undertakes to exploit the competences and the potential of the staff on the basis of objective and transparent analysis criteria, considering primarily for career and salary advancements, recognition of the results achieved, skills and professional competence expressed over time.

It is therefore essential to use an effective system of evaluation of the targeted performance, through the managers, to the evaluation of the strengths or improvement achieved, in order to promote individual and professional growth.

ALLTRANS also undertakes to promote by any means a culture and a growing awareness of the risks associated with the exercise of its activities, while preserving initiatives to control and prevent the health of its employees.

The protection of the privacy of the personnel is ensured, in conformity with the regulations in force, according to which are required, treat and retain only information related to the proper conduct of the employment relationship. The treatment or communication of personal data, in the absence of the consent of the person concerned, is prohibited. Requests for information relating to the private sphere of the individual contributor are not admissible.

#### **Duties of Staff**

The staff is obliged to offer to the company adequate working performances, with the absolute commitment to their continuous improvement. Relations with the coordinated persons, with the colleagues and with the superiors will have to be always based on correctness and collaboration.

Every person employed by the companies of our group must respect the property of the company. Their use must be functional and exclusive to the performance of their contractual task, avoiding misuse, fraudulent or otherwise to the detriment of the company interest.

The use of the information systems and their applications must be in compliance with the internal security systems and are not allowed to use them for purposes other than working. Particular reference is made to access to Internet

sites, already regulated with internal provisions, of vulgar or indecorous content, as well as the use of computer stations other than their own in the absence of specific authorization by the holder of the same.

The information acquired during the work activity is subject to confidentiality. They must only be used for the exercise of their activities and are managed in such a way as to maintain their integrity and safety.

Every person employed at ALLTRANS is required to avoid at any rate to fall into a conflict between Company and family or personal interests that may even potentially compromise the integrity or impartiality judgement or conduct.

The managers of the group must not abuse their position, role or power within the company in order to exert pressure of any kind on the personnel in order to influence for improper purposes, the carrying out of the assigned assignments.

Everyone is reminded that any unlawful pressure in carrying out its activity must be rejected. In case anyone should be subject to pressure or receive proposals contrary to the duty of objectivity and correct management of their work, this must be immediately reported to his supervisor or the General Direction.

Every person employed by the ALLTRANS Group is obliged to refuse treatment of favour or other benefits, gifts or acts of hospitality of such size as to exceed the simple act of attention or courtesy. In any situation in which this limit is exceeded or if the established doubt exists, the person concerned shall inform his or her supervisor in order to decide the most appropriate course of action.

## *External relations*

### **Relationship with the Customers**

Relations with customers must be absolutely based on compliance with the laws and regulations in force and in particular with those placed to protect the market and competition.

ALLTRANS, aware that the activity in reference is mainly driven by customers, maintains with the same loyal relationships of mutual esteem and consideration, aimed at satisfying their needs through the provision of highly elevated services at competitive conditions.

To this purpose, the behaviour towards the customer must be based on collaboration and efficiency. Communications must be simple, clear and comprehensive. The commitment to compliance with contractual obligations and commitments must be total.

The principles that must guide ALLTRANS staff in their relations with customers are correctness, professionalism, efficiency, availability, and courtesy.

Any modifications to contractual conditions or to the performance of the related services without prior agreement with the customer are not allowed.

In relations with new or usual customers, management of relations with persons of dubious or illicit reputation, lack of reliability or implied in illegal activities will be strictly avoided.

It is prohibited to offer or supply to collaborators or employees of the customer costly gifts or giveaways or other benefits in order to derive undue personal advantages.

The staff, in contact with customers, must adhere to the standards of presence and decorum, through behaviour, cleanliness, clothing and language, aimed at safeguarding the corporate image as well as its own.

### **Relationship with suppliers**

In the management of relations with suppliers, the guiding principles related to the management of customer relations are expressly recalled.

All the staff of the company is bound to the search of the suppliers bearing in mind the principles of the Code of Ethics and of behaviour, asking them to apply the same principles.

### **Relationship with non-exclusive staff**

The non-exclusive staff, such as technicians, consultants, and professionals, consists mainly of the number of people who, while not linked by an exclusive working relationship with our company, work by carrying out activities of business interest in the different Areas of operation.

For the management of the relationship with non-exclusive personnel, the guiding principles indicated for the relationship with suppliers are hereby expressly recalled.

## *Market, Collectivity, Public Administration, Information*

### *The Market*

ALLTRANS considers competition on the market, where it is characterized by principles of fairness, lawfulness, and sound competition as a factor in the improvement of services.

The Company wants to grow on the market through a development of services aimed primarily at the search for value and profitability for the customer.

### *The Community*

The Company must always be aware of its role and the influence that its activity can exert towards the community, meant as the sum of communities of different sizes and characteristics.

ALLTRANS has always been committed to offering its contribution to the maintenance of a sustainable eco environment through support and practices that promote recycling and the proper management of waste.

### *Relations with the Public Administration*

Relations with public, Italian or foreign institutions must always be characterized by a spirit of collaboration, honesty, correctness, and transparency.

### *Information organizations*

Relations with the information bodies must be characterized by correctness, spirit of cooperation and respect for the right of information

Data reports are solely the task of the General Direction and the functions to which they have been entrusted.

### *Unions, Trade Associations*

## **Relations with Political Organizations and Trade Unions**

Relations with organizations carrying political and trade union interests must be based on principles of absolute equidistance, independence, and transparency, without discrimination or unequal treatment.

No business forms of economic or other support are permitted to any of these organizations or to persons representing them.

## **Relationships with Professional Associations**

Transparent forms of relations with the entities in the subject which aim to defend the higher interests of the category are absolutely encouraged, with absolute respect for competition market rules.

## *Body for the control system*

In application to what foreseen above, ALLTRANS entrusts the function of the supervisory body to the General Direction, responsible for the following tasks:

- To update the code of Ethics and the Code of behaviour.
- Monitor compliance with the management model.
- Manage all aspects related to the knowledge and observance of the Code of Ethics and behaviour.
- Receive reports of the Code of Ethics and behaviour, ensuring the confidentiality of the sources of the reports.



ALLTRANS WORLDWIDE LOGISTICS  
Viale delle Industrie 13 - 20090 Sesto - (MI)  
Tel: +39 02 95375236 - Fax: +39 02 95375235

[www.alltrans.biz](http://www.alltrans.biz)

Baku – Batumi – Dalian – Genova – Hangzhou – Hong Kong – Piraeus – Poti  
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