

# CODE OF ETHICS AND CONDUCT

Alberti Germano e Santi Romano srl  
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## THE COMPANY

Alberti Germano Santi Romano S.r.l. (hereinafter referred to as "Alberti e Santi", "organization" or "company") was born in 1959, when the transportation companies "Alberti Germano" and "Fratelli Santi" merged.

The expansion of the company first involved several areas in central and southern Italy, and then continued in the UK and Eastern Europe, with the opening of three new offices, respectively in 1993 (UK), 2013 (Hungary), 2014 (Romania), and a representative office in 2020 (Poland).

Today, Alberti e Santi carries out its activities nationally and internationally and acts as a key partner for numerous companies throughout Europe in all production sectors.

Despite the fact that the company is now over 60 years old and has undergone many changes, the core values that have set Alberti e Santi apart over the years are what still make us successful today.

Specifically, the **Mission**, the strategic vision of Alberti e Santi, is to provide the best possible service through fast, efficient and cutting-edge logistics. The Mission is aimed at defining the standard on the basis of which business actions and decisions should be carried out, focusing on 4 key elements:


- Flexibility,
- Punctuality,
- Reliability,
- Sustainability.

The key elements of our Mission are summarized in the motto of the company, "Your business need... is our business solution!".

Our **Vision** is to offer global transportation and integrated logistics services integrated that are characterized by the structural flexibility of a people-oriented organization, with an ongoing commitment to taking care of the environment and people.

The **Values** that drive the company's behaviour and act as a compass on the proper way of conducting business are:

- **Integrity:** acting responsibly
- **Leadership:** continuing to stand out as a virtuous company that leads by example
- **Creating value for customers and employees**
- **Reliability,** punctuality and flexibility in the services offered, in all relevant fields



*The vibe we want to convey to our employees is that of a sense of belonging. At Alberti e Santi, we strongly believe that companies are composed of people that we consider close to us, with those same values and ideals that can be found in a family, which is to help each other through the difficult times in the workplace.*

Stefano Alberti  
Alberti e Santi Srl CEO

## PRELIMINARY NOTE

This Code of Ethics and Conduct (hereinafter "the Code") is adopted in the belief that acting responsibly and transparently is the cornerstone of the Company's success. It **contains the framework of deontological principles and delineates the rights and duties to which all employees and collaborators of Alberti e Santi - in all capacities and at all levels - must adhere in their everyday actions**, as the company's reputation and image are based on the full ability to be aligned with the values set forth herein.

The document **belongs to a broader project aimed at sustainable business management, accountability and alignment with the United Nations Sustainable Development Goals (SDGs), as well as to the consolidation of an internal structure in charge of sustainability governance.**

The Code is inspired by the main national and international laws, guidelines and regulations in force in the areas of corporate social responsibility, corporate governance, human rights, labor and environment. In particular, **it refers to the Principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the ILO Conventions on Workers' Rights.**

Within this framework, compliance with the Code is considered an essential prerequisite for the purposes of effective, prudent and proper business management, as well as for the proper running, reliability and reputation of the company, in addition to what is already established by civil, administrative and criminal law, current regulations and collective bargaining.

The Code also seeks to imprint the operations and the way of acting in relationships inside and outside the company on the values of loyalty, integrity, diligence, impartiality, fairness and transparency, focusing on the observance of laws and regulations, as well as compliance with corporate procedures. The Code aims, lastly, to recommend, promote or forbid certain behaviours - even in addition to the regulatory provisions - foreseeing sanctions proportional to the seriousness of the eventual violations committed.

Within the scope of their functions and responsibilities, all those who work in and for Alberti e Santi are bound to observe and enforce compliance with the principles of this Code, which represents **a base of shared and binding values.**

In no way may the conviction that one is acting for the benefit or in the interest of Alberti e Santi justify engaging in conduct conflicting with the principles outlined below.

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## 1. GENERAL PRINCIPLES

### 1.1. SCOPE AND RECIPIENTS

This Code is adopted by Alberti e Santi and governs all decisions and actions in the Company's offices, production sites and warehouses.

The Code applies to all personnel employed by the Company, whatever their capacity, including directors and members of corporate bodies, part-time employees, temporary employees, subcontracted employees, interns, etc. (hereinafter referred to as "Recipients").

### 1.2. RECIPIENTS' OBLIGATIONS

Observance of this Code shall be considered as an essential part of the contractual obligations of the Recipients, who are bound to **know and comply with its provisions both internally and in relations with third parties** that the Company establishes business relations with.

While contributing to the effective implementation, promotion and diffusion of the Code, Recipients shall abstain from all conduct contrary to it, in order to avoid situations that may lead them to behave in a manner that is not in accordance with the Company's values.

### 1.3. DISCLOSURE TO THIRD PARTIES

The document will also be made publicly accessible and available for consultation for **any third parties** (including customers, providers, consultants, etc.) through its publication on the Company's website.

### 1.4. COMPLIANCE WITH LAWS, REGULATIONS AND INDUSTRY STANDARDS

Alberti e Santi bases its activities on the principles of **legality and legitimacy**. As a consequence, a mandatory and peremptory principle is the respect of the laws in force in all the countries in which the Company provides its services and/or is engaged in business.

In addition, it guarantees compliance with company procedures and this Code at all levels.

### 1.5. ENHANCEMENT OF PERSONNEL

Alberti e Santi acknowledges and protects **the equal and inalienable rights of all women and men who work for the Company**, in whatever capacity.

The Company bases its corporate policies on the respect of the set of rules developed by the International Labor Organization (ILO), which aims at promoting equal opportunities for women and men in order to obtain dignified, safe, healthy and productive employment, under conditions of freedom, equity, security, dignity and non-discrimination.

The Company safeguards the physical, cultural and moral integrity of all employees and is committed to assessing each one according to its personal contribution, in a cohesive atmosphere based on professionalism, collaboration, trust and transparency.



## 1.6. PROMOTION OF SPORTS ACTIVITIES AND WELLNESS

Alberti e Santi is strongly involved in encouraging physical activity and healthy competition. For almost 50 years, in particular, the Alberti family has been the owner of **A.S.D. Pallacanestro Fiorenzuola 1972**, the basketball team of Fiorenzuola d'Arda.

Moreover, the company supports a variety of sports and recreational events on the territory of Piacenza.

## 1.7. COMMITMENT FOR THE COMMUNITY

Besides sports, Alberti e Santi supports the **social, cultural and economic development of the community in which it operates, mainly through donations and sponsorships.**

Alberti e Santi devotes considerable attention to the history and culture of the community in which the company's main office is located: in this regard, it supports **city events in Piacenza and neighbouring areas.**

## 1.8. RESPECT FOR THE ENVIRONMENT

Alberti e Santi acknowledges the convergence between environmental protection and economic progress, considering also the goals of sustainable development. It is therefore committed to **complying with international and European obligations in environmental matters** and to effectively implementing them in its strategies, through a systemic approach.

The commitment to protecting and safeguarding the environment is strongly supported by its management, which: (1) is developing strategies that can contribute to the reduction of environmental impacts; (2) is involving employees in training related to the topic of sustainability and corporate social responsibility; and (3) is advocating the sharing and observance of good practices towards stakeholders.

## 1.9. CERTIFICATIONS AND QUALITY POLICY

The company pursues goals of quality, innovation, continuous improvement, employees' welfare and customer satisfaction. To achieve this, it ensures that internal processes are effective and comply with the main guidelines of its sector and relies on third-party, impartial certification agencies to **validate its commitments and provide accreditation to its activities.** Alberti e Santi, as proof of quality management in its productive processes, **has been ISO 9001 certified since 2013 and ISO 14001 certified since 2020, and is committed to retaining them over time.**

## 1.10. CONFLICT OF INTEREST

Between the Company and the Recipients there exists a relationship of complete trust and loyalty. All the Recipients ensure that the decisions they make on behalf of the Company correspond to the Company's best interest and make every effort to avoid the arising of situations of conflict of interest <sup>1</sup>. Therefore, it is prohibited to **subordinate the functional position within the Company to personal, family or friendship interests or the interest of other companies.**

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<sup>1</sup> A conflict of interest is understood to be a situation in which an employee, collaborator or manager pursues an objective that is different from the corporate objective, or even to the detriment of corporate interests, or engages in activities that may, in any way, interfere with its ability to take decisions in the exclusive interest of the Company, or voluntarily obtains or attempts to obtain a personal/family advantage in the course of carrying out activities in the interest of the Company, or procures it for a third party.

Activities other than those carried out in the Company are permitted, as long as they comply with the law, do not conflict with the activity carried out for the Company's benefit, and comply with the obligations of loyalty, diligence, prudence, and professional expertise to which each employee must conform.

### **1.11. PREVENTION OF MONEY LAUNDERING AND HANDLING OF STOLEN GOODS**

Alberti e Santi scrupulously complies with national and international legislation aimed at preventing the phenomena of money laundering, self-money laundering, receiving stolen goods and financing criminal activities and/or terrorism. In this regard, the company is committed to renew every year its registration on the white list referred to in the Prime Ministerial Decree of April 18, 2013. To this end, Recipients are called upon, exercising the utmost professional diligence, to:

- **carefully verify available information on counterparties** (especially casual ones), verify their identity, integrity and reputation;
- **avoid entering into or maintaining business or financial relationships** in those cases where there is reasonable doubt about the respectability and legitimacy of the counterparties' activities;
- immediately **report** any irregularity (even if potential) of which they are aware, to facilitate the prevention and countering of crimes;
- make and accept **cash payments only within the limits and for the amounts permitted by law** and ensure the traceability of payments;
- ensure the **utmost cooperation with the competent authorities** in the prevention, countering and suppression of crimes.

### **1.12. COMBATING CORRUPTION**

Corruption is defined as the conduct of those who, including through an intermediary, solicit or receive, for themselves or others, undeserved money or other benefits, or accept the promise of such, in order to perform or omit an act in violation of the obligations inherent to their duties or obligations of loyalty. Alberti e Santi does not tolerate any form of corruption and is committed to complying with the anti-corruption laws in force in all the countries in which it operates, and demands that all Recipients **act with honesty and integrity**. For this reason, no Recipient shall be discriminated against or punished if it refuses to perform a corruptive or potentially corruptive act, even if such refusal results in the loss of business for Alberti e Santi's business.

### **1.13. GIFTS AND OTHER BENEFITS**

**Gifts, gratuities or favors are forbidden, except within the limits of ordinary business courtesy, and on the condition that they are goods of moderate value**, expressly permitted by the existing laws and anyway such that they cannot be interpreted, by an impartial observer, as having the purpose of acquiring improper advantages and/or compromising the integrity or reputation of the Company. In any event, expenses related to gifts and gratuities must be regularly approved by the competent company offices, properly documented, accounted for and recorded.

#### 1.14. PROTECTION OF FREE AND FAIR COMPETITION

In its broadest sense, competition is defined as a market situation in which there is freedom to access business activity, multiple companies produce the same goods or offer the same services, and everyone is given the freedom to take advantage of the best opportunities available in the market and/or propose new opportunities, without impositions or constraints from the State or business coalitions.

Alberti e Santi acknowledges free and fair competition as a decisive factor for growth and constant business improvement, and therefore acts in full compliance with national and European **antitrust legislation**, as well as with comparable non-EU regulations.

Any action or omission directed at altering the conditions of fair competition is contrary to this Code. The pursuit of the Company's interest cannot, under any circumstances, justify a conduct that does not comply with the principles of fair competition.

## 2. PROTECTION OF RESOURCES AND INFORMATION

### 2.1 RESPECTING CORPORATE ASSETS

Alberti e Santi provides each Recipient with a variety of company assets, both **tangible** (fleet of vehicles, equipment, machinery, supplies, computers) and **intangible** (image and reputation, data, information, intellectual property, software, hardware). These assets must be used exclusively **for their intended purposes**, avoiding to cause damage, decrease efficiency or in any way conflict with the Company's interest.

Each Recipient must, in addition, take appropriate precautions to preserve resources from any form of (even attempted) theft, loss, damage, abuse or illegal, inappropriate or unauthorized use, intrusion, sabotage, or destruction.

### 2.2 INTELLECTUAL PROPERTY PROTECTION

The Company promotes and protects research, development and innovation and acts in full compliance with laws, regulations and conventions, and with intellectual property rights legitimately held by Alberti e Santi itself and by third parties.

All Recipients are expected to **respect and protect** the intellectual heritage of the Company and to **prevent any violation** of the intellectual heritage of others, ensuring the broadest compliance with intellectual property rights.

It is also **forbidden to use any computer or telematic program** on which copyrights are held by third parties and which has not been previously licensed to the company.

The company is, also, the owner of the following registered trademark:

Trademark (literal)	Request number	Territorial extent	Nice classification	Date of filing
"ALBERTI E SANTI"	018704731	European Union	35, 39, 41	18/05/2022
"ALBERTI E SANTI"	UK00003862340	UK	35, 39, 41	14/04/2023

The above mentioned trademark unambiguously identifies the company and sets its goods and services apart from those of competitors in the sector. Therefore, it is possible to use said trademark only **upon explicit written authorization** given by the relevant corporate offices and in compliance with the appropriate license agreement.

### 2.3 TRANSPARENCY OF CORPORATE INFORMATION

Alberti e Santi bases its actions on the principle of transparency, which is based on truthfulness, accuracy and completeness of information and clarity of communication both outside and inside the Company. The Company applies, at all levels, the utmost commitment to provide **correct and truthful**

**information** regarding the Company's activities, assets and operations, and to facilitate the internal and external control processes of the competent authorities.

The concept of transparency imbues corporate communication at all levels, as well as **accountability - both financial and non-financial**.

As to the first profile, the Company implements rigorous, timely, reliable, and effective processes, procedures, information and informatics systems in compliance with accounting principles, and opposes any conduct that could possibly harm the **transparency and traceability of financial statement reporting**. In this regard, it guarantees that the accounting records and financial statements faithfully represent the capital net worth, the financial position, and results of operations.

As to **non-financial accountability**, Alberti e Santi is a pioneer in internal and external accountability, with reference to the Company's impact on society and environment. Since 2013, in fact, Alberti e Santi has published its own social report and, since 2022, has adapted its report on sustainability to the relevant international standards.

## 2.4 PROPER USE OF IT TOOLS

All data and information stored in the company's informatics and telematics systems are property of Alberti e Santi and are to be used **exclusively for the performance of company activities**, in the way and within the limits specified by the Company.

The Company, being aware of the importance of guaranteeing the confidentiality of data, also intended as **protection of information from unauthorized access i.e. integrity of the data themselves**, requires all Recipients to behave correctly, in order to avoid any form, even attempted, of undue intrusion or damage to data and informatics or telematics systems (belonging to the Company and others) and to comply with the legislation aimed at preventing or repressing cyber-crimes.

## 2.5 SECRECY, CONFIDENTIALITY AND PRIVACY

Alberti e Santi, having already complied with the requirements of previous applicable laws (Legislative Decree 196/2003) on the protection of personal data, currently operates in accordance with the provisions set forth in Regulation (EU) 2016/679 adopted by the European Parliament and Council on April 27, 2016 (General Data Protection Regulation, "GDPR").

Pursuant to the general obligation of loyalty as set forth in Article 2105 of the Italian Civil Code, the Recipients must **avoid using or disclosing** (even indirectly) **confidential and non-public information**, of which they have become aware because of their duties and/or profession except in cases where the disclosure of such information would be authorized or required by law. As such notions characterize the organization and production methods of the company, complete confidentiality must be maintained for the duration, and beyond, of the employment contract (regardless of the type of contract) and it is forbidden to draw advantages of any kind out of it - be they direct or indirect, personal or pecuniary.

Disclosure to third parties of any information inherent to the Company must be made exclusively by **authorized individuals** and in any case in accordance with existing company regulations and nondisclosure agreements.

## 2.6 CYBER-SECURITY

In order to operate in a secure manner and in step with digital transformation, Alberti e Santi has launched a series of projects on its IT infrastructure in order to accelerate digitalization and increase its **resilience against cyber-threats**.

Using cyber-security solutions tailor-made to its specific corporate needs, the company has deployed a telematics infrastructure to defend itself against cyber-attacks, as well as a digital data storage system using Cloud infrastructure.

### 3. CONDUCT CRITERIA

This section of the Code defines the rules of conduct inspiring the Company's action towards the categories of key stakeholders, as identified through appropriate analysis.

The objective is to provide clear and precise indications, differentiated for each type of stakeholder, in order to guide and coordinate the conduct of the Recipients.

#### 3.1 RESPONSIBILITY TOWARDS EMPLOYEES

This section is inspired by the four UN Global Compact principles relating to work, which themselves recall the ILO Declaration on Fundamental Principles and Rights at Work (1998).

##### 3.1.1 NON DISCRIMINATION

Non-discrimination is the basis of modern social life and, as such, it is recognised and enshrined in all major national and international legal provisions. Taking from the prescriptions contained in Art. 2 of the Universal Declaration of Human Rights, Art. 21 of the Charter of Fundamental Rights of the European Union and Art. 3 of the Italian Constitution, the Company **opposes and sanctions any form of discrimination** of the individuals with whom it interacts, internally or externally, on the basis of: ethnic origin, skin colour, gender, sexual orientation, religion, nationality, age, political opinion, trade union affiliation, marital status, different physical or mental abilities, any other personal status or characteristic.

Denigration or harassment, whether physical or verbal, is in no way tolerated.

##### 3.1.2 ENHANCEMENT OF EMPLOYEES

Alberti e Santi protects **legal work**, performed in a healthy and safe environment. It abhors the use of forced, child, illegal, clandestine or undeclared labour, as well as the use of labour deriving from human trafficking.

Employees are hired through regular employment contracts, in the manner and at the times prescribed by current legislation and collective bargaining. Each employee receives **adequate information** on the contract and remuneration parameters before the employment relationship is established, ensuring that the acceptance of the assignment is based on actual knowledge of said information.

During the course of the employment relationship, the Company encourages the **development of its personnel's skills**, encouraging participation in training courses and team building activities.

Particular importance is given to **young employees**, as Alberti e Santi promotes the inclusion of young students in the world of work, involving them in training internships and apprenticeship contracts.

Alberti e Santi is also aware of the positive effects of a **proper work-life balance**, in terms of personal and professional satisfaction.

Lastly, in order to enhance individual qualities and aptitudes and guarantee the well-being and autonomy of employees, Alberti e Santi grants a variety of **fringe benefits**.

##### 3.1.3 INCLUSION AND DIVERSITY

The Company acknowledges diversity in its multiple expressions as a success factor and a strategic advantage, as a source of **cultural enrichment and openness**. It promotes, therefore, an inclusive working environment, oriented towards collaboration and the full integration of professionals from

different cultural, ethnic and geographic backgrounds, as well as those belonging to protected categories.

### **3.1.4 EQUAL PAY**

Alberti e Santi complies with all laws and regulations relating to remuneration and mandatory benefits. Employees are paid fairly and promptly, on the basis of predetermined parameters and in accordance with the national collective agreements.

### **3.1.5 TRADE UNION FREEDOM AND COLLECTIVE BARGAINING ENTITLEMENT**

Alberti e Santi keeps good and ongoing relations with trade unions, not favouring or discriminating against any trade union organisation, either directly or indirectly.

The company respects and recognises the right of every employee to associate, organise or join a trade union and to negotiate collectively agreements in a lawful manner without being subject to interference, sanctions, retaliation, discrimination or harassment.

### **3.1.6 SAFETY AND HEALTH**

Alberti e Santi implements **health surveillance** and acts in full compliance with applicable legislation, and guarantees the **healthiness of the environment**.

The Company is equipped with innovative technologies and systems in order to **operate safely**, adopts all the necessary prevention measures to avoid putting the safety of employees at risk and carries out regular maintenance of workplaces, equipment, plants and safety and protection devices. Every environment in which employees operate is technically and logistically configured and equipped to facilitate safe and respectable work, preventing accidents or injuries.

The employees who are exposed to the greatest risks are provided with **personal protective equipment** which must be used correctly and with care, not altering it, and reporting specific defects or inconveniences.

Alberti e Santi also employs an external Head of the Prevention and Protection Service, who assists the corporate management in assessing risks and planning protection and prevention measures, and periodically updates the **Risk Assessment Document**.

The Company is committed to **the diffusion and consolidation of the culture of safety in the workplace** and requires its Recipients to diligently adhere to legal obligations and internal procedures regarding risk prevention, health protection, safety and hygiene in the workplace, in accordance with the provisions contained in **Legislative Decree 81/2008**, and subsequent amendments and additions. In order to protect themselves and others, all employees receive appropriate **initial and ongoing training**.

## **3.2 ENVIRONMENTAL RESPONSIBILITY**

A beneficio della collettività e delle generazioni future, Alberti e Santi si impegna ad assicurare un **miglioramento continuo delle proprie prestazioni**, cosciente dell'impatto dei propri servizi sull'ecosistema naturale. A tal fine:

- Si impegna per il **monitoraggio delle emissioni** derivanti dalle proprie attività e alla definizione di obiettivi di miglioramento di breve e lungo periodo;



- **Rileva e monitora** i consumi di energia elettrica in tempo reale, mediante un *software* dedicato;
- **Differenzia efficacemente i propri rifiuti** e, laddove possibile, cerca, attraverso l'ausilio di terzi specializzati, di avviarli a recupero o riciclo;
- **Riduce progressivamente l'utilizzo della carta**, anche grazie alla digitalizzazione dell'archivio cartaceo;
- **Divulga verso l'esterno, attraverso un Bilancio di Sostenibilità**, le proprie performance anche in ambito ambientale;
- **Definisce periodicamente obiettivi di miglioramento** delle performance ambientali aziendali.

### 3.3. RESPONSIBILITY TOWARDS EXTERNAL STAKEHOLDERS

#### 3.3.1 RELATIONS WITH CUSTOMERS

In relations with Customers, all Recipients shall maintain an attitude based on the highest professional standards, aimed at fully satisfying their needs, with the **aim of creating a solid and lasting business relationship**.

In addition to an **effective customer service**, the Company conducts periodic surveys to assess the level of satisfaction and keep up with Customers' expectations.

#### 3.3.2 RELATIONS WITH PROVIDERS

Provided that Alberti e Santi only relies on providers that operate in compliance with the legislation in force and hold the authorisations required by law, business relations are based on the principles of fairness, integrity, professionalism, transparency, lawfulness and impartiality, in order to **create solid and lasting trust and business relations**.

Alberti e Santi does not abuse its contractual power to impose unfair or excessively burdensome conditions.

For each provider, there is a careful assessment of the levels of quality, convenience and cost-effectiveness of their services, as well as an **analysis of their commitment to environmental and social issues**. In this regard, among others, the following parameters are examined: the class of the vehicle fleet, the possession of certifications, and the commitment to communicating sustainability through the publication of the Sustainability Report and Code of Ethics and Conduct.

#### 3.3.3 RELATIONS WITH COO-PETITORS

Alberti e Santi acknowledges the value of **cooperation with competitor companies**, understanding the advantages of jointly handling certain processes and overcoming the logic of competition.

Collaboration with competitors represents, for Alberti e Santi, a form of open innovation in terms of processes, which translates into the sharing of information and the definition of strategies based on complementarity.

### 3.3.4 RELATIONS WITH CERTIFYING AUTHORITIES AND CONTROL ENTITIES

Relations with the parties involved in the certification process are based on criteria of loyal collaboration, transparency, timeliness and accuracy.

In the event of inspections, the Recipients are required to cooperate with the auditors, while respecting each other's roles. It is forbidden to engage in any conduct that is intended at influencing, even indirectly, the auditing and evaluation activities.

### 3.3.5 RELATIONS WITH TRAINING INSTITUTIONS AND UNIVERSITIES

Alberti e Santi has established and strengthened collaborative relationships over time with schools, training institutions and universities in its area. It aims - on the one hand - at adapting the company to the needs of an evolving market and - on the other - at attracting the best young talents to the company. The company is, moreover, a member of the **ITS Foundation for Sustainable Mobility and Logistics**, which has as its main purpose the promotion and diffusion of technical and scientific culture, through the integration of education, training and employment systems.

### 3.3.6 INSTITUTIONAL RELATIONS WITH ASSOCIATIONS

Alberti e Santi maintains relations at different levels with bodies and institutions, including **trade associations**, in relation to issues of corporate interest and in accordance with their reciprocal roles and prerogatives.

The Company, in its institutional relations, acts as an authoritative, independent and autonomous interlocutor, in order to contribute to the definition of development and growth policies.

The attendance and participation in trade meetings, when necessary to tackle issues of a more general nature and to interpret and apply the legislation concerning the fields in which Alberti e Santi operates, is allowed only to the personnel authorised for this purpose.

### 3.3.7 SPONSORSHIPS

Alberti e Santi is the main sponsor of A.S.D. Pallacanestro Fiorenzuola 1972 and financially supports a number of sports and cultural initiatives in the Piacenza area.

Co-operation with bodies or associations, other than trade unions, is possible if the purpose can be traced back to the company mission or can be referred to public interest projects, if the allocation of resources is transparent and documented and if there is an express authorisation from the relevant corporate functions. The Company carefully evaluates which initiatives to support, based on criteria of **reliability, compliance with its corporate values and policies**, while taking care to avoid possible situations of conflict of personal or corporate interests.

In the event of sponsorship activities, these must be carried out after establishing specific agreements and verifying the honourableness of the beneficiary and the event or initiative promoted, avoiding sponsoring counterparts who are even only suspected of belonging to criminal organisations or committing crimes, and must be properly and adequately documented and traceable.

### 3.3.8 RELATIONS WITH PUBLIC ADMINISTRATION AND LOCAL INSTITUTIONS

Alberti e Santi has **excellent relations with local institutions** and is committed to maintaining relations with the Public Administration based on the utmost transparency, fairness, impartiality and lawfulness, following a collaborative approach and in strict compliance with the applicable legal provisions.

Managing relations with the Public Administration is reserved exclusively to the designated and authorised corporate functions. These individuals are required to operate in rigorous compliance with internal procedures, without harming the integrity and reputation of the Company, and to always guarantee the traceability and documentability of operations/relations with institutions.

### 3.3.9 RELATIONS WITH THE CUSTOMS AGENCY

The company headquarters in Cortemaggiore (PC) is an "**authorised place for customs warehousing**" pursuant to art. 210 of the European Union Customs Code (EU Reg. 952/2013). In this facility, subject to the control of the Customs Authority, goods can be stored without being subject to the relative taxation, while waiting to be assigned their final destination.

In order to ensure the fulfillment and maintenance of the requirements established by the legislation, Alberti e Santi is committed to actively cooperate with the Customs Agency and ensure effectiveness and efficiency during the regular inspections.

### 3.3.10 RELATIONS WITH THE JUDICIAL AUTHORITY

Managing relations with judicial authorities, control bodies overseeing compliance with current legislation and other similar institutions is based on the principles of **correctness, completeness and truthfulness** and is reserved exclusively to the designated and authorised corporate functions.

The Company shall respond in a correct and collaborative way to any legitimate requests and orders from the Authorities, issued in the course of legal proceedings, investigations or inspections.

Recipients are therefore prohibited from: behaving in a reticent or ommissive manner; producing false documents, providing false data, altered and falsified statements or behaving in a misleading way. It is not permitted to conceal or destroy information related to an investigation, whether it concerns ongoing proceedings or proceedings that could presumably be instituted.

It is forbidden to exert pressure, of whatever nature, on the person called upon to render statements before the Judicial Authority, in order induce such person to give or not to give false testimony.

### 3.3.11 RELATIONS WITH THE MEDIA AND PUBLIC RELATIONS

Communicating with the outside world performs an important role in creating and enhancing the Company's public image. For Alberti e Santi, this activity consists of:

- Advertising
- Radio announcements
- Articles in local newspapers
- The Company's website, constantly updated
- The Company's social media channels
- Printed brochures with corporate presentations
- Communications conveyed by trade organizations

All the above-mentioned activities are based on the principles of **truthfulness, fairness, transparency and prudence**, complying with the laws, in particular on privacy, and this Code.

**The Company's website and social channels** are developed and managed in compliance with this Code, with the commitment not to publish misleading or untrue information.



Relations with the press, media and information are handled exclusively by **individuals expressly appointed to do so**, in compliance with the procedures or regulations adopted by Alberti e Santi.

Any press or media request received by the Company's personnel shall be communicated to the relevant persons in charge of external communication, before any commitment to reply to the request is made.

The Company forbids:

- to all employees, in a more general way, the disclosure or commitment to disclose information concerning the Company in the absence of specific authorisation by the competent functions;
- the disclosure of confidential information and/or false or misleading news concerning the Company, or other parties with which the Company has relations in the performance of its activities;
- any form of pressure aimed at acquiring favors from the media or public information organs.

The Company is committed to communicating with Customers in an accurate, clear, truthful and transparent manner, correctly informing them about the features, quantity, quality, origin and provenance of the offered products, using a comprehensible language adhering to the standards of the sector, avoiding the use of any deceptive, elusive or unfair practices and always guaranteeing the preservation of the condition of equality and impartiality. Alberti e Santi guarantees that communication and **advertising messages** addressed to Customers are carefully and sensitively defined so that they are in line with the Company's values and practices

#### 4. USE OF SOCIAL MEDIA BY RECIPIENTS

Alberti e Santi, being aware that social media represent an important communication tool, that can also be a factor in business development, hopes for the optimization of the opportunities arising from such platforms, but is committed to minimize the potential risks that may arise from improper, careless or unaware use of them, harming to the good name of the Company.

Keeping in mind that the Recipients of this Code are always ambassadors of the Company, the Company recognizes their right to use social media, but only in **their personal capacity**.

Should Recipients intend to divulge news related to the Company, they commit to give prior notice, in order to obtain appropriate **authorization**, to the relevant corporate functions. They also undertake to disclose only truthful information **supported by data or evidence**.

## 5. METHODS OF IMPLEMENTATION

### 5.1 DIFFUSION OF THE CODE

To ensure full knowledge and compliance, Alberti e Santi is committed to ensuring the widespread diffusion of this Code through:

- publication on the company **website** and social channels;
- **diffusion and awareness** actions;
- sharing of the document **when new employees are hired**;
- **initial** training actions - upon adoption - and **ongoing**.

All Recipients are required to be familiar with this Code, share its principles and implement it, contributing, each to the extent of their responsibility, to compliance, promotion and diffusion of the Code.

### 5.2 APPROVAL OF THE CODE AND AMENDMENTS

**This Code has been approved on 15/11/2023 by the Alberti e Santi Board of Directors.**

Any changes and/or updates of the same shall be approved by the Board of Directors and promptly communicated to all Recipients.

### 5.3 REPORTS OF CODE OR LAW VIOLATIONS

All Recipients, should they become aware of violations of this Code (actual or potential, provided they are substantiated) or actions that do not comply with the rules of conduct enshrined herein, including omissions or attempts at concealing violations, must promptly report them to the Company, which will make the necessary checks and assessments to take adequate action.

The whistleblower must have reasonable grounds, in light of the circumstances and information available to it at the time of the report, to believe that the facts being reported are true.

Alberti e Santi conforms its discipline to the principles enshrined in **Law No. 179/2017** "Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship," as well as in **Directive 2019/1937**, implemented in Italy through **Legislative Decree No. 24/2023**, and is equipped with effective, confidential and secure reporting channels that guarantee effective protection of informants (whistleblowers<sup>2</sup>) from possible retaliatory behaviour.

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<sup>2</sup> A whistleblower is an individual who reports or discloses information regarding violations witnessed in the course of its professional activities, regardless of the nature of such activities or whether the employment relationship has meanwhile ended or not yet begun.

*This category includes not only full-time and permanent employees, but also employees with atypical contracts (e.g., part-time and/or fixed-term), as well as employees with an employment contract or relationship with a temporary agency, trainees and volunteers. The same protections are, likewise, provided to self-employed workers, consultants, subcontractors and providers. Finally, shareholders and individuals serving on governing organs are protected. Pursuant to the provisions of Directive 2019/1937, protection is also provided to so-called facilitators, i.e., those who assist a whistleblower in the reporting process in a work context and whose assistance must be confidential (e.g., colleagues or family members or associated legal entities).*

## 5.4 REPORTING METHODS

The whistleblower is allowed to submit reports, in written form and anonymously, through a **cloud-based software application (SaaS)**.

The system guarantees complete secrecy of the whistleblower's data, separating them from the content of the report. The interface is intuitive and adapted to the different literacy levels of the whistleblower, who has a private area to submit the report and to monitor the progress of the inquiry.

In addition, upon the request of the whistleblower, reports may be made through in-person meetings with the Head of Human Resources, who is in charge of handling reports and investigations.

Provided the consent of the whistleblower is obtained, complete and accurate records of the in-person meetings are made and maintained on a durable medium that allows access to the information, by means of:

- recording of the conversation;
- preparation of detailed minutes. The whistleblower is guaranteed the opportunity to verify, rectify and approve the minutes by affixing the signature.

## 5.5 PUBLIC DISCLOSURE

The **report** must be transmitted through **internal channels** before addressing the outside world.

Public disclosures are possible provided that the whistleblower:

- reported internally but no appropriate action was taken in response to the report within a three-month period;
- the whistleblower has reasonable grounds to believe that:
  - (i) the violation could pose an imminent or obvious danger to the public interest - e.g., emergency situation or risk of irreversible harm;
  - (ii) there is a risk of retaliation or there is little likelihood that the violation would be effectively addressed because of the circumstances of the case - e.g., evidence may be concealed or destroyed or collusion of the authority with the perpetrator or involvement of the authority in the violation.

## 5.6 RESPONSIBLE SUBJECTS AND PROCEDURES FOR FOLLOWING UP AND VERIFYING THE REPORT RECEIVED

Reporting channels are managed internally by the Head of Human Resources, who is also responsible for diligently following up on reports. In very serious cases or where the Head of Human Resources is directly involved, the matter is forwarded to the **Board of Directors**.

All reports that are received will be investigated, and investigations will be conducted, depending on the case, including with the help of qualified personnel or experts in the relevant subjects, who guarantee independence, professionalism and professional diligence.

Under no circumstances should Recipients independently conduct investigations into known or suspected violations of the Code.

## 5.7 PROCESSING TIME

The Company guarantees that all cases will be addressed until finally resolved and is committed to providing feedback regarding the outcome of the investigation to anyone making a report.

Within **seven days**, the reporting party will receive a notice about the receipt of the report, and within a period not exceeding **three months**, a response will be given to the report.

## 5.8 CONFIDENTIALITY OF THE WHISTLEBLOWER'S IDENTITY

The channels through which reports are received are designed, implemented, and managed securely, in accordance with data protection regulations, so that the identity of the whistleblower or any third party named will not be disclosed, without explicit consent, to anyone other than the authorized personnel responsible for receiving or following up reports.

All data and other information related to the report is diligently stored so that it can be provided to the competent authorities where necessary.

## 5.9 WHISTLEBLOWER PROTECTION MEASURES

Alberti e Santi is committed to and adopts the necessary measures to protect the whistleblowers from any retaliatory act, whether direct, indirect or attempted, as a result of the report made - such as, for example, dismissal, demotion or non-promotion, imposition of disciplinary measures, discrimination, blacklisting, premature termination of contracts for goods or services, cancellation of licenses or permits, damages, including to the person's reputation, particularly on social media or submission to psychiatric or medical examinations.

The Company ensures that legal or contractual obligations (such as loyalty clauses in contracts or confidentiality or non-disclosure agreements) cannot be invoked to prevent reporting, deny protection, or penalize whistleblowers.

Whistleblowers are also excluded from liability for accessing and acquiring the reported or disclosed information, provided that such acquisition or access would not constitute a crime in itself.

## 5.10 SYSTEM OF SANCTIONS

Complying with the rules contained in the Code should be considered an essential part of the contractual obligations to which all Recipients are bound.

Violating the provisions of this Code undermines the fiduciary relationship between the Company and the Recipients, and constitutes a **disciplinary offence and a breach of contractual obligations** under the employment or professional collaboration relationship and/or a disciplinary offence, with all subsequent legal and contractual effects.

In the event that misconduct is ascertained, there will be effective, proportionate, and deterrent actions, regardless of the level or position of the person(s) involved, against those who:

- hinder or attempt to hinder reporting;
- engage in retaliatory or harassing acts against the whistleblowers;
- violate the obligation of confidentiality regarding the identity of whistleblowers

In order to protect Alberti e Santi, those making malicious or grossly negligent reports that turn out to be false or unfounded will be sanctioned.

Within the limits of what is provided for by the National Collective Agreements and the legislation in force, any violations may also constitute just cause for dismissal and may **legitimize a claim for compensation for damages** arising from the same.





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