

CODE OF ETHICS

I HEREBY DECLARE THAT I HAVE UNDERSTOOD THE CONTENTS AND UNDERTAKE TO COMPLY WITH THE CONTENTS OF THIS DOCUMENT.

The management	The employee
Signature	Signature
DATE 06 November 2017	

Code of Ethics

The Company Testa Tiziano is aware that the authority of a company is recognised not only by the skills of its human resources and the high quality of the service provided to customers, but also by the attention paid to the needs of the entire community.

The principles that have always inspired the work of this company are formally set out in an Ethical Code of Conduct in the belief that reliability is built on a daily basis by respecting the rules and by valuing people. Therefore, our Code of Ethics represents an identifying element for the market and for third parties, the knowledge and sharing of which, required of all those who work at the Company or collaborate with it, is the foundation of our activity and the first step towards our objectives:

- Pursuing excellence through sustainable development.
- Safeguarding the environment and the safety of all persons involved by means of consistent behaviour that respects Social Ethics.

Therefore, the following Code of Ethics describes all the ethical and moral principles underlying the activities of the Company Tiziano Testa, as well as the lines of conduct adopted by the company both internally (with its own staff) and externally (with all its partners: Customers, Suppliers, Institutions etc.).

This Code of Ethics is therefore binding for the managers and employees of Testa Tiziano, as well as for all those who work permanently or temporarily with it, whom we will identify hereafter as *THE ADDRESSEES*.

General principles

The conduct of the addressees at all levels shall be guided by the principles of legality, fairness, non-discrimination, confidentiality, diligence, and fairness.

Legality

The Company Testa Tiziano works in full compliance with the law and with this Code.

All addressees are therefore required not to establish any privileged relationship with third parties resulting from external solicitations aimed at obtaining improper advantages. Addressees are therefore required not to accept donations, favours, and/or compensations in general for the scope of granting advantages to third parties.

Therefore, they must not donate money or goods, offer unlawful benefits or favours related to the activity they perform for the Company Testa Tiziano.

Non-discrimination

In relations with all persons involved with the business (customers, suppliers, employees, institutions, etc.), in particular in the selection and management of staff, work organisation, choice, selection and management of suppliers, as well as in relations with bodies and institutions, the Company Testa Tiziano avoids and rejects any discrimination due to age, gender, race, sexual orientation, state of health, political and/or trade union opinions, religion, culture and nationality of its counterparts.

Confidentiality

The Company Testa Tiziano undertakes to ensure the protection and confidentiality of the personal data of its addressees and collaborators (customers, suppliers, etc.) in compliance with the applicable legislation on sensitive and personal data.

Addressees are required not to use confidential information, learned during the performance of their activity, for purposes unrelated to the exercise of that activity and in any case must always act in compliance with the obligations of confidentiality, assumed by the Company Testa Tiziano towards all its partners, whether they are customers, suppliers, institutions or others. In particular, the addressees undertake not to disclose documents concerning research projects, inventions or operations related to the Company Testa Tiziano and its know-how.

Diligence

The relationship between the Company Testa Tiziano and its employees is based on mutual trust: employees are therefore required to work to further the interests of the company in accordance with the values set out in this Code of Ethics.

The addressees shall refrain from any activity that may conflict with the interests of the Company Testa Tiziano, renouncing the pursuit of personal interests in conflict with the legitimate interests of the company.

In cases where the existence of a conflict of interest is *suspected*, the addressees must immediately contact their line manager so that the company can assess and possibly authorise the possibly conflicting activity.

In the event of a breach, the Company Testa Tiziano will take all appropriate measures to put an end to this conflict, reserving the right to take action to safeguard its own protection.

Fairness

Both the Company Testa Tiziano and its Addressees are committed to fair competition, in compliance with national and EU regulations, in the knowledge that honest competition is a healthy incentive for innovation and development processes and protects the interests of both consumers and of the community.

Relations with employees and collaborators.

Staff selection

Staff assessment and selection take place in a fair and transparent manner, respecting equal opportunities in order to match Testa Trasporti's needs with the professional profiles, ambitions and expectations of the candidates.

Therefore, the company is committed to adopting all useful measures to avoid any form of favouritism in the staff selection process, applying objective and merit-based criteria that respect the dignity of the candidates and the efficient performance of the company.

The staff hired also through the implementation of this Code of Ethics receive clear and correct information about the roles, responsibilities, rights, and duties of the parties.

Staff management

The Company Testa Tiziano safeguards and empowers its human resources, promoting the conditions necessary for professional growth, knowledge, individual skills and carrying out appropriate further training and promoting participatory tools capable of collecting the opinions and suggestions of workers. While guaranteeing maximum availability, no worker is obliged to perform tasks that are outside his or her employment contract or role in the Company.

Relations between employees must be conducted with loyalty, fairness, mutual respect and in compliance with the values of civilized coexistence and personal freedom.

Working environment

The Company Testa Tiziano is committed to providing its staff with a healthy, safe working environment that respects the dignity of workers and, for this purpose, the company adopts an organisational and management model that complies with the UNI INAIL guidelines.

In order to ensure its full implementation, this model provides for a periodic monitoring and verification phase on the efficiency and effectiveness of this MOC (Management of Change).

Staff training is a central element of the SGSL (Occupational Health and Safety Management System) adopted, specifically all the procedures and checks periodically implemented are as follows:

- Management of documents, data, records.
- Identification and assessment of occupational health and safety risks.
- Human resources management.
- Management of plants, machines, equipment and working environment.
- Management of health monitoring
- Operational control for health and safety risks at work.
- Internal audits.
- Management of non-compliances, incidents, accidental events.
- Corrective and Preventive Actions.
- Surveillance and measurements.
- Emergency management and first aid.

Enterprise management

Compliance with internal procedures

The Company Testa Tiziano believes that management efficiency and a culture of control are essential elements in achieving its objectives.

Addressees are required to strictly comply with the company's internal disciplinary procedures and guidelines.

They must act in accordance with their authorisation profiles and must keep all appropriate records to keep track of actions taken on behalf of the company.

Accounting management

In relation to accounting management, the Addressees must act in compliance with the principles of truthfulness, accuracy, and transparency, so that the reputation of the Company Testa Tiziano is safeguarded both internally and externally.

Compliance with these principles also enables the company to plan its operational strategies on the basis of its actual economic and financial situation. Therefore, all entries in the accounts must be supported by complete, clear, and valid documentation, avoiding any form of omission, falsification or irregularity. In the case of assets and liabilities based on valuations and estimates, these must be recorded on a reasonable and prudent basis.

Asset protection

The Addressees carry out their duties while seeking to limit the use of company resources and are required to ensure security in order to protect the company's hardware from unauthorised access that could seriously damage the protection of personal data and that of Testa Traporti's customers.

Communication

The Company Testa Tiziano provides all Customers, suppliers, bodies and institutions and collaborators in general with all the most suitable communication tools necessary to interact with the company in order to forward requests, ask for clarifications, make complaints etc.

All information is complete, accurate and effective, so that all those who have a long-term and/or temporary relationship with the Company can make correct and informed decisions.

External relations

Relations with Authorities and Public Administrations

All relations with the authorities and with the Public Administration must be based on the utmost clarity, transparency, and cooperation, in full compliance with the law and according to the highest moral and professional standards.

The Addressees, unless expressly authorised, may not engage in the name and on behalf of the Company Testa Tiziano with the Authorities and with the Public Administration.

In relations with Public Officers, Persons in Charge of a Public Service, and with the Public Administration in general, the authorised Addressees shall abide by the highest standards of fairness and integrity, refraining from any form of pressure, explicit or subtle, aimed at obtaining any undue advantage for themselves or for the Company Testa Tiziano. In this regard, the authorised Addressees shall strictly comply with the provisions of this Code of Ethics, the Organisational Model, the protocols in force, as well as, in general, with all the provisions of Testa Trasporti's directives.

Relations with political and trade union organisations

The Company Testa Tiziano does not favour or discriminate any political organisation or trade union and refrains from making any undue contribution in any form to parties, trade unions or other social groups, except for specific waivers and always within the limits of what is permitted by the regulations in force.

The Addressees are required to refrain from any direct, indirect, or vaunted pressure on political figures or trade union representatives.

Relations with customers and suppliers

The Addressees shall deal with all third parties politely, competently, and professionally, in the belief that the protection of the company's image and reputation and consequently the achievement of the company's objectives depend on their conduct.

For this purpose, the Addressees shall refrain from any form of unfair or deceptive behaviour that might induce customers or suppliers to rely on unfounded facts or circumstances, constantly striving to offer punctual and high-quality services to customers, limiting inefficiencies and delays and pursuing full customer satisfaction.

Relations with suppliers are based on fairness, correctness and transparency and suppliers are chosen on the basis of objective criteria of affordability, opportunity and efficiency.

The Addressees must put in place all possible controls so that suppliers and customers are also able to comply with the fundamental ethical principles set out in this Code of Ethics.

Internal control system

Compliance with the provisions of this Code of Ethics is entrusted to the prudent, reasonable and careful supervision of each of the Addressees, within the scope of their respective roles and functions within the Company.

All Addressees are invited to report to their line managers facts and circumstances potentially in conflict with the principles of this Code of Ethics.

Testa Trasporti's management and the bodies appointed for this purpose shall take all necessary measures to put an end to the violations and may resort to any disciplinary measure in compliance with the law and the rights of workers, including trade union rights.

Guidelines of the sanctions system

The internal control system is oriented towards the adoption of tools and methods aimed at countering potential business risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures. In fact, the violation of the principles set out in the Code of Ethics and in the procedures indicated in the internal controls compromises the relationship of trust between the Company and its managers, employees, consultants, collaborators in various roles, customers, suppliers, commercial and financial partners. Such violations will therefore be immediately pursued by the Company Testa Tiziano, in an effective and timely manner, through the implementation of appropriate and commensurate disciplinary measures.

The effects of violations of the Code of Ethics and of internal protocols must be considered by all those who, for any reason, have relations with the Company Testa Tiziano. Depending on the seriousness of the conduct of the person involved in one of the unlawful activities envisaged by the Code of Ethics, the Company Testa Tiziano shall promptly take the appropriate measures, regardless of any criminal prosecution by the judicial authorities.

Without prejudice to the above, conduct in breach of the Code of Ethics constitutes:

- a serious breach for employees (labourers, employees, middle management and executives), with the sanctions, applied depending on the seriousness, provided for by the respective CCNL-National Collective Bargaining Agreement (verbal reprimand, written reprimand, fine not exceeding three hours' pay, suspension from work and from pay up to a maximum of three working days, dismissal for just cause or justified reason); in the event of criminal proceedings pending or the execution of a measure restricting the employee's personal freedom, before adopting the disciplinary measure, the sanction of suspension from work and pay may be adopted, for the duration corresponding to the outcome of the criminal proceedings or until the end of the duration of the measure restricting the employee's personal freedom;
- just cause for revoking the managers' mandate;
- cause for immediate termination of the relationship, in the most serious cases, for external collaborators and consultants;
- cause for immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors.

The identification and application of sanctions shall always take into account the general principles of proportionality and appropriateness with regard to the alleged violation.

In all the afore-mentioned cases, the Company Testa Tiziano reserves the right to take all the actions it deems appropriate to claim compensation for the damage suffered as a result of conduct in breach of the Code of Ethics.