



Code of Conduct

for Business Partners

Scope of the document

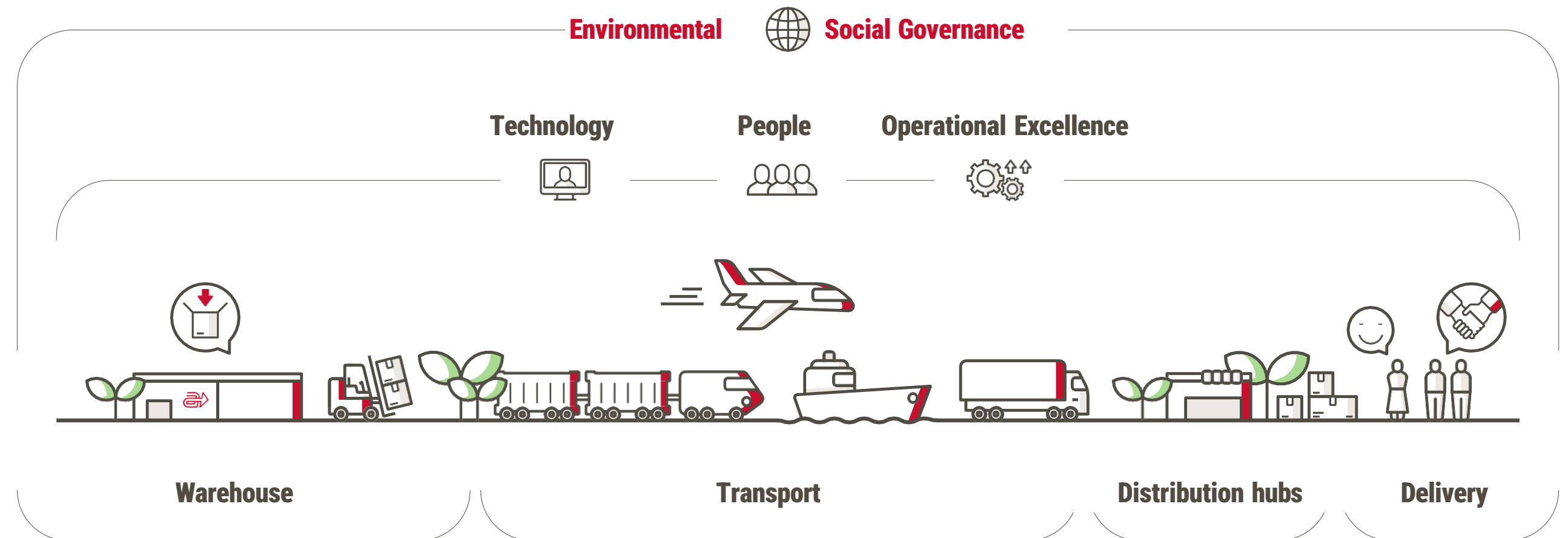
- The present document contains **ethical, social and environmental requirements** that apply to all business relations between Arcese Group and its Business Partners.
- Furthermore, Business Partners must take **appropriate actions** to ensure compliance with these requirements by their own business partners and along their **supply chain**.
- Business Partners can also be inspired by this document and use it to develop their own **Sustainability strategy**.

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Introduction

We are a global logistics operator providing integrated transport and logistics services, targeting customer satisfaction through our strategic aims: **Operational Excellence, People, Digital Thinking** and **Growth**. We connect worlds creating value for all those who participate in our strategy and share our objectives.



A responsible Supply Chain

We recognize the importance of building a sustainable and responsible supply chain. In carrying out our business activities, we interact with a plurality of suppliers and the most effective collaboration with them is crucial to perform our operations sustainably for all stakeholders involved.

Arcese ethics' principles also applies to third parties, intending to refer to subjects external to our company who operate, directly or indirectly, with us. Third parties shall therefore commit, through specific contractual agreements, to comply with the provisions contained in the Code

of Ethics and other related documents within the limits of their competences and responsibilities. Any violations of the Code of Ethics, if applicable, may result in the termination of the relationship based on what has been contractually agreed.

Business Partners' selection

Business Partners are selected on the basis of objective parameters, such as: **legal compliance, ethics, quality, capabilities, efficiency** and **value for money**.

In more general terms Arcese Group partners' selection process considers the following key prerequisites:

- the counter-party's professionalism;
- the appropriately documented availability of financial and other resources, organized structures, design capabilities and resources, know-how, etc.;
- good practices with regard to environmental protection and occupational health and safety standards;
- business practices which do not damage the image and reputation of the Arcese Group.

Our pillars for a responsible supply chain

Business Ethics



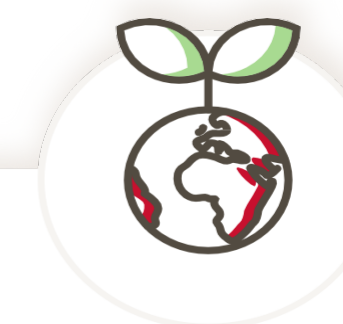
We consider ethical business conduct **an essential priority to manage** relations with our employees, collaborators, customers, suppliers, partners and, more generally, with any third party safeguarding ethical values within a context of mutual respect, protection, transparency and correctness.

People



Our People is our most important asset contributing to the achievement of our goals. The reason why we are committed to creating a captivating, safe and engaging work environment, accompanying our employees throughout their journey and delivering the best Employee Experience. **We promote the respect of diversity and provide a stimulating and creative environment** to attract and retain talented people where everyone is respected and where discrimination is not tolerated.

Environment



A responsible environmental management is recognized as **a prerequisite for operating and competing in the modern marketplace.** We are committed to reducing our environmental footprint thus taking proactive actions against climate change. Our business model aims at excellence and **we want to be a leading green logistics service provider across the globe** through the improvement of our practices and processes and the development of innovative business models.

Respect for the law

Compliance with the law and regulations is an essential principle of all Arcese Group's activities in all the countries where we operate. Under no circumstances shall pursuance of the company's interests justify conduct which is not honest, ethic and does not comply with law regulations.

In the pursuance of our Promise, we comply with the law on the prevention of money laundering and the bribery of public or private officials, at both the national and the international levels, and of illegal immigration.

All applicable laws for the import and export of goods, software services, and technologies are strictly respected.



What we expect from Business Partners

To be strictly compliant with laws and regulations in the countries where they conduct their operations and shall obtain all permits relevant to the business.

To be strictly compliant with restrictions on the export or re-export of goods, software, services, and technologies, as well as restrictions on trade with certain countries, regions, companies, entities, and individuals.

To be strictly compliant with all applicable laws on fair competition and antitrust, avoiding money laundering or the acceptance of illicit funds.

Respect for people

The relationships between the people who work for, or in any way interact with our company, at all levels, are grounded in criteria and behavioral standards of honesty, integrity, cooperation, fairness, mutual respect, and a commitment to human rights.

We strongly condemn all discrimination basis of race, gender, religion, or political opinions.

We also emphasize the importance of training for employee's development.

We respect the rights of local communities. We promote respect for the physical safety and cultural rights of individuals and respect for personal relationships, and gender equality. Within hierarchical relationships, authority is exercised fairly and justly, with no abuse or lack of transparency permitted.



What we expect from Business Partners

To set as their priority the respect for people and human rights in their workplace and when representing our company.

To behave according to the principles of honesty, integrity, cooperation, fairness and mutual respect.

To avoid to engage or employ **private or public security forces** to safeguard the commercial project if inadequate training or lack of oversight by the company could result in human rights violations.

To respect the rights of local communities to decent living conditions, education, employment, social activities, and the right to free, prior and informed consent (FPIC).

Zero discrimination

We strongly condemn all kind of discrimination. Any type of personal discrimination based on race, religion, national origin, ancestry, political beliefs, union membership, gender, sexual orientation, age or other characteristics is not accepted.

Equal opportunities

New hires are assessed and selected in accordance with principles of **impartiality and equal opportunities** and on the basis of the required profiles and the company's needs. **No form of informal or illegal employment is permitted.**

Non-EU labour may only be employed if the foreign worker meets the requirements and holds the documents specified by the law.



What we expect from Business Partners

To guarantee and promote at all levels the respect for individuals refusing all types of discrimination.

What we expect from Business Partners

To guarantee an inclusive workplace characterized by impartiality and equal opportunities for all employees.

To ensure that no informal or illegal employment is permitted, for either national or foreign workers.

Freedom of unions and wage negotiation

Every worker has the right to join a trade union for the **entitlements recognized under the wage negotiation**.

The trade union representatives must not be discriminated against and must have access to all the work areas necessary to execute their representation functions.

Adequate remuneration

Every employee must be provided with a remuneration that's compliant **with the law and the minimum wage**, in accordance with with the laws in the country in question, and in line with the general remuneration rules applied throughout the company.



What we expect from Business Partners

To recognize and respect the right of personnel to enjoy freedom of association and collective negotiations, in alignment with applicable legislation.

What we expect from Business Partners

To ensure that remuneration for their employees corresponds **at the very least to the legally valid and guaranteed minimum**, in accordance with the laws and national collective bargaining agreements in the country.

Working hours

Working hours correspond at least to the legal requirements or the minimum standards of the respective national economic sectors. As a general rule, the working week may not exceed 48 hours, and every employee must have at least one day off per week. Overtime is voluntary, may not exceed 12 hours per week, and must be compensated with extra pay.

What we expect from Business Partners

To guarantee that working hours, including overtime, comply with the applicable legislation.

Health & safety

Every employee has the right to a healthy, safe, and hygienic working environment. Arcese Group shall promote prioritisation of safety, encouraging an awareness of risk assessment and management, also through **specific training, encouraging responsible behavior and protecting the health and safety of all employees and associates**, especially by means of preventive actions. All work shall be performed without any influence from alcohol or drugs.



What we expect from Business Partners

To comply with the occupational health, safety and fire safety legislation.

To be aware of the occupational health & safety risks of its operations and develop internal processes enabling the reduction of work-related health hazards and improvement of occupational health, safety and fire safety.

Respect for the environment

We consider environmental protection of the utmost importance, we aim to continuously optimize the use of our resources by developing our services according to a logic of sustainability, and by raising awareness of the relative issues among our employees, customers and partners.

We constantly work for continual improvement of environmental performances through specific actions.

We reduce the environmental impact of our operations minimizing consumption of resources and emissions.

In particular energy consumptions and GHG (Greenhouse Gas) emissions are monitored and specific policies/action plans are developed.

The efficient use of energy, water and other resources, the use of renewable resources and the minimization of damage to the environment are all taken into consideration in the execution of our services.

Our vehicle fleets is constantly renovated to improve the environmental performances and reduce consumption and emissions. Renewable fuels must be prioritized.

We continuously protect and monitor natural habitats, air and soil quality, and biodiversity.

Tires shall be compliant to EU Legislation if sold within EU market, this requirement has to be applied on new and remould tires. We encourage the use of low rolling resistance tires (compliant with EU labelling standards) in order to reduce the carbon footprint. In addition the proper tire type should be selected depending on weather/season circumstances to grant the safety on the road. Avoiding waste, re-use and recycle as well as the safe, environmentally-friendly disposal of residual waste, chemicals and waste water are taken into account in the production and execution of our services. Business Partners must comply with relevant local regulations related to maintenance, washing, cleaning and handling of environmentally- hazardous products, waste and painting of vehicles. Eco-labelled products should be prioritized.



What we expect from Business Partners

To make efforts to minimize their environmental impacts, especially regarding emissions, energy, use of water and waste management.

To cooperate with Arcese Group in the development of improvement action plans and procedures and environmental policies.

To provide environmental data referred to: vehicle and fuel statistics, types of fuel, proportion of renewable fuels, Euro classes, energy consumptions and follow-up of environmental programs. Furthermore, to provide, upon request, **GHG emissions report** for the goods and services provided.

To adopt practices, protect or promote natural habitats and biodiversity. No deforestation or illegal logging is tolerated.

To monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination.

To avoid forced eviction and the deprivation of land, forests, and water in the acquisition, development, or other uses of land, forests, and water.

Protection of data and confidential information

Arcese Group protects the privacy of employees and third parties and the confidentiality of data in accordance with the relevant legislation (data protection legislation), by means of rules and procedures which regulate the methods applied for the use and storage of data and information.



What we expect from Business Partners

To use and protect all information in an appropriate manner.

To ensure that sensitive data is properly collected, processed, saved and deleted. Confidential content may not be published, transmitted to a third party or made available in any other form without the necessary authorization.

The processing of all personal data relating to employees, customers and business partners (e.g. capture, storage, collection, use, provision) must be carried out in accordance with the applicable data protection legislation.

Verification of compliance

The business relationship between Arcese Group and its partners is based on honesty, trust and cooperation.

Arcese Group shall be provided with the opportunity to verify the business partner's compliance with the requirements of this Code of Conduct. Verification may be conducted in the form of self-assessments and/or by on-site audits conducted by the company's personnel or a third party appointed or approved by Arcese Group to verify compliance with this Code of Conduct.



It is the responsibility of the Business Partner to ensure that all subjects in its supply chain fulfil the requirements of this Code of Conduct.

Any non-compliance with the requirements of this Code of Conduct identified in the business partner processes and in its supply chain shall be reported to Arcese Group's contact person and managed through appropriate corrective actions addressed by the business partner with the company's support where necessary. Arcese Group manages information obtained during self-assessments or audits as confidential and will not, without the written consent of the interested party, pass on any confidential information to a third party or unauthorized person.