



Ethic Code

2021

1.	INTRODUCTION	4
I.	THE COMPANY.....	4
II.	ETHIC CODE TARGETS	4
III.	FIELD OF APPLICATION.....	5
IV.	DOCUMENT STRUCTURE	5
2.	THE ETHIC CHART	6
I.	<i>COMPANY'S MISSION AND VISION</i>	6
II.	ISS PALUMBO VALUES AND PRINCIPLES.....	6
III.	ISS PALUMBO'S <i>STAKEHOLDERS</i>	8
3.	BEHAVIOR RULES.....	9
I.	AFFILIATES	9
II.	COLLABORATORS.....	9
III.	CUSTOMERS.....	12
IV.	PARTNERS.....	13
V.	GOODS AND SERVICES SUPPLIERS.....	13
VI.	FINANCING BODIES	14
VII.	PUBLIC ADMINISTRATION	14
VIII.	COMMUNITY.....	15
4.	CONTROL AND MONITORING	17
I.	SUPERINTENDING BODY.....	17
II.	KNOWLEDGE AND APPLICATION.....	17
III.	INFRINGEMENTS POINTING OUT	17
IV.	DISCIPLINARY MEASURES	17
V.	AMENDMENTS AND UPDATES	18

LETTER OF THE CHAIRMAN

Dear Colleagues,

the Ethic Code represents the statement of the most significant company's values we believe in and it highlights the whole rights, duties and responsibilities of all those who, at any capacity, work with ISS Palumbo: directors, auditors, employees, consultants, agents, commercial partners and, more in general, all those who collaborate with the company whatever may be the nature of this collaboration.

This Code is an integral part of the «Model of organization, management and control» provided for by art. 6 of the Legislative Decree 231/2001 regarding «Regulation of the administrative liability of legal persons», approved in the session of the Board of Directors of 15/11/2019: the «Model 231» is a set of principles, procedures and provisions affecting the internal functioning of the company and the modalities by which it interrelates with the world outside, ensuring proper mechanisms aimed at preventing crimes by all the subjects operating with the company.

The reason why the company has started the project for the adoption of this model is both the will of getting an organization model allowing operating in compliance with the existing rules and the ambitious target of improving and making clearer, more transparent and well organized the most important company's decision processes, with the final aim of protecting the company's interests as something higher than the interests of any single person.

We want the constant application of the principles contained in this ethic code to be a precise engagement of all those who work in ISS Palumbo, being confident that this important step represents the achievement of one of the improvement targets necessary to allow the company – and therefore to all of us – to look to the future with confidence.

Cav. Lav. Andrea Palumbo
ISS Palumbo S.r.l. Chairman

1. INTRODUCTION

I. The company

ISS Palumbo S.r.l. (hereinafter also "ISS Palumbo" or "Company"), was incorporated in 1974 by the current chairman, Cav. Lav. Andrea Palumbo and since then it has rapidly increased its presence on the market thus becoming one among the five main suppliers, in Italy, in the project sector and in logistics within the energetic field of Oil & Gas.

In October 2012, Inchcape Shipping Services (ISS) and Palumbo S.r.l. united their forces in order to offer a dynamic and compliant product worldwide for the sector Oil, Gas and Energy.

This partnership matches the worldwide ISS network with Palumbo's ability to supply Project and General Cargo shipments, thus offering a sole global combination of Agency and Project Freight Forwarding.

The Group has had an organization system certified for the quality since 1997, among the first ones in Italy. Thanks to the attention to the themes of Workers' Health and Safety and to the Environment respect that have always characterized it, it has adopted, in addition to the quality system, also Safety and environment systems and today it manages a certified integrated system on the basis of the regulations ISO 9001, OHSAS 18001 e ISO 14001.

This ethic code complies also with and contains all the principles contained in the code of ethic behaviour issued by the partner ISS.

II. Ethic code targets

The Ethic Code (hereinafter also "Code") is aimed at managing the group according to legal provisions, as well as to loyalty, professional fairness, and economic efficiency in relationships within and outside the group, in order to have uniform behavior indications aimed at meeting the needs of *stakeholders* and consolidating a positive company's reputation.

By the approval of this code, ISS Palumbo declares to follow in its activity the principles it contains in order not to begin or continue any relationship with whoever doesn't share its spirit or infringes its principles and the behavior rules.

This document is aimed at summarizing, also according to the Legislative Decree 8 June 2001, n. 231, the company's values, culture and the behavior rules that ISS Palumbo considers as prioritay in managing its business.

In no way, the pursuit of the company's interest can prescind from the respect of the current legal provisions and by the principles of the ethic code.

III. Field of application

This ethic code is valid for all the companies belonging to ISS Palumbo group, it leads their behavior and it is therefore binding for the behavior of any collaborator.

For any company of the group, the Collaborators, are the members of the board of directors, the employees and all those who, at any capacity, act in the name and on behalf of and in the interest of ISS Palumbo, independently from the juridical qualification of the relationship.

IV. Document Structure

The ethic code is composed by the following three parts.

- **Ethic Chart:** it includes the mission, the values and the principles being the grounds of ISS Palumbo culture;
- **Behavior rules:** it highlights the responsibility areas and the behaviors to follow in order to comply with the principles of the previous point;
- **Control and monitoring:** it identifies who is responsible for the implementation of the ethic code and it shows how the defined values and behavior standard are to be applied in order to establish them as current daily routine.

2. THE ETHIC CHART

I. *Company's Mission and Vision*

ISS Palumbo Group pursues the growth with profit of its activities both in Italy and abroad, in the respect of ethic and sustainability values.

Our mission is being leaders for resources, processes and elements coordinated, integrated and managed efficiently and effectively in the “global logistics” service.

ISS Palumbo's mission is customer satisfaction which is pursued through continuous improvement, the search for increasingly higher quality standards suitable for guaranteeing made-to-measure, effective and efficient services.

People are the true value of ISS Palumbo which enhances their skills and expertise.

ISS Palumbo promotes teamwork and innovative spirit; In ISS Palumbo we act with passion, curiosity and courage and believe that building up solid relationships, which go beyond the simple provision of services, is the objective to aim for at the beginning of each new project.

QUALITY, ENVIRONMENT, HEALTH and SAFETY form our corporate “system of beliefs” and are the important areas in which to pursue the possibility of continuous improvement, on a daily basis and at all company levels.

We pursue the growth with profit of our activities both in Italy and abroad in the respect of the values learned from 1974 up to today, always aware of having the precise obligation to always make decisions, without any exception, for the sake and the future prosperity of the company facing the changing situations bravely and with determination.

II. **ISS Palumbo values and principles**

Ethic in business

Legality – All the collaborators are supposed to respect the current laws and regulations in the countries where they work, the ethic code and the company's internal rules, by applying them fairly and with integrity.

Integrity – In the relationships with third parties ISS Palumbo Group engages to act in a correct and transparent way avoiding fraudulent info and behaviors from which may arise an unjust advantage caused by the weakness or not awareness of the counterpart.

Loyalty – The relationships with the world outside, the relationships with the collaborators and those among the collaborators are to be loyal at the most: it means

that everybody must act with sense of responsibility and in absolute good faith in any activity or decision.

Transparency – All ISS Palumbo Group actions and the relationships with its *stakeholders* are to be carried out by guaranteeing fairness, completeness and timeliness of info according to the lines established by law, by the best market accepted practice and within the limits of the protection of the *know-how* and of the company's belongings.

Respect of people's dignity – ISS Palumbo respects the basic rights of people by protecting their moral integrity and guaranteeing equal opportunities. In both internal and external relationships, are not allowed behaviors being discriminatory on the basis of political and union trade opinions, religion, race, nationality, sex, sexual orientation, health and in general any personal feature of the human person.

Ethic of labour and protection and enhancing of collaborators

Engagement to improve – The collaborators engage towards ISS Palumbo to give the best of their professional skills and to improve them with the instruments offered by the company.

Confidentiality – The collaborators engage to treat any info got in relation to the performance of the working activity as confidential and, therefore, not to disclose it and to use it only in relation to the performance of their activity and in the respect of the principle of transparency.

Absence of conflict of interests – The collaborators guarantee that in any business decisions will be taken in the interest of the company, avoiding any conflict of interests between the personal or family economic activities and the position held within the group.

Health and safety – ISS Palumbo promotes working conditions and places protecting people's psycho-physical integrity and supporting active participation, creativity, ability to work in team and assumption of responsibilities.

Professional development – The appreciation of the results achieved in compliance with the principle of the code, of the professional potentiality and of the competences expressed by people are the essential criteria for career upgrading.

Engagement for the sustainable development and the responsibility towards the collectivity.

Promotion of the sustainable development – For ISS Palumbo group the protection of the environment is a very important value of the collectivity and it is consistent with the company's development.

ISS Palumbo, therefore, engages to work in the respect of the current laws by applying the best technologies available, to promote and program a development of its activities aimed at the valorisation of natural resources, to preserve the environment for future generations and to promote initiatives for the environment protection.

Responsibility towards collectivity – ISS Palumbo works taking into consideration the needs of the communities within which it performs its activity and contributes to their economic, social and civil development.

III. ISS Palumbo's stakeholders

ISS Palumbo's *stakeholders* are all those groups composed by people, organizations and communities that influence the group's activity or are affected directly or indirectly by their effects.



- **Affiliates:** are all those subjects who have conferred goods or services for the common exercise of ISS Palumbo's economic activity, in order to share the profits.
- **Collaborators:** are the members of the board of directors of the group's companies and all those who, at any capacity, act in the name or on behalf of and in the interest of the company, independently from the legal qualification of the relationship.
- **Customers:** are all those who at any capacity take advantage of the products or the services offered by ISS Palumbo.
- **Partners:** are all those with whom ISS Palumbo has, at any capacity, relationships of collaboration aimed at the development of commercial activities in Italy and abroad.
- **Suppliers:** are all those who supply goods, services and resources necessary to the realization of the activities and contribute to

determine the quality of ISS Palumbo's products.

- **Financing bodies:** are the banks supplying financial support to the choices of investment of ISS Palumbo.
- **Public Administration:** in the widest meaning of the term, are all those either public or private subjects performing a public function or a public service. With public functions we mean the activities regulated by public law,

related to legislative, administrative, judicial functions and characterized by the exercise of authoritative and certificative powers. "Public service" is any activity regulated in the same forms of the public function but lacking of the authoritative and certificative powers.

- **Community:** represents the local community with which ISS Palumbo has relationship and, in general, the whole civil society with which the company has or could have mutual relationships.

3. BEHAVIOR RULES

I. Affiliates

ISS Palumbo protects against the managerial risk by means of a policy safeguarding the solidity in the medium-long term, by promoting the respect of the principles of fairness and transparency.

The company follows high standard of good company's governance in defence of its value and its reputation, as well as in the interest of the affiliates. It also guarantees to all the affiliates fairness, clearness and equal access to the company's info.

The operations within the group are carried out at market conditions, by respecting the substantial and procedural fairness criteria with the aim of a transparent and objective assessment. Therefore, the sums concerning exchanges of services and/or goods between the group's companies are defined according to the market conditions and in any case they are always justifiable.

II. Collaborators

Representativeness and collaboration – All the collaborators of ISS Palumbo and of any other company of the group are supposed to act with rigour and professional diligence in order to preserve the group's reputation by creating with any both internal and external interlocutor, relationships based upon confidence and mutual collaboration. The collaborators in the daily performance of their activities engage to highlight the reliability, efficiency and excellence characterising ISS Palumbo's style.

Honest and transparent behavior – The collaborators are supposed to have a honest behavior in the respect of the current regulations, laws and internal procedures. The belief of acting for the advantage of ISS Palumbo cannot, in any way, justify a behavior in contrast with the principles contained in this document, whose generalized observance is absolutely important for the company's good functioning and prestige.

Conflict of interests – The conflict of interests occurs when a collaborator of ISS Palumbo or o another group's company uses his position for the personal advantage or if the personal interests are in conflict with the group's interests. Therefore, any collaborator shall avoid any involvement interfering or which may interfere with his ability of assessing with impartiality the decisions on behalf of ISS Palumbo. The conflict of interests involving ISS Palumbo's employees shall be notified in writing. For example, a conflict of interests is:

- Accepting money, favors or other kind of benefits from people and/or legal entities which are going to subscribe economic agreements with ISS Palumbo;
- Performing working activities, of any kind, with suppliers, private and public bodies, which may damage the working performance in favor of ISS Palumbo;
- Taking or favorising decisions in the execution of his own role within the company, with the aim of advantaging a relative or a component of his family.

Treatment of the info

Transparency and correctness of the info: the collaborators shall ensure the truthfulness, accuracy and completeness of the documents and of the info given ni the performance of their activity. ISS Palumbo condemns any behavior aimed at altering the correctness and the truthfulness of the data and of the info contained in the balance sheets, in the reports and in the other company's communications provided for by law and direct to the public, to the supervising authorities, to the board of auditors and to the certified public accountant.

Protection and confidentiality of info: the collaborators have to guarantee the strictest confidentiality about info strategic, confidential, or related to the intellectual property of ISS Palumbo. The company guarantees the correct management of the confidential info and requires to collaborators to keep the most absolute discretion on any confidential info concerning the group or third parties.

ISS Palumbo engages to protect the intellectual property and the copyright of third parties. All the collaborators contribute to check the respect of the laws about the rights of intellectual property and the copyright.

Personal data protection: the company protects the personal data acquired during the performance of its activities concerning its collaborators and third parties. ISS Palumbo treat these data in the respect of the current laws and of the moral protection of people.

Traceability and correctness of operations – All the operations and the transactions, in the widest meaning of these terms, have to be authorized and registered in the respect of the principles of honesty and impartiality. It is all collaborators' duty to to work with the due diligence and to guarantee that the activities carried out are supported by the

relevant document and/or IT evidence also with the aim of allowing the congruity and the legitimacy of the operations, as well as detecting who has authorized, carried out, registered and checked the same operation.

ISS Palumbo promotes the principle of the fair behavior in the business activities also with reference to the crimes provided for by the model of organization, management and check adopted pursuant to the legislative decree 231/2001.

Gifts/Benefits – The Collaborators of ISS Palumbo and of any company of the group cannot ask, for themselves or for other people, and nor through a third party, gifts, money or other benefits, not accept them, excepted if they are cheap or in conformity with the usual commercial and courtesy practices, by whoever has treated or who anyway may get benefits by the group's activity.

The Collaborators cannot offer gifts, money or other benefits to those subjects from whom they may get favors in the performance of any activity referable to ISS Palumbo, thus ensuring an advantage to the same.

Company's resources and instruments – The Collaborators of ISS Palumbo and of any other company of the group are supposed to act with diligence to protect the company's belongings (material and immaterial) by using them in a proper way and by adopting behaviors avoiding their misuse by third parties.

With regard to the use of IT devices any collaborator is responsible of the safety of the systems he uses and shall respect the current legal dispositions and the conditions of the applicable licence contracts. It is forbidden to use softwares which do not comply with the company's standards, unless after written authorization of the competent functions. The collaborators shall not introduce in the company's IT system illegal software copies.

With the exception of what provided for by the current law, the misuse of the company's belongings and resources includes the use of network links for purposes different from those concerning the working relationship or to send insulting messages or messages which may damage the group's image.

Any collaborator is also supposed to engage at his best in order to prevent IT crimes and the illicit treatment of the data.

Working site – ISS Palumbo adopts all the safety measures required by the technologic evolution to guarantee a safe and healthy working site, in the full respect of the current laws in the matter of prevention and protection of bodily injuries on the working site.

The company promotes the diffusion of an aware safety culture by encouraging responsible behavior by all its collaborators, in order to protect, especially by means of preventive actions, their safety and health..

For this purpose, ISS Palumbo sets up technical and organization initiatives concerning the risk assessment, the adoption of better technologies, the monitoring of the working methods and training and communication events.

The collaborators of ISS Palumbo and of any other company of the group are supposed to the strict respect of the dispositions and the obligations provided fro by the current laws regarding safety and health, as well as to respect all the mesaures required by the internal procedures.

ISS Palumbo engages to guarantee the respect of the conditions necessary to create a working site collaborative and not hostile and to prevent any discriminatory behavior of any kind.

The collaboration of everybody is required in order to keep an atmosphere of mutual respect of the dignity, the honor and the reputation of anybody.

Selection, recruitment and evaluation of the personnel – The selection of the personnel is subordinated to the full correspondence of candidates to the required professional profiles. The competent function adopts all the proper measures to avoid favoritisms, nepotisms or other kind of patronage.

The recruitment of personnel is done on the basis of regular labor contract, as it is not permitted any kind of working relationship not complying with the current laws or anyway eluding them.

ISS Palumbo, with regard to the evaluation of the personnel defines the company's both general and individual targets on the basis of possible, concrete and measurable results.

III. Customers

Quality and excellence – ISS Palumbo aspires to meet the best and legitime expectations of its customers by supplying them excellence and quality services, in the respect of the regulations ruling competition and market.

The target is to guarantee an immediate, qualified and competent answer to the customers' needs by adopting fair, polite and collaborative behaviors.

Negotial and contractual correctness –The full satisfaction of its customers' needs represents the main target of ISS Palumbo also with the aim of creating a strong relationship inspired to general values of correctness, honesty, efficiency and professionalism.

Within the relationships with its customers all ISS Palumbo's collaborators engage to work in compliance with the current laws and to respect always the engagements and the obligations they undertake and they engage to the truth of their advertisements messages and of any kind of communication.

ISS Palumbo engages not to preclude anybody; however, it is forbidden to have either direct or indirect relationships with subjects whose appurtenance to criminal organizations is ascertained or even only suspected or whose behavior is illicit

The contracts stipulated with the customers, and in general any communication addressed to them, are characterized by criteria of simplicity, clearness and completeness, by avoiding any misleading practice. In case of unforeseen events, the group engages not to get profit from situations of dependence or weakness of the counterpart.

IV. Partners

Partners' evaluation – ISS Palumbo engages to work with partners of consolidated reputation and experience, by having relationships respecting this code. All the Partners, within the defined contactual relationships, are supposed to act with professional rigour as well to respect the current laws and this code. ISS Palumbo expects that its partners have a fair, diligent behavior complying with the legal dispositions, with a particular attention to the respect of law and of the good practices regarding the protection of health and safety on working sites and the respect for the environment, as well as regarding the protection of the intellectual property, industry and trade.

Negotial fairness – The relationships with partners are based upon negotial fairness and transparency, by trying to foresee the circumstances which may significantly influence the relationship. When unforeseen events occur, the group engages not to get profit from the dependence or weakness of the counterpart and expects the same attitude from its partners.

V. Goods and services suppliers

Objective evaluation – The process of selection of the suppliers, based on objective and documentable criteria, is carried out in the respect of internal procedures, of the relevant laws, of fairness, cheapness and quality principles.

Negotial correctness and contractual equity – The contracts of the group with its suppliers are informed in a correct, complete and transparent way, by trying to foresee the circumstances which may significantly influence the relationship.

When unforeseen events occur, the group engages not to get profit from the dependence or weakness of the counterpart and expects the same attitude from its partners.

Each supplier has to declare to share the principles reported in this document and engage to respect them the infringement of these principles represents a breach of the contract and it causes the interruption of the relationship.

VI. Financing bodies

Transparency and respect of the engagements – The financiers are the bodies supplying a financial support to the investment choices of ISS Palumbo and of other group's companies.

ISS Palumbo and any other company of the group ensure the truthfulness and the timeliness of the information required by the financing bodies, so that their decision of investment is based upon the true representation of their patrimonial and economic situation. With regard to the received financing, ISS Palumbo and any other group's company respect rigorously the engagements they have undertaken with the financing bodies, by punctually respecting the agreed dates of expiry.

VII. Public Administration

Integrity and independence in the relationships – ISS Palumbo inspires its behavior to the respect of the principles of lawfulness, correctness and transparency, in order not to lead the Public Administration to infringe the principles of impartiality.

In order to guarantee the highest clearness in the institutional relationships, these latter are managed only by company's representatives who have received adequate powers and are not in situations of conflict of interests with the representatives of the institutions.

Presents and courtesy and hospitality towards the government's representatives, the public offices and the public employees are allowed only if their small value doesn't compromise their integrity and independence. In any case these kinds of expenses are to be authorized and documented.

ISS Palumbo condemns any behavior, by whosoever, consisting in promising and offering either directly or indirectly gifts and benefits (money, goods, services, favors or other) to Italian or foreign public administration representatives, or to their relatives, by which an undue interest and/or advantage may arise.

In the relationships with the Public Administration it is forbidden to alter the functioning of an IT or telematic system of the Public Administration, manipulate the data it contains in order to obtain an unfair profit or anyway any benefit for ISS Palumbo group.

Transparency and collaboration – in case of investigations or controls by the Public Administration, the behavior of any collaborator shall be inspired to willingness and transparency. The relationships with the judicial authority and with the tax authority are characterized by the highest collaboration in the respect of their institutional roles. The collaborators engage to avoid behaviors which may be interpreted in a misleading way or, anyway, as corruption attempts.

It is considered as an infringement of this ethic code, as well as of law, the induction of any subject, by means of violence, menaces or offers or promises of money or of any other benefit, not to give declarations or to give false declarations before the judicial authority.

Business negotiations – Within any business negotiation or relationship with the Public Administration are not permitted, for any reason, behaviors aimed at the acquisition by ISS Palumbo or any other group's company of undue profits and/or advantages.

Just for example, the following behaviors are not allowed:

- Proposing, in any way, employment and/or commercial opportunities which may advantage public officers, public servants or the relevant relatives;
- Offering gifts, unless they have just a little value and the company's authorization procedure has been followed;
- Soliciting or obtaining confidential information which may compromise the integrity or the reputation of both the parties;
- Doing anything aimed at inducing the public administration servants to do or to omit to do something infringing the current laws;
- Abusing his position or his powers to induce or oblige someone to unduly promise to him or to others money or other benefits.

Public financing – it is forbidden to use contributions, subventions or financing got from the European community, by the state or by other public bodies for purposes different from those for which they have been obtained.

ISS Palumbo condemns the behaviors aimed at obtaining, by the public administration, any kind of contributions, financing, loans at preferential rate or any other allocation of the same kind, by means of statements and/or documents for this purpose altered or faked or by means of omitted information or, more in general, by means of cheats or deceits, included those realized by means of an IT or a telematic system, aimed at misleading the financing body.

It is considered an infringement of this ethic code, as well as of legal dispositions, the fact of inducing anyone, with violence, menaces or by offering or promising money or other benefits, not to declare anything or to declare something false before the judicial authority.

VIII. Community

Attention for the environment and for the health and safety on working sites – the environment and the prevention of bodily injuries and the safeguard of its employees' health and safety are among the priority values of ISS Palumbo's policy.

The company has voluntarily adopted a management system of environment and of health and safety on working sites complying respectively with the standards ISO 14001:2015 and OHSAS 18001:2007. This system integrates targets and policies with the quality system and, in general, with the systems of design and production.

The integration of the systems of management of quality, environment and safety on working sites has the following general targets:

- Making the company's operative practices consistent with the policy oriented to the respect of quality, people and environment;
- Improving the company's structure to make it more efficient and effective and to protect each person, by identifying and defining their responsibilities;
- Uniforming the operative modalities on sites, by creating more synergy among them;
- Getting economic and organization advantages for the management of integrated documents, joint certificates, integrated inspections and a higher duration of environment authorizations;
- Progressively reducing the acceptable risks, with the aim of lessening the environment accidents, bodily injuries, illnesses, by favoring the prevention of these risks.

Fair competition – ISS Palumbo recognizes the value of the fair, free and open competition. Therefore, the collaborators of the company and of the other group's companies are engaged in observing the relevant laws. It is forbidden to get information about competitors by means of ways illicit or contrary to ethic.

Relationships with trade unions' representatives – ISS Palumbo has relationships with the trade unions based upon correctness and transparency principles, within the limits imposed by the legal dispositions and of the provisions provided for by the applicable CCNL (national collective bargaining employment contract).

Mass-media – The data and the information regarding ISS Palumbo and directed to the mass-media may be disclosed only by the proper company's functions which are delegated to do this or with their authorization. In any case the communication to third parties has to be truthful, complete and not tendentious.

It is forbidden any kind of pressure on mass-media aimed at obtaining favors by them as well as the use of deceitful ad.

4. CONTROL AND MONITORING

I. Superintending body

The body charged of the supervision on the application of this code the the superintending body created within ISS Palumbo pursuant to the legislative decree 231/2001(hereinafter also “OdV” or “Body”). The OdV coordinates its activity with the competent bodies and fnctions for the correct implementation and the proper control and monitoring of the contents of this document.

The company’s bodies and their components, the employees, the collaborators and the third parties acting on behalf of ISS Palumbo or of another group’s company are supposed to collaborate at their best to favorise the performance of the functions of the superintending body.

II. Knowledge and application

All the addresses are acquainted with this code by means of proper communications. The OdV works with the competent functions and proposes adequate training paths allowing the clarification of any aspect related to the application of the code. Possible applicative doubts related to this document shall be immediately discussed with the superintending body.

III. Infringements pointing out

The addressees are supposed to point out any infringement of the code to the superintending body by means of confidential internal mail or by means of a dedicated e mail box.

Internal dedicated mail box	Dedicated mail boxes in the offices
E mail	<i>odv@iss-palumbo.com</i>

The OdV will immediately evaluate the information received also by interrogating the sender, the author of the presumed infringement and any other potentially involved subject. The superintending body and ISS Palumbo guarantee not to disclose the identity of the sender, unless obliged by law, and they also guarantee the protection from any kind of retaliation.

IV. Disciplinary measures

The OdV is supposed to check and ascertain possible infringements of the duties provided for by this document. In the case an infringement is ascertained, the superintending body and the function holding the disciplinary power inflict, with coherence and impartiality,

sanctions proportionate to the infringement and in conformity with the current laws ruling the working relationships and, if applicable, to the sanction system defined in the organization, management and control model adopted by the company.

V. Amendments and updates

Any amendment and/or integration to this ethic code shall be done by ISS Palumbo board of directors.