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Bertani Trasporti S.p.A.

Ethics, a term that derives from the Greek **“èthos”** is that branch of philosophy

which studies the conduct of human beings.

Ethics is both a set of norms and values that regulate human behavior in relation to others,

is a criterion that allows man to judge behavior,

their own and that of others, with respect to good and evil.

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Approved by the Board of Directors on December 20, 2023

Bertani Trasporti SpA – Share capital: €10,000,000.00 iv,
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Message from the Directors of Bertani Trasporti SpA

Dear colleagues,

Bertani Trasporti SpA has always inspired its activity by respecting the laws and regulations current regulations.
The Company intends, with the Code of Ethics, to vigorously affirm that the principles of protection of the fundamental rights of the person, of correctness and lawfulness in work and business constitute and will always constitute an essential value. The Company undertakes to protect this value, implementing all appropriate measures to avoid any behavior that could constitute damage to it.

Bertani Trasporti SpA does not establish or continue business relationships with anyone who refuses to respect the principles contained in this Code of Ethics.
In particular, the Company bases its choices and rules of conduct on the ethical principles summarized below, which shape the company policy.

Everyone in their function and responsibility must be guided by the table of principles expressed in this Code of Ethics, because everyone is responsible for the company's success which cannot and must not ignore the observance of these principles.

The Board of Directors therefore invites anyone who finds something that does not work correctly or has doubts about the legality of certain practices to discuss and share their doubts: our synergy will be the guarantee of the ethical nature of our behaviour.

Bertani Trasporti SpA must, respecting its history and the efforts of its founders, be a model of quality in work and practices based on correctness.

And members of the CdA

Cesare Bertani Sergio Bertani Franca Bertani

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PREMISE

Bertani Trasporti SpA (hereinafter also *Company, Company or Group)* since its foundation in 1954, has adopted corporate practices inspired by the principles of integrity, honesty, transparency, correctness, innovation as well as social and environmental responsibility and corroborated by humility, temperance, courage, justice, patience, industriousness and modesty.

The entrepreneurial style of the founders of the Bertani Trasporti SpA company, strengthened over years of traditions, experiences and sharing with employees/collaborators, has made commitment in daily activities one of the fundamental resources *of the Company.*

In the perspective of this process of dissemination and clarification of company principles, the fundamental document is the "Code of Ethics".

Honesty, integrity and ethically correct behaviour, starting from the Board of Directors to the Directors, from the Managers to the Managers up to each individual employee and all the subjects, i.e. the Recipients1 who operate in the interest of Bertani Trasporti SpA, represent the key principles of the Company. The latter, in fact, are committed to observing and ensuring that the principles of the Code of Ethics ("Code") are observed, each according to their own functions and responsibilities in their relationships with people, companies, public and private bodies both in Italy and abroad, adopting a way of communicating and reporting that is true, complete and timely.

In carrying out its business, Bertani Trasporti SpA is inspired by the supreme principles governed by the Universal Declaration of Human Rights adopted by the United Nations General Assembly on 10 December 1948, in the ILO (International Labor Organization) conventions for rights at work , and the Constitution of the Italian Republic with particular attention to the articles. 2 and 3:

- Art. 2 The Republic recognizes and guarantees the inviolable rights of man both as an individual and in the social formations where his personality develops, and requires the fulfillment of the mandatory duties of political, economic and social solidarity.
- Art. 3, co. 1 All citizens have equal social dignity and are equal before the law, without distinction of sex, race, language, religion, political opinions or personal and social conditions.

Bertani Trasporti SpA is also committed to respecting the key principles of Social Responsibility and has obtained the SA 8000 certification. With the aim of drawing inspiration from the highest standards of good corporate organisation, Bertani Traporti SpA has also obtained the ISO 9001 Certifications (Management of Quality), ISO 14.001 (Environmental Management), ISO 45.001 (Occupational Safety Management), ISO 27.001 (Information Security) and TISAX VDA (Automotive Information Security), and undertakes to respect the principles and protocols in the present and in the future contained in them.

1 By Recipients we mean precisely all the subjects who operate in the interest of Bertani Trasporti SpA, both inside and outside the Company without distinctions or exceptions of any kind or in addition to the so-called. also employees are external collaborators who in any capacity and on the basis of any legal relationship operate in the interest or to the advantage of the Company, such as for example business partners, suppliers, or those who represent it in some way.

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1. The Code of Ethics

This Code of Ethics (hereinafter also *the 'Code'),* consisting of the set of general principles and rules of conduct - also in light of the necessary prevention activity of criminal conduct for which the administrative liability of the entities is envisaged , pursuant to Legislative Decree 231/2001 - is a document that expresses the values and principles of behavior that Bertani Trasporti SpA follows in the management of its corporate activities and in relations with all those who interact with it .

The Code of Ethics acts as a binding guideline in everyday work and is integrated with directives, internal rules and provisions regarding the regulation of employment relationships and compliance with national and international regulations.

This means that the Bertani Trasporti SpA company never takes part in any activity that may or could involve corruption, fraud, embezzlement, extortion, theft, embezzlement, tax fraud, or any other intentional damage to the assets of customers or third parties or the State.
Failure to comply with the principles contained in the Code of Ethics can cause considerable damage, not only to Bertani Trasporti SpA but also to employees, business partners, collaborators and stakeholders who interact with it.

The Code is also a constituent element of the Internal Control and Risk Management System and
Organization, management and control model adopted by the Company pursuant to Legislative Decree 231/2001.
This code does not replace or overlap with laws and other internal and external regulatory sources but represents a document that integrates and strengthens the principles contained in these sources, with specific reference to the ethical profile of corporate behaviour.
The Code of Ethics is aimed, without exception, in Italy and abroad, at all Recipients, such as, by way of example and not limited to, the President, Directors, Auditors, Service Heads, Collaborators, Consultants, the Auditors, the Dealers and other commercial partners in various capacities, the Suppliers and the Customers.

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2. Values

Compliance: Compliance with the laws and regulations in force in the countries in which the Company carries out its business.

Resilience: Ability to react with flexibility, speed and resourcefulness to market changes.

Integrity: Correctness, honesty, loyalty and good faith in daily activities and in internal and external relationships.

Transparency: Attention to the needs and expectations of Stakeholders, guaranteeing completeness, reliability, uniformity and timeliness of information and avoiding misleading communications, in compliance with laws and market *best practices* .

Confidentiality: Protection of the confidentiality and confidentiality of information learned as a result of one's work function, guaranteeing correctness, completeness, uniformity and timeliness of information in compliance with privacy legislation.

Responsibility: Sense of responsibility towards all Stakeholders in every company activity or decision.

Sustainability: Creation of sustainable value over time for all stakeholders and ability to create sustainable projects, works and services for the reference context through an ethical use of resources in order to safeguard the expectations and interests of future generations, in full compliance with people and the environment.

Collaboration and Fair Play: Enhancement and development of everyone's skills and competences, team spirit, sharing and comparison of ideas.

Quality & Safety: Maximum attention and care of the service provided to customers in terms of quality, safety and reliability, through a certified management and quality system that integrates the various skills present.

Innovation: Guarantee of efficiency and research in our company offer.

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3. Commitment towards all Stakeholders

3.1 Corporate Social Responsibility and Respect for Human Rights

The Board of Directors, in line with the policies, strategies and continuous improvement actions already implemented in the occupational health and safety management systems compliant with the ISO 45001 standard and those of environmental management (ISO 14.0001), has decided to take on the commitment to operate consistently with the principles of Social Responsibility compliant with the SA 8000 standard.

To this end, transparent methods and systems have been implemented to detect and satisfy the expectations of the main stakeholders (customers, suppliers, employees, citizens, public bodies, non-governmental associations) and to pursue dialogue and growth of the social, economic and environmental value of the territory where it operates. Further details in this regard can be found in the Social Responsibility Policy adopted by the company on 17 June 2021 to which please refer for further information.

Bertani Trasporti SpA respects internationally recognized human rights and bases its own
based on the United Nations Guiding Principles on Business and Human Rights.
Bertani Trasporti SpA rejects all forms of discrimination regarding employment and occupation, slavery, child labor, threats to people who defend human rights and other violations of human rights. Furthermore, it attaches particular importance to the protection of fundamental rights at work.
The Company undertakes to ensure compliance with these principles also by its commercial partners, and in particular by its suppliers and respective sub-suppliers.

ü Example: *If an Area Manager becomes aware of the ethically incorrect behavior of a Supplier (e.g. use of minor personnel in the production process or exposure of employees to serious health risks), the same is required to initiate the necessary actions and to promptly inform your superior. The Company will thoroughly evaluate the relationship with the incorrect Supplier and, if necessary, will put an end to this relationship.*

3.2. Protection of diversity and equal opportunities

Bertani Trasporti SpA knows how to appreciate the diversity of its employees. For this reason the concepts of *diversity* and inclusion are part of the company strategy, which promotes the conscious management of diversity and individuality. This assumption is fundamental to the economic success of the Company. According to corporate principles, the Company interacts with an attitude based on mutual respect, tolerance and fairness. Equal opportunities are an objective to be constantly pursued.

Any form of discrimination is not tolerated, in particular regarding:

- sex, origin, provenance and nationality
- religious belief and worldview
- political, social or trade union activity
- sexual identity and orientation
- physical and/or mental handicaps, or
- age.

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Bertani Trasporti SpA respects the personality rights of its employees and creates a culture of tolerance, in which one can develop individually to fully express one's potential in the workplace. Any form of discrimination, harassment or mobbing is against it
with the image of the Company and cannot find space in Bertani Trasporti SpA
It is the responsibility of all those involved to create a fair, tolerant, respectful and collaborative working environment.

ü Example: *Anyone who, while carrying out their work, should witness episodes of discrimination linked to differences in skin colour, harassment of any kind, mobbing, etc., must point out this behavior to the person involved and, in impossible to intervene directly, you must communicate the incident to your superior, to the Human Resources Office or directly to the Supervisory Body in order to put an end to this situation as quickly as possible.*

3.3. Impartiality, fairness and equality The Company

has required all its Collaborators to act with impartiality and loyalty, not only in the performance of their duties, also in intra-company relations and in relations with the external partners of Bertani Trasporti SpA

The Company is intent on developing the corporate spirit of belonging and condemns any form of discrimination and/or abuse both in internal and external relationships.

3.4 Countering racism and xenophobia

The Company has as an essential value the fight against every form and expression of racism and xenophobia.

It, therefore, repudiates any activity that may involve the propaganda of ideas based on racial or ethnic superiority or hatred and the commission of acts of discrimination and violence, or even just the incitement or incitement to such acts, for racial, ethnic, national or religious reasons.

Phenomena such as racism, xenophobia, the denial of crimes against humanity, in whatever form they are manifested, including diffusion through the press or social media, are condemned in the most absolute way.

ü Example: Anyone who notices forms of aversion towards foreign colleagues and/or collaborators, *attitudes or behaviors that lead to the isolation of such subjects, must immediately inform their superior, the Human Resources Office and if necessary the Supervisory Body. Not intervening means being complicit and contributing to the persistence of forms of racism and xenophobia prohibited by law.*

3.5 Health and Safety at work

The *Company* is committed to offering a working environment capable of protecting the health and safety of its staff, considering this obligation a productive investment and a factor of growth and added value for the *Company* itself.

The Company is committed to protecting the moral and physical integrity of its employees, consultants, collaborators and all its interlocutors.

To this end, Bertani Trasporti SpA promotes responsible and safe behavior and adopts all the safety measures required by technological evolution to guarantee a safe and healthy working environment, in full compliance with current legislation on prevention and protection.

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The Company therefore ensures the fulfillment of all related legal obligations (Legislative Decree 81/2008 – art. 30, *'Consolidated Law on Security');*

The *Company* undertakes to spread and consolidate a culture of safety with a view to prevention, developing awareness of the risks and promoting responsible behavior on the part of all people, who are ensured adequate information and training to guarantee full and timely compliance with the regulations and of internal procedures, who are asked to promptly report any deficiencies or failure to comply with applicable rules.

In particular, in application of workplace health and safety regulations, the Company takes the following steps:

- the *Company* intends to make effective and apply to its organizational and functional structure the rules for the protection of Health and Safety at work with the aim of systematically reducing the risks for personnel regarding accidents and occupational diseases. • this objective is considered strategic for the Organization, which intends to pursue it with a view to continuously improving its operational management in synergy with the primary aim of optimizing the activity, reducing waste, diseconomies and improving profitability;

- the *Company* uses its own *'Risk Assessment Document'* as a reference tool for its prevention activity, developing the safety procedure, operating instructions, staff training and training programs on the basis of what is established in the *'Document of Risk Assessment,* the timely updating and maintenance of which is ensured with the assistance and support of qualified and adequate resources in terms of competence, experience and ability;

- the Risk Prevention and Protection Service is managed according to the objectives set, ensuring adequate economic, financial and personnel resources that are maintained over time, with the use of external resources in all cases where there are no internal resources within the organisation. are adequate skills.

- the Company bases its work on standards recognized by accredited Certification Bodies, in particular ISO 45.001.

ü Example: If in a company department the presence of a colleague/collaborator is noticed who does not use the assigned Personal Protective Equipment (PPE) in carrying out his/her duties, whoever notices the non-compliance must report it to the Area Manager. Reporting will help protect the person from the possible risk of injury and comply with the law.

- The company has internal procedures and protocols aimed at avoiding the use of irregular workers or any hypothesis of labor exploitation which constitute forms of crime.

3.6 Environmental Protection

The Company contributes to the dissemination and awareness of environmental protection issues and manages the activities entrusted to it in an eco-compatible manner, in compliance with current national and community legislation.

To carry out its activities, Bertani Trasporti SpA is committed to ensuring that projects, processes, methodologies and materials take into account the development of scientific research and

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better experiences in environmental matters, in order to respect territorial balance, prevent pollution, protect the environment and the landscape.
The Company adopts an effective environmental management system that complies with all relevant national and international regulations. These are the fundamental principles that inspire it:

- Do not pollute; •
- constantly optimize the use of resources; • develop products and
- services that are increasingly compatible with the environment. • the Company bases its
- work on standards recognized by accredited Certification Bodies, in particular it adopts the behaviors necessary to comply with the requirements of ISO 14.001 certification.

Company activities are carried out by minimizing any type of emissions, based on available technologies.

In order not to cause damage to the environment, the Company carries out specific controls aimed at minimizing polluting emissions.
Furthermore, the waste generated by the exercise of company activities is regularly stored and disposed of, through the use, where necessary, of specialized and qualified individuals.

The Company wishes to preserve public trust regarding the integrity of its activities through reports and open discussions with other parties, with the aim of improving knowledge of environmental issues related to its activities.

ü Example: In the ecological island, the presence of a battery positioned in contact with the flooring in the vicinity of which there is a water collection drain is noted. The person who identifies this situation is required to immediately contact the competent employee or inform him of the problem encountered so that he can proceed with the correct storage of the battery in the appropriate containment basin. Avoiding acting in the belief that someone else will take care of it could lead to a risk situation and consequent environmental damage. Reporting means respecting the Environment and the law in force.

4.Principles of Commercial and Corporate Responsibility

4.1 Business Process Management

In business relationships and, more generally, in the management of the business, the Recipients are required to behave ethically and respectful of the law, based on maximum transparency, clarity, correctness and efficiency.

In commercial or promotional relationships, the Recipients are also required to behave in line with the corporate policies of Bertani Trasporti SpA, which can never translate, even if aimed at pursuing the corporate purpose, into acts contrary to the law, to the regulations in force , to the company procedures adopted with reference to the individual Services or to the Company Policy and Code of Ethics.

In the exercise of their skills, Collaborators who occupy managerial positions must also respect rules and conditions established at an organizational and management level, having regard to the spending programs and operating methods of the Company, operating within budgets assessed and approved and resorting to the necessary involvement of the respective company services.

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Collaborators and subjects who make any purchase of goods and/or services, including external consultancy, on behalf of the Company, must act both in compliance with the specific procedures and in compliance with the principles of correctness, economy, quality and lawfulness and operate with the diligence of a good family man.

4.2 Relations with the Public Administration

At Bertani Trasporti SpA, deals are not concluded at any cost. The fundamental principle is "never corrupt or allow yourself to be corrupted".

The people appointed by the Company to follow any business negotiation, request or relationship with the Italian and/or foreign PA must not for any reason try to improperly influence the decisions of the Public Officials/Public Service Representatives who deal with and make decisions on behalf of the Italian or foreign PA.

In dealing with employees of public authorities and public sector companies, as well as with public officials and politicians, the Company always acts in accordance with our business principles. The Company avoids giving even the simple impression that there is inappropriate influence,

for example, through payments, benefits or other advantages. This rule is followed even when such favors are apparently "usual" or "expected" in relations with the public administration.

Through training courses and regular checks, the Company ensures that corruption is prevented, detected and punished.

During a request or a commercial relationship with Public Officials and/or Public Representatives Service, Italian or foreign, the following actions cannot be undertaken - directly or indirectly - indicated by way of example and not exhaustively:

- directly or indirectly promise or offer money or other benefits to Italian or foreign Public Officials and/or Public Service Representatives, from which the Company itself may obtain an interest or advantage;
- promise and/or offer any object, service, provision of value to induce Italian or foreign Public Officials/Public Service Representatives to use their influence on other subjects belonging to the Italian or foreign PA;
- offer any object, service, provision or favor to Public Officials/Public Representatives Service, Italian or foreign, or their relatives within the 2nd degree, directly or through a third party, except in the case of gifts or other benefits of modest value, i.e. falling within legitimate uses or customs;
- maintain working relationships with PA employees or hire former Italian or foreign PA employees, or their relatives within the 2nd degree, who participate or have personally and actively participated in business negotiations or endorsed requests made by the Company to the PA Italian or foreign; • propose - in any way -

employment and/or commercial opportunities that may benefit Public Officials and/or Public Service Representatives on a personal basis;

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- solicit or obtain confidential information that may compromise the integrity or reputation of both parties;
- carry out any other act aimed at inducing foreign Public Officials and/or Public Service Representatives to do or omit to do something in violation of the laws of the system to which they belong.

It is prohibited to use it for purposes other than those for which contributions, subsidies or financing obtained from the State or other public body or from the European Communities were granted, even of modest value and/or amount.
The Company condemns any behavior aimed at obtaining, from the State, the European Communities or other public body, any type of contribution, financing, subsidized loan or other disbursement of the same type, by means of altered or falsified declarations and/or documents , or through omitted information or, more generally, through artifices or deceptions, including those carried out by means of a computer or telematic system, aimed at misleading the provider body.

Particular attention must be paid when organizing promotional and entertainment events involving representatives of the PA in any form; this organization must in any case take place in full compliance with current regulations, company procedures, the Model and the principles of the Code of Ethics.

ü Example: *In relations with Public Administrations, unequivocal ethical behavior must be adopted. If an employee/ collaborator must interact with the representatives of a PA to obtain an authorization procedure for the Company and thinks of asking, through* common acquaintances, to structure the activity in such a way as to facilitate the Company in obtaining the practice, Your intention is prohibited. He must refrain from adopting illicit behavior sanctioned by law.

4.3. Relationships with Customers and Suppliers

In relationships with customers, suppliers and third parties in general, offers of money, the giving of benefits of any kind or gifts aimed at obtaining real or apparent advantages of any nature, or which may compromise the integrity or reputation are not permitted. of one of the parties or which may influence the independence of judgment (e.g. promises of economic advantages, favours, recommendations, promises of job offers), or which are intended to influence the beneficiary and push him to behave contrary to duties of office or obligations of loyalty or which are in any case capable of distorting free competition.

The Company maintains relationships with its business partners and customers only through its services and not by influencing them inappropriately. Nor does he allow himself to be influenced inappropriately, but rather bases his decisions on objective and understandable reasons.

Bertani Trasporti SpA does not tolerate illicit behavior on the part of its employees, business partners or customers. Decisions based on the illicit management of the contractual phase distort competition, damage the Company and the common good. In order to prevent possible damage to the Company, Bertani Trasporti SpA avoids giving even the simple impression that there is inappropriate influence.

ü Example: *Corruption is a serious phenomenon in business relationships.*
If the Manager of the Commercial Area, who communicates directly with the customer for the assignment of a tender called by the customer, proposes to condition the tender in favor of his Company behind

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payment of a fee, this is corruption. Such behavior, if detected, must be reported immediately to one's superior or to the Supervisory Body.

4.4 Relationships with the Judicial Authorities and with the Authorities with inspection powers in the context of inspections, accesses and checks carried out by these

Authorities Bertani Trasporti SpA acts in compliance with the law and does not hinder, within the limits of its competences, the correct administration of justice.

In carrying out its activities, the Company operates in a lawful and correct manner, collaborating with representatives of the Judicial Authority, the Police Force and any Public Official with inspection powers.

Relationships with the Judicial Authorities and Judicial Police bodies, of every order and degree, must be based on maximum transparency, correctness and collaboration; in this regard, the Recipients - especially if they are involved in judicial proceedings - must refrain from adopting behaviors that are reticent, omissive or that could result, even indirectly and/or involuntarily, in hindering the work of the justice bodies. Similarly, the Recipients must refrain from any pressure or threat, including through the use of physical violence, as well as from any offer of money or other benefits, in order to induce a person not to make statements or to make false statements before an Authority. Judicial.

4.5 Relations with commercial partners and donations

Acts of commercial courtesy are permitted as long as they are of modest value or in any case such that they do not compromise the integrity or reputation of one of the parties nor can they be interpreted, by an impartial observer, as aimed at acquiring undue and/or improper advantages; in each

case, provided that they are carried out in compliance with the indications contained in the company procedures. In any case, acts of commercial courtesy must never be carried out in circumstances that could give rise to suspicions of behavior contrasting with the guiding principles of the Code of Ethics. Acceptance of money given by natural or legal persons who are or intend to enter into business relationships with the Company is prohibited.

These rules do not allow exceptions even in those countries where offering valuable gifts to business partners is customary.

In relationships with business partners and customers, gifts and invitations (acts of generosity) represent an acceptable custom within reasonable limits. To avoid reputational damage and financial losses to Bertani Trasporti SpA, company decisions are based on objective and understandable reasons and must not be influenced by inappropriate acts of generosity.

Employees may not encourage, solicit or request gifts, entertainment, personal services or favors from business partners for themselves or others. Acts of generosity must be rejected if they may generate even the simple impression of inappropriate influence.

The Company expects that promotional and occasional gifts freely offered by commercial partners may be accepted only if their value is within reasonable limits. Invitations to lunch/dinner or events are permitted only on the condition that they are freely offered as part of a business occasion, do not occur too often and the invitation is related to the particular business occasion.

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As a guide to what can be considered reasonable, we are based on a value of €50.00 for gifts and a value of €100.00 for invitations from third parties. In case of doubts about the appropriateness of gifts or invitations, the person involved must consult his/her manager.
In the case of donations that exceed the guideline values, they must be made public and their receipt documented. Any other reporting obligations pursuant to legal provisions, such as tax legislation, remain unaffected .
Even when it comes to gifts and invitations to business partners and customers, the principle of avoiding giving even the mere impression of inappropriate influence must be adhered to. Acts of generosity are permitted only within reasonable limits of value and within the scope of normal business commercial. With regard to gifts and invitations to employees of public authorities and public sector companies, as well as to public officials and politicians, their appropriateness must be assessed critically.

ü *Example: If a supplier with whom the employee has a commercial relationship offers him a gift of a certain value, even if he is certain that accepting the gift would not affect the commercial relationship, the value of the gift must not exceed the limits contained in this Code. If the interested party has doubts, it is better not to accept the gift or to agree with his superior on the behavior to be adopted.*

4.6 Transparent and complete information The

Company, respectful of the principle of transparency, undertakes to disseminate correct, truthful and complete information to third parties.

4.7 Selection of business partners

Bertani Trasporti SpA expects compliance with the Company Code of Ethics and the law not only from employees, but also by business partners, such as customers and suppliers.
Based on the risk, before concluding a contract, Bertani Trasporti SpA carries out an integrity check and follows a formalized *due diligence process.* Employees responsible for selecting business partners are required to carry out the verification as part of a transparent selection procedure. In order to ensure that potential business partners respect this Code of Ethics.

Bertani Trasporti SpA trusts in compliance with the principles regulated in the Code of Ethics of commercial partners even after the signing of the contract.
The commercial partners of Bertani Trasporti SpA are required to communicate the standards of the Code of Ethics and the obligations deriving from it to their employees. Furthermore, business partners are obliged to transmit these principles to their suppliers and to commit to ensuring compliance with them.
In the event of potential violations of the requirements of this Code of Ethics by business partners, the responsible employees must take action to reach a clarification with the business partner.

ü Example: *If an employee/collaborator of Bertani Trasporti SpA who has commercial relations with a Supplier realizes that the same violates the principles contained in the Code of Ethics, he must immediately inform his Manager who will verify the situation and, if necessary to terminate the existing contractual relationship.*

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4.8 Conflict of Interest All

business decisions and choices made on behalf of Bertani Trasporti SpA must correspond to your best interests and be in line with the provisions of the Code of Ethics in force.

Collaborators, therefore, must avoid situations and/or activities that could lead to conflicts of interest with those of the Company or that could interfere with their ability to make impartial decisions, in safeguarding the best interests of the Company.
If situations of conflict arise between the interests of the Collaborators and those of the Company, such as by way of example but not limited to: 1) personal financial relationships or
those of one's family members up to the 2nd degree (for example the child - 1st relative - or the grandchild – 2nd relative), with business partners, competitors, suppliers or customers of the Company;

2) commercial transactions between family members within the 2nd degree (for example the child - 1st relative - or the nephew - 2nd relative) and the Company,

3) commercial transactions with business partners without any reference to price, quality of service or other measurable factors;

4) personal relationships of external collaboration with business partners, competitors or suppliers;

it is necessary that such situations, even if potential, merely presumed or, in any case, future, are communicated immediately, in writing, to your hierarchical superior or, failing that, to your Manager, who will inform the Supervisory Body.

In any case, the Recipients are required to abstain from any activity connected to the situation giving rise to the conflict.

The Company will not be represented in relations with the PA, whether Italian or foreign, by third parties when a conflict of interest could arise, even abstractly.

Third parties (such as consultants, suppliers, members of the sales and assistance network) who operate on behalf of the Company have the obligation to abstain from maintaining relationships with the PA, Italian or foreign, in any other case where there are conflicts of interest or other reasons that conflict with the principles referred to in this Code.

The Company has adopted a procedure that regulates cases of conflict of interest which must be known and respected by all collaborators.

ü Example: *If the Purchasing Manager asks his collaborator to check some offers for a specific supply of goods and, while proceeding, the collaborator realizes that one of the most convenient offers comes from the company of a close friend of his, he must immediately inform the Your Manager and avoid participating in the decision-making process, to avoid any suspicion of conflict of interest.*

5. Principles regarding corporate management

5.1. The example as a guarantee of the CODE OF ETHICS

Collaborators who hold a role of responsibility, such as for example. the President, the Administrators, the Managers and the Department Heads must set an example, provide leadership and guidance in accordance with the principles of business conduct contained in the Code of Ethics and, with their behavior, must demonstrate to other Collaborators that compliance with the Code of Ethics it is a fundamental aspect

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of their work, ensuring that they are aware that business results must never be separated from respect for the principles of the Code of Ethics.

The subjects in positions of responsibility indicated above must report any case of failure to comply with the provisions contained in the Code of Ethics and are responsible for ensuring the protection of those who, in good faith, report violations of the Code of Ethics and for adopting and applying , having consulted the SB if necessary, sanctioning measures commensurate with the violation committed and sufficient to constitute a deterrent to further violations.

5.2 Principles relating to corporate offenses The

Company prohibits any conduct, carried out by anyone, aimed at supporting, encouraging, facilitating and inducing the members of the corporate bodies, the Managers and any liquidators of the Company to violate one or more of the principles below indicated.

Any behavior aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or other corporate communications required by law, addressed to the shareholders, the public and the company carrying out the audit is prohibited.
All subjects called upon to prepare the aforementioned documents are required to verify, with due diligence, the correctness of the data and information which will then be implemented for the drafting of the documents indicated above.

The Company requires that the directors, managers and collaborators behave correctly and transparently in carrying out their functions, especially in relation to any request made by the shareholders, the management control body, the other corporate bodies and the auditing firm. in the exercise of their respective institutional functions.

The Directors of the Company are prohibited from engaging in any behavior aimed at causing damage to the integrity of the company's assets.
The Directors of the Company must not carry out any type of corporate operation likely to cause, even potentially, damage to creditors. It is forbidden to carry out any act, simulated or fraudulent,
aimed at influencing the will of the members of the shareholders' meeting to obtain the irregular formation of a majority and/or a different resolution. It is forbidden to spread false information both inside and outside the Company, concerning the latter, its Collaborators and third
parties who work for it.

Collaborators, on the occasion of checks and inspections by the competent public authorities, must maintain an attitude of maximum availability and collaboration towards the inspection and control bodies.

ü Example: *at the end of the year the company must proceed with the valorisation and registration of all revenues not yet invoiced. Given that the revenue threshold is exceeded, the person in charge of carrying out the registrations decides to invoice the services performed for the year and not yet invoiced, in the following year. This choice was made to avoid having a budget with too high revenues and to postpone the taxation of the revenues themselves. Such behavior is prohibited by law. It cannot be done because the budget numbers would lose their veracity (there would be a lack of relevant revenues) and in any case it would cause the tax imposition not permitted by the law to be postponed.*

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5.3. Compliance with tax, social security, customs and free competition regulations

Bertani Trasporti SpA respects the provisions of tax and customs law, which include corporate income tax, tax withholdings from salaries, the payment of social contributions,
value added tax, customs duties and excise duties due on the importation of goods.

In order to guarantee the correct management of taxation Bertani Trasporti pursues the following objectives:

a) lasting growth of the company assets and protection of the reputation of Bertani Trasporti SpA, ensuring tax management in line with applicable legislation, aiming to optimize the tax variable but always in compliance with all laws and required obligations;

b) correct and timely determination and payment of taxes, withholdings and social contributions, due by law and execution of the related obligations;

c) containment of tax and contribution risk, understood as the risk of incurring the violation of tax or contribution rules or the abuse of the principles and purposes of the tax system through adequate procedures and organizational solutions also through the involvement of external professionals;

d) good faith and transparency in the relationship with the tax and social security authorities, being recognized as a reliable counterpart with which to establish collaborative relationships;

e) promotion of a tax and contribution culture oriented towards transparency, honesty and correctness and compliance with regulations at all company levels.

Free competition is protected by current Antitrust legislation. Compliance with this regulation guarantees the non-distortion of competition in the market, to the advantage and interest of all those operating in it.

In particular, agreements and concerted practices between competitors with the aim of hindering or limiting free competition are prohibited. Furthermore, it is not permitted to abuse a dominant position within the market. For example, abuse of a dominant position means: different treatment of customers without any objective justification (discrimination), refusal to carry out supplies, imposition of unjustifiably burdensome prices and purchase or sales conditions, making the conclusion of contracts conditional to the acceptance by the other contractors of additional services which, by their nature and according to commercial usage, have no connection with the object of the contracts themselves. Conduct that contravenes free competition can not only significantly damage the reputation of Bertani Trasporti SpA but also lead to serious financial and criminal sanctions, and is in any case considered particularly serious. Collaborators and subjects who make any purchase of goods and/ or services, including external consultancy, on behalf of the Company, must act both in compliance with the specific procedures and in compliance with the principles of correctness, economy and quality and operate with the diligence of the good father of the family as expressly regulated in the art. 1176 of the Civil Code, to be assessed with regard to the nature of the activity carried out

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ü Examples: *During a sector-specific training course, a Bertani Trasporti SpA employee chats with an employee of a competing company. He realizes that the interlocutor is trying to obtain information on company know-how. In return, the interlocutor declares himself ready to reveal the same type of information about his company.*

The Bertani Trasporti SpA employee must make it clear to the interlocutor unequivocally that he does not intend to talk about confidential topics. The disclosure of confidential information is prohibited by competition laws, causing serious repercussions for the defaulter, for the Company as well as for the interlocutor and his company.

6. Principles of responsibility in the workplace

6.1 Hiring

Collaborators are prohibited from accepting or soliciting promises or payments of money or goods or benefits, pressure or services of any kind which may be aimed at promoting the hiring of a Collaborator or his transfer or promotion.

The Company does not tolerate any form of irregular
work. The hiring of foreign personnel without a residence permit or with an expired residence permit and whose renewal has not been requested, within the legal terms, or with a revoked or canceled residence permit is specifically prohibited.
The Company rejects any form of exploitation and the state of need of all workers and abstains from any relationship with intermediaries who are even suspected of recruiting labor by taking advantage of the aforementioned state of need.
The Company undertakes to strictly comply with current and applicable legislation regarding working hours, rest periods, weekly rest, compulsory leave, holidays.
It also undertakes to pay workers wages that are proportionate to the quality and quantity of the work performed, and in any case in line with the provisions of the applicable collective bargaining.
The Company condemns the use of degrading or potentially dangerous working conditions, surveillance methods or housing situations, which are deemed absolutely unacceptable.

ü Example: *An interview is held with a Ukrainian driver, he successfully passes the driving test, therefore the documents are requested to evaluate the hiring. In this phase we realize that the driver's residence permit has expired, he reassures us that he already has an appointment for renewal at the competent bodies, we therefore decide to hire him anyway, as he will soon obtain the permit .*

*Absolutely NO, in this
case the hiring cannot take place until the driver has renewed his residence permit and has shown the company the regularity of the documentation.*

6.2 Professionalism and training The

Company undertakes to ensure that the subjects operating within it, or those to whom the Company entrusts the performance of certain services, are equipped with proven requirements of competence, professionalism and experience.

With particular reference to its staff, the Company constantly takes care of their training, updating and professional growth.

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6.3 Enhancement of human resources (Equal opportunities)

All employees/collaborators of Bertani Trasporti SpA contribute to defining, maintaining and improving the image *of the Company* itself and the quality of the Services offered.

Bertani Trasporti SpA enhances its human resources by implementing a serious personnel management policy and more precisely by promoting the criterion of meritocracy and the recognition of the quality of work as well as the growth and development of employees/collaborators through training activities.

Furthermore, *the Company* recognizes the productive potential coming from the community and promotes all those conditions that make the right to work effective, without distinction of sex, race, language, religion, political opinions, personal and social conditions in reference to the provisions contained in the art. 3 of the Constitution which offers the principle of equality and equal opportunities as a key to understanding.

6.4 Worker representation

Recognizing the fundamental right of all workers to establish trade union representation within the Company, we are committed to collaborating with trust and transparency with workers' representatives, to have a constructive and collaborative dialogue, aimed at achieving a legitimate balance of interests. Having professional relationships with workers' representatives without providing for privileges or discrimination is an integral part of our corporate culture.

The future of Bertani Trasporti SpA and its employees passes through the spirit of collaboration in resolving any conflicts and social commitment in order to guarantee competitiveness and innovation. Of equal importance and the object of common objectives are the profitability of the Company and the protection of employment.

7. Control implementation methods

7.1 Implementation

7.1.1 Communication and training In order for

it to be made known to all Recipients and to acquire binding force, the Code of Ethics is: • - shared within the Company, by delivering a copy of it in electronic format to members, corporate bodies, Service Heads and Company Collaborators. A copy of the Code is inserted into the company Intranet and, in any case, it is made available and consultable on the Company portal; • - disseminated outside the Company through specific information sent to consultants, suppliers and customers

as well as through reporting and publication on the website www.bertanitrasporti.it, from which it can be freely downloaded.

Furthermore, in order to allow the full operation of the Code of Ethics, Bertani Trasporti SpA:

- guarantees the timely dissemination of the Code of Ethics and subsequent updates and amendments among the Recipients; • provides Collaborators
- with adequate training and information support, also in order to allow the resolution of interpretative doubts relating to provisions contained in the Code Ethical;

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- guarantees that Collaborators who report violations of the Code of Ethics are not subject to any form of retaliation;
- adopts fair sanctioning measures commensurate with the type of violation of the Code of Ethics in compliance with the legal and contractual provisions applicable to each individual case;
- activates periodic checks to ensure compliance with the rules of the Code of Ethics.

Bertani Trasporti SpA encourages constructive contributions on the contents of the Code of Ethics from Collaborators, both in the implementation phase and in the subsequent phase, whenever shortcomings of the same or the need for its updating are highlighted (following regulatory developments or the most established practices international organizations as well as for experience acquired in the application of the Code of Ethics itself), which must be reported to the Supervisory Body.

7.1.2 Interpretative questions relating to the Code of Ethics For questions

relating to the interpretation and application of specific rules or for clarifications on the Code of Ethics, Collaborators must contact the corporate Compliance function and the HR function and/or the Supervisory Body at the following e -mail: odv@bertanitrasporti.it

7.1.3 Amendments and revisions

The Code of Ethics is subject to periodic review by the Board of Directors of Bertani Trasporti SpA and any update, modification or addition to the same must be approved by the Board of Directors with the same methods adopted for its initial approval .

7.1.4 Conflicts with the Code of Ethics In

the event that even just one of the precepts of the Code of Ethics conflicts with the provisions set out in the internal regulations or procedures, the Code of Ethics must be considered prevalent.
The Code of Ethics integrates, without replacing, the content of the other ethical or category codes currently adopted by the Company.

7.2 Control

7.2.1 Reporting of violations The Company

guarantees all Recipients accessibility to one or more channels that allow them to submit, to protect the integrity of the entity, detailed reports (hereinafter the "Reports") of irregularities or offenses and , among these, of: • illicit conduct, presumed or actual, relevant pursuant to Legislative Decree 231/2001 and based on precise and consistent factual elements; • violations, presumed or actual, of the Model or Code of Ethics adopted by the Company.

All Recipients of the Code of Ethics and the Model may submit Reports if, in good faith, they believe there is illicit conduct or violations of the Model or the Code of Ethics of which they have become aware due to the functions performed. The Report is considered made in good faith when it is made on the basis of a reasonable belief based on factual and detailed elements.

To manage reports, the Company has established specific rules and a *whistleblowing* process in a specific *"Procedure for reporting violations (so-called "whistleblowing")".*

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Reports can be made through various alternative channels suitable to guarantee the confidentiality of the identity of the reporter.

The channels envisaged
are: - an IT system for reporting that guarantees the anonymity of the reporter, accessible from the following URL https://bertanitrasporti.it/whistleblowing/

- a reserved *e-mail* address accessible to members of the Supervisory Body odv@bertanitrasporti.it.
The Reports can also be anonymous, but in this case they will only be taken into consideration if they are sufficiently precise and detailed with elements such as to make it possible to understand what happened and start an investigation.

In any case, the confidentiality of the identity of the whistleblower and of the information is ensured in any context subsequent to the Report itself, without prejudice to legal obligations and the protection of the rights of the Company or of persons accused in bad faith.

However, the Company guarantees whistleblowers in good faith against any form of retaliation, discrimination or penalization for reasons connected, directly or indirectly, to the reporting, without prejudice to the right of those entitled to protect themselves if criminal or criminal liability is established on the part of the reporting person. civil related to the falsity of the declaration and without prejudice to legal obligations.

7.2.2 Treatment of infringements

The SB in its control function, once any violations of the rules of the Code of Ethics have been detected, reports them to the competent bodies to take the relevant disciplinary initiatives, according to the methods established by the Disciplinary System, based on the type of transgression.

7.2.3 Cogency of the Code of Ethics and disciplinary system Observance

of the rules of the Code of Ethics must be considered an essential part of the contractual obligations of the Company's Collaborators, pursuant to and for the purposes of the art. 2104 of the Civil Code and the current CCNL

Violation of the rules of the Code of Ethics constitutes failure to fulfill the primary obligations of the employment relationship or disciplinary offense, with all legal consequences, including with regard to the preservation of the employment relationship itself and may also lead to actions for compensation of damages from the same violation caused.

In particular, the violation of the principles contained in the Code of Ethics may lead to the application of the sanctioning measures contained in the company disciplinary system adopted pursuant to Legislative Decree 231/01.

For Recipients who are not Collaborators, compliance with the Code of Ethics is a prerequisite for the continuation of the existing professional/collaborative relationship with the Company.

8. Confidentiality and Privacy Protection

As part of carrying out its business activity, Bertani Trasporti SpA collects a significant amount of personal data and confidential information, which it undertakes to process in

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compliance with all laws in force in your jurisdiction and best practices applied regarding confidentiality and privacy.

The Company, having already complied with the provisions of the previous reference laws (Law 31.12.1996 n. 675 first and then Legislative Decree 196/2003) regarding the protection of personal data, currently operates in compliance with the provisions of the Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter the "Privacy Regulation").
For greater protection and transparency towards the interested parties, the Company, in its capacity as data controller, has decided to entrust specific tasks on the processing of personal data to qualified internal figures of the Company, in compliance with the principle of *accountability* to which the GDPR itself it is permeated.

Furthermore, the Company guarantees a high level of security in the selection and use of its *information technology* systems intended for the processing of personal data and confidential information and declares to have adopted the security measures imposed by the laws currently in force for the protection of themselves. Finally, the company has obtained ISO 27.001 Certification and is committed to constant compliance with the procedures and protocols required by the aforementioned certification. The company has also obtained the TISAX VDA (Automotive Information Security) certification.

9. Essential documents regarding compliance

The Code is a constituent element of the Internal Control and Risk Management System and
Organization, management and control model adopted by the Company pursuant to Legislative Decree 231/2001.
This Code must therefore be interpreted in light of the entire company Compliance system and in particular of the following references:
i) Organizational Model adopted pursuant to Legislative Decree 231/2001
ii) Disciplinary system adopted pursuant to Legislative Decree 231/2001
iii) Privacy Organizational Model
iv) The protocols relating to obtaining ISO, SA and TISAX certifications.

Final Provisions

This Code of Ethics is approved by the Board of Directors and constitutes an official document of the *Company.* Any variation and/or addition thereto will be approved by the Board of Directors, after consulting the Supervisory Body and must be disclosed to all recipients to whom it is addressed.