

ALPI GROUP Code of Conduct

An integral part of the Code of Ethics
Annex to Model 231/2001



Foreword

In carrying out its activities, ALBINI & PITIGLIANI S.p.A., one of the leading operators in the international forwarding sector in Italy, respects the laws and regulations in force in all the countries in which it operates.

Therefore, ALBINI & PITIGLIANI S.p.A. acts in compliance with the principles of freedom, human dignity and respect for diversity, and repudiates any discrimination based on sex, race, language, personal and social condition, religious and political beliefs.

ALBINI & PITIGLIANI S.p.A., due to the size and importance of its activities, as well as to its strategic role in the Italian economic scenario, intends to consolidate its growth by reinforcing a solid image, faithful to values of fairness and loyalty, in every process of its daily work.

To this end, ALBINI & PITIGLIANI S.p.A. favours a working environment which, inspired by respect, fairness and cooperation, allows for the involvement and empowerment of employees and collaborators, with regard to the specific objectives to be achieved and the methods chosen to pursue them.

ALBINI & PITIGLIANI S.p.A. will ensure an information and awareness programme on the provisions of this Code of Ethics and its application to the subjects it refers to, so that Employees, Managers and all those who work for ALBINI & PITIGLIANI S.p.A. perform their activities and/or duties according to a constant and strict observance of the principles and values contained in this Code, as well as in full compliance with the laws and regulations in force in all the countries where ALBINI & PITIGLIANI S.p.A.'s activities are carried out.

The Code constitutes a set of principles, the observance of which is of fundamental importance for the regular operation, management, reliability and image of ALBINI & PITIGLIANI S.p.A.

All operations, behaviour and relations, both inside and outside the Company, must refer to these principles.

This Code of Conduct of the ALPI Group has therefore been prepared with the aim of clearly defining the set of values that ALBINI & PITIGLIANI S.p.A. recognises, accepts, shares and sets as the basis of its daily activities as a free agent on a free market.

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As specified in the Extract of Model 231 published on the company website under Point 4 **ALBINI & PITIGLIANI S.P.A. and ALPI GROUP**, and 4.1. **Group structure and business history**, ALBINI & PITIGLIANI S.p.A. operates internationally. The ALPI Group is made up of several companies in which ALBINI & PITIGLIANI S.p.A. holds an interest. A list of these can be found on the company website www.alpiworld.com

This Code of Conduct is approved by the Board of Directors of ALBINI & PITIGLIANI S.p.A. Any variation and/or integration of the same shall be approved by the Board of Directors and promptly circulated to the Addressees.

APPENDIX A – ALPI GROUP Code of Conduct



Code of Conduct

Purpose of the Code of Conduct		
<p>In this code of conduct ALBINI & PITIGLIANI S.p.A. has defined binding standards and expectations related to daily conduct with the aim of making our business activities ethically irreproachable also at the level of the ALPI Group. All Presidents, Managing Directors, Executives and Employees worldwide are obliged to comply with these principles. Executives must also set a particular example in the application of the code of conduct.</p>		
1	<i>General Principles</i>	<p>Customer orientation, profitability, progress, spirit of cooperation and responsibility are the values on which the ALPI Group's Mission is based; they represent the core elements of this code of conduct. In our dealings with our customers, business partners, employees and shareholders, we constantly aim to act in a fair and honest manner. We offer our customers efficient and secure shipping, transport and logistics services with the aim of making them increasingly more socially sustainable and profitable.</p> <p>Our intention to pursue business activities in an ethically and legally irreproachable manner is directly related to the way we behave at work. In our business activities, we comply with the applicable laws as well as the applicable directives and standards, avoiding conflicts of interest and respecting the customs, traditions and social values of the countries and cultural environments in which we operate.</p>

		<p>We also expect our business partners to establish similar ethical principles based on the applicable laws and universally recognised values; we also expect them to adhere to the principles contained in this Code of Conduct for all Business Partners, which originates from the corporate ethical principles adopted in our business.</p>
2	<i>Responsibility towards the company and employees</i>	<p>We are convinced that the economic, social and environmental dimensions must be harmonised in order to achieve sustainable and socially acceptable business success. Achieving this balance is consequently an indispensable element of the ALPI Group's value-oriented corporate management.</p> <p>Customer satisfaction and the quality of the service offered, as well as the growth and development of the business are equally important factors for the success of the ALPI Group, as are cultural change, employee satisfaction, the protection of our resources and the progressive implementation of sustainability principles.</p>
2.1	<i>Human Rights</i>	<p>The ALPI Group, in the framework of its activity, respects the universally recognised human rights and fundamental freedoms of the individual in compliance with the principles provided for by the UN Global Compact. Furthermore, the ALPI Group is committed to actively protect and promote these rights and freedoms.</p>
2.3	<i>Child labour and forced labour</i>	<p>We ban child labour and any form of forced labour.</p>
2.4	<i>Equal opportunities</i>	<p>The ALPI Group reflects the diversity and plurality of society, languages, cultures and ways of life. We respect and promote this diversity as it is a guarantee of closeness to society and the customer as well as a source of innovative ideas. We do not tolerate any kind of discrimination of persons on the basis of their origin, religion, nationality, age, or their sexual orientation, political or trade union commitment, gender, or disability.</p>
2.5	<i>Collaboration</i>	<p>Our collaboration is characterised by mutual esteem, respect and transparency. We cooperate and create a positive working climate.</p> <p>Our employees contribute decisively to the success of the ALPI Group. The ALPI Group is responsibly committed to encouraging and supporting all its employees in their professional development.</p>

		The ALPI Group recognises the rights of freedom of association and the right to form lobby groups. We ensure that these rights are protected in all our business units worldwide.
2.6	<i>Safety</i>	The safety of our employees and customers is our top priority and one of the core values of the ALPI Group. Together we take steps to ensure the safety of our working environment and our services.
2.7	<i>Protection of work and health</i>	Through the constant adoption of appropriate safety measures in the workplace, we strive to eliminate risks for our employees, promoting and protecting their health. The safety of our employees is a categorical imperative of our business activities. Job protection is also entrusted to the personal responsibility of each individual employee, who can avoid risks through preventive, foresighted and prudent behaviour. Any shortcomings in labour protection must be reported immediately to the competent managers.
2.8	<i>Protection of the environment</i>	We are committed to protecting the environment by progressively implementing measures geared towards environmentally friendly and sustainable services.
3	<i>Conduct of our employees</i>	All employees are required to comply with the regulations in force within the ALPI Group
3.1	<i>Behaviour in public</i>	Employees influence the public image of the ALPI Group. Our aim is to always address our customers and business partners in a polite, considerate and service-oriented manner.
3.2	<i>Confidentiality</i>	<p>All information on the ALPI Group's business activities that is not published and therefore not known to everyone, must be treated confidentially. This also applies to information from third parties, e.g., business partners, that we receive in the course of our work for the ALPI Group. We do not use knowledge derived from our internal business processes for private purposes.</p> <p>Communication with the media and the public on issues concerning our business is generally the responsibility of the company's Board of Directors.</p>
3.3	<i>Avoiding conflicts of interest</i>	We avoid situations in which individual personal or financial interests collide with the interests of the ALPI Group or our business partners. The interests

		<p>of the ALPI Group must not be jeopardised in situations of conflict. The reconciliation of work and family remains unaffected by this.</p> <p>Secondary activities and participation in external companies or business partners of the ALPI Group must not entail the risk of a conflict of interest. Any conflict of interest, real or presumed, must be communicated to the company's Board of Directors and/or managers.</p> <p>The ALPI Group encourages employees to become socially committed to public functions, associations or citizens' initiatives, provided that such commitment does not give rise to conflict with the ALPI Group's legitimate interests.</p>
3.4	<i>Invitations and gifts</i>	<p>Invitations relating to our activity for the ALPI Group may be accepted or made within the limits defined by the ALPI Group's internal regulations, provided they are appropriate and adequate and do not represent a means of obtaining illegitimate benefits or unlawful preferential treatment.</p> <p>The same applies to the acceptance or granting of gifts and other types of compensation.</p>
4	<i>Conduct towards competitors, public officials and business partners</i>	<p>The ALPI Group takes an interest in the needs of customers, suppliers and business partners and treats them honestly, responsibly and fairly.</p>
4.1	<i>Bribery</i>	<p>The ALPI Group does not tolerate any form of bribery and even less so unlawful business practices by its employees, or third parties appointed by us. Gratuities, privileges or concessions, which could prejudice the ability to make objective and fair business decisions are neither offered nor accepted by us or by third parties appointed by us.</p>
4.2	<i>Conduct towards public officials</i>	<p>In principle, tangible and intangible gifts and gratuities of any kind to public officials or employees or appointees of public institutions or bodies or their relatives are prohibited.</p>
4.3	<i>Political parties</i>	<p>Funding of any kind to political parties, their representatives as well as to delegates and candidates for political office is also prohibited.</p>
4.4	<i>Business partners</i>	<p>We expect our business partners to conduct their business activities in accordance with the principles set out in this code of conduct.</p> <p>Collaboration with our business partners is characterised by trust, loyalty and stability.</p>

4.5	<i>Consultants/agents/ intermediaries</i>	The remuneration of consultants, agents and intermediaries must be commensurate with the services rendered and must not have the purpose of unlawfully benefiting business partners. Consultants, agents and intermediaries are carefully selected based on the criteria of integrity, competence and fitness for the purpose.
4.6	<i>Competition law and antitrust law</i>	We comply with the relevant directives of the competition law and do not enter into any agreements or arrangements that would influence prices and conditions thereby unlawfully restricting fair competition.
4.7	<i>Donations/sponsorships</i>	The ALPI Group supports education and scientific research as well as environmental protection, sport, art, culture and humanitarian aid. The allocation of a donation must always be transparent and documented. Donations must always be made on a voluntary basis and without the expectation that they will be reciprocated in some way. Sponsorship measures may in no way serve the occult promotion of interests.
5	<i>Responsibility towards shareholders and owners</i>	The activities of the ALPI Group are characterised by responsibility and transparency towards shareholders and owners. The protection of corporate assets and the continuous increase of corporate value are part of the objectives of our business activities.
5.1	<i>Protection of company assets</i>	<p>Company property and all working tools made available for the performance of work duties may in principle only be used for work-related purposes and must be treated with all due care.</p> <p>Without express authorisation, company property may neither be sold nor hired out or used for purposes other than those intended within the company, irrespective of its condition or value. All employees are obliged to protect the assets of the ALPI Group within the scope of their work and to act honestly and correctly when using these assets.</p> <p>Fraud, corruption or other criminal actions are not tolerated. Suspected cases of unlawful conduct are investigated to the extent permitted by law and in compliance with data protection provisions; in the event of proven unlawful conduct, appropriate action is taken.</p>

5.2	<i>Reporting</i>	Company reports and documentation relating to all essential interests of the company shall be drawn up fairly and truthfully, meeting current standards and documenting all relevant information in full.
5.3	<i>Insider trading</i>	Employees are forbidden from using non-publicly accessible information, obtained in the course of carrying out their duties for the ALPI Group, in order to obtain financial or commercial advantages for themselves or for third parties.
	<i>Protection of personal data</i>	<p>We collect, process and use personal data only and to the extent permitted by the relevant laws and company directives.</p> <p>Documents containing personal data of employees are processed with the utmost confidentiality, stored with care and made available only to authorised recipients.</p>
5.4	<i>Money Laundering</i>	The ALPI Group takes all necessary measures to prevent money laundering within its sphere of influence.
6	<i>Compliance with the Code of Conduct</i>	The ALPI Group will apply the principles expressed in the code of conduct in all its operating units worldwide.
6.1	<i>Obligation to comply</i>	All, CEOs, managing directors, managers and employees of the ALPI Group are obliged to comply with the code of conduct. The managers have a special responsibility in transmitting and personally applying these guidelines. All ALPI Group employees are required to report any serious violations of laws and internal guidelines in the ALPI Group's information system.
6.2	<i>Protection of whistleblowers</i>	We do not tolerate any kind of retaliation against employees who have reported such violations.
6.3	<i>Consequences</i>	In the event of violations of laws or internal directives, employees will suffer appropriate consequences, which may include disciplinary measures and measures provided for in labour law. Such violations may also lead to consequences under criminal law and civil liability.
7	<i>Entry into Force</i>	The Code of Conduct was approved at the meeting of the Board of Directors of ALBINI & PITIGLIANI S.p.A. on 14 September 2023, and came into force on 15 September 2023.