Code of Ethics and Conduct

Respecting the rules and valuing people: the principles and rules by which we work every day, in the company and beyond.

AT A GLANCE

What this is about
The single document that gathers the values (Code of Ethics) and the rules of conduct (Code of Conduct) of La Molisana Trasporti S.r.l.

Who it applies to
The Sole Director, employees, collaborators and anyone acting in the name or on behalf of the company, even temporarily.

What you must do
Know the Code, comply with it and sign to acknowledge it. If in doubt, ask your manager before acting.

How to report
The “Reports” platform on the website, verbally, or confidential mail to C.da Lecine 30, 86014 Guardiaregia (CB). You are protected.

Who we are and what we believe

La Molisana Trasporti S.r.l. (hereinafter the “Company”) knows that a company's authority is recognised in the competence of its people and the quality of its service, but also in its attention to the needs of the whole community. The principles that have always inspired our work are gathered in this Code, in the belief that reliability is built every day by respecting the rules and valuing people.

We recognise ourselves in art. 41 of the Italian Constitution: private economic initiative “may not be carried out in conflict with social utility or in such a way as to harm safety, freedom or human dignity”. Our goal is excellence in our market through sustainable development that protects the environment and people's safety with conduct respectful of social ethics, and brings value to employees, customers and the community.

The guiding principle. Pursuing the Company's interest never justifies unlawful conduct or conduct contrary to this Code. Acting in the belief that one is serving the company's interest does not exempt anyone from following its rules.

Our six principles

Legality
We comply with the law and this Code and keep up to date with regulatory developments, including through the training offered by the Company. Every transaction is lawful, authorised, documented, verifiable and traceable.

Fairness
Moral integrity and fairness are a duty for everyone. No privileged relationships are established with third parties to obtain improper advantages.

Non-discrimination

We avoid and reject all discrimination based on age, sex, ethnicity, sexual orientation, health, political and trade-union opinions, religion, culture and nationality. We foster integration and intercultural dialogue.

Confidentiality

We protect personal data and confidential information, and we do not use them for purposes unrelated to work.

Diligence

The relationship with employees is based on mutual trust. People act in the interest of the company and avoid conflicts of interest.

Loyalty and transparency

We compete fairly, in compliance with Italian and European rules, and give third parties clear, accurate, complete and understandable information.

Who it applies to and how we make it known

The Recipients of the Code are: the company bodies and their members; employees, on permanent or fixed-term contracts; workers, including temporary and voluntary workers; consultants and collaborators of any kind; and anyone acting in the name and on behalf of the Company or having stable or temporary relations with it.

What the Company does

- Trains and raises awareness on the contents of the Code
- Distributes it to all staff, via the website and an accessible notice board
- Periodically checks that it is complied with
- Reviews it when the organisation or the rules change
- Adopts preventive tools and adequate sanctions

What the Recipients do

- Act in line with the Code
- Report any violations they become aware of
- Cooperate with internal investigations
- Inform the third parties they work with of the Code's commitments and require compliance

Contractual value. The Code is an integral part of the employment contract. For collaborators, consultants, suppliers and other third parties, adherence to the Code is an essential condition of the relationship: a breach justifies termination of the contract under art. 1456 of the Italian Civil Code.

Our people

Selection and onboarding

We assess and select staff fairly and transparently, in accordance with the **Personnel Selection Policy**, with objective and merit-based criteria, equal opportunities and no favouritism, respecting candidates' privacy. All staff are hired under a regular contract, in compliance with the law: irregular work is forbidden

and not tolerated. On hiring, every person receives clear information on their role, rights and duties, safety rules, company policies and this Code.

Dignity, equal opportunities and respect

We respect people's fundamental rights, protect their moral integrity and guarantee equal opportunities and equal treatment, including in pay for equal work or work of equal value. Diversity is an opportunity for innovation and development. Discriminatory conduct, intimidation, mobbing, stalking, harassment and psychological or physical violence are not permitted, inside or outside company premises.

Growth and teamwork

We protect and value people through continuous training and updating and tools to gather workers' opinions and suggestions. Work is based on trust and collaboration, respecting the roles in the organisation chart: personal interests do not come before common goals. No worker may be required to perform duties, services or favours not owed under their contract.

Health, safety, quality and environment

The Company has adopted and implements an integrated management system for **quality** (UNI EN ISO 9001:2015) and **occupational health and safety** (UNI EN ISO 45001:2023), covering the design of exceptional transport, transport, handling, lifting, technical escort and storage. Details are in the **QHSE Policy**.

Customers
Services that satisfy the customer and legal requirements, with attention to complaints, non-conformities and corrective actions.

People
A healthy and safe working environment, training as a central element, a safety culture and responsible conduct by everyone.

Environment
Compliance with environmental rules, rational use of resources and reduction of the direct and indirect impacts of our activity.

- We expect maximum cooperation with the employer, the Head of the Prevention and Protection Service (RSPP) and anyone carrying out inspections and checks on behalf of public bodies.
- Anyone who finds anomalies or irregularities in matters of safety reports them immediately to the supervisor, the employer or their delegate and the RSPP.
- We constantly inspect premises and workplaces, including trucks, truck-mounted cranes, cars and vans.
- In choosing suppliers and partners we consider, besides price, environmental sustainability and the protection of safety.
- Lifting people with a truck-mounted crane is an exception and is done only in accordance with the **Procedure for lifting people with truck-mounted cranes**.

Driving and working

For those who drive, escort or operate with our vehicles, safety comes before every delivery. These rules complete the Code on the riskiest activities.

Alcohol and substances

Zero tolerance applies when driving and working. It is forbidden to show up or be under the influence of alcohol, drugs or similar substances during work and in workplaces. For professional drivers the alcohol limit is zero, under the Highway Code.

Driving and rest times

Driving and rest times and the tachograph rules are respected. Data, records or devices are never tampered with or falsified.

Truthful documents

Transport documents, authorisations and trip records are complete and correspond to reality. For exceptional transport, the requirements of the authorisations are followed exactly.

Distractions

While driving, phones and other distracting devices are not used. Anomalies in vehicles or equipment are reported immediately.

Money, assets and fairness

Accounting and payments

We act with truthfulness, accuracy and transparency. Every transaction is authorised, verifiable, legitimate, consistent and recorded correctly and on time, with complete, clear and valid documentation: omissions, falsifications and irregularities are forbidden. Estimates are based on reasonableness and prudence. Without documentation and formal authorisation, no payments are made on behalf of the Company. Anyone who becomes aware of omissions or falsifications reports it to the higher body. Obstructing the checks of control bodies is forbidden.

Anti-money laundering

Our business must not become a tool for unlawful, criminal or terrorist activities. We apply anti-money-laundering rules and diligently verify information on customers, suppliers, partners and consultants before starting business relationships.

Gifts, benefits and entertainment expenses

General rule: no gifts. It is forbidden to request, promise, offer or receive gifts, favours or benefits of any kind when they may be interpreted as exceeding normal business practice or aimed at obtaining favourable treatment. This applies both to gifts offered and to those received.

The only exception: courtesy business gifts of modest value that are occasional, lawful, transparent, authorised and documented in accordance with company processes. Never cash or equivalent vouchers. Meals, travel and entertainment offered to third parties follow the law and company policies. The full rules are in the **Anti-Corruption Policy**.

Company assets and IT tools

We use the company's assets, vehicles, computers and communication systems diligently and for lawful purposes, documenting their use precisely. We comply with IT security measures to protect devices from

unauthorised access. Company resources are not used for illegal purposes, or in an offensive or harassing way, in compliance with privacy, copyright and trade secrets.

Information and personal data

Confidential information
Know-how, commercial and customer information, financial data, corporate transactions and transport information remain confidential and are used only for work. The obligation also applies after the end of the relationship, when every document is returned to one's manager.

Personal data
We process data in compliance with the GDPR (EU Regulation 2016/679) and Legislative Decree 196/2003, with the company's **privacy notices**. Investigations into people's opinions, preferences and private life are forbidden.

Conflict of interest

We act in the Company's interest and avoid situations that could affect independence of judgement. Anyone who is, even potentially, in a conflict of interest reports it immediately to their manager, so that the company can assess it and, if appropriate, authorise the activity. No one takes advantage of opportunities linked to the Company's assets, information or position, nor carries out activities in competition with the Company.

Dealing with the outside world

Authorities and Public Administration
Relations based on clarity, transparency and cooperation. Only authorised personnel deal with the Authorities on behalf of the Company. No pressure, explicit or veiled, and no payment or promise of money or other benefits to obtain advantages, including towards magistrates, judges and witnesses.

Politics and trade unions
We neither favour nor discriminate against any political or trade-union organisation and make no improper contributions. No pressure, direct or claimed, on political or trade-union figures.

Customers
Relations marked by courtesy, competence and professionalism, without unfair or deceptive behaviour. We aim for punctual, high-quality services, limiting disruptions and delays.

Suppliers and subcontracting carriers
Chosen on objective criteria of cost-effectiveness, expediency and efficiency, never on subjective grounds. We ask them to comply with the **Supplier Code of Conduct** and we check that they do.

Communication. We give those who interact with us tools to make requests, ask for clarification or lodge complaints. The information we disseminate is complete and accurate. Advertising respects ethical values, protects minors and rejects vulgar or offensive messages.

Reporting violations

Anyone who becomes aware of a violation of the Code, by Recipients or by third parties such as suppliers, reports it promptly. For doubts about applying the Code, ask your manager. Violations are reported through the dedicated channels, with the protections of the **Whistleblowing Policy**.

Verbally
By telephone, voice messaging or by requesting an in-person meeting.

Online platform
Via the link in the "Reports" section of the corporate website.

Confidential mail
Ordinary or registered mail with return receipt to: La Molisana Trasporti S.r.l., C.da Lecine n. 30, 86014 Guardiaregia CB, marked "personal and confidential – Report/Code of Ethics".

Who handles reports
The Human Resources Manager, who acts as RPCT. The Sole Director handles reports concerning the RPCT, as the superior body.

Your protections
Confidentiality of the reporting person's identity and no retaliation, subject to legal obligations. Acknowledgement of receipt within 7 days and feedback within 3 months: details are in the Whistleblowing Policy.

For security reasons at the premises, hand-delivering an envelope by an outside party does not guarantee anonymity and confidentiality: for this reason it is advisable to use the channels indicated above.

What happens if the Code is not followed

Breaching the Code and company procedures undermines the relationship of trust with the Company. Violations are pursued promptly and proportionately, regardless of any criminal action. The sanction always takes into account seriousness and the principles of proportionality and adequacy.

Employees
A serious breach of duty, sanctioned under the applicable national collective agreement (CCNL) and art. 7 of the Workers' Statute: verbal or written reprimand, fine, suspension from work and pay, dismissal. In the event of criminal proceedings or a restrictive measure, suspension from service and pay may be ordered until the outcome. The disciplinary code is posted on the notice board.

Directors
Just cause for revocation of the mandate. The most suitable measures provided by law are adopted by the corporate bodies.

External collaborators
Grounds for immediate termination of the relationship in the most serious cases, as provided in the assignments.

Suppliers, contractors, subcontractors
Grounds for immediate termination of the relationship in the most serious cases, in addition to what is provided in the Supplier Code of Conduct.

The Company may claim compensation for damages and cooperates with the competent authorities, reporting violations to the authorities when it deems appropriate. Conduct outside work may also be sanctioned, when the nature of the work requires a wide margin of trust.

Managers' commitments

- ✓ Ensure that their collaborators comply with the Code and make clear that complying with it is part of the work performance.
- ✓ Select employees and collaborators who guarantee compliance with the principles of the Code.
- ✓ Prevent any form of retaliation against those who cooperate in applying the Code or report violations.
- ✓ Lead by example: those in positions of authority follow exemplary conduct, spread the Code and cooperate with the competent parties.

Related documents

Anti-Corruption Policy
Gifts, benefits, facilitation payments, reporting of corrupt practices.

Whistleblowing Policy
Channels, timelines, protections and handling of reports.

HR Policy
Personnel selection and the fight against modern slavery.

QHSE Policy
Quality and safety management system, commitments and objectives.

Privacy notices
How we process personal data, by role and relationship.

Supplier Code of Conduct
The rules we ask of suppliers and subcontractors.

Entry into force and updates

The Code enters into force on 02.12.2026, after approval by the Sole Director, and replaces the Code of Ethics (01-04-2024) and the Code of Conduct (Rev. 0 of 16/11/2022). It is reviewed periodically and any amendment or addition is approved by the Sole Director. The current version is also available on the website www.molisanatrasporti.it.

Document revisions

Rev. 00 · 02.12.2026
Drafted by Diego Carnevale. Approved by Margherita Berardini. Replaces the Code of Ethics (01-04-2024) and the Code of Conduct (Rev. 0, 16/11/2022).

Acknowledgement

☐ I declare that I have received, read and understood the Code of Ethics and Conduct and undertake to comply with it.

Signature

Place and date

Signature of acknowledgement

Guardiaregia, 02.12.2026

The Sole Director
Margherita BERARDINI