

QUADRANTE SERVIZI S.R.L.
Registered Offices in Verona
Via Sommacampagna, 61

CODE of ETHICS

Approved by the Board of Directors on 01/02/2019

INDEX

INTRODUCTION	03
PRINCIPLES	04
PERSONAL INTEGRITY AND PROTECTION	05
PROTECTION OF PRIVACY	05
CONFIDENTIALITY AND INFORMATION MANAGEMENT	06
PERSONAL DUTIES	06
USE OF COMPANY ASSETS	06
GIFTS, HANDOUTS AND OTHER BENEFITS	07
CONFLICT OF INTEREST	07
COLLABORATOR OBLIGATIONS	07
RELATIONS WITH PARTNERS	07
RELATIONS WITH TRADE UNION ORGANIZATIONS	08
RELATIONS WITH CUSTOMERS	08

RELATIONS WITH SUPPLIERS	08
PURCHASE REGULATIONS	09
SUPERVISORY BODY	09
CODE OF ETHICS DISTRIBUTION	10
NOTIFICATIONS	10
CODE OF ETHICS VIOLATION	10
CORPORATE SOCIAL RESPONSIBILITY POLICY	11

INTRODUCTION

“Quadrante Servizi” operates in the supply of an extremely vast range of services mainly connected to the Interporto Quadrante Europa in Verona.

Founded in October 1988 on the request of Consorzio ZAI and several private haulage companies with the aim to provide activities to the operators with premises inside the Quadrante Europa, over the years it has implemented all the mutual services, thus becoming an impartial reference point for the Interporto: a point of equilibrium between Consorzio ZAI, the logistic centre infrastructures and operators that “live” and work in this context.

Quadrante Servizi has become highly specialized in four particular activity areas:

- management of railway manoeuvres for all railway and logistics centre terminal operators and others;
- management of the logistics centre telecommunication and information technology networks;
- logistics centre assistance – management of ordinary and extraordinary maintenance of buildings and structures belonging to Consorzio ZAI;
- administrative management of Consorzio ZAI property.

PRINCIPLES

Quadrante Servizi maintains that the company's success not only depends on a solid company structure and clarity in terms of the objectives to be achieved, but also, and above all, on human resource management and appreciation, on training procedures and, ultimately, on a climate of mutual trust that must be created between all the staff and each individual operator. Objectives that are not always easy to achieve.

If we then add that each company should achieve its own corporate objectives in the most absolute transparency, it is easy to understand that making declarations of abstract principles is not enough. It is therefore necessary to possess tools and standards that guarantee everyone concerned with a "chain of values" that, starting from suppliers, includes the customers and even all the citizens, by elaborating an end product, services in our case, that, in order to reach perfection, must not only contain intrinsic qualities, but also daily monitored guarantees that are constantly demonstrable to all the interested parties.

Respecting the laws in force is not the same as voluntarily adopting standards and behaviours that, besides abiding by the laws, oblige the company to respect those values that, even when not foreseen by the law, constitute, by choice, indispensable principles simply because they are the very foundations of all civil coexistence.

The above therefore explains the attention that Quadrante Servizi places on focusing on people, on appreciating human resources, on guaranteeing safety at the workplace, on correctness and transparency in relations with its users/customers, on respect for the environment, on the success of every person both inside and outside the company, on multi-disciplinary and personalized training for all the staff.

The company's Administrative Body and Management has, in fact, always held respect for the workers and their rights in high esteem. Their safety at the workplace, for example, is one of the company's main activities. Considerable resources are dedicated to the question of safety. All activities are subject to constant monitoring.

PERSONAL INTEGRITY AND PROTECTION

Quadrante Servizi srl endeavours to protect the moral integrity of its collaborators and their right to working conditions that respect personal dignity.

For this reason, it protects the workers from acts of psychological violence and opposes any behaviour or discriminating or harmful conduct towards individuals, their beliefs and preferences.

Any form of sexual harassment will be prosecuted and any conduct or discourses that may disturb, either in form and/or content, a person's sensitivity, must, in any case, be avoided.

PROTECTION OF PRIVACY

The privacy of an employee and of all those who come into contact with the company is protected pursuant to the laws in force. Quadrante Servizi srl endeavours not to communicate or divulge, unless legally obliged, the relative personal data without the prior consent of the interested party. The acquisition, processing and preservation of the aforementioned information is carried out by specific procedures aimed at guaranteeing that no unauthorized person can become aware of it. Company employees and collaborators are obliged to respect the data processing provisions relating to their position and which they have accepted by respecting the provisions outlined in the document "Privacy system policy – Quadrante Servizi srl Code of Conduct" of 17/05/2018

CONFIDENTIALITY AND INFORMATION MANAGEMENT

Employees are obliged to keep any information of which they may become aware in carrying out their duties confidential in accordance with the laws, regulations and circumstances, endeavouring to use it exclusively for the purposes of carrying out their own working activities and avoiding, through their conduct, divulging any Company information that has not yet become public domain. Employees must observe this confidentiality clause even after termination of employment relations in order that the fulfilments foreseen by the privacy laws in force are respected.

They must also carefully safeguard the documents entrusted to them and take all possible care to avoid any undue disclosure of information.

PERSONAL DUTIES

Staff members are expected to respect the obligations foreseen in this Code of Ethics and must, in professionally carrying out their duties, comply with the law and direct their own conduct to the principles of integrity, correctness, loyalty and good faith.

Employees must refrain from behaviour and declarations that may, in any way, damage the image of Quadrante Servizi. They should, however, make every effort to promote this image through the correct behaviour that is expected of them.

Employees' professionalism in executing their own duties is, besides the obligation of correct fulfilment, a fundamental value that the company encourages and protects.

Requesting, as a hierarchical superior, services, personal favours or any other conduct that amounts to a violation of this Code of Ethics, is abuse of a position of authority.

Should colleagues or subordinates engage in negligent behaviour in carrying out their duties, the person or colleague responsible will be expected to deal with the question, avoiding any disrespectful conduct that may be detrimental to the respect of the other party.

USE OF COMPANY ASSETS

Employees are expected to use the company assets according to the "family man" rule, notifying his/her hierarchical superiors of any incorrect and damaging use of said assets.

GIFTS, HANDOUTS AND OTHER BENEFITS

Employees cannot ask, either for themselves or for others, for gifts or other benefits, nor can they accept them, except for those of modest value or that conform to normal commercial and courtesy practices, from anyone who has benefitted or could benefit from Quadrante Servizi srl activities.

Moreover, employees cannot offer gifts or other benefits to any subject from whom they could obtain preferential treatments in conducting any activity that may be connected to Quadrante Servizi srl. Unlawful advantages cannot be attributed to customers or public and private suppliers.

CONFLICT OF INTEREST

All Quadrante Servizi srl employees are obliged to avoid situations in which conflicts of interest may arise as well as to abstain from personally taking advantage of business opportunities that they may have become aware of while carrying out their own duties.

COLLABORATOR OBLIGATIONS

The above provisions also apply to any Company collaborators, consultants, representatives and agents.

RELATIONS WITH PARTNERS

Quadrante Servizi, aware of the important role that the Partners play, and with the purpose of improving their stakeholder conditions, ensures them of accurate, true and timely information, as is their prerogative, for making company decisions. It is to be remembered that Quadrante Servizi is a company that, as foreseen in its statute, does not distribute its profits but invests them in order to improve the services

offered to its users, constituting its commitment to protect and increase the value of its activities and the solidity of the company's patrimony through managerial development and pursuing high standards in its productive and service efforts.

RELATIONS WITH TRADE UNION ORGANIZATIONS

Quadrante Servizi srl has always shown great care in relations with Trade Union Organizations considering union membership essential for the good working order of the company and for achieving social objectives. The Management holds periodical meetings with the Company Union Representatives and with Provincial Representatives, sharing company objectives and the modalities for achieving them.

RELATIONS WITH CUSTOMERS

Respect of, and collaboration with, the customer is, in the opinion of Quadrante Servizi srl, a fundamental value for the company's good working order. The company installs a highly professional relationship with its customers based on availability, respect, courtesy and seeking and offering maximum collaboration.

Customer contracts and communications must be clear, simple and formulated in a language that is as close as possible to that of the clientele and in conformity with the laws in force and the guiding and monitoring Authority indications.

Quadrante Servizi srl endeavours to promptly and appropriately communicate all the relative information on any modifications and variations in service supply.

RELATIONS WITH SUPPLIERS

Quadrante Servizi endeavours to select qualified suppliers following the provisions outlined in its own Integrated Management System (made up of ISO 9001:2015, SA8000:2014 and OHSAS 18001:2007 Certifications) and considers the dispositions

laid down in art. 26 of Leg. Dec. 81/2008, and subsequent integrations and modifications, better known as the Safety Act, as essential qualification elements. Any accredited suppliers with ongoing relations with Quadrante Servizi that lose any of the qualification requirements, shall be invited by Quadrante Servizi to upgrade their position. If the supplier is no longer in possession of the essential requirements to be considered as a qualified supplier for the Company, the contract may be terminated.

PURCHASE REGULATIONS

Purchase regulations, approved by the Board of Directors, are in force in the company and all employees must conform to them in their relations with suppliers. Moreover, there is also a supplier qualification procedure that is constantly updated with the current laws in force with particular reference to the Safety Act provisions (Leg. Dec. 81/2008).

SUPERVISORY BODY

The correct enactment of a Company Organizational Model (see Leg. Dec. 81/2008) must, by law, be checked by an external body known as the Supervisory Body. The company's Board of Directors has nominated a Supervisory Body whose members include experts on matters of safety, labour, administrative and criminal law.

By way of a link with company operability, and merely in a consultancy capacity, some of the company's Department Managers are also part of this Body. We would also specify that the Board of Directors has drafted the statute of the aforementioned Body which provides specific details of its activities.

CODE OF ETHICS DISTRIBUTION

The Code of Ethics is posted on the company's notice boards, on the intranet network and on the company website.

NOTIFICATIONS

All receivers, both internal and external, are obliged to report, either verbally or in writing, and not anonymously, any non-observances of this Code of Ethics and all requests to violate it, from whomsoever they may come, to their manager and to the Supervisory Body.

Those whose notifications are clearly groundless will be subject to sanctions.

CODE OF ETHICS VIOLATION

The serious and/or persistent violation of Code of Ethics regulations by its receivers is detrimental to the trust installed with Quadrante Servizi srl and may lead to imposing disciplinary sanctions, claims for damages and, in cases of serious non-fulfilment, employment contract termination.

Employees' respect in observing the regulations in the Code of Ethics is an essential part of contractual obligations, in accordance with, and by effect of, articles 2104, 2105 and 2106 of the Italian Civil Code. The sanction system must conform to the provisions foreseen by Law no. 300 of 20th May 1970, by the specific sector regulations, should they exist, by collective bargaining and by the company's disciplinary codes.

Attachment: SA8000:2014 policy

CORPORATE SOCIAL RESPONSIBILITY POLICY SA8000:2014

QUADRANTE SERVIZI S.r.l., aware of its role and responsibilities within the economic and social community of the Interporto logistics centre in Verona where it operates, has made its own company policy comply with the requirements outlined in the SA8000:2014 standard, thus continuing its virtuous social responsibility course aimed towards constant improvement.

This all translates into QUADRANTE SERVIZI's solid commitment to equip itself with a social responsibility management system that conforms to the SA8000:2014 standards as well as to the provisions in the official international documents and their interpretations (ILO Standards) and to all the national laws applicable on the subject.

The elements featured in QUADRANTE SERVIZI's corporate social responsibility system, in line with the SA8000 standard's requirement, are:

- Distribution among the workers of the integrated manual and the policy and procedure definitions that describe how they are applied;
- Commitment not to use, nor to support the use of child labour and forced labour and also to guarantee the right to collective bargaining, freedom of association, a retribution policy and working hours distributed in accordance with the National Collective Agreement in force and the binding legislation;
- Provision of every tool and measure to ensure that any risks to the workers' health and safety are identified and dealt with;
- Provision of tools and measures that will enable all the parties concerned to participate in the constant improvement of the SA8000 system through notification, comments, complaints (also confidential), which will be managed by QUADRANTE SERVIZI by means of specific internal procedures;
- Setting up of a Social Performance Team and Health and Safety Committee;
- Definition of a procedure and the operative tools to facilitate the Social Performance Team's activities, with particular attention to risk assessment and monitoring activities and to reviewing the system's correct application.

Furthermore, for some time now QUADRANTE SERVIZI has been implementing an Organizational Model that is regularly updated in terms of company and regulatory developments, which also includes the company's Code of Ethics. The latter specifies the various principles implemented by the company and requests customers, suppliers and employees to respect them.

The social responsibility management system is part of the Integrated Management System inherent to the UNI EN ISO 9001, BS OHSAS 18001 and SA8000:2014 certifications and therefore aims at improving the company by providing added value in terms of efficiency.

In guaranteeing transparency and adequate information, any interested party can check these requirements on the company's website www.quadranteservizi.it and send comments or notifications to any of the following:

- email: sa8000@quadranteservizi.it

- Certifying Body: CISE C.so Repubblica no. 5 - 47121 Forlì – Tel.: 0543.38214, Fax: 0543.38219 - Email: info@lavoroetico.org

- Accreditation Authority: SAAS 15 West 44th Street, 6th Floor - New York, NY 10036 USA – tel.: 001 (212) 684-1414, f , fax: +212-684-1515 - email: saas@saasaccreditation.org.

Verona, 04/2017

The President

Signed Elio Nicito