

De Vellis Traslochi e Trasporti CODE OF CONDUCT

DEVELLIS REPUTATION IS ATTAINED THROUGH OUR INDIVIDUAL BUSINESS CONDUCT. EVERY INTERACTION TAKEN IS AN OPPORTUNITY FOR US TO DEMONSTRATE THAT INTEGRITY IS CENTRAL IN OUR BUSINESS.

IT IS THEREFORE IMPORTANT FOR US TO ENDEAVOUR THIS TRADITION OF INTEGRITY EVEN IN THE FUTURE .

THE COMPANY MUST MAINTAIN AND PROTECT EVERY SINGLE EMPLOYEE. OUR EXCELLENT REPUTATION COMPLY WITH RELEVANT RULES AND PRINCIPLES PERVAIDING EVERYDAY COMPANY'S BEHAVIOURS. EMPLOYEES HOLDING A POSITION OF LIABILITY MUST NOT HAVE THE AUTHORITY TO COERCE COLLEAGUES ON VIOLATING THE ETHICAL GUIDELINES OF THE COMPANY.

EACH OFFICIAL HAS THE RESPONSIBILITY OF OBSERVING THE LAWS AND REGULATIONS IN FORCE, KEEPING ALWAYS IN MIND

THAT OUR BUSINESS ETHICS STANDARDS GO BEYOND COMPLIANCE WITH LAWS PER SE. NO SET OF RULES CAN REPLACE THE YEAR BY EACH PERSON

REPRESENTING OUR COMPANY, THE SIMPLE MORALITY ', THE RECTITUDE COMMON OF HIGH ETHICAL PRINCIPLES AND RESPECT LAW . THE OFFICIAL THAT MAY HAVE DOUBTS ON THE CORRECTNESS OF A DETERMINED ACTION SHOULD ARISE THE FOLLOWING QUESTION : IF

SUCH ACTION BECOMES PUBLIC, WOULD THE OFFICIAL AND THE COMPANY FEEL COMFORTABLE FROM AN ETHICAL AND LEGAL POINT OF VIEW?

IF IT IS SO, WE ARE IN LINE WITH THE PHILOSOPHY UNDERLYING OUR COMPNAY.

ON THE OTHER HAND, IF THE ANSWER IS NO, ASSESSMENT SHALL THEN BE DOCUMENTED AND REVIEWED WITH A SUPERVISOR.

THE COMPANY BELIEVES THAT THE COMMUNICATION AND THE RIGHT TO STATE SOMEONE OPINION

CONTRIBUTE EFFECTIVELY TO THE MAINTENANCE OF HIGH ETHICAL STANDARDS.

ACCORDINGLY, IF YOU BELIEVE OR SUSPECT A COMPLIANCE VIOLATION HAS OCCURRED, OR IF YOU ARE TOLD TO ACT UPON ANY DIRECTIONS AND ISTRUCTION FROM SUPERVISORS WHICH SEEM TO BE CONTRARY TO THESE PRINCIPLES , YOU SHOULD REPORT IT PROMPTLY TO A MANAGER .

ONCE RECEIVED THE COMMUNICATION , THE COMPANY PERFORMS THE INVESTIGATION OF THE CASE AND IN EVALUATING IT AS IN INFRINGEMENT , ACTIONS DEEMED TO BE NECESSARY ARE TAKEN .

EMPLOYEES WITH SENSE OF RESPONSIBILITY MAY SUBMIT REPORTS OF ANY VIOLATION OF THE CODE OF CONDUCT, THE COMPANY IS COMMITTED TO PROTECTING THE MORAL INTEGRITY OF ALL EMPLOYEES

HOWEVER, ANY OFFICIAL THAT MAY FAIL TO COMPLY WITH APPLICABLE LAWS, RULES, REGULATIONS, STANDARDS, POLICIES AND PROCEDURES ARE SUBJECT TO DISCIPLINE UP TO AND INCLUDING TERMINATION.

ANY ACTION CONDUCTED BY ANY EMPLOYEE AT DEVELLIS HAS THE SOLE AIM TO SATISFY THE CUSTOMER NEEDS WHILE ALWAYS REMAINING WITHIN THE BOUNDERIES OF OUR CODE OF CONDUCT . THE SUCCESS AND SAFETY OF OUR JOBS , EITHER ENTERPRISE OR PERSONAL LEVEL IS LEAD BY OUR EFFORT IN MAINTAINING OUR HIGH STANDARDS

EVERY EMPLOYEE IS OBLIGED

IN CARRYING ON HIS DUTIES AND PURSUE OR EVEN PROMOTE RELATIONS WITH COLLEAGUES , SUPPLIERS , CUSTOMERS , AND WITH ANYONE RELATED WITH THE COMPANY.

EMPLOYEES ARE ALSO REQUIRED TO A MUTUAL TREATMENT AND RESPECT, CONSINSTENTLY WITH THE ABOVE-MENTIONED PRINCIPLES. THIS IS ESPECIALLY FOR THOSE WHO , COVERING SPECIAL COMPANY CHARGES,

MAY AFFECT THE EMPLOYMENT SECURITY AS WELL AS REMUNERATION , PROMOTION AND CAREER OF OTHER EMPLOYEES . RESPONSIBILITIES INCLUDE , AMONG OTHERS , THE DUTY TO AVOID CONDUCTS WHICH CONSTITUTE DISCRIMINATION , AND ANY OFFENSIVE BEHAVIOR IN RESPECT OF RACE, RELIGION , CREED OR OTHER PERSON ETHNICITY.

DEVELLIS RETAINS HIGLY SKILLED AND MOTIVATED EMPLOYEES, REGARDLESS OF GENDER, RACE OR NATIONAL ORIGINS. WE DO NOT TOLERATE DISCRIMINATION.

THE COMPANY ' GIVES STRONG VALUE TO PRINCIPLES OF COMPLIANCE HONESTY ' AND FAIRNESS, ESPECIALLY IN RELATIONS WITH COLLEAGUES AND WHEN CARRYING OUT COMPANY ACTIVITIES EMPLOYEES MUST BEHAVE HONESTLY AND CORRECTLY.

ALL THE ANSWERS GIVEN CASH FLOW INSIDE OR OUTSIDE COMPANY (CUSTOMER , SUPPLIER , FINANCIAL INSTITUTIONS , BODIES STATE OF ANY KIND, COMPANIES AND / OR PEOPLE WHO NEED OR HAVE THE RIGHT TO RECEIVE SUCH INFORMATION) MUST BE TRUE, ACCURATE AND NOT MISLEADING, AVOIDING THE INAPROPRIATE DISSEMINATION OF SOCIETY INFORMATION TO THIRD PARTIES

DEVELLIS RELIES ON THE CORRECTNESS OF ITS DATA BEFORE MAKING IMPORTANT BUSINESS DECISION , TO MAKE OR RECEIVE PAYMENTS , AND IN PROVIDING REPORTS TO ADMINISTRATIVE BODIES OR AGENCIES IT IS THEN ESSENTIAL THAT ALL ACTS , DATA AND INFORMATION ARE THE MOST ACCURATE AND COMPLETE . NO EMPLOYEE SHALL MAKE FALSE DECLARATIONS OR ALTER ANY RECORD CONCERNING SOCIETY, CLIENTELE OR THIRD PARTIESIS.

WE SELL OUR PRODUCTS AND SERVICES BASED ON THE BENEFITS BID . WE WILL NOT TAKE UNFAIR ADVANTAGE THROUGH MANIPULATION CONCEALMENT, ABUSED WITH PRIVILEGED INFORMATION, MISREPRESENTATION OF MATERIAL FACTS, OR ANY OTHER UNFAIR PRACTICE. WE DO NOT COMPROMISE OUR STANDARDS TO MEET FINANCIAL GOALS

EMPLOYEES SHOULD NOT SEEK ILLEGAL METHODS TO OBTAIN DATA AND INFORMATION ON COMPETITION . WE DO NOT ENCOURAGE EMPLOYEES TO DISCLOSE CONFIDENTIAL INFORMATION ABOUT THEIR PREVIOUS EMPLOYMENT RELATIONSHIP WITH OTHER COMPANIES.

WE ARE COMMITTED TO MAKE EMPLOYEES WORKING CONDITIONS SAFER, TO IMPLEMENT MANAGEMENT SERVICES , AND TO OBSERVE THE LAWS FOR ENVIRONMENTAL PROTECTION . EVERY EMPLOYEE HAS A DUTY TO PROMOTE AND PURSUE THESE OBJECTIVES WHEN PERFORMING HIS OWN TASK.

BY PERFORMING THEIR OWN TASKS, EMPLOYEES MAY HAVE ACCESS TO RESERVED DATA AND OTHER INFORMATION CONCERNING OTHER EMPLOYEES SUCH AS WORKING DOCUMENTS, INVOICES AND PAYCHECKS AND SUPPLEMENTARY INFORMATION. CONFIDENTIAL INFORMATION MUST NOT BE SHARED OUTSIDE DEVELLIS WITHOUT AUTHORIZATION. ANY UNAUTHORIZED DISCLOSURE , WHETHER INADVERTENT OR NOT, MUST BE REPORTED TO THE EMPLOYEE'S SUPERVISOR OR LEGAL DEPARTMENT REPRESENTATIVE, ETHICS AND COMPLIANCE DEPARTMENT OR ANY MANAGER

DEVELLIS EMPLOYEES MUST CONSERVE, PRESERVE AND PROTECT DEVELLIS'PHISICAL AND INTELLECTUAL PROPERTY AND FINANCIAL ASSETS. THEY ARE REQUIRED TO TAKE ALL APPROPRIATE STEPS TO OPTIMIZE THE VALUE OF AND/OR MAINTAIN THE SECRECY OF ALL VALUABLE ASSETS

EACH EMPLOYEE MUST NOT ALLOW THEIR OWN INTERESTS TO GET IN THE WAY OF SOCIETY INTERESTS. IN CASE OF OCCURANCE OF EVEN ONLY APPEARANCE OF A CONFLICT OF INTERSTS, IT MIGHT DAMAGE PERSONAL REPUTATION OR THAT OF THE COMPANY. IN THIS SITUATION, DEVELLIS EMPLOYEES MUST DISCLOSE ANY APPARENT OR ACTUAL CONFLICT TO SUPERVISORS. MANY POTENTIAL CONFLICTS OF INTEREST CAN BE SOLVED IN A SIMPLE AND MUTUALLY ACCEPTABLE WAY.

A CONFLICT OF INTERST MAY ARISE:

1. WHEN EMPLOYEES' PRIVATE INTERESTS INTERFERE OR EVEN APPEARS TO INTERFERE WITH DEVELLIS' INTERESTS.
2. IN TAKING ADVANTAGE OF PERSONAL OPPORTUNITIES BASED ON INFORMATION OBTAINED THROUGH DEVELLIS
3. WHEN EMPLOYEES OR EMPLOYEES'RELATIVE HAVE, DIRECTLY OR INDIRECTLY INVESTMENTS, A JOB OR A POSITION WITH ANY DEVELLIS COMPETITOR, SUPPLIER, DISTRIBUTOR OR VENDOR
4. PROVIDING OR ACCEPTING ANY INAPPROPRIATE LOAN, GRANT, GUARANTEE THAT HAS THE POTENTIAL TO HARM DEVELLIS'BUSINESS AND REPUTATION

DEVELLIS EMPLOYEES ARE REQUIRED TO PREVENT COMPLIANCE VIOLATIONS AND PROTECT DEVELLIS REPUTATION BY ACTIVELY SUPPORTING ETHICAL BEHAVIOUR THEY MUST ENDEAVOUR TO DEAL FAIRLY WITH OUR CUSTOMERS, SUPPLIERS AND EACH OTHER.

THE DIRECT OR INDIRECT OFFER OF MONEY, GIFTS OR BENEFITS OF ANY NATURE TO MANAGERS, OFFICIALS, OR STAFF OF CLIENTS, IN ORDER TO INFLUENCE THEM IN THE PERFORMANCE OF THEIR DUTIES AND/OR ACHIEVE UNDUE ADVANTAGE IS PROHIBITED. ACTS OF COURTESY ARE PERMITTED PROVIDED THAT THEY ARE OF MODEST VALUE OR IN ANY CASE DO NOT COMPROMISE THE INTEGRITY OR REPUTATION OF ONE OF THESE PARTIES. MANAGERS AND EMPLOYEES ARE PROHIBITED FROM ACCEPTING BRIBES FOR THEMSELVES OR FOR OTHERS, WITH THE ECEPTION OF GIFTS OF MODEST VALUE AND/OR GIVEN AS PART OF NORMAL AND PROPER ACTS OF COURTESY EMPLOYEES WHO RECEIVE UNSOLICITED GIFTS OR OTHER BENEFITS OF CONSIDERABLE VALUE WHICH ARE INCONSITENT WITH THE ABOVE PROVISIONS, SHALL PROMPTLY NOTIFY THE COMPANY

DEVELLIS EMPLOYEES ARE RESPONSIBLE FOR KNOWING AND COMPLYING WITH THE CURRENT LAWS, REGULATIONS, STANDARDS, POLICIES AND PROCEDURES THAT GOVERN OUR WORK

OUR CODE APPLIES TO ALL EMPLOYEEES, OFFICERS AND MEMBERS OF DEVELLIS. WE ARE CONFIDENT THAT IN THE FUTURE DEVELLIS WILL REACH GRATIFYING RESULTS TO KEEP ITS EXCELLENT REPUTATION HIGH, BY CONTINUING ON BUILDING ON THE FOUNDATIONS OF ITS ACHIEVEMENTS.

THANK YOU FOR YOUR SUPPORT AND UNDERSTANDING.

DE VELLIS TRASLOCHI E TRASPORTI LTD
ENNIO DEVELLIS
SOLE ADMINISTRATOR