

April 23rd 2018

CODE OF ETHICS

MIRCO SANTI SRL



MIRCO SANTI

Ship and Forwarding Agent

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SOCIETÀ SOGGETTA ALLA DIREZIONE E COORDINAMENTO DI **S.M.C. S.R.L.**

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INTRODUCTION

The Company MIRCO SANTI S.r.l. provides consultancy activities and services related to the maritime transport.

All activities and services offered by MIRCO SANTI S.r.l. must be given in accordance with the law, in condition of fair competition performed with honesty, integrity, fairness and good faith, in compliance with the legitimate interests of the customers, the employees, the shareholders, the commercial and financial partners. All people working at or collaborating with MIRCO SANTI S.r.l., without any distinctions or exceptions, are committed to observe and enforce these values within their own functions and responsibilities. The assumption to act for the convenience of MIRCO SANTI S.r.l. could not justify in any case the adoption of behaviors contrasting these values.

The present “Code of Ethics” has been edited for this reason. The compliance with the Code by MIRCO SANTI S.r.l. employees and collaborators is considered as fundamentally important for the proper functioning, reliability and the reputation of MIRCO SANTI S.r.l., that are considered to be key assets for a proper Company success.

MIRCO SANTI S.r.l. employees are supposed to fulfil the general obligations of loyalty, fairness, execution of the contract of employment in good faith and they have to refrain from any activity in competition with MIRCO SANTI S.r.l. Moreover, they have to respect the Company rules and to comply with the regulation of the Code of Ethics in accordance with the article 2014 of the Civil Code (1).

All employees are supposed to be aware about the Code of Ethics, to promote its observance and to report in case of possible deficiencies. MIRCO SANTI S.r.l. is committed to disseminate and to promote the Code of Ethics knowledge among the employees and their contributions on it. Every behavior in contradiction to the Code principles will be punished by disciplinary action, except is made for the most serious circumstances that will be submitted to law actions.

MIRCO SANTI S.r.l. will ensure with attention the Code observance by drawing up proper means of information, dissemination, prevention and control, by guaranteeing the transparency in operations and behaviors and by intervening, if necessary, with corrective actions.

The Code of Ethics is brought to the attention of all the people interested by business with MIRCO SANTI S.r.l.

Whenever MIRCO SANTI S.r.l. employees or collaborators should be aware of possible violations of the obligations mentioned in the Code, they are liable to inform immediately the Directorate of Resources and General Affairs in the person of the Director, Mr. Alessandro Vianello by written communication to be addressed to the Headquarters settled in Venice - Mestre, Via Torino, 151/a or email to avianello@santimarineconsulting.com or by phone contact to office number +39 041 2589641 or mobile number +39 349 2649533 in order to verify the proper actions to be engaged.

(1) Art. 2104: *Due diligence of the worker – the worker is requested to use the diligence required by the nature of the service rendered, by the company interest and by the higher interest of the domestic production. He is also requested to comply with the dispositions for the execution of the work and for the work discipline given by the work contractor or by his collaborators.*

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1. GENERAL PRINCIPLES

1.1 SCOPE AND RECIPIENTS OF THE CODE

The moral integrity is a constant duty of all the people working for MIRCO SANTI and it represents the main value of the behavior of all its organization.

The rules of the Code apply without any exceptions to all the employees, business partners of MIRCO SANTI S.r.l. and to all the people working to achieve MIRCO SANTI S.r.l. goals.

All department/ business function managers are asked to comply with the Code rules in proposing and carrying out the projects, actions and investments aimed to increase, in the long term, the company assets, the management and technological values, shareholders returns, the long-term wellbeing for the employees.

The company management is responsible in the first place of the compliance with the values and principles of the Code. The management shall be responsible internally and externally, encouraging the trust, the cohesiveness and the team spirit.

MIRCO SANTI S.r.l. employees and business partners, in accordance with the laws in force, will adjust their actions and behaviors complying with the principles, objectives and commitments provided for by the Code.

All the actions, operations and negotiations carried out and, in general, the conduct of MIRCO SANTI S.r.l. employees during their job activity shall be inspired to the maximum accuracy, from a management point of view, information transparency and completeness, formal and substantial legitimacy, and accounting clearness and truth, according with the internal procedures and rules.

MIRCO SANTI S.r.l. actively and fully cooperates with the competent Authority through its employees.

All the company activities shall be carried out with professional commitment and accuracy. All the employees shall provide their professional contribution in line with the assigned duties and responsibilities and act protecting MIRCO SANTI S.r.l. renown.

The relationship between the employees shall be based, at all levels, on behaviors and principles of mutual respect, honesty, cooperation and integrity.

In order to fully comply with the Code rules, all the employees shall refer, apart from their own supervisor, directly to the specific internal departments that will be appointed to this purpose.

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1.2 MIRCO SANTI S.R.L. COMMITMENTS

MIRCO SANTI S.r.l. shall ensure, through the appointment of specific internal functions, the following:

- The maximum circulation of the Code to the employees, business partners and staff;
- The development and update of the Code in order to adjust it to the evolution of the civil awareness and of the relevant laws;
- The provision of any necessary information and clarification tools for interpreting and applying the rules of the Code;
- The implementation of checks regarding the violation of the rules of the Code or relevant rules;
- The evaluation of the facts and consequent implementation, in case of ascertained violation, of adequate penalties;
- That nobody suffer any kind of repercussions for having provided news on possible violations of the Code rules and/or of the reference rules.

1.3 EMPLOYEES OBLIGATIONS

All the employees are required to know the rules of the Code and the applicable rules governing the job activity carried out within their own business function.

MIRCO SANTI S.r.l. employees are required to:

- Refrain from any act or conduct not complying with the above mentioned rules;
- Refer to their own supervisor, or appointed persons in case any clarifications are needed regarding the application of the above mentioned rules;
- Promptly refer to their own supervisor:
 - on any news, either known directly or reported, regarding the rules violation;
 - on any rules violation request received.
- Cooperate with the organization appointed to control any possible rules violation.

1.4 ADDITIONAL OBLIGATIONS FOR HEADS OF DEPARTMENTS AND BUSINESS FUNCTIONS MANAGERS

All company department / function managers have the following obligations:

- to represent with their own behavior an example for the company employees;
- to lead their own employees to comply with the rules of the Code and to invite them to raise any possible problems or questions relating to the rules;
- raising awareness on the compliance with the Code rules by the employees, as an essential part of the quality of the work carried out;

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- to select accurately, within their own capacity, employees and external business partners to avoid the appointment of people not fully committed in the compliance with the Code rules;
- to promptly inform their own supervisor on possible rules violation cases reported either by themselves or by other employees;
- to adopt immediate remedial measures whenever it is needed;
- preventing retaliation.

1.5 VALIDITY OF THE CODE AGAINST THIRD PARTIES

All MIRCO SANTI S.r.l. employees and collaborators, within their own competences towards third parties, will take care of :

- adequately informing them about the commitments and obligations imposed by the Code;
- requiring the compliance with the obligations that directly affect their activity;
- adopting the appropriate internal and external initiatives, within their competences, in the event of non-fulfillment by the third parties to the obligation to comply with the rules of the Code.

1.6 INTERNAL REFERENCE STRUCTURES

The Director of Personnel and General Affairs will be responsible of:

- Giving instructions about the conditions of use of company means of communications (phones, e-mails etc.)
- Defining the criteria and procedures aimed to reduce the violation of the present Code;
- Promoting the dissemination of guide lines and operational procedures with the participation of all the competent units;
- Arranging training and communication programs for the employees aiming to improve the knowledge of the Code;
- Promoting and verifying the internal and external knowledge of the Code of Ethics and its fulfillment;
- Examining the possible Code violations notifications by supporting the most suitable investigations;
- Reporting to the CEO all relevant results of such investigations in order to adopt any necessary disciplinary actions;
- Reporting all the competent structures about the results of such investigations in order to adopt the most suitable measures.

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1.7 CONTRACTUAL VALUE OF THE CODE OF ETHICS

The observation of the rules of the Code of Ethics should be considered as an essential part of the employees' contractual obligations within the meaning and for the purposes of the art. 2104 of the Civil Code.

The violation of the rules of the present Code may constitute a non-fulfillment of the primary obligations of the employment relationship or a disciplinary offence. The violation will lead to any related legal consequences with regards to the preservation of the employment relationship and may also lead to the request of compensation for any possible resulting damages.



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2. RELATIONSHIP WITH THIRD PARTIES

MIRCO SANTI S.r.l. in its business affairs operates in respect of the principles of loyalty, fairness, transparency, efficiency and opening up to the market.

MIRCO SANTI S.r.l. employees and the third parties whose actions could be ascribable to MIRCO SANTI S.r.l. are supposed to act correctly within MIRCO SANTI S.r.l. business, regardless of the competitiveness of the market and the relevance of the business.

In exercising its duties, MIRCO SANTI S.r.l. engages relationships with Companies and institutions; for this reason

MIRCO SANTI S.r.l. employees, at any level, are not allowed to promise or donate, either directly or indirectly, any kind of benefit as money, performance or service to any person, any private or public corporate or public institutions given in order to obtain benefits or facilitations in exercising their own activities.

Bribery actions are forbidden, including “facilitation payments”, i.e. non-official payments given to institutional officers in order to obtain benefits or facilitations; illegal commitments; collusive behaviors; direct or indirect solicitations finalized to obtain personal or professional benefits. The mere fact of creating expectations of possible benefits or facilitations is considered in itself a form of corruption.

None among employees is allowed to ask, accept or permit, directly or indirectly, any kind of benefits to be intended as money, performance or service from anyone, from any private or public corporate nor from national and international institutions if this should be considered as illegal practice to obtain benefits or facilitations.

Commercial courtesy as free gifts, entertainment and hospitality expenses, sponsorships and all donations in general intended to be legitimate actions for legal purposes will be allowed if they could be considered of reasonable price. In any case, they should not compromise the integrity or reputation of one of the parties involved and should not be interpreted by an impartial observer as an improper action in order to obtain advantages. These expenses must be authorized in every case in accordance to the budget assigned and they must be properly reported and registered in accordance to traceability principles. Cash is always forbidden.

In particular:

- Free gifts and entertainment expenses: all free gifts must be considered as promotional means for , MIRCO SANTI S.r.l. relationships as regards to third parties. Their value cannot exceed € 150,00. Possible exceptions must be submitted in written to the Directional functions representatives who will evaluate their possible authorization. The payments must be traceable and registered. The employee who receives free gifts or facilitations not directly ascribable to common courtesy must inform his/her superior.

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- Hospitality: all hospitality expenses offered by MIRCO SANTI S.r.l. must be intended as legal purpose in promotional business activities. All expenses must be authorized by Directional representatives in respect of the budget assigned; once approved they could not exceed the authorized value.
- Sponsorships and donations: all contributions offered by MIRCO SANTI S.r.l. must be intended as legal purpose to promote MIRCO SANTI S.r.l. good reputation. All contributions related to these aims must respect the budget assigned not exceeding the maximum of expense authorized value.

Third parties (in case of purchase of products, services, consultancy and professional performances) are asked to observe the Code of Ethics principles. To this aim all employees, in relation of his/her functions, will take care of:

- Using only qualified suppliers on the basis of technical, economic, legal, environmental, safety and security parameters;
- Using only consultant verified in terms of professionalism expertise and organization;
- Periodical examination of the international “black lists” for anti-bribery and terrorism in order to verify foreign suppliers;
- Exercising an impartial and well-documented selection (i.e. by comparison of almost three offers/suppliers ascertained to be qualified and granting a good reputation in order to ensure an impartial comparison);
- Guaranteeing that contacts and purchase orders are always finalized by authorized persons;
- Verifying the accuracy of the received invoices and their match with the offer and/or the service rendered;
- Verifying the adequacy of the amount paid with the service provided and the market conditions;
- Informing immediately the superiors/supervisors about the possible infringement of the Code of Ethics by third parties

2.1 RELATIONSHIPS WITH CLIENTS

MIRCO SANTI S.r.l. pursues its own business through the offer of qualified services in accordance with the rules of the fair competition.

MIRCO SANTI S.r.l. is aware of the importance of the appreciation for the services rendered. For this reason, MIRCO SANTI S.r.l. employees are obliged:

- To observe the internal rules related to client relationships management;
- To offer, in the limits of the contractual rules, services that could satisfy or exceed the expectations of the clients, with efficiency and accuracy;
- To issue careful and exhaustive information about the services rendered in order to make clients able to make consciousness decisions;

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2.2 RELATIONSHIPS WITH SUPPLIERS

MIRCO SANTI S.r.l. employees, in relations to contracts, tenders or supply for goods and services, are obliged:

- To observe the internal procedure for the selection and the management of suppliers;
- Not to preclude any provider fulfilling the requested requirements the possibility to compete in order to obtain a possible provision to MIRCO SANTI S.r.l. by granting the adoption of impartial evaluation criteria in a declared and transparent manner;
- To observe contractual conditions;
- To maintain a sincere and outspoken dialogue with the suppliers, in accordance to commercial practices.

2.3 RELATIONSHIPS WITH EXTERNAL PARTNERS

All external collaborators (consultants, brokers, agents etc) are asked to observe the Code of Ethics principles.

For this reason, all MIRCO SANTI S.r.l. employees, in relation to their functions, are asked:

- To observe the principles and the internal procedures for the selection and the management of the relationships with external collaborators;
- To select only professionals and certified company with good reputation: in this respect is liability of the competent function to verify and ascertain the identity of the external collaborator, to evaluate his/her expertise and to examine the resources made available by the collaborator in order to provide the services offered. The collaboration must be signed only with the person or the company issuing the service and with no other subject, in particular not with Off-shore companies;
- To trace ever communication about the opportunity to use particular collaborators;
- To report immediately to the superiors any doubt about possible violation of the Code of Ethics.

In any case, the payment should be related to the service/performance indicated on the contract and to the professional expertise and the services rendered. The payment must be reported by apposite document (i.e. invoice) duly registered. Payments cannot be dispensed in cash or by a different subject or Nation in relation to what is indicated on the subscribed contract

Every external collaborator will receive a copy of the present Code of Ethics

2.4 RELATIONSHIPS WITH MASS MEDIA

The outward information is based on the respect of the right in information and it is performed in transparency, frankness and promptness.

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In order to guarantee the completeness and the coherence of the information originated by the society, the relationships with the mass media are strictly reserved to the designated figures and must be intended as in respect of the communication policy designed by the Company.

For this reason, no employee and collaborator of MIRCO SANTI S.r.l. is allowed to provide or undertake to provide any information to the mass media without the approval of the relevant competent subjects.

2.5 RELATIONSHIPS WITH THE PUBLIC ADMINISTRATION

For the purposes of the present Code of Ethics we intend as Public Administration all the State Administrations, the Public Bodies, any independent administrative agency and all people acting as public official or on behalf of any public service, In Italy and abroad.

In relationships with the Public Administration, all employees and collaborators of MIRCO SANTI S.r.l. must act in respect of the law and the ethics rules and they must not adopt actions that could represent a crime against the Public Administration.

In particular, all employees and collaborators of MIRCO SANTI S.r.l. cannot:

- Put in place, collaborate or cause actions that could represent crimes subject to sanctions of the Penal Code;
- Put in place, collaborate or cause actions that, even if they do not represent a crime as per above description, could potentially become crimes, i.e. actions that could encourage the performance of crimes

With reference to the above-mentioned crimes, the Company is duly alerted about the possibility that common commercial practices could be considered not acceptable or in violation of the law when performed towards Public employees or public officials acting on behalf of the Public Administration.

During any business negotiations, request or relationship with the Public Administration, the staff assigned must not try to inappropriately influence the counterpart decisions, including the ones expressed by people acting on behalf of the Public Administration.

In particular, the staff assigned cannot:

- Offer any kind of benefits or gifts
- Examine or propose jobs or commercial opportunities that could represent a personal benefit for the Public Administration employees;
- Require or obtain reserved information that could compromise the integrity and/or reputation of both sides.

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In case of public tender, the staff assigned must operate in respect of the law and the common commercial practices.

With reference to the general criteria above mentioned, it is clarified that tributes, free gifts or benefits are not allowed, in whatever form to be intended as offered, promised or given to the Public Administration, to people acting on behalf of the Public Administration or to their relatives. Moreover, illegal pressures performed with the aim to encourage or facilitate a decision or the realization of a formal act against the Public Administration rules, even if performed only to represent expectations in this sense, are not allowed.

The behaviors carried out by MIRCO SANTI srl employees and/or collaborators with the aim to facilitate or damage a party in a civil, criminal or administrative process, and to directly or indirectly benefit the Company are also strictly prohibited.

If MIRCO SANTI srl employees and/or collaborators should receive direct or indirect requests for any kind of benefits from Public Administration Representatives and /or by people or companies acting on behalf the Public administration they have to suspend immediately any kind of relationships with this subject and inform immediately the MIRCO SANTI Directors/ Managing representatives.

The beneficiaries of the present code must not elude the regulations above mentioned by using different kinds of contributions, as well as facilitation payments, i.e. sponsorships, assignments, consultancies and/or advertising that should represent purposes which are forbidden by the present rules.

The above mentioned regulations are not applied to complimentary actions not exceeding the value of 150 €.

In Countries where it is a common practice to offer gifts to the clients, the gifts must be intended of modest value and in any case, they should represent a violation of law regulations nor represent a request of facilitation. In this case MIRCO SANTI srl employees and/or collaborators must keep evidence of the gift(s).

2.6 CONFLICT OF INTERESTS

MIRCO SANTI srl respects the right of its employees to participate in investments, business or other activities performed outside the interest of MIRCO SANTI S.r.l. if these activities are permitted by law and compatible with the obligations undertaken as employees.

In any case MIRCO SANTI srl employees and/or collaborators must avoid all the situations and the activities that should represent a conflict with the interests of the Company or which may

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interfere with their ability to assume impartial decisions for the best interests of the company and in full compliance with the provisions of the Code.

Every situation that could represent a conflict of interest must be immediately communicated to a superior.

In particular, all MIRCO SANTI srl employees and/or collaborators are asked to avoid any conflict of interests between the personal / familiar economical activities and their position among the Company.

As an example, the following situations are considered to cause a conflict of interests:

- Economical and financial interests of the employees and/or collaborators and/or their families in activities performed as suppliers, clients and competitors;
- Use of the position covered in the Company or the information collected during the work that could represent a conflict of interests between the personal employees and/or collaborators interests and the Company interests;
- Carrying out any kind of work in the interests of customers, suppliers or competitors;
- Accepting money, facilitations or benefits from people or companies that are not intended to establish business relationships with the Company.

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3. TRANSPARENCY OF ACCOUNTS AND INTERNAL CONTROLS

3.1 ACCOUNTING RECORDS

The accountability transparency is based on the truth, accuracy and completeness of the basic information related to the accounting records. Each employee / collaborator is asked to collaborate with the aim to correctly and promptly represent the managing activities in the accountability.

For each action the documentation that support each activities is retained for the Company records in order to facilitate:

- An easy accounting registration
- The identification of different liability levels
- The correct reconstruction of the operations, also with the aim to reduce the probability of interpretative errors

Each accounting record must exactly expose what is reported by the related documentation. It is an employee task to make the documentation easily traceable and orderly archived as per logical criteria.

MIRCO SANTI srl employees and/or collaborators who should have knowledge of omissions, falsifications, negligence in accountability or about the documents on which accounting records are based, must report these activities to their superior

3.2 INTERNAL CONTROLS

MIRCO SANTI srl promotes a knowledge characterized by the awareness of the presence of controls and by the assumption of an attitude oriented to the practice of control. The attitude to the controls must be positive for their contribution to the improvement of business efficiency.

As internal controls are intended all the necessary or useful tools to direct, manage and verify the activities of the company with the aim of ensuring compliance with the corporate rules and procedures, by protecting the company assets and efficiently managing the activities, the provision of accurate and complete accounting and financial data.

The responsibility to create an efficient internal control system is common to all levels of the organization; consequently all MIRCO SANTI srl employees and/or collaborators are liable for the definition and the proper functioning of the internal control within the scope of their own functions.

Within their remit, the persons in charge of the different departments must take part in the company internal control and share it with their own collaborators. Everyone must be responsible for the company tangible and intangible assets that are aimed to their own function. No employee can make improper use of the assets and resources belonging to MIRCO SANTI srl neither allow others to do it.

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4. STAFF POLICIES

4.1 HUMAN RESOURCES

The Human Resources are an essential element for the existence itself of the Company. The commitment and the professionalism of the employees are paramount values and conditions to pursue MIRCO SANTI srl targets.

MIRCO SANTI srl is committed to develop the capability and the knowledge of each employee in order to empower their creativity and to make possible the full expression and realization of their own potential.

MIRCO SANTI srl offers to all the employees the same job opportunities, by granting an equal treatment based on merit criteria, without discriminations. The person in charge must

- Adopt merit criteria based on knowledge and professional skills for any decision related to the employees;
- Create a fair working environment where personal features would not determine discriminations.

MIRCO SANTI srl performs its business by protecting the working conditions and the psychophysical integrity of the workers, by respecting their moral personality, by avoiding illicit conditioning or undue inconveniences. To this effect, MIRCO SANTI srl will retain relevant also the extra-work behaviors that should be considered as particularly offensive to the civil perception or that should make reasonably difficult the interpersonal contacts in the work environment.

MIRCO SANTI srl employees and/or collaborators, at all levels, are expected to collaborate to create a fair working context characterized by the mutual respect for the dignity, honor and reputation of everyone.

MIRCO SANTI srl will intervene to prevent abusive or defamatory interpersonal attitudes.

4.2 HARASSMENT IN THE WORKPLACE

MIRCO SANTI srl demands that no harassments is performed in the internal and external work relations, such as:

- the establishment of an intimidating, hostile or isolating working place against an employee or groups of employees;
- the undue interference with someone else's professional performances;
- the impediment of other people's job scenarios for mere reasons of personal competitiveness.

MIRCO SANTI srl does not accept sexual harassment such as:

- the subordination of relevant decisions for the working life of the addressee to the acceptance of sexual favors;

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- the proposals of private relationships despite an expressed or reasonably evident disagreement, that should have as consequence the trouble of the addressee's quietness by determining objective implications on his/her working expression, in relation to the specificity of the situation.

4.3 ALCOHOL AND DRUG ABUSE

MIRCO SANTI S.r.l. demands that each employee personally contribute to maintain the workplace respectful of other peoples' sensitivity. For this reason, the company will consider as responsible of having consciously threatened the existing working environment all the people that during the work and in the workplace, even occasionally, will act as follows:

- working under the effects of alcohol, drugs or any other substances with similar effects;
- consuming or offering for whatever purpose drugs in the workplace.

Chronic addition to such substances, when they impact the workplace, will be – by contractual extension – compared to the over mentioned cases.

4.4 SMOKING

Smoking is banned in the workplace at MIRCO SANTI S.r.l. in particular where smoking can be dangerous, in accordance with the existing law.



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5. HEALTH, SAFETY AND ENVIRONMENT

Within its activities, MIRCO SANTI S.r.l. is involved in developing and strengthening a culture of safety by raising awareness on the risks and using all the necessary means to ensure the safety and the health of its employees, external partners, customers and of all the community where it works.

MIRCO SANTI S.r.l. is engaged in the environmental protection, which is a vital resource for all the community, by planning its activities in the constant search of a balance between economic initiative and unavoidable environmental concerns.

All the activities of MIRCO SANTI S.r.l. are carried out complying with the existing rules for the environmental prevention, protection and environmental impact, adopting technical and organizational tools to protect safety and health.

The operational management shall refer to advanced criteria for the improvement of the health and safety conditions at work.

MIRCO SANTI S.r.l. employees, within their activities, participate in the risks prevention process, environmental, health and safety protection for themselves, their colleagues and third parties.



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6. CONFIDENTIALITY

MIRCO SANTI S.r.l. activities constantly require the acquisition, the conservation, the process, the communication and the dissemination of news, data, documents and further information related to trading, negotiations, transports, administrative procedures, financial operations and know how documents (contracts, formal acts, reports, notes, drawings, pictures, software) etc

MIRCO SANTI S.r.l. databases should include also personal data protected according to the art. 13 of the EU Regulation n. 2016/679 (hereafter "GDPR") and the Italian law D.Lgs. 30.6.2003 n. 196 (hereafter "Privacy Code") rules. Such data cannot be disclosed since their dissemination could spoil the company interests.

It's MIRCO SANTI S.r.l. employees' and collaborators' duty to ensure the due confidentiality according to the circumstances related to the information acquired in function of their own activity. MIRCO SANTI S.r.l. undertakes the protection of all the information related to its employees and to third parties, that should have been generated or acquired within and in business relations in order to avoid any improper use of these information.

The information, knowledge and data acquired or processed by the employees during the business activities are MIRCO SANTI S.r.l. property and they cannot be used or disclosed without the specific approval of their superiors.

Notwithstanding the prohibition to disclose any news related to the internal organization and the service supplying methods or to use them by causing damage to the Company, all MIRCO SANTI S.r.l. employees and collaborators are obliged to:

- Acquire and process only the necessary data useful for business activities strictly connected to their functions;
- Acquire and process the data only if related to specific procedures;
- Store the data by avoiding those non-authorized persons to access them;
- Communicate the data according to specific procedures and/or under specific authorization after verifying the data disclosure authorizations;
- Verify the presence of total or partial bond in relation to third parties information in order to obtain their consent for the dissemination;
- Aggregate the data in order that any allowed person could easily access them in a way as precise, exhaustive and truthful as possible.

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