



Nuovo Borgo Terminal Containers Srl

Code of Ethics

Status: January 2018

Code of Ethics

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Global Code of Ethics

I. Preamble

Nuovo Borgo Terminal Containers Srl, herein after called “NBTC” .

Our global focus and our strategy of profitable growth require a common system of values and principles that should provide guidance on conduct to all employees.

As an innovative company in our field, we recognize the ongoing globalization of business as a chance and a challenge. With motivated employees as the basis of our success, we can seize the chance and accept the challenge.

The excellent reputation of our Company among the public, our customers and partners is one of the major fundamentals to our achieving success. As a prerequisite for this, it is essential that each employee acts properly and responsibly. Therefore the following principles are binding for all employees:

Protection of human rights

Respect for the personality and dignity of the individual

Prohibition of any discrimination

Fair and cooperative collaboration

Professionalism, truthfulness, loyalty, personal responsibility and integrity

Respect towards fellowman and the environment

Expectations from Employees

Our staff act professionally. In our value system, besides responsibility, accountability, integrity and exemplary behaviour, this means adhering to our principle of collaboration. Additionally, we strive for the principle of direct, open communication.

Expectations from Senior Management

The senior managers of our Company have significant responsibility. It is their duty to demonstrate integrity and ethical values through their day-to-day actions and decision- making. They set the direction and serve as a good example to other staff.

By implementing value-based leadership and management actions resulting from this, the senior managers support tolerant and fair behaviour. Through their conduct they contribute to respect being shown for the personality and dignity of all employees. With their open-minded attitude towards employees, they create a working environment that allows an open exchange of ideas. They cultivate respectful interaction with each other through politeness, respect, kindness, and mutual thoughtfulness. As part of their leadership, they prevent unacceptable behaviour and act as neutral intermediaries in possible disputes.

Expectations when Interacting with Third Parties

Our staff are aware that they represent NBTC through their behaviour, shaping its reputation externally. All employees treat others as they expect to be treated themselves. The outcome is fair and respectful interaction with customers, suppliers and other external individuals, who have a business relationship with the Company.

Area of Application

However, not every possible situation can be described that might occur in day-to-day business. The following provisions are to be seen as a code of practice, providing orientation for the actions of all employees – regardless of position and area of responsibility.

II. Internal Relations

1. Employees

1.1 Corporate Culture

All employees contribute to a corporate culture bearing the hallmark of fair and cooperative collaboration. Tolerance and trusting interaction in the normal course of business are two of the basic principles for all staff.

1.2 Competencies

NBTC relies on the motivation, expertise and sense of responsibility of the employees. We continually develop the expertise of our employees in order to achieve highest quality standards in a constantly changing global market.

1.3 Unfair Treatment and Discrimination

Discriminatory actions due to ethnic background, religion, age, gender, disability, sexual identity, ideology, affiliation to a political, religious or trade-union organization, child- or compulsory labor, unworthy working conditions or other characteristics, will not be tolerated. The rights for freedom of association and collective bargaining are honored.

1.4 Relationships

The dignity and personality of each employee are to be respected. All employees act with integrity, loyalty and absolutely avoid conflicts of interest. Inter-personal interaction is characterized by mutual respect, fairness, team spirit, professionalism and openness.

Our employees are judged on their performance, receiving honest and fair feedback. Employees communicate their wishes and needs directly to their supervisor.

By implementing value-based leadership and management actions resulting from this, managers support tolerant and fair behaviour. With their open-minded attitude towards their staff, managers create a working environment that allows an open exchange of ideas. As part of their leadership, senior management prevent unacceptable behaviour and acts as intermediary in possible disputes.

Senior management demonstrate exemplary integrity and ethical values through their day-to-day activities and prove their competence especially in conflict situations.

1.5 Working Environment

NBTC expects its employees to contribute to a positive working environment through their behaviour towards one another. This also means that workplace problems are addressed and joint solutions sought. This is the only way to develop an environment characterized by openness, tolerance and fairness.

1.6 Compliance with Regulations

Each employee is to be aware of the laws related to his or her work, observe them, as well as to impart this knowledge to his or her staff. Furthermore, employees are to comply with the terms of their employment contracts and corresponding company regulations.

In this context, the Senior Management is responsible for the implementation and communication of adequate internal security and control procedures, as well as for monitoring adherence to these procedures.

1.7 Working Hours and Minimum Wages

NBTC complies with the maximum number of working hours laid down in the applicable local laws and provides fair remuneration under consideration of applicable national statutory minimum wage to all employees.

2. Company

2.1 Corporate Property

The handling of all equipment and other assets of NBTC by its employees is to be performed with care. The use of company equipment is exclusively for the purpose for which it was intended. A target-oriented, efficient, and cost-conscious use of all equipment is to be ensured. The use of corporate property is only allowed for operational purposes. Deviations from this principle are to be agreed separately. Employees are obliged to protect corporate property from loss, theft or misuse.

2.2 IT / Data Security

The provisions regarding the use, access, and security of both software and information technology, email, internet and intranet are to be adhered to. All data protection regulations are to be complied with. This especially pertains to the protection of personal and Company internal data throughout our overall business process.

2.3 Confidentiality

In a spirit of teamwork and collaboration, great value is placed on the accuracy and completeness of the compiled and/or documented information. Knowledge of all business affairs obtained during business activities should be treated with the utmost discretion, regardless of whether they concern NBTC or third parties. Utmost accuracy is required for both the handling and storing of such information.

All employees are bound to secrecy regarding all operating and business secrets both during their employment and subsequent to termination of their employment.

2.4 Conflicts of Interests

Employees are committed to their work for NBTC. Accordingly, without prior knowledge and the explicit written agreement of NBTC, employees are neither allowed to pursue additional business on their own account, nor for the account of, or on behalf of others. The interests of NBTC are not to be impaired by the employee's additional business interests. Possible or potential conflicts of interest should be reported to their own supervisor.

All appropriate action should be taken to avoid conflicts of interest or to resolve them if they are unavoidable. Employees personal business interests are not to conflict with the interests of customers, or those of NBTC.

III. External Relations

1. General Regulations

1.1 Interaction with Third Parties

NBTC acts as a fair competitor in a competitive global environment. Under no circumstances are other companies or institutions to be denigrated. Our behaviour towards external partners and market participants is professional, transparent, respectful and fair for the good of our interest groups.

1.2 Representation

The behaviour of an employee always reflects on NBTC Behaviour, which has a negative impact on customers, other employees and/or the public due to the prestige of NBTC, should be avoided.

1.3 Protection of the Environment

A major part of the corporate philosophy of NBTC is the protection of the environment and sustainable development. Our goal is to conserve natural resources, develop environmental awareness and ensure quality services as well as safe operations. The environment has to be protected for future generations and compliance with all applicable environmental laws and the Quality and Environmental Management Manual is of fundamental concern.

1.4 Prevention of Corruption

NBTC is determined to achieve highest ethical standards in all of its business transactions. We do not accept immoral or corrupt practices, extortion or bribery performed by employees or business partners.

We maintain transparency of interaction with all customers, suppliers and authorities. NBTC does not tolerate any form of corruption, whether public or private, active or passive.

a) Gifts

To ensure our independence and as an expression of our high ethical standards, our employees are prohibited from asking for favours, accepting, receiving or giving any gifts, except for locally accepted small giveaways from individuals, that they come into contact with in the normal course of business.

b) Financial Benefits

It is not permitted to ask for or accept payments, loans or any other financial benefits from traders or customers for personal benefit.

1.5 Usage of Compromising Substances

As a matter of principle, working under the influence of alcohol, illegal drugs and other substances that have an influence on the execution of an employee's work and on the safety of the employee and other parties is prohibited.

2. Special Regulations

2.1 Customers

We aim to ensure fair treatment of all our customers. We provide our customers with high quality services and strive to offer the best possible performance at competitive prices in every area of operations. We permanently check, evaluate and improve services, technologies and procedures to ensure quality, safety and security.

2.2 Suppliers

Relations between NBTC, its suppliers and service providers are based on the acceptance of contractually clearly defined and appropriate interests of each party in compliance with our Code of Ethics. When conflicts of interest occur, these are to be reported immediately. Please note that the conflicts of interest regulations above, also apply here.

2.3 Competitors

NBTC respects the rules of open competition. With regard to this, we only publish truthful information about our services.

To obtain information about our competitors we use all permitted approaches, but avoid any actions which are illegal, or could result in liability claims. In direct comparison with our competitors, we present relevant information precisely and in a fair manner for both parties. We explicitly prohibit unethical or illegal business practices.

We comply with local laws concerning competition. We prohibit any activities that are considered as illegal or that could be considered as damaging the competition.

IV. Compliance with the Global Code of Ethics

1. Scope

The Code of Ethics is a binding internal standard based on laws in force and is applicable to all business activities.

In compiling this code, different cultures and the diversity of social values have been acknowledged and considered.

The Code of Ethics applies to official business activities carried out in the Company and on all areas in which employees are perceived as its representatives.

2. Implementation

In order to maintain the good reputation of NBTC, the provisions of the Code of Ethics are to be observed not only during working time but should also apply to non-working activities. When the employee is perceived by third parties as a representative of the Company and consequently affecting the interests of the Company, the Global Code of Ethics applies. We ask all our staff to support other employees in observing the Global Code of Ethics and work together with NBTC on the implementation of its provisions.

The Senior Management is asked to actively promote the implementation of the Code of Ethics.

This comprises ensuring that all of their subordinates know this Code of Ethics and observe its provisions in practice.

Employees support the compliance with this policy by providing any necessary information to their superior or other appropriate authorities implemented by the company. If employees are aware of a possible violation of this policy, they are encouraged to report the violation.

No employee has to fear disadvantages as a result of such notification, which is done in good faith, even if this turns out to be unfounded.

3. Violations

Violation of the NBTC Global Code of Ethics may result in a formal warning. Major violations may even lead to termination of the employment contract.