



## W.H.S. Worldhail System Code of Ethics

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General management is convinced that ethics, in the management of a company, is a prerequisite for its success and an instrument to promote and preserve its image, a crucial issue, just like trust, fairness and transparency for all stakeholders.

To this end, Management has adopted this Code of Ethics in order to regulate, through behavioral norms, the activity of WHS worldhailsystem srl, setting the general principles which the entire organization must comply with.

The objective of this Code of Ethics is to define the duties and ethical responsibilities towards [WHS worldhailsystem srl](#), and its administrators, managers, employees and collaborators are obliged to adapt their behavior in their activity; therefore, it defines the deontological profile of the company.

The recipients of the Code of Ethics are all managers, subordinates workers and employees of the company, without exception, and all those who, directly or indirectly, permanently or temporarily, establish relations with [WHS worldhailsystem srl](#) and work to meet their objectives as providers, contractors, service providers.

They have, therefore, the obligation to know the rules of the Code of Ethics and to refer to the principles and standards of behavior presented above, adapting their attitude, rigorously observing religious, cultural and social particularities.

The rules contained in this Code of Ethics establish the behavior that employees and collaborators are obliged to observe, the primary disciplinary rules related to all workers, rules provided by legal regulations and contracts commonly used in labor relations. The primordial nature of [WHS worldhailsystem srl](#) interests cannot justify conduct contrary to the laws and rules of this Code.

In any business relationship, all parties concerned must be informed of the existence and content of this Code of Ethics and are bound by contract to observe them.

For this purpose, to third parties, all addressees of this Code, according to their competences, will be concerned to:

- adequately inform them on the tasks and obligations under the Code;
- require compliance with the obligations that are directly related to their work;

- adopt appropriate initiatives, internal and external, in cases of noncompliance.

This Code of Ethics is valid and operative in all geographical areas in which [WHS worldhailssystem srl](#) operates.

#### 2.1.1) COMPANY VALUES

Within its own activities, WHS worldhailssystem srl has identified benchmarks that determine the behavior of all persons acting on its behalf, in order to ensure fairness in business management and the company's activities, protecting its heritage and the image of the company and trying to meet the expectations of all partners in the field.

Honesty, fairness, integrity, transparency, impartiality, reserve, respect and care for the work environment, and the preservation of health and job security are important values which characterize the activity of [WHS worldhailssystem srl](#), and are core values in achieving their economic, productive and social objectives.

The coherent update of company values means, from each, a compelling cultural, technical, operational and ethical contribution; this applies in exercising the responsibilities and powers conferred by the Organization, either within individual or collective behavior. The first category includes activities requiring exclusively personal involvement in the application of ethical principles; the second category includes the same behavioral attitudes in the relations with stakeholders, involving each person.

#### 2.1.2) RESPECT FOR HUMAN RIGHTS

In the decisions that influence the relations with the external and internal partners, [WHS worldhailssystem srl](#) considers essential not to tolerate any discrimination concerning age, sex, sexual preference, health, race, nationality, political opinions, religious beliefs.

[WHS worldhailssystem srl](#) supports and respects Human Rights, in accordance with the Universal Declaration of Human Rights and the UN Charter of Fundamental Rights of the European Union.

#### 2.1.3) THE VALUE OF HUMAN RESOURCES

[WHS worldhailssystem srl](#) recognizes the critical importance of human resources as the main success factor of any productive activity, manifested in a framework of loyalty and mutual trust between employers and employees.

To this end, the company protects and promotes the value of human resources in order to improve and enhance the professionalism, experience and the knowledge of each employee and collaborator, also by conducting formative initiatives.

Employment relationship is conducted observing the rules applicable to the collective labor contract and regulations in the field of social security, taxation and insurance; for establishing a work relationship, the collaborator is obliged to sign, with the contract, a commitment to the principles defined in the Code of Ethics.

In personnel management procedures, decisions are made based on criteria for assessing competence, in meritocratic logic; the same goes for access to jobs or functions.

In case of reorganization of a company, it is concerned with preserving the value of human resources by providing, where necessary, training and / or retraining of staff.

In the existing relationships with employees, the company promotes actions in order to prevent the exercise of authority from damaging the dignity, professionalism and autonomy of the employee.

#### 2.1.4) INTEGRITY OF EMPLOYEES

Respect for the person's physical and cultural integrity is a reference ethics value for [WHS worldhailssystem srl](#), which guarantees it by ensuring working conditions for the respect of individual dignity and proper workplaces; to this end, the company conduct activities in technical, organizational and economic conditions, aimed at enabling full assurance regarding prevention of occupational accidents and a healthy and safe work environment, fully observing the norms in force, adopting the much needed defining, protective and preventive rules.

[WHS worldhailssystem srl](#) is committed to defend and strengthen the safety culture, promoting risk awareness and asking responsible attitudes from all collaborators.

#### 2.1.5) VALUE OF REPUTATION

[WHS worldhailssystem srl](#), aware of the importance of its work and the effects it has on economic and social development, pays significant attention to the correspondance between their goals and the general interests of the nation.

For this reason, the Company conducts its activities in full compliance with local and national communities, associations, institutions, in order to achieve a high level of reputation to help promote a good image of its products in the community in which it operates.

The good reputation and image of the Company is therefore an essential spiritual resource.

#### 2.1.6) HONESTY, IMPARTIALITY AND COMPLIANCE WITH NORMS

In carrying out its tasks for the employees and collaborators of the Company, respect for the law must prevail, before any other interests, own decisions and own attitudes being determined by the care for the importance of the designated activity. The crucial interest of

WHS worldhailssystem srl cannot justify personal conduct characterized by violation of the laws and rules of this Code.

In carrying out those tasks discriminatory attitudes of partners with respect to age, sex, sexuality, health, race, nationality, political and trade union opinions or religious beliefs are prohibited.

The employee should reject illegitimate influences, flattery or requests for favors which harms the honesty and impartiality of his tasks, being ordered to immediately notify its superiors or, when the illegitimate pressures come from his superiors, to the competent staff office.

#### 2.1.7) USE OF COMPANY PROPERTY

Company assets are assigned to staff for production activities; however, their use will be limited to the designated pursuit. Staff must demonstrate responsible behavior, in accordance with the procedures provided for use of company goods, reading manuals on their use, when necessary. It is prohibited to alter, in any way, the operation of equipment, machines, information or telematics systems, or to illegally interfere in any way with the data, information or programs contained in a computer system (or telematic) to which they belong.

#### 2.1.8) MANAGEMENT OF INFORMATION

Employees and collaborators who, in exercising their work functions, come into contact with confidential and secret data, shall use such data only for purposes agreed by law and internal rules, avoiding their use for private purposes or those of others; the restriction also extends to unclassified information or documents available used during activity.

They only consult those papers and documents for which they are authorized and provide access for third parties only in cases prescribed by law, and to colleagues while on duty in accordance with the tasks assigned to that particular office.

Company employees and collaborators must adapt their own behavior to keep maximum reserve even outside working hours in order to protect company "know-how". As a result, compliance with norms and a concern for "privacy" remain valid, and they must observe the secret nature of the activity and maintain the secrecy of data and information used in the exercise of their activities. The duty to keep this information in reserve shall extend after termination of employment.

#### 2.1.9) WORK ENVIRONMENT

Each employee or collaborator of the Company is required to apply the rules of a civilized cohabitation and of fair social and trade relations in the work environment, as foreseen and regulated by laws and regulations, and common practice.

The company recommends its employees to maintain respect for the sensitivity of others in the working environment. As a result, the person who demonstrates during work and in the workplace a behavior contrary to civilized life rules and safety standards will be liable for having consciously put at risk the existing workplace; in particular, it is prohibited to:

- carry out own activity under the influence of alcohol, drugs or substances with similar effect;
- consume or distribute narcotic drugs in any form in the course of work.

The states of chronic dependence on substances of this nature, where they influence the quality of the working environment will be - for contractual effects - equated to the cases above.

Relations between employees, at all levels, must be characterized by fairness, cooperation, loyalty and mutual respect. The company, in internal and external labor relations, wants not to give rise to phenomena of harassment, being implied, by way of example, the following:

- creating a work environment which is intimidating, hostile and which creates isolation towards individuals or groups of workers;
- unjustified interference in the execution of the work of another person;
- preventing individual work perspective of a person on grounds of promoting the skills of another person.

In relations involving hierarchical relations, authority must be exercised with equity and fairness, avoiding any abuse. Sexual harassment is not allowed in any way, nor tolerated, and behaviors or expressions that can hurt the sensitivity of a person should be avoided.

#### 2.1.10) OBLIGATION OF NOTIFICATION

All persons targeted by the regulations contained in the Code, whom, during work, become aware of administrative and procedural irregularities, omissions or false information, are obliged to immediately inform their superior and, if such irregularities involve the head of that office, the notification should be addressed to his superiors.

#### 2.1.11) STAFF MANAGEMENT

The company avoids any form of discrimination against its own employees. Personnel management procedures are based on meritocratic principles and assessments made on the basis of objective criteria.

The Company undertakes to keep the moral profile of employees and to ensure the right to working conditions which respect the dignity of the person. For this reason, the Company prohibits any act of psychological violence and disavows any arrogant or invasive attitude or behavior towards a person, its beliefs and preferences. It is also prohibited to carry out any

research on the ideas, preferences, personal tastes and, more generally, on the privacy of employees.

#### 2.1.12) INSTITUTIONAL RELATIONS AND MASS MEDIA

Within institutional relations, the Company undertakes:

- to establish, without any discrimination, stable channels of communication with all institutional partners in the territory of reference;
- to represent the interests and position of the Company in a transparent, rigorous and consistent manner, avoiding inadequate attitudes.

Communications with external factors and the relations with bodies of information will be exclusively supported by representatives of the Company's management, with support from services in charge of communication and external relations, in order to standardize the interests of the Company.

Statements which are detrimental to the image and interests of the Company are not permitted; when asked by communication institutions, the designated officers are obliged to redirect those interventions towards the functions targeted.

##### 2.1.12)1. REPORTING ETHICAL CODE VIOLATION

Each office or organizational unit responsible is obliged to report any violations of staff working in offices and organizational units, hierarchically and/or in the department to its own employees.

Events and attitudes assimilated as violations of the Code of Ethics will be signaled to the Company's Personnel Office which will proceed with the necessary initiatives, organizing, when necessary, internal training for this purpose.

[WHS worldhailsystem srl](#), when reporting violations to the Code of Ethics, shall take sanction measures while observing with criteria of consistency, impartiality, proportionality, in accordance with the provisions governing labor relations. In such circumstances, the Company reserves the right to proceed with all necessary and appropriate actions for compensation regarding the damages suffered as a result of that person's behavior.