

TRANSMEC GROUP

CODE OF ETHICS

CHAPTER I – INTRODUCTORY PROVISIONS

Article 1 – The Code of Ethics

The Code of Ethics sets out the core values and principles underpinning and guiding the Company's activities.

In particular, TRANSMEC GROUP conducts its business in strict compliance with corporate ethics, operating in full awareness of the applicable regulations concerning corporate social responsibility, ensuring firm respect for human rights and individual dignity, and establishing an effective system of control and prevention in order to guarantee compliance with, and the progressive integration of, principles such as legality, integrity, transparency, impartiality, environmental protection, quality and safety of services, and responsibility towards customers and the community.

Accordingly, the purpose of the Code of Ethics is not limited to a mere declaration of intent aimed at preventing unlawful practices; rather, it extends to the active strengthening of corporate policies in day-to-day operations and the consequent consolidation of a sense of belonging within the corporate structure.

The values and rules of conduct set out in this Code of Ethics therefore represent the cornerstone of the Company's culture, which regards continuous technological innovation as an essential prerequisite for achieving excellence in the quality of the services provided, while ensuring the utmost care and protection of customers and the working environment. To this end, such principles and rules shall form an integral part of the Company's corporate culture and shall also constitute a strategic area of investment from the perspective of commercial competitiveness.

Furthermore, Transmec Group fully acknowledges that the adoption of a Code of Ethics plays a fundamental role in preventing the offences referred to in Italian Legislative Decree No. 231 of 8 June 2001 – the legislation that introduced administrative liability of legal entities into the Italian legal system – while also representing a tangible guarantee of the Company's reliability and integrity of reputation. Consequently, this Code forms an integral part of the internal control system, the Organisational, Management and Control Model pursuant to Legislative Decree 231/2001 (hereinafter the "231 Model"), and the Company's policies.

Having stated the above, this document, unanimously adopted by the Board of Directors of TRASPORTI INTERNAZIONALI TRANSMEC S.p.A., sets out the ethical and professional principles to which Transmec Group adheres in carrying out its activities and with which it

requires the strictest compliance by corporate officers, employees and, in any event, all those who contribute to the achievement of its mission.

To this end, the widest possible dissemination of the Code of Ethics shall be ensured, including through appropriate training and awareness programmes concerning its contents.

Article 2 – Recipients

The Transmec Group Code of Ethics applies to directors, managers, employees and collaborators, as well as to the Company's third-party suppliers. It also applies to directors, managers, employees, collaborators and suppliers of the other companies within the Group.

The Code of Ethics shall also apply to Third-Party Recipients, namely individuals or entities external to the Company who operate, directly or indirectly, in pursuit of its objectives (e.g. agents, consultants, suppliers, etc.).

Within the scope of their respective duties and responsibilities, such parties are required to comply with the provisions of this Code of Ethics.

In the absence of an express commitment to comply with the provisions of the Code of Ethics, TRASPORTI INTERNAZIONALI TRANSMEC S.p.A. reserves the right not to enter into and/or continue any relationship with the non-compliant parties concerned. To this end, specific clauses shall be included in engagement letters and/or contractual agreements requiring third parties to fully comply with the Code of Ethics and providing, in the event of a breach, for formal notices requiring compliance, the application of penalties and/or termination of the contractual relationship.

Article 3 – Dissemination, Accessibility, Training and Acceptance

The Transmec Group Code of Ethics shall be given the widest possible publicity.

The Company shall ensure its broad dissemination through its corporate website and internal communication channels.

Copies of the Code shall be made available at all Company sites and in the relevant languages of the countries in which the Group operates.

The Code shall also be accessible in inclusive formats (for example, for persons with visual impairments).

Adherence to the Code constitutes an essential condition for establishing and maintaining relationships with Third-Party Recipients.

All Recipients shall participate in initial and periodic training programmes covering ethics, the 231 Model, anti-corruption policies, privacy and information security, sustainability, and occupational health and safety.

Article 4 – Whistleblowing and Protection of Whistleblowers

Transmec Group adopts internal reporting channels to enable the reporting, including anonymously, of breaches of the Code, the 231 Model under adoption, laws, regulations, or corporate procedures.

Reports shall be handled impartially and confidentially by authorised personnel, with the involvement of the Supervisory Body in matters falling within its remit.

Any form of retaliation or discrimination against whistleblowers acting in good faith, and against persons connected with them, is strictly prohibited.

Feedback shall be provided to whistleblowers within the statutory time limits, and corrective measures shall be implemented following the completion of investigations.

The Group shall provide all employees with specific training on whistleblowing matters.

CHAPTER II – GENERAL PRINCIPLES

Article 5 – Human Rights, Inclusion, Equal Opportunities, Social Dignity and Honesty

Transmec Group recognises and safeguards human rights in accordance with United Nations and International Labour Organization (ILO) Conventions and ensures respect for personal dignity and equal opportunities. To this end, personnel management is based on the principles of impartiality, equal opportunities, merit-based recognition and progressive professional development.

The Group promotes an inclusive and respectful working environment, free from any form of discrimination based on sexual orientation, gender identity or expression, sex characteristics, ethnicity, religion, disability, or any other personal or social condition.

All corporate processes, including recruitment, promotion, remuneration and performance evaluation, shall be conducted in accordance with principles of fairness, transparency and inclusion.

Internal communication shall be free from stereotypes and respectful of diverse identities, and all employees are required to respect the gender identity, sexual orientation and other personal characteristics of colleagues and stakeholders, refraining from any explicit or implicit offensive language or behaviour.

Reports of discrimination shall be managed confidentially, promptly and impartially, ensuring respect for all individuals involved.

Welfare programmes and initiatives aimed at promoting physical and psychological well-being, work-life balance and inclusion shall be encouraged. In this regard, the Group is committed to supporting gender transition pathways in all relevant aspects.

As an active and responsible member of the communities in which it operates, Transmec Group undertakes to comply with, and ensure compliance by all employees, both internally and in dealings with external stakeholders, with the laws in force in the countries where it conducts its business, as well as with the ethical principles generally recognised and established by national and international standards governing business conduct.

The Company rejects and condemns the use of unlawful or otherwise dishonest practices as a means of achieving economic objectives.

Article 6 – Prevention of Illegal Labour Brokerage and Labour Exploitation

Transmec Group condemns all forms of illegal labour brokerage, labour exploitation, human trafficking and forced labour.

The Company is actively committed to preventing and combating such practices by promoting dignified, transparent and lawful working conditions throughout the entire supply chain.

To this end, all employment relationships must comply with national and international legislation, and periodic inspections, including unannounced inspections, shall be carried out to ensure that no worker is subjected to treatment detrimental to their dignity, freedom or safety, and that child labour is strictly prohibited.

Transmec Group also carries out thorough due diligence checks on the working conditions offered by suppliers, contractors and subcontractors. In particular, any collaboration with parties suspected of engaging in labour exploitation shall be immediately suspended and reported to the competent authorities.

The use of unauthorised intermediaries for recruitment purposes is strictly prohibited, and the adoption of ethical contractual clauses prohibiting illegal labour brokerage is mandatory.

Any internal breach of labour regulations or of this Code shall be subject to disciplinary measures, without prejudice to any civil or criminal liability.

Article 7 – Fairness, Conflicts of Interest and Confidentiality

Personnel shall avoid engaging in or facilitating any activity giving rise to an actual or potential conflict of interest with the Company, Transmec Group, or any other Group company, as well as

any activity that may interfere with their ability to make impartial decisions in the best interests of the Company and in full compliance with the provisions of this Code.

In particular, personnel shall not hold financial interests in suppliers, competitors or customers, nor undertake any employment or business activities that could give rise to a conflict of interest.

Where personnel find themselves in a situation involving an actual or potential conflict of interest, they must promptly notify their line manager and refrain from undertaking any related activity or transaction.

Personnel shall treat with the utmost confidentiality all data, information and knowledge acquired or obtained in the course of their employment, including after termination of the employment relationship, and shall refrain from disclosing or using such information for personal gain or for the benefit of third parties. Confidential information may only be disclosed within the Company to those who require such information for legitimate business purposes.

The Company recognises confidentiality as a fundamental and indispensable principle governing all conduct and ensures the confidentiality of information in its possession. It shall refrain from using confidential information except where expressly and knowingly authorised and, in any event, always in strict compliance with the applicable data protection legislation.

Article 8 – Enhancement of Human Resources

Transmec Group recognises the central role of human resources as a key factor in the success of any enterprise.

Within this framework, while the Group is committed to enhancing the professional skills and competencies of each employee and collaborator, personnel are likewise expected to continuously expand and update their knowledge within their respective areas of expertise.

Article 9 – Occupational Health and Safety

Transmec Group rigorously applies occupational health and safety legislation, adopting an approach based on prevention, risk assessment and continuous improvement.

To this end, the Group adopts internationally recognised health and safety standards, such as ISO 45001, monitors compliance with the obligation to use personal protective equipment (PPE) and operational procedures, and enforces the prohibition on working under the influence of alcohol or narcotic substances.

Training, information and instruction programmes are implemented, together with near-miss reporting procedures (namely, hazardous events which, due to fortunate circumstances, did not result in injury or damage but had the potential to do so), emergency management

procedures, and specific measures for high-risk activities (e.g. goods handling, professional driving, maintenance activities, etc.).

The Group also promotes safe driving practices and fatigue management measures for travelling personnel.

Article 10 – Environmental Protection and Sustainability

Transmec Group is committed to conducting its investments in an environmentally sustainable manner, seeking to prevent risks to local communities and the environment, while also taking into account scientific research in the relevant fields.

Transmec actively integrates environmental protection into its business strategy by promoting energy efficiency, emissions reduction, the use of renewable energy sources, responsible resource and waste management, sustainable logistics and the circular economy.

More generally, the Group is committed to giving preference to suppliers and partners that adopt environmental policies consistent with those of the Group.

The Group pursues measurable improvement objectives (KPIs) and promotes cooperation throughout the value chain in order to reduce its overall environmental footprint, adopting environmental management systems such as ISO 14001, promoting technological fleet renewal, load and route optimisation, and the use of intermodal transport solutions, as well as lower-impact fuels and technologies where available.

In addition, Transmec monitors and annually reports its greenhouse gas emissions in accordance with recognised methodologies.

To this end, all employees and collaborators are required to minimise waste, report non-compliant behaviour and favour environmentally sustainable means of transport wherever possible.

Breaches of environmental protection provisions may result in corrective actions and disciplinary measures consistent with this Code of Ethics and the Company's internal regulations.

Article 11 – Quality, Security, Business Continuity and Value Creation

Transmec conducts its business with a view to achieving full customer satisfaction, continuous improvement and the prevention of service disruptions, adopting quality standards and control measures accordingly.

The security of goods and infrastructure is ensured through physical, organisational and technological measures, in accordance with industry standards such as TAPA, which have been fully adopted by the Group.

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To this end, the Group implements quality management systems such as ISO 9001, security measures for cargo protection, business continuity plans and disaster recovery procedures.

Furthermore, Transmec manages its activities on the basis of supplier qualification and monitoring criteria for critical suppliers, as well as performance indicators and customer satisfaction metrics.

Transmec actively seeks to ensure that its economic and financial performance safeguards and enhances the Company's value, thereby providing an adequate return on the risks assumed by shareholders.

Article 12 – Business Integrity and Anti-Corruption

Transmec adopts a zero-tolerance policy towards all forms of corruption, whether public or private, direct or indirect.

Facilitation payments, improper benefits, and the offering or promising of money or other advantages to public officials or private individuals for the purpose of influencing decisions or obtaining undue benefits are expressly prohibited.

Gifts, hospitality expenses, sponsorships and donations are permitted solely where they are of modest value, occasional, consistent with lawful business practices, properly documented and authorised in advance in accordance with Company procedures.

Recipients of this Code of Ethics are also required to promptly disclose any actual or potential conflict of interest in order to prevent situations that may compromise the impartiality of corporate decision-making.

Moreover, all transactions must ensure the highest levels of traceability and transparency, supported by an appropriate segregation of duties in order to minimise the risk of unlawful conduct.

Any form of unlawful intermediation or the use of third parties to engage in non-compliant practices is strictly prohibited.

Agents and consultants shall be selected exclusively on the basis of transparency and integrity criteria, and contracts shall include specific ethical clauses designed to prevent corrupt practices.

Article 13 – Fair Competition and Antitrust

Transmec strictly complies with market regulations designed to safeguard competition and refrains from any conduct that may restrict free competition.

Anti-competitive agreements, the exchange of commercially sensitive information with competitors, boycott practices and abuse of a dominant market position are strictly prohibited.

The Group's participation in trade associations and technical working groups shall always take place in full compliance with antitrust regulations, adopting appropriate safeguards when sharing data and information in order to avoid potential breaches of applicable legislation.

Article 14 – Anti-Money Laundering/Handling of Stolen Goods, Sanctions and Export Controls

Transmec is committed to preventing and combating all forms of money laundering and handling of stolen goods through appropriate due diligence procedures on counterparties, checks on the lawful origin of funds and assets, monitoring of suspicious transactions, and careful retention of documentary evidence.

In particular, it is mandatory that:

- a) appointments granted to service providers and/or individuals responsible for managing the Company's economic and financial interests are made in writing, specifying the scope of services and the agreed financial terms;
- b) the competent functions ensure that payments made to all counterparties are properly verified and that the party receiving payment always corresponds to the party to whom the order has been issued;
- c) the minimum requirements established for the selection of suppliers of goods and/or services are strictly observed;
- d) clear criteria for the evaluation of bids and offers are established;
- e) all necessary information concerning the commercial and professional reliability of suppliers and business partners is requested and obtained;
- f) in the event of agreements relating to investments, maximum transparency is ensured.

The Group strictly complies with international sanctions and export control regulations, refusing to engage in transactions involving sanctioned counterparties or high-risk countries, and obtaining all necessary authorisations where required by law.

Article 15 – Data Protection, Privacy and Cybersecurity

15.a – Processing of Personal Data

Transmec processes personal data in full compliance with applicable legislation – including the General Data Protection Regulation (GDPR) – and with its internal policies, ensuring the principles of lawfulness, fairness, transparency, integrity, confidentiality, data minimisation, storage limitation and information security.

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Each employee is required to process personal data relating to customers, employees and suppliers exclusively for purposes connected with their duties and in accordance with the instructions received.

The Company undertakes to guarantee the exercise of data subjects' rights as provided for by applicable legislation.

The Company also provides specific training programmes for its employees on GDPR compliance, confidentiality and the processing of personal data.

15.b – Information Security and Use of IT Tools

Technical and organisational measures are adopted to ensure information security, including access controls, encryption systems, backup procedures, continuous monitoring, and periodic vulnerability assessments and management activities.

These measures are complemented by ongoing training and awareness programmes for all employees.

The proper use of corporate IT systems and authentication credentials (usernames and passwords/PINs) is mandatory. Such credentials must remain strictly confidential and must not be shared with third parties.

The installation of unauthorised software or any attempt to manipulate IT systems is strictly prohibited.

Employees are required to protect Company devices (including laptops, smartphones and tablets) and physical assets (such as paper documents) from unauthorised access and theft.

15.c – Incident Management (Data Breaches)

In the event of a suspected or confirmed personal data breach or cybersecurity incident (such as malware infections, phishing attacks, etc.), every employee is required to report the matter immediately to the Data Protection Officer (DPO), IT Department or designated internal contact person, in order to enable the Company to promptly activate the appropriate management, containment and notification procedures.

Social Media and Corporate Confidentiality

Guidelines are established to ensure the responsible use of social media and the Company's digital channels.

The disclosure of confidential, proprietary or sensitive information, or of the Group's trade secrets, through social media, blogs or any unauthorised digital channel is strictly prohibited, in order to protect both the Group's reputation and its information assets.

Article 16 – Digital Ethics and the Use of Artificial Intelligence

16.a – Governance and Ethical Principles

Transmec Group establishes an Ethics and Technology Committee responsible for assessing the introduction of new digital technologies and Artificial Intelligence (AI) systems, ensuring that their use complies with the fundamental ethical principles of transparency, fairness, non-discrimination, and applicable legislation.

The Committee is responsible for assessing the potential risks associated with AI systems, particularly those that may significantly affect the fundamental rights and freedoms of individuals.

16.b – Guidelines and Responsibilities

The Committee shall develop and regularly update guidelines and policies concerning digitalisation and Artificial Intelligence, promoting continuous employee training on the risks and opportunities associated with such technologies.

These guidelines shall clearly define the permitted scope of use, decision-making responsibilities, and the need for meaningful human oversight over the outputs and recommendations generated by AI systems.

16.c – Responsible Use of AI Tools

All employees shall receive training on the principles of digital ethics, the responsible use of AI-based tools, the protection of personal data, and digital rights and obligations.

In particular:

- It is strictly prohibited to input confidential, proprietary or personal data into public generative AI systems that have not been approved by the Company (for example, third-party chatbots), in order to prevent the potential disclosure of, or model training using, sensitive Group information.
- Any output generated by an AI system must always be reviewed and validated by the employee before being used for operational or business decisions.

Audits and Accountability

Periodic audits shall be carried out to verify compliance with Company policies and the proper documentation of algorithmic decision-making processes, assess the impact of digital systems on the rights of employees and users, and ensure accountability for any decision taken or influenced by AI systems. Prompt action shall be taken in the event of breaches or ethical risks.

CHAPTER III – RULES OF CONDUCT AND EXTERNAL RELATIONS

Article 17 – Rules of Conduct in Relation to Corporate Governance

Appointments to corporate bodies shall be made through transparent procedures.

Corporate bodies shall act and deliberate independently, in compliance with the principles of legality and fairness, pursuing exclusively the interests of the Company.

Independence of judgement is an essential requirement for members of corporate bodies. Accordingly, members shall ensure the utmost transparency in the management of transactions in which they may have a particular interest.

The Company promotes transparency and periodic disclosure to shareholders in accordance with applicable laws and regulations.

Any particular or sectional interest is rejected: the interests of all shareholders shall be promoted and protected equally.

Transmec encourages the proper functioning of shareholders' meetings by ensuring that each participant has the right to take an active part in discussions.

The Company undertakes to disclose information relating to corporate accounting with the utmost transparency. Personnel shall pay particular attention to the preparation of financial statements and other corporate documents.

In this respect, it shall be necessary to ensure: appropriate cooperation with the corporate functions responsible for preparing corporate documents; the completeness, clarity and accuracy of the data and information provided; compliance with the principles governing the preparation of accounting records and corporate documentation.

The Group promotes and disseminates, at every corporate level, a culture of control, raising employees' awareness of the importance of the internal control system and of compliance with applicable laws and Company procedures in the performance of their duties.

Every action, transaction or operation must be properly recorded in the Company's accounting system in accordance with legal requirements and applicable accounting principles and must also be duly authorised, verifiable, legitimate, consistent and appropriate.

Article 18 – Rules of Conduct in Relation to Employees

Personnel shall be selected through transparent and documented procedures, in compliance with the principles of equality and equal opportunities, thereby avoiding any form of favouritism.

Employment relationships shall be formalised through lawful employment contracts, and any form of undeclared or irregular work is strictly prohibited.

Transmec Group rejects all forms of discrimination against its employees and promotes the professional development of all staff members through appropriate training programmes.

Transmec authorises the use of the Company's IT systems; however, in carrying out their professional activities, employees shall use IT and telecommunication tools and services in full compliance with applicable legislation (particularly with regard to cybercrime, information security, privacy and copyright) and internal procedures.

Employees may not upload borrowed or unauthorised software onto Company systems, nor may they make unauthorised copies of licensed software for personal, corporate or third-party use.

Employees shall use computers and all IT equipment provided by the Company exclusively for business purposes. Accordingly, the Company reserves the right to verify the contents of computers and to monitor the proper use of IT resources.

Employees are also required not to send threatening or offensive emails, nor to use language that is inconsistent with the Company's standards or otherwise inappropriate.

Article 19 – Rules of Conduct in Relation to Customers and Suppliers

Transmec Group builds relationships with customers and suppliers based on mutual trust, quality and safety, ensuring that information provided is clear, accurate and complete. Suppliers are selected according to transparent and objective criteria, taking into account not only cost but also reliability, service quality, ethical standards, and environmental and social sustainability (ESG) requirements.

Suppliers are required to accept and comply with contractual ethical clauses.

Prior to establishing a business relationship, due diligence proportionate to the level of risk shall be carried out in order to identify risks and opportunities before entering into an agreement. The Company continuously monitors suppliers' performance and compliance with Health, Safety and Environment (HSE) standards. Contractual clauses shall provide for audit rights, as well as contract termination and the application of sanctions in the event of serious breaches.

Article 20 – Rules of Conduct in Relations with the Public Administration

All dealings with persons qualifying as Public Officials or Persons in Charge of a Public Service shall be conducted in full compliance with applicable laws and regulations, as well as with this Code of Ethics, in order to ensure the lawfulness, transparency and integrity of the Company's conduct.

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In particular, employees of Transmec Group are strictly prohibited from accepting, offering or promising, whether directly or indirectly, money, gifts, goods, services, benefits or favours (including employment opportunities or activities – including commercial activities – directly or indirectly attributable to the employee) in connection with relationships with Public Officials or Persons in Charge of a Public Service, with the aim of influencing their decisions, obtaining preferential treatment or undue advantages, or for any other purpose, including inducing them to perform acts within their official duties.

Gifts and acts of courtesy towards Public Officials, Persons in Charge of a Public Service or, more generally, public employees are permitted only where they are of modest value, do not in any way compromise the integrity and independence of the parties involved, and cannot be interpreted as a means of improperly obtaining advantages.

No conduct of a corrupt nature may be justified or tolerated on the grounds that it is "customary" within a particular business sector or activity.

No service or performance may be requested, imposed or accepted where it can only be carried out by compromising the values and principles set out in this Code of Ethics or by violating applicable laws and procedures.

In the event of investigations, inspections or requests by public authorities, employees shall provide full cooperation in strict compliance with applicable legislation.

Article 21 – Accounting Transparency and Internal Controls

Every accounting transaction shall be accurately recorded, authorised, verifiable, lawful, consistent and appropriate. False, incomplete or misleading entries are strictly prohibited.

Transmec shall ensure the implementation of internal control and audit systems, as well as an appropriate segregation of duties, guaranteeing the traceability of all financial and documentary flows.

Article 22 – External Communications

Relations with the press and the media shall be managed exclusively by individuals expressly authorised to do so, in accordance with the procedures and policies adopted by the Company.

It is prohibited to make statements or disseminate information that may be misleading, detrimental or damaging to the Group's reputation.

Any marketing activity shall comply with the principles of truthfulness, fairness and the protection of consumers' rights, avoiding any aggressive or misleading practices.

Article 23 – Occupational Health and Safety

Employees shall take care of their own health and safety and shall act in a manner that safeguards the health and safety of all persons present in the workplace, in accordance with the training received, the instructions provided and the resources made available by the employer.

In particular, employees shall:

- a) cooperate with the employer, managers and supervisors in fulfilling obligations relating to occupational health and safety;
- b) comply with the instructions and directions issued by the employer, managers and supervisors for the purposes of collective and individual protection;
- c) correctly use equipment, hazardous substances and preparations, means of transport and safety devices;
- d) make appropriate use of the personal protective equipment provided;
- e) immediately report to the employer, manager or supervisor any failure to provide or malfunction of the equipment referred to under points (c) and (d), as well as any hazardous condition of which they become aware, taking personal action, in cases of urgency and within the limits of their competence and capabilities, to eliminate or reduce situations of serious and imminent danger, without prejudice to the obligation referred to under point (f), and informing the workers' safety representative accordingly;
- f) not remove or modify safety, signalling or control devices without authorisation;
- g) take proper care of the personal protective equipment provided, refrain from making any unauthorised modifications thereto, and report any defects to the employer, manager or supervisor;
- h) not undertake, on their own initiative, operations or actions that may jeopardise their own safety or that of other workers;
- i) participate in training and instruction programmes organised by the employer;
- j) undergo the health surveillance checks required by applicable legislation or otherwise arranged by the competent occupational physician.

Article 24 – Compliance with Industry Regulations (Logistics and Transport)

The Group strictly complies with all regulations applicable to logistics and transport services, including provisions concerning driving and rest periods, the use of tachographs, road safety, cabotage, the transport of dangerous goods (ADR), cargo security and customs regulations.

In particular, the Group complies with the provisions of Regulation (EC) No. 561/2006 governing drivers' driving and rest periods, the use of digital tachographs and ADR regulations concerning the transport of dangerous goods.

Specific operating procedures and training programmes are implemented to ensure cargo integrity, compliance with temperature requirements (where applicable), proper management of documentation and adherence to cross-border regulations.

Article 25 – UN Sustainable Development Goals (SDGs) and Certifications

Transmec Group integrates the United Nations Sustainable Development Goals (SDGs) into its strategies, operational decisions and innovation processes, promoting a sustainable and inclusive business model.

The Company translates this commitment into concrete actions, including support for diversity and inclusion (SDG 5), the promotion of employee well-being and employment growth (SDG 8), investment in innovative technologies and infrastructure (SDG 9), responsible resource management and circular consumption (SDG 12), and targeted initiatives aimed at reducing environmental impact (SDG 13).

In order to ensure transparency and accountability, the organisation measures and communicates its performance against SDG-related criteria, valuing the achievement of international certifications as a tool for continuous improvement.

More generally, partners and suppliers are selected according to environmental, social and ethical responsibility criteria (see Article 10), and periodic checks are carried out to verify compliance with the required standards.

Article 26 – Sponsorships, Donations and Political Activities

Sponsorships and donations are permitted only where they are consistent with the Company's values, authorised in advance, transparent, adequately documented and free from any corrupt purpose.

Transmec Group maintains a position of political neutrality and does not provide contributions to political parties or candidates.

Any civic initiatives shall be undertaken in compliance with applicable laws and internal policies.

Article 27 – Management of Conflicts of Interest

Recipients of this Code shall avoid any situation, including potential situations, involving a conflict between personal interests (or those of family members or relatives) and the interests of the Company.

Any conflict of interest shall be immediately disclosed and managed in accordance with internal procedures, ensuring transparency and fairness.

Participation in decisions that may result in personal advantages to the detriment of the Company's interests is strictly prohibited.

CHAPTER V - FINAL PROVISIONS

Art. 28 - Global Implementation and Conflict of Laws

This Code applies in all countries in which the Group operates. In the event of a conflict between local legislation and the principles contained in the Code, Addressees are required to contact the Compliance function to identify the solution that best complies with the law and corporate values. Group companies may adopt stricter local procedures, provided that they are consistent with the principles expressed in this document.

Art. 29 - Entry into Force, Update and Adoption

The Code of Ethics is approved by the Board of Directors and is subject to periodic review to take into account legislative developments, organisational changes, and ethical-compliance risks. Management is responsible for the dissemination, application, and monitoring of the Code, while the Supervisory Body (*Organismo di Vigilanza*) monitors its compliance within the limits of its duties.

Art. 30 – Violations

The provisions of the Code of Ethics constitute an essential part, pursuant to Article 2104 of the Italian Civil Code, of all contractual obligations of personnel. In particular, employees are obliged to:

a) diligently observe the provisions of the Code of Ethics, refraining from any conduct contrary to them;

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- b) report to their direct superiors or, alternatively, to the Supervisory Body any information regarding alleged violations of this Code of Ethics occurring within the company;
- c) offer the utmost cooperation in investigating potential and/or alleged violations of this Code of Ethics;
- d) inform third parties who enter into relations with the Company about the requirements of the Code of Ethics and request compliance therewith.

Consultants, agents, representatives, intermediaries, and any other collaborators of the Transmec Group, as well as anyone who maintains business relations with the Group (excluding Public Administrations, consumers, and entities operating under a monopoly regime), are also required to abide by the principles contained in the Code of Ethics.

The Company is required to take disciplinary action in the event of a violation of the provisions of this Code of Ethics, adopting any necessary measure also for the purpose of correcting and remedying the aforementioned violations.