

Code of Conduct for Uniservice Unisafe S.r.l.

Document Revisions

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Table of Contents

Compliance with Regulations	3
Ethical Conduct	3
Safety First	3
Environmental Stewardship	4
Quality Assurance	4
Employee Welfare and Labor Practices	4
Customer Satisfaction	5
Risk Management	5
Continuous Improvement	5
Community Engagement	6
Compliance Reporting	6
Corporate Governance	6
Supplier Relations	7
Zero Tolerance for Corruption	7
Communication and Training	8
Data Protection	8

Compliance with Regulations

Uniservice Unisafe conducts business globally, operating within legal boundaries at all times. We recognize that our operations and partnerships worldwide are subject to various national and international trade laws, including trade control regulations such as embargoes and anti-terrorism laws. Our primary objective is to prevent our products from being misused or falling into the wrong hands. Trade control laws govern our activities, restricting or prohibiting the import and export of our products and services. These restrictions may be based on factors such as the nature of the product, the countries involved, or the identity of the customer. Export controls extend beyond physical goods to include services and technology transfer. Uniservice Unisafe has established rules and procedures that are designed to prevent such offenses, ensuring all our business practices conform to legal standards and reduce any risk of liability.

Employees are encouraged to seek assistance from our compliance resources if they have any questions or concerns regarding trade control regulations or compliance with D.lgs. 231/2001. We remain committed to conducting our global business operations in full compliance with applicable laws and regulations.

Ethical Conduct

Uniservice Unisafe is deeply committed to conducting business with integrity, fairness, and respect for all individuals involved. We prioritize human rights, labor standards, and social responsibility in every aspect of our operations. Aligned with globally recognized standards such as the United Nations' Universal Declaration on Human Rights and the OECD Guidelines for Multinational Enterprises, we actively promote sustainable value creation and strive to avoid any adverse impacts on human rights. Respect in the workplace is foundational to our company culture. We cultivate an inclusive environment that embraces diversity and values the unique contributions of each team member. Discrimination or harassment based on any characteristic is strictly prohibited, and we ensure that all employment decisions are made impartially. Our commitment to ethical conduct extends beyond our organization to our partners and suppliers. We expect them to share our values and adhere to similar principles. Together, we work to create a workplace where everyone feels respected, valued, and empowered to succeed.

Safety First

At Uniservice Unisafe, safety is our top priority. We are dedicated to ensuring the well-being of all aspects of our operations at every moment. This commitment to safety permeates every level of our activities, from the strategic planning stages to the execution on the ground. We enforce strict safety protocols and procedures designed to protect our operations and ensure the integrity of our transport and storage processes. Each step, from the meticulous handling of products to their secure transport, is governed by our rigorous safety standards. Our team is consistently involved in evaluating and improving our safety measures to align with both industry best practices and the latest regulatory demands. We also place a strong emphasis on training and education to heighten safety awareness and provide our staff with the tools they need to proactively address and mitigate risks. This culture of safety consciousness and relentless pursuit of improvement helps foster a work environment where safety is deeply ingrained in the daily responsibilities of each team member. Our commitment to safety goes beyond meeting regulatory requirements—it is a core value that influences our decisions and defines our company culture. At Uniservice Unisafe, safety is more than just a protocol; it is a fundamental principle that we live by to ensure the well-being of everyone and everything in our charge.

Environmental Stewardship

Uniservice Unisafe is committed to minimizing our environmental footprint by implementing sustainable practices, reducing emissions, preventing pollution, and conserving resources. We place paramount importance on the health and safety of people, acting responsibly beyond mere compliance with regulations to mitigate risks and lessen our environmental impact. Our dedication extends to energy efficiency and climate protection, and the development of sustainable solutions across our operations. In partnership with our suppliers, we strive for the highest standards of health and safety, maintaining trust among employees, customers, business partners, and stakeholders. Our business operations, from plant management to global transportation of goods, are conducted with utmost responsibility to protect people and the environment. Given the specific needs of our business in chemical development, production, processing, and transportation, we adhere to a disciplined approach, supported by an overarching company code that emphasizes environmental and safety standards. This code ensures that all employees and contractors are aware of and handle the inherent risks of our operations and products with the utmost responsibility, from R&D to their end use. Our commitment to environmental protection, health, and safety is a shared responsibility with our partners and suppliers, with whom we collaborate closely to improve our collective sustainability efforts.

Quality Assurance

We maintain rigorous quality standards in the handling, storage, and transportation of chemical products, as well as in maritime safety services and supplies, ensuring the integrity and safety of the cargo throughout the supply chain. This commitment to quality is not limited to our operations but extends to our partners worldwide. We collaborate closely with our global partners to ensure they adhere to the same high-quality standards that we set for ourselves. This comprehensive approach to quality assurance includes regular audits, shared best practices, and continuous training programs designed to uphold our quality standards at every touchpoint in the supply chain. By fostering a culture of excellence and accountability, we ensure that our partners around the world are equally dedicated to maintaining the highest levels of quality, safety, and integrity in their operations, reflecting our shared commitment to excellence and customer satisfaction.

Employee Welfare and Labor Practices

At Uniservice Unisafe, we place our employees at the forefront, recognizing them as our most valuable asset. Our dedication to fostering a safe, inclusive, and respectful work environment is unwavering, aimed at promoting well-being, professional growth, and work-life balance. Our commitment to employee well-being is reflected in our extensive welfare programs, which focus on both physical and mental health. Employees can easily access these benefits, including fitness facilities and health plans, through our dedicated partner's website.

- **Equal Treatment:** We are staunch advocates for equality, striving to ensure that all staff and job applicants enjoy equal opportunities. Uniservice Unisafe is committed to creating a workplace where everyone can fully utilize their skills and abilities, free from discrimination, harassment, or any form of unequal treatment. Decisions, including promotions, are made purely on merit, without discrimination based on national or ethnic origin, gender, marital status, age, religion, disability, or sexual orientation. We foster a culture of respect and equality, expecting all employees to embody these principles and not tolerate any form of workplace discrimination, harassment, or bullying.
- **Fair Working Conditions:** As a socially responsible employer, Uniservice Unisafe treats all employees with respect and honesty. We adhere to all occupational health and safety standards to ensure a safe

working environment, strictly prohibiting compulsory or child labor. Compliance with laws regarding minimum wage, maximum working hours, and respect for employees' rights to freedom of association and collective bargaining is paramount. We encourage our employees to report any breaches of these standards to their supervisors or the HR Department, emphasizing our commitment to upholding fair working conditions globally.

Through these practices, Uniservice Unisafe not only complies with international labor standards but also goes above and beyond to ensure the welfare and satisfaction of our employees, laying the foundation for a productive, ethical, and harmonious workplace.

Customer Satisfaction

We set ourselves apart in maritime chemical distribution, firefighting, rescue, and safety services through our Customer Consulting assistance. We leverage our industry expertise to provide strategic insights and practical solutions. Our consulting services focus on process optimization, safety enhancements, and environmental compliance, aligning closely with our clients to identify areas for sustainable growth. Furthermore, we actively support the optimal use of chemicals, tailoring our advice and solutions to meet the specific needs of each client precisely. This personalized approach builds trust and fosters long-lasting partnerships based on mutual respect. Our commitment goes beyond merely offering comprehensive support in chemical handling, storage, and transportation; we are dedicated to understanding and addressing the unique challenges and opportunities our customers face. By merging our consulting expertise with a focus on optimal chemical usage, we reinforce our position as a trusted partner in the sector, synonymous with quality, innovation, and customer success.

Risk Management

Our approach to risk management is comprehensive, focusing not only on the operational aspects of maritime chemical distribution but also on ensuring the safety and security of all services on board. We meticulously identify, assess, and manage risks associated with our operations, employing robust risk management practices designed to safeguard our assets, personnel, and reputation. Integral to our risk management framework is a special emphasis on safety services on board our vessels. This includes the implementation of advanced safety protocols, regular safety drills, and the provision of state-of-the-art safety equipment to prevent incidents and respond effectively should they occur. By integrating these safety measures into our risk management strategy, we ensure a proactive approach to minimizing potential hazards, thereby enhancing the overall safety of our maritime operations. Our commitment to risk management extends to continuous monitoring and evaluation of our practices, ensuring they remain effective and aligned with the latest industry standards and regulations. Through this holistic approach, Uniservice Unisafe upholds the highest standards of safety and operational excellence, reinforcing our dedication to protecting our most valuable assets—our people and our environment.

Continuous Improvement

Uniservice Unisafe is dedicated to excellence, leveraging innovation, technology, and best practices to enhance our operations' efficiency, safety, and sustainability. Central to our ethos of continuous improvement is our adherence to the UNI EN ISO 9001 standard, affirming our commitment to a high-quality management system. This quality certification reflects our dedication to superior service standards and operational excellence across maritime chemical distribution and associated safety services. Our approach to continuous improvement involves not only maintaining these quality standards but also embracing technological advancements and innovative methods to exceed our clients' expectations. By integrating state-of-

the-art technologies and ongoing staff development, we ensure that Uniservice Unisafe remains adaptive and forward-looking, setting benchmarks in the maritime services industry for quality, efficiency, and sustainability.

Community Engagement

Our commitment to community engagement is deeply rooted in our proudly Italian heritage, which forms the core of our identity and influences our approach to business. While we are firmly anchored in these Italian roots, our perspective and operations are unmistakably global, allowing us to engage with local communities, stakeholders, and authorities around the world in a meaningful and impactful way. This dual approach enables us to contribute positively to the social and economic development of the regions where we operate, respecting local cultures and needs while bringing international standards and practices to our engagements.

Compliance Reporting

We place paramount importance on integrity, honesty, and the adherence to our Code of Conduct and all applicable laws and regulations. We foster an environment where open and honest communication is not just encouraged but is a fundamental expectation. To this end, we provide designated channels for all employees to report any concerns or potential violations, ensuring confidentiality and offering full protection against any form of retaliation. We understand that sometimes taking the right action requires courage, but we firmly believe that early intervention is key to preventing serious issues or minimizing their impact. We want to assure every member of our team that raising concerns in good faith will never result in retaliation. At Uniservice Unisafe, doing business with integrity means playing by the rules, treating people fairly, and competing based on the quality of our products and services. If there are ever moments when our actions seem to deviate from these standards, we urge you to speak up. Your voice is critical in helping us maintain our commitment to integrity, ensuring our operations remain successful and our reputation as a trustworthy company is upheld in the eyes of all stakeholders. We rely on you to act whenever there's doubt, reminding you that our team is always available to address your concerns. Together, we can maintain a culture of integrity, transparency, and respect, safeguarding the core values that define Uniservice Unisafe.

Corporate Governance

Uniservice Unisafe is committed to the highest standards of corporate governance, underpinning our business operations with transparency, accountability, and fairness. These principles are not just guidelines but the foundation of our decision-making processes and business practices, ensuring we build trust through reliability and transparency. For us to be considered trustworthy by all our stakeholders, it is crucial that the accuracy and integrity of our books, financial, and non-financial records are beyond question. Recognizing the potential consequences of any irregularities in accounting or reporting, we have implemented robust internal control systems designed to ensure compliance with all relevant legal requirements. Accurate books and records are the bedrock of our corporate integrity. We are dedicated to maintaining records that provide a fair, transparent, and complete picture of our business operations. This responsibility is shared across our organization, and we expect the same standards of honesty and integrity to be applied in all business records, from research results to expense claims. Our adherence to statutory requirements for proper accounting, financial reporting, tax laws, and regulations is unwavering. We place paramount importance on creating records that accurately reflect the true nature of our transactions and activities. This commitment to transparency and accuracy in our documentation is a critical aspect of our

corporate governance strategy, reinforcing our dedication to upholding trust and integrity in every aspect of our operations. Through these measures, Uniservice Unisafe strives to maintain a governance framework that not only complies with legal standards but also sets a benchmark for ethical conduct in the maritime chemical distribution industry and in safety services and supplies on vessels.

Supplier Relations

We prioritize ethical standards, integrity, and legal compliance when selecting suppliers and business partners, aiming for sustainable and mutually beneficial relationships. We emphasize the importance of avoiding conflicts of interest, ensuring decisions favor the company's and stakeholders' interests without personal bias. Key guidelines include:

- Contractual decisions with suppliers and third parties must rely on objective criteria like price, quality, and reliability, excluding personal gains or relationships.
- Recruitment should be unbiased, focusing on candidates' qualifications and suitability without influence from personal connections or interests of Uniservice Unisafe employees.
- Employees are restricted from engaging in work or holding significant financial interests in competing or partner companies to prevent conflicts of interest.
- Immediate disclosure of potential conflicts to supervisors or the Regional Compliance Manager is required to maintain transparency and integrity.

By streamlining these principles, Uniservice Unisafe reinforces its commitment to ethical business practices, fostering trust and respect in all professional relationships.

Zero Tolerance for Corruption

Uniservice Unisafe is steadfast in operating with the utmost integrity, categorically rejecting all forms of corruption and bribery. Our commitment extends to ensuring that our partners share and act according to these ethical standards. We unequivocally prohibit engaging in or facilitating corrupt activities, including bribery, to gain business advantage. This principle is integral to our operations, prioritizing ethical conduct and transparency in all business dealings, including political engagement, which is conducted openly and in strict compliance with legal guidelines, without financial contributions to political entities. In line with these values, Uniservice Unisafe mandates all employees to avoid any actions that could be interpreted as improper or illegal. Specifically, employees are forbidden from offering, promising, or providing any undue benefit, whether directly or indirectly, to any public officials or representatives of any entity. This includes actions intended to influence decisions, secure improper advantages, or induce improper performance. Unlawful influence, through inappropriate gifts, favors, or other advantages, is strictly banned.

Furthermore, employees are also instructed not to request or accept any improper benefits from business partners or third parties. In situations where there is uncertainty about the propriety of giving or receiving gifts, favors, or other advantages, employees are encouraged to seek guidance from their supervisors.

Our policies on sponsorships, donations, and charitable contributions are clear—they must be transparent and comply with applicable laws, ensuring no conflicts of interest. Consistent with our stance on integrity, Uniservice Unisafe does not make political contributions of any kind.

Vigilance against potentially fraudulent activities is a responsibility of each Uniservice Unisafe employee, embodying our commitment to integrity and ethical business practices. This culture of ethics and transparency is the foundation upon which we build trust with our partners, stakeholders, and the communities we serve, ensuring that our business not only grows but does so on the principles of fairness and legality.

Communication and Training

Uniservice Unisafe is dedicated to effectively communicating our Code of Conduct across the entire organization, ensuring that all employees and stakeholders are fully aware and equipped with the necessary training and resources. This comprehensive approach ensures understanding, compliance, and a commitment to our core principles.

- Risk Management and Compliance Organization: Our commitment to integrity requires strict adherence to legal standards and our own internal policies. Through advanced internal controls and a structured compliance organization, we emphasize every employee's role in upholding these standards.
- Policies and Procedures: We've established detailed policies and guidelines to help our team navigate compliance requirements, empowering them to perform their duties within the legal framework.
Monitoring: Regular audits and compliance assessments verify the effectiveness of our strategies in managing risks and fostering an ethical workplace.
- Training: Mandatory training sessions, mainly conducted through our e-learning platform, aim to familiarize employees with Uniservice Unisafe's policies, enhancing their ability to comply with our guidelines.

Through these strategic measures, Uniservice Unisafe promotes a culture of compliance and integrity, ensuring that ethical practices are woven into the fabric of our daily operations.

Data Protection

At Uniservice Unisafe, we are fully committed to upholding the highest standards of data protection and cybersecurity. This commitment is in strict compliance with both the General Data Protection Regulation (GDPR) (EU) 2016/679 and the obligations outlined in the NIS2 Directive, officially known as Directive (EU) 2022/2555. Our approach to safeguarding personal data and ensuring robust cybersecurity reflects our dedication to protecting the integrity and privacy of information related to employees, suppliers, customers, and third parties.

- Cybersecurity Risk Management Measures: In line with the NIS2 Directive, Uniservice Unisafe has instituted comprehensive technical and organizational measures designed to manage and mitigate risks to the security of network and information systems integral to our operations. Our proactive measures are aimed at bolstering our digital infrastructure against evolving cyber threats, ensuring resilience and safeguarding our operational continuity.
- Incident Reporting: Consistent with the requirements of Directive (EU) 2022/2555, we have established detailed procedures for the immediate reporting of significant cybersecurity incidents. This ensures timely communication with the relevant national authorities, reinforcing our commitment to transparency and swift action in our cybersecurity efforts.

By integrating the mandates of the GDPR and the NIS2 Directive into our data protection and cybersecurity framework, Uniservice Unisafe reaffirms its unwavering commitment to ethical business practices, trust, and accountability. Our dedication to these principles underscores the importance we place on the privacy, data protection, and cybersecurity of all stakeholders, establishing Uniservice Unisafe as a responsible and trustworthy entity in the digital age.