



CODE OF ETHICS

With the adoption of the Code of Ethics we have identified an essential core of values already rooted in the corporate culture, as a constant reference of our daily action inside and outside the Company. We have defined implementation policies that translate these ethical values into guidelines for the conduct of the main processes and have designed a system of internal management and control for their consistent implementation and widespread dissemination, in the spirit of continuous improvement. It is the responsibility of all Employees, Corporate Bodies, Consultants, Suppliers and Partners to observe the ethical principles and policies of the Code, promote its disclosure and be an example of its concrete application.

We ask everyone to believe in this commitment as an essential element for the transparent realization of the same mission as the Marina dello Stretto S.r.l.

TASKS AND DUTIES OF DIRECTORS AND BUSINESS LEADERS

The Directors, Members of the Control Boards and the Company's top management perform their functions with conscience and a sense of responsibility, combining the pursuit of the Company Objectives with the protection of the interests of Shareholders, Customers, Employees and all members of the community. They make the indications of this Code their own as far as they can do their functions and avoid taking advantage of business opportunities that they have become aware of to take advantage of personally. Or in the interests of third parties.

TASKS AND DUTIES OF EMPLOYEES AND EMPLOYEES

Employees, of the Marina dello Stretto S.r.L. they are required to carry out their work with loyalty, diligence and competence, investing adequate time and resources and avoiding participating in initiatives that place them in situations of conflict of interest, on their own or on their own.

Each employee must avoid taking advantage of business opportunities that he has become aware of while performing his duties, in order to take advantage personally or in the interests of third parties.

More generally, all employees and employees of the Straits Straits Are required to be confidential about the information they are aware of during the performance of their duties.

EQUAL OPPORTUNITY AND INTERPERSONAL RELATIONSHIPS

Marina dello Stretto S.r.L. guarantees equal opportunities for all employees and is committed to avoiding all forms of discrimination Interpersonal relationships within the Company must be based on mutual respect, collaboration and professionalism.

RESPECT OF LEGALITY

Marina dello Stretto S.r.L. - and every Subject who operates on his behalf - is committed to acting in accordance with national and community legislation with reference to the activity carried out by the Company.

COMPLIANCE WITH INTERNAL REGULATIONS

The work of the Persons acting on behalf of the Navy of the StraitS S.r.L. must be respectful of internal legislation and company procedures, also in order to comply with the order of D. Lgs 231/01.

Each operation must be documented in all its phases, so as to allow the verification of the legitimacy of the individual acts carried out and the identification of the material executors intervened. In accordance with the current regulations, the principle of separation of duties must be guaranteed (usually the execution of a given operation cannot be carried out by the same function that has previously authorized it or which must carry out the subsequent control). Each, therefore, must operate in accordance with the powers and responsibilities assigned to them within the framework of the company's organisational structure, complying with the scrupulous compliance with the procedures and promptly reporting to the higher function the onset of any critical issues.

USE OF ASSETS AND THE CORPORATE NETWORK

The use of company assets, including personal computers and telephone equipment, material intended for port management, should be limited to professional needs. Their use for personal purposes is only allowed in situations of real need and in any case so as not to be in the way of normal work.

DOCUMENT RETENTION

Each employee is required to file, confidentially and according to criteria of simple availability, documentation related to the activity carried out, in order to ensure a correct and truthful representation of the management. Special attention should be given, in accordance with the provision of D. Lgs231/01, to the operations carried out by means of electronic and/or computer systems, recommending the correct use of the company's access enablings (user-id and personal password), the use of which must remain entirely reserved for the persons who have been assigned to it.

WRITING UP ACCOUNTING DOCUMENTS

Each entity which, within the scope of its own allocations and competences, contributes to the drafting of the Budget or any other document that represents, or contributes to represent, the economic, wealth and financial situation of the Marina dello Stretto S.r.l. must respect the principles of clarity in the drafting and fairness in the representation of the Company's asset position and the financial result of the financial year; reasonableness in the estimation of the accounting post office; completeness of corporate information. These behaviours also respond to what D. Lgs 231/01 indicated.

WRITING SOCIAL COMMUNICATIONS

Any other social communication provided by law must contain clear, accurate and complete information under D. Lgs. 231/01.

TRAINING AND UPDATE

Marina dello Stretto S.r.L. cares that its employees are suitable for the functions to be performed and professionally qualified and constantly provide for their professional update.

GIFTS AND FREEBIES

Employees should avoid any situation that may interfere with the ability to make decisions impartially and in the best interest of the Marina dello Stretto S.r.l.. Even under the D. Lgs. 231/01, it is forbidden to all Persons operating on behalf of the Company, in the context of relations with third parties and in particular with the Public Administration, to receive any form of consideration or benefit from anyone, outside the Company, for the execution of an act of their office or contrary to the duties of office. It is also forbidden for the same Subjects to offer or promise to third parties, and in particular to Customers, Suppliers, Control Authority and Public Administration, money, gifts, job opportunities, benefits of any kind. The exceptions are small gifts which do not generate bias in the bargaining process. If the gift cannot be refused without causing any consequences for the relationship, the employee must inform the company management that they will evaluate any actions to be taken.

REPORTS WITH THIRD PARTIES

The relations of the Marina dello Stretto S.r.L. with the Public Administrations, the Trade Union Political Organizations and with the other external subjects must take place with the utmost fairness, integrity, impartiality, transparency and independence, avoiding also giving the impression of wanting to improperly influence the decisions of the other party or to request preferential treatment. As part of the relationship with Marina dello Stretto S.r.L., third parties are also required to comply with the provisions contained in the laws and regulations at the penalty of termination of the contract (formerly D. Lgs. 231/01).

CUSTOMER AND MEMBERS

In customer relations, each Employee is required to adapt his behaviour to criteria of courtesy, collaboration and transparency, providing complete and comprehensive information, and avoiding, in all circumstances, the use of elusive, incorrect or aimed at undermining the independence of the interlocutor's judgment.

CHOOSE FORNITORS

The purchase of goods or services must take place according to an objective assessment of the characteristics of the supplies in terms of quality, price, service and reliability of the supplier.

COMPLIANCE WITH OCCUPATIONAL SAFETY AND ENVIRONMENTAL HYGIENE STANDARDS

The Company's top management, Employees and Employees are strongly determined to comply with occupational safety and environmental hygiene standards during the completion of their work. At Tand for the purpose, the rules governing the matter are due to be disclosed at all levels and periodically updated also through internal training and communications.

RELATIONSHIPS WITH AUDITORS

Relations with the Auditors, in accordance with D. Lgs. 231/01, must be based on full cooperation and based on criteria of utmost transparency and fairness; they must be treated in accordance with mutual operational independence, avoiding attitudes that can have negative effects on the serenity of judgment of the interlocutors.

RELATIONS WITH THE PUBLIC ADMINISTRATION AND THE JUDICIAL AUTHORITY

Institutional relations with authorities and public bodies are reserved exclusively for the competent functions and must be carried out with the utmost fairness, probity and impartiality, in the most complete transparency, again, avoiding attitudes that can have negative effects on the serenity of judgment of the same Authorities.

PRESS REPORTS

Communications with the media, under D. Lgs. 231/01, are kept and excluded from the top management. In any case, information and communications relating to the S.R.L. Straits Marina must be truthful, complete and transparent.

Marina dello Stretto S.r.L. is committed to making known this Code of Conduct, also under D. Lgs. 231/01, to all recipients.

SPREADING OF THE CODE OF ETHICS

Non-compliance with these provisions undermines the relationship of trust established with the Company and may lead to disciplinary, legal or criminal action. Non-compliance may result in the application of disciplinary sanctions under the current contractual rules, subject to any other liability if put in place by an Employee, i.e. the termination of the relationship, if put in place by a third party.