

Anti-Corruption and Anti-Bribery Policy Code of Conduct and Ethics

Introduction

Custom is committed to conducting its business responsibly and in accordance with the highest legal and ethical standards. Operating transparently and ethically is not only the right thing to do, it is ultimately good for business. Enforcing anti-bribery laws and following the principles in the Code of Business Conduct and Ethics and in the Anti-Bribery Policy is essential for Custom to safeguard its reputation for honesty and integrity and long term financial wellbeing. Following policies and procedures in the Code of Business Conduct and Ethics and in the Anti-Bribery Policy is not optional for Custom and failure to do so can lead to serious consequences for the individuals concerned.

Nature

This is a public statement that identifies the general principles and rules of conduct, the behavior in relation to health and safety at work and aims to address the ethical act of Custom, therefore the provisions contained therein are binding for the behavior of all directors, managers, supervisors and employees, for the consultants and for anyone who establishes, for any reason, a business or collaborative relationship with Custom.

Custom agrees to recall the provisions in all business relationships and the observance is an essential part of the contractual obligations of suppliers, customers and employees.

Human rights as the baseline

Custom supports and respects the protection of human rights as defined in the UN declaration of human rights signed at Paris on December 1948 the 10.

Repudiation of all forms of terrorism

Custom repudiates all forms of terrorism and intends to adopt, as part of its activities, the appropriate measures to prevent the risk of involvement in acts of terrorism.

Custom would neither create any relationship of employment or business relationship with subjects, whether natural or legal persons, involved in acts of terrorism, and shall not finance or otherwise facilitate any of their activities.

Freedom of opinion, association and collective bargaining

Custom respects the freedom of association and the right to collective bargaining. Custom respects every democratic opinion and not makes financial contributions to political parties or political forces.

No child, forced or hazardous labor

Custom shall not violate the ILO (International Labour Organization) Convention 138 on the minimum age for employment, signed on 1973, and the ILO Convention 182 on the worst forms of Child labor, signed on 199. Regular work age is equal to or higher than 16 year. Custom shall not accept forced or hazardous types of work.

No corporal punishment

Custom shall not accept corporal punishment or other forms other forms of mental and physical coercion. Custom is committed to adapting the work to the individual, including matters relating to design of workstation, choice of equipment, methods of work and production, and to reduce the negative effects of work on health.



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Non-discrimination/equal opportunity

Custom shall not discriminate between gender, race, language, religion, political or other personal or social convictions or economic conditions, including its suppliers, but always employ the people best skilled for a particular job.

Working and remuneration

Employees are recruited only on the basis of regular employment contracts, not tolerated is any form of illegal labor. Custom complies with applicable laws and industry standards on working hours, including overtime, and recognizes the right to a fair remuneration. Custom invests on security and staff training, ensuring moral and physical integrity, as well as a healthy and safe work environment that facilitates the performance of assigned duties.

Compliance with laws

Custom comply with laws and regulations in force in all countries in which operates, as well as the democratic order and therefore will not start or continue any relationship with those who do not intend to comply with this principle.

Integrity of conduct

Custom rejects any unlawful exploitation of industrial property rights of third parties. Custom is based on the principles of social responsibility for the protection of its customers, suppliers, third parties, and ensures the quality of its products and the clarity of its behaviors. The competition, as fair competition consistent with the principles of fairness and transparency, is a positive value; Custom is committed to preserve it not adopting collusive or predators behavior or abuse of position.

Anti-corruption and Anti-bribery

Custom does not demand or offer, promise, give a bribe or other undue advantage to obtain or retain business or any other improper advantage neither as an employee nor as a business. Custom does not only prohibit bribery (or attempts to bribe) within its operations in direct contact with third parties, does not accept bribery carried out through intermediaries either. Custom should avoid facilitation payment to secure or expedite the performance of a routine or necessary action to which has legal or other entitlement. Custom does not pay protection money in any form.

Money laundering

Custom does not involve in financial transactions derived from or to be used for criminal activities. All business relationships involving financial transactions shall be verified, documented and accurately recorded on books. Custom undertakes to take all necessary precautions to verify the reliability of these transactions, as well as the legitimate origin of the funds and the means used.

Dealings with international actors

Custom is committed to ensuring that all its dealings, including those of a commercial nature, intervening with actors at the international level, shall be in full compliance with applicable laws and regulations, in order to avert the commission of transnational crimes.

Custom is committed, within the limits of its ability, to co-working with honesty and transparency with the authorities, including foreign ones, who may request information or conduct investigations into the relationships with international operators.

Gifts

Gifts are acceptable, as a gesture of friendship, only to the extent that they are conform to the uses, of modest value and do not improperly affect a specific business transaction. A gift is given without expectation of consideration or value in return and may express common purpose and the hope of future business success.

Hospitality and expenses always should be reasonable and be done openly and with a specific business purpose.



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Custom shall provide a safe and healthy working environment, prevent accidents and injuries and minimize the causes of hazards.

Custom comply with applicable laws and precautionary rules laid down for each specific matter and is committed to promoting a culture of safety in terms of prevention, developing risk awareness and promoting responsible behavior.

Environmental protection

Custom is committed to safeguarding the environment and contribute to a sustainable development of the territory, including through the careful selection of their investments and available technologies and the constant monitoring of business.

Protection of privacy and confidentiality

Custom is committed to protecting the privacy of individuals and legal entities, collecting and processing their personal data in full respect of privacy rules (Italian Privacy Legislative Decree 196/2003) in order to prevent the disclosure or dissemination of personal data in absence, or beyond the limits, of the consent given.

Custom respects ethical and legal responsibilities to protect confidential and proprietary non-public information and is committed to communicate only as necessary. Custom maintains this confidentiality and does not use confidential and proprietary non-public information for personal advantage or for non-business use.

Relationship with local authorities and public institutions

Custom pursues the highest levels of integrity and honesty in relationships, contractual and otherwise - not only for what concerns the request, or the management of public funds - with the Public Administration, with the European public institutions, as well as with individuals who pursue public interest goals.

Relations with institutional stakeholders shall be maintained exclusively by the subjects to this delegated.

Scope

Custom shall favor suppliers who practice the above mentioned principles and shall not deliberately employ or collaborate with suppliers and other stakeholders who violate these principles.



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