

	<b>ELBANA DI NAVIGAZIONE S.P.A.</b>	<b>HSSE Department</b>	Page: <b>1</b> of: <b>1</b>
		<b>COMPANY POLICY</b> <b>CODE of ETHICS and CODE of CONDUCT</b>	Revision: <b>0</b>
<small>Document may not be disclosed to any third party without the prior approval of the management.</small>			

The Code of Ethics and Code of Conduct (referred to hereafter also as the Codes) is based on Company's beliefs and values establishing its commitment to honesty and integrity. The main function of the Codes is to make the fundamental values and principles, which guide the activities of the Company, known within the Organization and its managed vessels and to all agents, contractors, suppliers and other third parties, the Company cooperates with. The Codes apply to the whole Company and managed vessels.

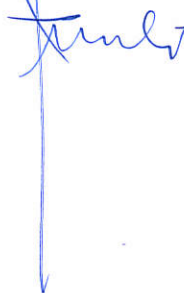
The aim of the Codes is to ensure that the Company is united by strong and clear values and the highest standards of behaviour and to orient individual conduct with the purpose of confirming the image of correctness, prestige and the good reputation which have always been the assets of our Company. The Company expects from all personnel behaviour in line with the established principles, laws, rules and standards in order to protect its image, reputation and the quality of the services provided. All employees are responsible to comply with the Codes and actively support their principles. The Managers are responsible to ensure implementation and management of the Codes in their area of interest.

- The Company's shore staffs and seagoing personnel shall not be involved in any kind of harassment, abuse, discrimination or child pornography.
- The Company's personnel shall not conceal any identified unsafe act or event which affects or could affect human health and safety, the environment and the property.
- The Company's personnel shall carry out their duties in a professional and impartial manner. All Company's employees shall act in honesty and good faith.
- All information regarding **Elbana di Navigazione** operations, projects, reports or any work carried out shall be treated as business confidential to the extent that such information does not conflict with Company's policy for HSSE excellence and is not already disseminated or made generally available to third parties.
- Any kind of offer, gift or bribe in any form direct or indirect, including kickbacks is strongly prohibited in all Company's operations. Furthermore, the Company prohibits the use of other routes or channels for provision of improper benefits to, or receipt of improper benefits from agents, contractors, suppliers or employees of any such party or government officials.
- Procurements are conducted in a fair and transparent manner.

Any employee who fails to comply with the Codes is subject to disciplinary action up to and including dismissal.

Managing Director

Fabrizio Freschi



Created by: HSSE Department Date: 01 December 2018	Checked by: Designated Person Ashore Date: 01 December 2018	Approved by: Managing Director Date: 01 December 2018	Reference: IMO Resolution A. 741 (18), as amended. Cross reference: SMS Manual
--	---	---	--