



The employees' and/or collaborators' involvement is ensured by periodic information moments relating to the achievement of company objectives.

CIN safeguards the value of human resources in its work organisation, foreseeing, where necessary, professional training and/or requalification.

4.5. PROTECTION OF PRIVACY

CIN protects the privacy of all employees and/or non-subordinate collaborators, in full observance of the current legislation in force. For this purpose, CIN has adopted standards that foresee, in particular, a ban on communicating and/or diffusing personal data, except for circumstances foreseen by law, without the prior consent of the party involved and establish rules for controlling privacy protection laws by each employee and/or collaborator.

It is forbidden in all cases to carry out any investigation about the ideas, preferences, personal tastes and private life in general of employees and/or non-subordinate collaborators.

4.6. EMPLOYEES AND COLLABORATORS ' DUTIES

Each employee and/or non-subordinate collaborator undertakes to act loyally while carrying out his work, in observance of the obligations signed in their employment contract with CIN and as set out in the herein Code of Ethics.

Each employee and/or non-subordinate collaborator must know and implement what is foreseen by company policies on information security and must draw up his own documents using a clear, objective and thorough language, allowing any checks to be made by colleagues, managers or authorised external parties who request to do so.

Each CIN employee and/or non-subordinate collaborator must avoid situations in which conflicts of interest may arise and abstain from personally gaining advantage of business opportunities that he has learned of while carrying out his own duties.

Each employee and/or subordinate collaborator must work diligently to protect company assets, through responsible conduct and in line with operational procedures and company directives set out to regulate use thereof.

In reference to computer applications, each employee and/or non-subordinate collaborator must:

- Strictly adopt what is foreseen by corporate security policies, in order to avoid compromising the IT systems' functions and protection;
- Not illegally duplicating the programmes installed on IT systems or data contained in them;
- Not sending email messages that are threatening and offensive, not resorting to low level language, not expressing inappropriate comments that might cause offence to people and/or damage the corporate image;



- Not navigating on websites with offensive or unseemly content. On this matter, CIN adopts measures aimed at preventing the connection of company systems to websites with content of this kind.

4.7. MOLESTATION IN THE WORKPLACE

CIN demands that no molestation takes place in internal and external working relations, intending such as:

- The creation of an intimidating, hostile or isolating working environment for individual or groups of workers;
- Unjustified interference with the carrying out of other people's work;
- Obstructing other people's working prospects for pure reasons of personal competitiveness.

The company prevents, as far as possible, and in all cases pursues mobbing and personal molestation of any type, and therefore also sexual.

4.8. ALCOHOL OR DRUG ABUSE

CIN requires each Recipient to contribute personally to maintaining the working environment respectful of other people's feelings. It will therefore be considered an aware assumption of risk of harming said environmental characteristics, during working activities and in the work place by:

- Working under the effect of alcohol, drugs or substances with a similar effect;
- Consuming the above-stated substances or supplying drugs in any way during work.

The company undertakes to aid social actions foreseen regarding the current legislation in force.



5. HEALTH, SAFETY AND ENVIRONMENT

5.1. HYGIENE AND SAFETY IN THE WORKPLACE AND SAFETY ONBOARD

CIN operates at all levels to guarantee the physical and moral integrity of its own collaborators, working conditions that respect individual dignity and working environments that are safe and health, in full observance of the current laws in force on preventing accidents in the workplace and protecting workers, and safety on board ships.

The company evaluates safety and health risks for workers, also in the choice of equipment and in arranging work places; it carries out its working activities in technical, organisational and economic conditions that will allow adequate accident prevention and a healthy, safe working environment to be guaranteed.

Each company decision, of all types and levels, on health and safety matters in the workplace and on board must take into consideration the following basic principles and criteria:

- Avoiding risks;
- Evaluating risks that cannot be avoided;
- Fighting risks at source;
- Adapting work to the man;
- Taking into account the rate of evolution of the technique;
- Replacing what is dangerous with what is not or is less so;
- Giving priority to collective protection measures compared to individual protection measures.

The company plans prevention, aiming at a consistent set that integrates technique, organisation, working conditions, social relations and influence of work environment factors.

CIN undertakes to diffuse and consolidate a culture of safety among its collaborators, developing awareness of risk and promoting responsible conduct by all collaborators.

The Recipients of this Code and in particular the Employer and his deputies, the executive managers, people in charge, workers, the Prevention and Protection Service Manager, the doctor and the workers safety representative all contribute to the risk prevention and health and safety protection process for themselves, colleagues and third parties, notwithstanding individual responsibility pursuant to the legal dispositions applicable on the matter.

5.2. ENVIRONMENT

Within the realm of its activities, CIN undertakes to contribute to the development and wellbeing of the communities it operates in, pursuing the goal of guaranteeing safety and health for employees, external collaborators, clients and communities interested in activities and of reducing environmental impact.

The environment is a primary asset for the community that CIN wants to contribute towards protecting. For this purpose, it plans its own activities while searching for a balance between economic initiatives and environmental needs, in observance of the legal and regulatory provisions applicable.



Recipients of the herein Code contribute to the process of protecting the environment. In particular, those involved in activities regarding navigation pay the utmost attention to avoiding any illegal downloading and emission of harmful materials and handle waste or process residues considered to be most at risk with specific instructions.

CIN actively contributes to the promotion of scientific and technological development in the appropriate sites, aimed at protecting the environment and safeguarding resources.

Operational management must refer to advanced criteria for environmental protection and energy efficiency, pursuing improvement of health and safety in the workplace conditions.

Technological research and innovation must in particular be dedicated to the promotion of products and processes that are increasingly compatible with the environment, and characterised by increasing attention to the operators' health and safety.

CIN employees take part in the process of risk prevention, environmental protection and health and safety protection for themselves, colleagues and third parties, as part of the own duties.



6. OBLIGATIONS OF CONFIDENTIALITY

CIN's activities constantly require the acquisition, preservation, handling, communication and diffusion of news, documents and other data regarding negotiations, administrative procedures, financial operations, expertise (contracts, deeds, reports, notes, studies, designs, photographs, software etc).

CIN's databanks can also contain personal data that is protection by privacy laws, data that cannot be made known outside the company due to contractual agreements and data which is unsuitable or ill-timed for diffusion and therefore may damage company interests.

CIN undertakes to protect information about its own employees and third parties, which is generated or acquired inside the company and during business relations, and to avoid any improper use of this information.

It is each recipient's obligation to ensure maximum confidentiality as required by the circumstances, for each piece of news learned during their own duties, work, office or profession. This information may regard present and future activities, information and news that has not yet been divulged, even if it is about to be.

The information and/or any other kind of news, documents or data, that are not of public domain and are connected to the acts and operations of each role or responsibility, belong to CIN and cannot be used, communicated or divulged without specific authorisation.

Notwithstanding the ban on divulging news regarding the organisation or using it in such a way as to cause harm to the company, each recipient must:

- acquire and handle only the data that is necessary and suitable for the purposes of his role and in direct connection with his duties.
- Acquire and handle data only inside specific procedures;
- store data so that non-authorized persons cannot access it;
- Communicate data within the realm of pre-set procedures and/or on express authorisation from the competent superiors and in all cases, after making sure that the data can be divulged;
- Make sure that there are no absolute or relative restrictions on divulging information about third parties connected with CIN by any kind of relationship and if necessary, obtain their consent;
- Associate data with modes that any authorized subject to access said data can easily draw the most precise, thorough and truthful picture possible.



7. USE OF IT RESOURCES

IT and computer resources are an essential tool for the correct, competitive functioning of the company, ensuring rapidity, breadth and correctness of information flows required for the efficient management and control of company activities.

All the information that resides on the company's IT and computer systems, email included, is the property of CIN and must only be used to carry out company activities, with the ways and limits indicated by the company.

In order to guarantee observance of individual privacy legislation and the prevention and repression of IT piracy, a correct and limited use of IT and computer tools is pursued, avoiding any use that aims to collect, store and diffuse data and information for purposes other than company activities, and avoiding any access to protected systems without the necessary authorisation; use of IT and computer tools is subject to monitoring and verification by the company in order to prevent any conduct that is contrary to legislation or regulation.



8. IMPLEMENTATION AND CONTROL

In observance of the current laws in force and in view of the planning and management of company activities aimed at efficiency, correctness, transparency and quality, CIN adopts and implements organisation, management and control models that foresee suitable measures for guaranteeing the carrying out of activities in observance of the law and rules contained in this Code and also for discovering and rapidly eliminating risk situations, preventing illegal conduct that is contrary to the rules of this Code by any subject acting for the company.

Due to the varied activities and organisational complexity, the company adopts a system of delegated duties and powers, in explicit, specific terms foreseeing the allocation of roles to people with suitable capacity and skills.

The company adopts and implements organisation and management models for the extension of delegated powers that foresee measures that are suitable for guaranteeing the carrying out of activities in observance of the law and rules of conduct set out in this Code, and for discovering and rapidly eliminating the risk situations.

Application of the Code of Ethics is the responsibility of the administrative body, which uses the Supervisory Body, given the tasks of:

- Supervising observance of the Code and the diffusion of the code to the recipients;
- Checking each report of violation of the code and information the company bodies and departments of the results of said checks, for adoption of any sanctions and provisions;
- Proposing modifications to the contents of the Code, to adapt it to the changing context in which the company finds itself operating and to the needs deriving from the evolution of the company itself.



9. SUPERVISORY BODY

CIN's Supervisory Body, as outlined in the organisation, management and control model, pursuant to Leg. Decree nr. 231 dated 2001, have the following tasks, in addition to the duties listed in the above model:

- Verifying application and observance of the Code of Ethics;
- Promoting the initiatives for diffusion of knowledge and understanding of the Code of Ethics, preparing training and information for this purpose, aimed at an increasing, wider-spread understanding of the Code of Ethics;
- Receiving and analysing the reports on violations of the Code of Ethics;
- Expressing opinions about revision of the operating procedures and company directives, in order to guarantee consistency with the Code of Ethics;
- report the opportunity of proceeding with a revision of the rules contained in the Code of Ethics to the Board of Directors.

In carrying out said activities, the Supervisory Board receives support from all company departments and has free access to all documents that are considered useful. The Human Resources Department prepares and creates an annual training report, based on the Supervisory Board's indications, which is aimed at aiding knowledge of the main contents of the Code of Ethics.

10. SANCTIONS DERIVING FROM VIOLATIONS OF THE CODE OF ETHICS

Observance of the provisions contained in the Code of Ethics is an essential part of the contractual obligations for CIN employees and collaborators, i.e. all subjects who cooperate with pursuing CIN's purpose pursuant to and in accordance with articles 2104 and following and 1453 of the Italian Civil Code. Violation of the provisions contained in the Code of Ethics is therefore a serious breach of obligations deriving from the relations held for any purpose with CIN, and therefore an offence, depending on the gravity, which may involve the cancelling of the current contract, according to article 7 of Law nr 300, 30th May 1970 and later amendments and integrations, as it may also give rise to compensation for damage caused. The necessary provisions are issued with consistency and impartiality and the Supervisory Board is promptly informed of this.