



Social Responsibility Policy
Code of Conduct



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Our company is built on four pillars which embody our values, define who we are and how we want to work:

Proven Excellence

We provide our customers with the best and consolidated solutions, ensured by the expertise of our employees.

Associated values: Quality, Professionalism and Reliability.

Teamwork

We work hand in hand with our customers and encourage teamwork throughout the company. We listen to our customers to understand and meet their needs.

Associated values: Client proximity, Collective performance and Trust.

Responsibility

We respect and trust each other and achieve more by working together across the industry. We care for and protect each other, our business and our environment.

Associated values: Commitment, People development and Personal fulfilment

Visionary

We are always aware of what is happening in the world around us.

We strive to develop new ideas and continuously improve the way we do business.

Associated values: Agility, Openness and Integrity



Purpose of this Code: Governing Rules for All

The purpose of this Social Social Responsibility / Code of Conduct (the “Code”) is to establish a set of governing principles applicable to Giovaruscio Moving Group (managers and employees) and their different stakeholders i.e. customers, suppliers, contractors, business partners and shareholders (the “Business Partners”).

This Code should be referred to as a decision-making tool. It however only provides a framework and is not intended to set a detailed and exhaustive list of all rules that govern the Company’s activities.

It is the responsibility of each Giovaruscio Moving Group employee to comply with the Code and act ethically in their day-to-day activities to sustain the company global reputation.

Business Partners are expected to adhere to the Code and apply standards that are equivalent to Giovaruscio Moving Group principles.

This Code is available on our website, as well as the corresponding policies.

In addition, all applicable codes, policies and procedures are available to Giovaruscio Moving Group employees on internally-shared platforms.

Managers and the Code

Managers are responsible for ensuring that this Code and any applicable supplemental policy or procedure are applied within their own area and thereby demonstrate, in case an incident occurs, their determination to solve any non-compliance issue. Managers however should not take action on their own on sensitive and potentially serious matters; they should advise their own manager of any such non-compliance issue, who will in turn handle the issue, strive to identify the cause and prevent any recurrence.

Giovaruscio Moving Group Compliance Department

The Chief Compliance Officer (CCO) is responsible for overseeing the promotion, roll-out and proper implementation of the rules arising from this Code. The Chief Compliance Officer is appointed by the Giovaruscio Moving Group CEO and reports to the same.

The Chief Executive Officer and the CEO are committed to making this mission successful by providing the Chief Compliance Officer and his team with the necessary means to seek continuous improvement and allowing him to perform this mission independently.



Commitments & Policies

1. Compliance & Ethics

Giovaruscio Moving Group is fully committed to its Social Responsibility Policy towards all of its Business Partners. Therefore, beyond the expected compliance with local legislation and regulations, Giovaruscio Moving Group strongly believes that seeking the highest standards in terms of ethics, business integrity and sustainability is its responsibility.

In this respect, our employees, who in addition may be considered by third parties as representing Giovaruscio Moving Group at any time, even in the private sphere (including their personal social network accounts), are expected to comply with these highest standards at any time.

2. Human Rights

Giovaruscio Moving Group has a duty to respect and promote internationally recognised human rights, both internally and with its Business Partners.

Giovaruscio Moving Group is committed to defending diversity, to prohibiting any kind of discrimination and to promoting health and safety principles. Moreover, Giovaruscio Moving Group favours the selection of its Business Partners on the basis of their ability to comply with the Code and in particular with Giovaruscio Moving Group 's Human Rights commitments set in the paragraph 2 of this Code and to apply them to their own employees as well as to their subcontractors and next-tier suppliers.



2.1 - Human Rights and Workplace

2.1.1 - Prohibition of Child Labour

The use of child labour in the manufacture of products or the provision of services in ways that are illegal, socially unacceptable or lead to a child losing his or her educational opportunities is not tolerated.

Giovaruscio Moving Group works towards the elimination of child labour and believes that societies that permit child labour are jeopardizing their future and that of future generations. In order to contribute to their education, young workers are admitted from the minimum age permitted by law for internship and apprenticeship. Internship and apprenticeship contracts are used only for contributing to the education of young workers which working hours and remuneration comply with local laws.

2.1.2 - Forced and compulsory Labour

Giovaruscio Moving Group does not tolerate the use of convict, indentured, slave, bonded, or other Forced Labour, including human trafficking, either directly or indirectly, by its Business Partners, or by any subcontractors utilised by its Business Partners.

This includes transporting, harbouring, recruiting, transferring, or receiving vulnerable persons by means of threat, force, coercion, abduction, or fraud for the purpose of exploitation.

All employees, both foreign and national, must be treated equally, and will not be required to pay fees to agencies or the Company in exchange for employment.

2.1.3 - Working time

Giovaruscio Moving Group recognises the right to rest and leisure and therefore complies with local laws, regulation and/or local customs with regards to working overtime hours.

2.1.4 - Fair Wages and Benefits

Giovaruscio Moving Group compensates its employees fairly, taking into account the country and industry standards, in compliance with wage and working time applicable laws, in particular, the minimum wage ones.



2.2 - Human Rights and Labour Relations

Giovaruscio Moving Group undertakes to contribute to all statutory social security and welfare funds to which employers and/or employees are required by applicable laws to contribute, including industrial injury insurance, pension and unemployment funds.

2.2.1 - Freedom of opinion and expression

Giovaruscio Moving Group recognises that by virtue of international Human Rights standards, every individual has the right to freedom of opinion and expression. The right to freedom of expression guarantees that no one should be harassed on account of their opinions. Giovaruscio Moving Group recognises the freedom of association for all its employees and does not interfere with employees' rights to form or join any workers' organization to protect their interests in the workplace.

2.2.2 - Promotion of social dialogue

Giovaruscio Moving Group encourages Collective Bargaining and is committed to facilitating and maintaining the Collective Bargaining process in good faith.

2.2.3 - Intolerance of discrimination

Giovaruscio Moving Group strives to create an environment free of any discrimination in the treatment of individuals, based on criteria other than competencies and aptitudes.

2.3 - Human Rights and Political or Religious Activities

Giovaruscio Moving Group recognises the rights individuals have to take part in political or religious activities. Giovaruscio Moving Group expects its employees to clearly indicate that they do not represent Giovaruscio Moving Group and to inform their manager in the event a conflict of interest may arise from these activities. Global Moving Srl maintains a neutral position with respect to politics and religion and any contributions to political or religious activities on behalf of Giovaruscio Moving Group is forbidden. Any Human Rights issue should be disclosed and reported by Giovaruscio Moving Group employees to their managers.



3. Data Protection

Giovaruscio Moving Group complies with all applicable privacy and data protection laws, wherever it does business.

Employees who have access to Personal Data shall be only those whose function and responsibility specifically include the handling of Personal Data; the right of access is restricted according to the nature and scope of the individual function and responsibility.

Giovaruscio Moving Group does not communicate personal information to third parties, except to the extent necessary and permitted by applicable laws or regulations.

Any personal information Giovaruscio Moving Group collects is treated with care, protected and used lawfully and properly.

4. Assets, Intellectual Property and Information Security

Giovaruscio Moving Group is a world-class removal services provider. In this respect, preserving, protecting and responsibly using company's assets, including intellectual property is essential to remain competitive and serve the interests of the company and its shareholders.

Giovaruscio Moving Group expects its employees to strictly comply with the internal policies and take all necessary steps to preserve and protect its intellectual property and more generally any Giovaruscio Moving Group know-how and confidential information.

Confidentiality obligations are further detailed in the employment agreements and/or Giovaruscio Moving Group internal rules. In particular, Giovaruscio Moving Group provides employees with a non-exhaustive list of measures to protect information and resources and steps to take in case of an incident.

5. Financial and Accounting records

Giovaruscio Moving Group Financial and Accounting records serve as a basis for managing its business and are essential in fulfilling its responsibility to our shareholders and other Business Partners.

They also are necessary for preparing the financial statements, accounting and tax filings and financial documents that the company has to make publicly available, when applicable.

Giovaruscio Moving Group is committed to maintaining accurate, timely and complete Financial records.



6. Health, Security and Environment

6.1 - Health and Security

Giovaruscio Moving Group strives to provide a safe and healthy work environment for its employees.

Every effort is made to ensure that risks of accidents, injury and exposure to health risks are minimized. It recognizes that providing a safe and healthy work environment is fundamental to a productive and competitive work environment.

Giovaruscio Moving Group is committed to providing a secure work environment, where employees are not encumbered by concerns for their personal safety or security due to internal or external threats.

6.2 - Environment

Giovaruscio Moving Group is committed to minimising the environmental impact of our day-to-day operations and continually improves its energy efficiencies and waste management. We recognise the need to protect the natural environment and believe that keeping our environment clean and unpolluted is a benefit to all.

We'll always follow best practices when disposing of waste and, apart from our legal obligations, Giovaruscio Moving Group will proactively protect the environment. We encourage all our employees to consider our environment at all times, we actively promote recycling in all communal areas.

Giovaruscio Moving Group is engaged in optimising the use of resources in its products and service processes, reducing the impacts on the environment and reinforcing its environmental management system in order to contribute to a better future for next generations.

Giovaruscio Moving Group has established a policy which aims to control and minimise the environmental impacts of its activities and is committed to a social and environmental responsibility shared approach.

Giovaruscio Moving Group expects its employees to comply with its environmental management principles.



7. Conflicts of Interests

A conflict of interests is a situation where the personal interest of an employee may be or may appear to be, directly or indirectly, in a potential or actual conflict with his or her job's responsibilities and/or the interests of Giovaruscio Moving Group.

Situations where the personal interests of an employee could inappropriately influence or appear to influence their business judgement may hurt the reputation and business of Giovaruscio Moving Group and should be avoided.

Giovaruscio Moving Group employees are expected to make business decisions that are based solely on Giovaruscio Moving Group best interest and prohibited from entering into any conflict of interests.

Conflicts or potential conflicts of interests should be disclosed and reported by employees without delay to their manager.

8. Committing to professionalism and quality

Giovaruscio Moving Group considers both customers and suppliers as valuable partners and Giovaruscio Moving Group decisions aim at enhancing their satisfaction and long-term relationships with Giovaruscio Moving Group

Giovaruscio Moving Group is committed to supplying services to its customers which meet their expectations of quality, integrity and reliability and constantly improving its practices and methods with a high standard of innovation and safety.

The quality of Giovaruscio Moving Group relationships with its customers and suppliers is essential to Giovaruscio Moving Group success.

Giovaruscio Moving Group and all employees must look to work with Business Partners who demonstrate strong business values, ethical principles and support our commitment to quality.

Professionalism ensures the ability of Giovaruscio Moving Group businesses and relationships to grow and thrive.

9. Antitrust and Competition Laws

Competition and Antitrust laws are intended to ensure free and fair competition between companies on the market.

Their violation may result in important fines and damages both for the individuals and the enterprise involved.

Giovaruscio Moving Group is committed to free and fair competition and expects its employees and Business Partners to abide by the same rules.

In particular, Giovaruscio Moving Group undertakes not to participate in cartels fixing prices, agreements on quotas, production or sales, or more generally, any unfair practices which impede free competition, in particular those intending to oust a competitor from the market or restrict access by new competitors to markets by unlawful means.



10. Anti-Bribery Laws and Anti-Money Laundering

10.1 - Anti-Bribery Laws

Bribery is a widespread phenomenon in international business transactions, including trade and investment, which raises serious moral and political concerns, undermines good governance and economic development, and distorts fair competitive conditions.

Giovaruscio Moving Group fights corruption in any form, including influence-peddling, whether it is active or passive, direct or indirect, or private or public and has decided to define a specific policy on this matter.

All Giovaruscio Moving Group employees, as well as any party acting on behalf of Giovaruscio Moving Group, are prohibited from making or accepting, offering to make or accept, or promising to make or accept any bribery whether or not any benefit is actually received.

No bribe may be provided, offered to or accepted from any person in exchange for recommending, purchasing, supplying or administering Giovaruscio Moving Group services or for a commitment to continue to do so. Nothing may be offered, provided or accepted in a manner or on conditions that would have an inappropriate influence on a person's action or conduct, or that would create the appearance of doing so.

Employees and any party acting on behalf of Giovaruscio Moving Group should not appear as unduly influencing suppliers, customers or government officials in any way.

Employees are not permitted to accept any gift or gratuity/invitation from customers or suppliers in any form whatsoever (in particular, amounts of money, merchandise, services, entertainment, or travel) except where the gift or gratuity/invitation is of a token value.

Giovaruscio Moving Group favours the selection of its Business Partners on the basis of their ability and commitments to comply with anti-corruption principles set in this Code and the Giovaruscio Moving Group Anti-Bribery Policy.

Giovaruscio Moving Group Anti-Bribery Policy provides further details to assist employees in identifying potential corruption issues, recommendations and procedures to comply with applicable internal rules and laws and selection processes for Business Partners.

10.2 - Anti-Money Laundering

Money laundering is the processing of criminal proceeds in order to disguise their illegal origin.

Giovaruscio Moving Group is committed to complying with all applicable anti-money laundering laws and to answer to any legitimate request of information on this basis.

In compliance with applicable anti-money laundering laws, Giovaruscio Moving Group conducts business with reputable Business Partners and undertakes to conduct due diligence aiming at verifying the origin of funds.



Glossary

Confidential Information shall mean all information of whatever kind or nature, which belongs to Giovaruscio Moving Group: information not disclosed to public about technology (including Intellectual property or trade secrets, clients, business plans, promotion and marketing, finance and others activities). Confidential Information may include confidential or proprietary information of third parties.

Collective Bargaining process is a voluntary process that determines terms and conditions of work and establishes the effective working relationship between management, employees and unions.

Financial and Accounting records may be the books of account, budget proposals, economic evaluation for projects and the like.

Forced Labour refers to any kind of work or service (forced and compulsory labour, prison labour, slavery...) exacted from an individual under the threat of any penalty, violence (physical or mental) or punishment and for which the individual did not volunteer.

Personal Data refers to any information that can be used to identify an individual, whether directly or indirectly.

For instance, name, date of birth, social security number, photograph, location data, email address, IP address are personal data.