TRASPORTI & LOGISTICA
TRASGO
www.trasgo.com

Code of Ethics

1. PRESENTATION OF THE ORGANIZATION

1.1 Company History

The key milestones in the development of the organization are outlined below:

- **1986:** The company Trasgo Srl is established with the objective of developing road freight transport operations;
- **1987:** Alongside standard road transport operations, express courier services are introduced on behalf of a world-leading company;
- **1990:** The company enters the integrated logistics sector, directly managing warehouses on-site at major client manufacturing facilities;
- **1992:** The commercial offering is further expanded with car and commercial van rental services;
- **1998:** The first Trasgo logistics hub is officially inaugurated in Balocco (Vercelli);
- **2002:** Inauguration of the new corporate headquarters and logistics center in San Pietro Mosezzo, on the outskirts of Novara;
- **2003–2005:** Dedicated services are developed for High-Tech Logistics and Promotional Logistics;
- **2005:** The private Type "C" bonded warehouse is inaugurated, expanding customs management and clearance activities;
- **2007:** Operations commence at the logistics unit in Giovinazzo (Bari);
- **2010:** The logistics center in Biandrate (Novara) is officially inaugurated.

1.2 Business Sectors

Trasgo operates in the integrated logistics sector, providing comprehensive transport, customs clearance, and warehousing services, including the direct on-site management of

client warehouses using proprietary equipment and personnel.

The range of transport services includes: Full Truckload (FTL), groupage (LTL), domestic and international transit, road haulage, ocean freight, air cargo, and intermodal transport.

Logistics operations represent the company's core business. Trasgo operates two logistics hubs where traditional storage is complemented by a comprehensive portfolio of value-added ancillary services executed in strict accordance with client-specific standard operating procedures. Furthermore, the company has acquired extensive outsourcing expertise, organizing and managing logistics platforms directly inside client manufacturing facilities using its own resources and workforce. In addition to Industrial Logistics, Trasgo provides specialized logistics support in the dedicated domains of High-Tech Logistics and Promotional Logistics.

Customs operations cover all primary functional areas: transport-related customs operations, private Type "C" bonded warehousing, private VAT fiscal deposit warehouses, and customs consultancy services.

1.3 Quality Certification

Demonstrating continuous commitment to internal process excellence and client satisfaction, Trasgo was awarded Quality Certification in 1996, subsequently aligning in 2003 with the procedural standards established by UNI EN ISO 9001:2000, and in 2009 with UNI EN ISO 9001:2008.

Trasgo defines its Quality Management System as a strategic asset to ensure clients that all services rendered strictly comply with agreed specifications as well as applicable statutory laws and regulations.

In addition to complying with all laws and regulations in force across every country where it operates, the company is committed to observing elevated ethical standards in the day-to-day conduct of its business activities: these standards, along with their guiding principles, are set out in this Code of Ethics.

The Code serves as an instrument that complements statutory rules of conduct: mere compliance with the law, while an essential prerequisite, is deemed insufficient on its own by Trasgo, which requires all corporate decisions and personnel conduct to be grounded in sound ethical standards, even where such standards are not formally codified by statutory law.

The term **personnel** refers collectively to all individuals working within or on behalf of the company: employees, directors, and external collaborators in any capacity.

The Code expresses the ethical commitments and responsibilities undertaken by all

individuals who collaborate in advancing Trasgo's objectives toward: shareholders, employees, collaborators, external consultants, suppliers, clients, and other entities. These entities collectively constitute the company's **stakeholders**, representing all parties holding a legitimate interest in the company's activities.

Every person working at Trasgo is required to act in constant compliance with the provisions set forth in this Code of Ethics.

Particular diligence is required of Executives and Department Heads, as well as the members of the Supervisory Body (*Organismo di Vigilanza*), who are charged with supervising the effectiveness of the Code and managing its ongoing updates: these figures are called upon to ensure that adopted principles are consistently implemented and to maintain conduct that serves as a benchmark and role model for employees and collaborators.

The Code is accessible to clients, suppliers, and third parties interacting with Trasgo. In particular, it is formally brought to the knowledge of third parties who receive mandates from the company or maintain enduring commercial relationships with it, formally inviting them to observe its principles and standards of conduct.

Within the internal control framework, pursuant to Articles 6 and 7 of Italian Legislative Decree no. 231/2001 and the "Guidelines for the Construction of Organization, Management and Control Models under Legislative Decree 231/2001" (updated edition of March 31, 2008) issued by CONFINDUSTRIA, this Code of Ethics constitutes a prerequisite and fundamental reference for the Organization, Management, and Control Model (hereinafter the "Model") and the related disciplinary sanction system provided therein.

2. PRINCIPLES OF CONDUCT FOR THE ORGANIZATION

The principles listed below are considered fundamental; Trasgo undertakes to respect them toward all parties. Reciprocally, the company demands that these principles be respected by all parties, both internal and external, who maintain relationships of any nature with the company itself.

Compliance with Laws and Regulations

Trasgo operates in strict observance of the law and ensures that all personnel act accordingly: individuals must maintain conduct that conforms to statutory legislation, regardless of the operational context, duties performed, and jurisdictions in which they operate.

This commitment equally applies to consultants, suppliers, clients, and anyone maintaining business relationships with the company. The company will neither initiate nor continue any relationship with parties unwilling to align with this principle.

Integrity of Conduct

Trasgo is committed to providing quality services and competing in the market in full accordance with fair and free competition and transparency, maintaining correct and upright relations with public, governmental, and administrative institutions, with civil society, and with third-party enterprises. Everyone is required to operate, under all circumstances, with integrity, transparency, consistency, and fairness, conducting all business relations with honesty.

Rejection of All Discrimination

In decisions affecting relationships with its stakeholders (client selection, shareholder relations, human resources management and work organization, vendor procurement and oversight, relations with local communities and institutional representatives), Trasgo refrains from any discrimination based on age, gender, sexual orientation, health status, race, nationality, political beliefs, or religious convictions.

Valuing Human Capital

Trasgo recognizes that human resources constitute a cornerstone of its ongoing development. Accordingly, it guarantees a safe working environment designed to facilitate job performance and enhance individual professional aptitudes. The workplace environment, rooted in mutual respect, fairness, and collaboration, must foster engagement and empowerment regarding defined operational targets and execution methods.

Human resources management is anchored in respect for the personality and professionalism of each individual, safeguarding their physical and moral integrity. Personnel must always exhibit respectful conduct toward anyone they interact with on behalf of Trasgo, treating all parties fairly and with dignity.

The company rejects any form of forced labor or child labor involving minors under sixteen years of age and tolerates no violations of fundamental human rights.

Fairness in the Exercise of Authority

In managing contractual relationships that entail hierarchical reporting structures, Trasgo is committed to ensuring that authority is exercised equitably and properly, preventing any form of abuse. Specifically, the company ensures that managerial authority never translates into an exercise of power that prejudices personal dignity or individual

autonomy.

These values must be safeguarded under all circumstances when making operational and work organization decisions.

Protection of Health, Safety, and the Environment

Trasgo conducts its business operations and capital investments in a socially responsible and environmentally sustainable manner. To this end, the Company schedules its operational activities seeking continuous equilibrium between commercial initiatives and social and environmental requirements, disseminating a proactive culture of workplace safety and risk prevention among all stakeholders.

Avoidance of Unethical Conduct

Conduct by any individual or organization attempting to extract unfair advantages from the collaborative efforts of others by exploiting a position of leverage is deemed unethical and fosters hostile attitudes toward Trasgo.

Fairness in Contractual Relations

Contracts and work assignments must be executed in accordance with terms consciously agreed upon by the parties; Trasgo undertakes not to exploit circumstances of ignorance or incapacity on the part of its counterparties. Furthermore, in existing contractual relationships, no person acting in the name or on behalf of the company may take unfair advantage of contractual ambiguities or unforeseen hardships experienced by the counterparty to renegotiate contract terms solely to exploit a position of weakness or dependency.

Protection of Fair Competition

Trasgo actively protects the value of fair market competition, refraining from collusive, predatory, or abusive market behaviors. Consequently, all entities collaborating in any capacity with the company are prohibited from participating in agreements contrary to antitrust and fair competition laws, the Italian Civil Code, or Law no. 287/1990.

Transparency and Completeness of Information

Trasgo is committed to providing comprehensive, transparent, understandable, and accurate information, enabling stakeholders to make autonomous and fully informed decisions regarding commercial arrangements, conflicting interests, alternatives, and material implications.

In particular, when drafting contracts, the company specifies in a clear, unequivocal manner the required conduct of counterparties under all anticipated operational

circumstances.

Protection of Personal Data

Trasgo collects and processes personal data of clients, shareholders, collaborators, employees, and third parties, encompassing both natural persons and corporate entities. Such data comprises any information enabling the direct or indirect identification of an individual, including sensitive personal data such as ethnic origin, political views, health status, or sexual orientation.

The company undertakes to process such data strictly within the boundaries of applicable privacy legislation, with particular reference to Italian Legislative Decree no. 196/2003 (Privacy Code) and applicable European and national data protection regulations.

Trasgo personnel handling personal data in the performance of their duties must act at all times in strict compliance with applicable statutory regulations and specific internal operating instructions.

3. PRINCIPLES OF CONDUCT APPLICABLE TO PERSONNEL

All individuals—employees, directors, and collaborators—must observe the following principles in their conduct toward Trasgo:

Professionalism

Every individual performs their professional duties with diligence, efficiency, and integrity, utilizing corporate resources and time effectively, and assuming full responsibility for assigned obligations.

Loyalty

Personnel owe an unwavering duty of loyalty and good faith toward the company.

Honesty

In the course of their duties, Trasgo personnel are required to understand and diligently adhere to the organization model and applicable statutory laws. Under no circumstances may the pursuit of corporate interests justify dishonest conduct. The company implements suitable informational mechanisms to guide personnel whenever procedural doubts arise.

Fairness and Propriety

Personnel shall not utilize for personal benefit any information, assets, or tools placed at their disposal in the performance of their assigned duties or office.

No individual shall exert, accept, or broker pressure, illicit recommendations, or improper referrals that could damage Trasgo or generate undue advantages for themselves, the company, or third parties. Personnel must reject and refrain from promising undue offers of money, gifts, or other benefits.

Confidentiality

Corporate personnel maintain the strictest confidentiality regarding information, trade secrets, and know-how constituting company assets or pertaining to Trasgo's business activities, in accordance with statutory regulations and internal policies.

Conflict of Interest Resolution

Personnel must pursue the general interests and objectives of Trasgo in all work activities.

Every employee or collaborator must immediately disclose to their direct superior or designated corporate officer any situation or activity that may represent a potential conflict of interest with the company, as well as any other circumstance where material propriety concerns arise.

4. STANDARDS OF CONDUCT

4.1 Relations with Personnel

Personnel Recruitment

The assessment of job candidates is based strictly on the alignment of candidate profiles with required competencies and corporate needs, ensuring equal opportunity for all applicants.

Information requested during recruitment is strictly confined to professional and aptitude profiles, respecting personal privacy and individual opinions.

The Human Resources department implements rigorous screening procedures to avoid favoritism and preferential treatment of any kind.

Establishment of the Employment Relationship

Personnel are hired under regular, legally binding employment contracts; informal or undocumented labor is strictly prohibited.

Upon hiring, each employee receives accurate information regarding: job description, role, and grade; regulatory and compensation framework; and safety rules and procedures aimed at preventing workplace health risks, presented in a manner that ensures informed

acceptance.

Personnel Management

People constitute Trasgo's primary asset. Accordingly, the company focuses on individual merit, professional growth, and personal development on a strictly meritocratic basis.

Trasgo safeguards the moral integrity of its personnel, guaranteeing workplace conditions that respect personal dignity. All personnel must be treated with equal dignity and granted equal opportunities for career advancement.

In HR management, career progression and compensation decisions are grounded in objective skill matching (e.g., promotions or transfers) and merit evaluations (e.g., performance incentives).

Access to roles is governed by competence. Compatible with operational efficiency, flexible working arrangements are accommodated to support maternity and childcare responsibilities. Personnel evaluations are conducted transparently, involving line managers, HR, and relevant collaborators.

Personal Integrity and Dignity

Trasgo protects workers against psychological harassment, mobbing, and discriminatory behavior. Zero tolerance is enforced against any form of harassment or discrimination.

Performance targets must be evaluated equitably against transparent, objective criteria, recognizing individual contributions.

Personnel witnessing or experiencing discrimination or harassment may report such occurrences to their manager, Human Resources, or the Supervisory Body (*Organismo di Vigilanza*), with full assurance against retaliatory acts.

Individuals found responsible for harassment or discriminatory practices are subject to disciplinary sanctions, up to and including summary dismissal. Differences in treatment are not considered discrimination only where objectively justified by operational criteria.

Dissemination of Human Resources Policies

HR management policies are accessible to all personnel via the corporate intranet, organizational handbooks, and direct managerial briefings.

Development and Training of Resources

Managers leverage available development tools (job rotation, mentorship, expanded operational responsibilities) to foster staff growth. Constructive feedback on strengths and areas for improvement is shared systematically to encourage targeted upskilling.

Trasgo delivers institutional onboarding for new hires and ongoing specialized training courses for operational personnel, utilizing both internal modules and external specialized institutions.

Working Time Management

Managers must optimize working hours, requesting duties consistent with assigned roles and operational plans. Demanding personal favors, subservient acts, or actions that violate this Code constitutes an abuse of hierarchical authority.

Employee Involvement

Active employee engagement in operational decision-making is fostered through team meetings and participatory discussions. Staff are expected to contribute with collaborative spirit and independent judgment, while actively supporting the implementation of finalized decisions.

Workplace Reorganization

In organizational restructuring, human resource value is preserved through professional retraining. Restructuring burdens are distributed equitably across the organization, and role reassignments safeguard professional competence.

Occupational Health and Safety

Trasgo is dedicated to providing a safe, healthy workplace, building a proactive safety culture, and implementing comprehensive preventative measures. Pursuant to Article 2087 of the Italian Civil Code and Legislative Decree no. 81/2008, the company adopts the following general health and safety prevention measures:

a) Comprehensive assessment of all health and safety risks;

b) Coordinated prevention planning that systematically integrates technical, production, environmental, and organizational factors;

c) Elimination of risks at source or their reduction to a minimum based on technological progress;

d) Ergonomic principles applied to workplace design, equipment selection, and work methodology to alleviate monotony and repetition;

e) Risk mitigation directly at source;

f) Substitution of hazardous substances and procedures with non-hazardous or less hazardous alternatives;

g) Minimization of the number of workers exposed to potential risks;

h) Controlled and restricted use of chemical, physical, and biological agents in the workplace;

i) Priority of collective protective measures over personal protective equipment (PPE);

l) Regular health surveillance and medical check-ups of workers;

m) Reassignment of workers away from specific risk exposures for medical reasons,

assigning alternative roles where practicable;

n) Adequate information and training for all workers;

o) Specialized training for managers and supervisors;

p) Targeted training for workers' safety representatives (RLS);

q) Clear, enforceable operational instructions for staff;

r) Active consultation and participation of workers;

s) Structured consultation and participation of workers' safety representatives;

t) Planned continuous improvement of safety benchmarks via good operating practices and codes of conduct;

u) Emergency management plans for first aid, fire prevention, evacuation, and imminent danger;

v) Standardized warning and safety signage;

z) Regular preventive maintenance of premises, machinery, and equipment in strict compliance with manufacturer specifications.

Privacy Protection

In processing employee personal data, Trasgo strictly adheres to Legislative Decree no. 196/2003 and applicable European privacy frameworks. Employees receive privacy notices outlining processing purposes, methods, disclosures, and access rights under Article 13. Inquiries into personal opinions, political beliefs, or private lives are strictly prohibited.

4.2 Personnel Obligations

Personnel must act in good faith and with loyalty to fulfill contractual commitments and provisions of this Code, delivering expected professional performance.

Duty of Diligence

Compliance with this Code is an essential condition of employment pursuant to Article 2104 of the Italian Civil Code, which provides that: *"The employee must exercise the diligence required by the nature of the performance due, by the enterprise's interest, and by the higher interest of national production. The employee must also comply with instructions for work execution and discipline issued by the employer and hierarchical superiors."*

The principles of this Code define specific manifestations of the duties of diligence, loyalty, and impartiality governing proper contractual performance.

Information Management

Personnel must understand and implement corporate information security policies to

guarantee data integrity, confidentiality, and availability. Documentation must be compiled using clear, objective, and exhaustive language to allow auditing by authorized colleagues, supervisors, or external authorities.

Confidentiality of Corporate Information

Corporate know-how and proprietary information must be safeguarded with maximum confidentiality. Material data acquired or generated during operations constitutes confidential assets; this applies equally to information concerning third parties (clients, business partners, suppliers, personnel).

Only authorized personnel may handle public disclosures or provide material requested by internal or external parties. When discussing sensitive, financial, or strategic topics, formal non-disclosure agreements (NDAs) must be executed beforehand.

Both during and following termination of employment with Trasgo, personnel may utilize proprietary confidential data solely in the company's interest and never for personal gain or third-party benefit.

Confidential Information Concerning Third Parties

Trasgo personnel must refrain from using unlawful means to obtain confidential information regarding third-party entities. Third-party data obtained under contract must be used strictly within the scope permitted by that contract. Inquiries or handling of third-party confidential data without authorization is prohibited.

Conflicts of Interest

Personnel must avoid any situation generating conflicts of interest and refrain from taking personal advantage of corporate business opportunities learned during their duties.

Potential conflict of interest situations include, without limitation: operating competing commercial activities, including through family members; holding executive roles (director, board member, manager) while having financial stakes with suppliers, clients, or competitors; managing supplier procurement while maintaining personal or familial ties with the supplier; accepting money, favors, or gifts from entities doing business or seeking business with Trasgo.

Personnel must promptly disclose to their manager any actual, potential, or apparent conflict of interest, as well as secondary professional activities performed outside work that may raise conflict concerns.

Unlawful Remuneration, Gifts, and Hospitality

Personnel are strictly prohibited from accepting or receiving gifts, gratuities, or hospitality of more than symbolic value from suppliers, clients, or professional contacts. Gifts capable of influencing business impartiality must be rejected. Commercial partners

must be informed of Trasgo's policy.

This rule cannot be circumvented via third parties. Gifts received that exceed permitted standards must be formally reported to the designated corporate department, which will review appropriateness and return items with a notification of corporate policy.

Use of Corporate Assets

Every individual must protect company assets through responsible, documented usage in line with operating procedures. Specifically, personnel must: use assets with care; avoid improper use causing damage or loss of efficiency; safeguard assigned assets; and report threats or damage immediately.

Regarding IT systems: strictly follow IT security policies; refrain from sending threatening, insulting, or vulgar emails; and refrain from browsing offensive, indecent, or non-work-related websites.

Trasgo reserves the right to prevent misuse of assets through accounting audits, financial controls, and risk monitoring, in full compliance with worker protection laws and privacy legislation.

Participation in Anti-Social and Criminal Activities

Trasgo firmly denounces criminal and anti-social activities and enforces zero tolerance against involvement in such phenomena. Personnel are strictly forbidden from maintaining relations with criminal organizations.

Faced with extortionate demands, personnel must reject compromises, make no disbursements, and immediately alert their supervisors for executive review and legal response.

4.3 Relations with Clients

Contracts and Client Communications

Client contracts and communications must be: clear, simple, and straightforward; fully compliant with applicable laws, avoiding elusive or deceptive practices; complete, leaving out no material facts affecting customer choices; and governed by principles of good faith and fair dealing.

Standards of Conduct toward Clients

Staff interactions with clients must reflect responsiveness, courtesy, and high professional standards, fostering constructive and transparent relationships.

4.4 Supplier Selection

Procurement processes must maximize competitive value for Trasgo, grant equal opportunities to vendors, and maintain absolute neutrality and fairness. Supplier selection is based on objective evaluation of quality, price, technical capabilities, warranty guarantees, and promptness of service.

Trasgo ensures procurement transparency by: applying objective qualification criteria; ensuring competitive bidding (soliciting at least three qualified bids where feasible, documenting any derogations); and maintaining clear segregation of duties across requisition, approval, purchasing, and auditing.

Trasgo reserves the right to verify vendors' documented financial and operational capabilities, technical know-how, and certified Quality Management Systems (e.g., ISO 9001).

4.5 Relations with Public Administrations

Public Administration encompasses any public official, civil servant, regulatory body, public agency, EU institution, or private entity operating as a concessionaire of a public service.

Fairness and Loyalty

Relations with public bodies must be conducted with absolute transparency and ethical integrity, avoiding any action that could compromise the independence or impartiality of public officials.

Rigorous controls and documentation must be maintained in public tenders, licenses, concessions, permits, and public grant applications. Any external engagement of civil servants as consultants must adhere strictly to statutory provisions.

Where external advisors act as representatives of Trasgo, they must strictly abide by this Code. Trasgo shall not be represented by third parties who present conflicts of interest.

Gifts, Gratuities, and Benefits

No Trasgo employee or representative may offer money, economic benefits, or perks to public officials to secure contracts or preferential treatment. Any gift exceeding normal commercial courtesy or aimed at gaining favors is strictly prohibited.

Gifts include complimentary event tickets, promises of employment, or personal favors. This prohibition cannot be circumvented via third-party agents; illicit payments made through intermediaries are treated as corruption.

Trasgo refrains from hiring or contracting former public officials (or their relatives) who personally managed official proceedings or negotiations involving Trasgo, for a minimum

cooling-off period of two years.

Any solicitation of benefits by a public official must be immediately reported to executive management for appropriate legal action.

Initiatives Undertaken by Trasgo S.r.l.

Trasgo may support public benefit initiatives, foundations, and associations under strict compliance with law. Donations of funds, equipment, or goods follow a formal procedure:

1. Formal written communication sent to the beneficiary entity expressing intent to donate;
2. Public entity compliance with statutory donation acceptance laws;
3. Execution of formal transfer documentation following verified acceptance.

4.6 Relations with the Community

Financial Relations with Political Parties, Trade Unions, and Associations

Trasgo reserves the right to fund political parties, candidates, or political conventions strictly within statutory legal limits and transparency requirements. The company rejects political pressure and does not accept patronage hiring referrals.

Contributions to trade unions are prohibited where conflicts of interest exist. Joint cooperation on specific non-conflicting initiatives is permitted only with documented fund allocation and executive authorization.

Contributions and Sponsorships

Charitable contributions are limited to recognized non-profit organizations with verifiable social, cultural, or charitable missions. Sponsorships (social, environmental, sporting, artistic) are restricted to high-quality initiatives where corporate involvement ensures originality and effectiveness.

Sponsorship approvals undergo scrutiny to eliminate personal or organizational conflicts of interest.

4.7 Dissemination of Information and External Communication

External communications respect the public's right to information. False or misleading statements are strictly prohibited. Disclosures must be truthful, clear, transparent, timely, and aligned with professional communication standards.

5. IMPLEMENTATION AND GOVERNANCE MECHANISMS

5.1 Dissemination and Communication

Trasgo actively disseminates this Code through all appropriate communication channels, including corporate portals, staff meetings, and training programs. All personnel must hold a copy of the Code, understand its tenets, and comply with its terms.

Management and the Supervisory Body establish structured training curricula tailored to employee responsibilities, including dedicated onboarding sessions for new hires. The Supervisory Body remains available to provide guidance and clarify interpretative questions.

5.2 Oversight of Code Implementation

Monitoring the implementation and observance of this Code is entrusted to:

- Trasgo Executives and Department Managers;
- The Board of Directors;
- The Supervisory Body (*Organismo di Vigilanza* – OdV), which possesses unhindered access to corporate records to monitor adherence and recommend updates.

The Supervisory Body is specifically charged with:

- Notifying Executive Management of reported violations for appropriate corrective action;
- Issuing binding opinions on the revision of key policies and standard operating procedures to guarantee alignment with the Code;
- Submitting periodic recommendations for Code updates to the Board of Directors.

5.3 Reporting Issues or Suspected Violations

Any individual who becomes aware of, or reasonably suspects, a violation of this Code, company policies, or the law must immediately inform their direct superior and the Supervisory Body in writing (in non-anonymous form).

Trasgo guarantees whistleblower protection against retaliation, discrimination, or career penalties. Whistleblower confidentiality is strictly safeguarded, subject to mandatory legal disclosures.

The Supervisory Body conducts impartial investigations, hearing the reporting party and the alleged infringer. Personnel must cooperate fully with internal inquiries. Upon conclusion, findings are submitted to Executive Management for disciplinary or

contractual enforcement.

5.4 Disciplinary Sanctions for Violations

Adherence to this Code constitutes a binding contractual obligation for personnel and external counterparties. Violations compromise the fiduciary trust between Trasgo and the breaching party.

- **Employees:** Violations are subject to disciplinary measures under applicable collective labor agreements (CCNL), independent of criminal proceedings. Sanctions range from oral/written warnings to unpaid suspension, demotion, and summary termination of employment for cause. The employee is afforded the right to present their defense prior to sanction adoption.
- **Third Parties (Consultants, Suppliers, Clients):** Violations trigger contractual termination mechanisms and immediate cancellation of ongoing engagements.

Trasgo reserves all statutory rights to seek compensation for damages suffered as a result of violations of this Code.

5.5 Operating Procedures and Decision-Making Protocols

All corporate actions and financial transactions must be appropriately recorded, verifiable, and authorized. Every transaction must be substantiated by adequate documentary records to enable verification of its commercial purpose, authorizing parties, executors, and audit chain at all times.