

**A RESPONSIBLE
MODEL
FOR SUSTAINABLE
BUSINESS.**

**ETHICS CODE
di Fleet220 srl**

**FLEET
220**

"We believe in sustainability, innovation, in the sharing economy and the diffusion of electric vehicles and travelers as a change to improve the environment and rediscover the territory."

Sustainability, innovation and enhancement of the territory and time: everything revolves around these concepts.

Within Fleet220 we strongly believe that, in order to operate in a sustainable business, such as that of electric mobility, it is mandatory to adopt responsible behavior in our daily lives.

We set ourselves the goal of operating in an honest, sustainable and ethically correct way

Responsibility, respect and equity are values that distinguish the company and that each of us protects daily by behaving in a consistent and responsible manner.

This Code has as primary objective to identify the guidelines that Fleet220 Benefit Corporation LLC collaborators are committed to in the exercise of their work activities.

The drafting of the above sets long-term goals aimed at the pursuit of a sustainable business, inside and outside the company, based on trust and strong relationships with its interlocutors.

Violation of the rules in this Code impairs the fiduciary relationship with Fleet220, and may lead to disciplinary and/or damage-compensation consequences.

The Code is intended for all of us who operate in the name and on behalf of Fleet220 and can be updated and modified, in accordance with the principle of transparency.

Thank you for the commitment and dedication you put in every day

January 2023

Carolina Solcia
Fleet220

We are responsible

All of us who work on Fleet220 are required to comply with the laws of the countries in which we operate and to conduct ourselves in accordance with ethical, sustainable and responsible principles.

Each of us must view of the Code, understand it and take responsibility for respecting it: we cannot operate in the pursuit of a business interest in violation of applicable laws and the Code.

If the Code conflicts with the law, the Law prevails over the Code.

We communicate clearly

All internal and external communications and relationships must be based on transparency, accuracy, truthfulness and completeness.

We support equals opportunity

At Fleet220 we protect ALL rights, including Privacy, for those involved, and we support equal opportunities.

It is for this reason that every employee can expect equal job opportunities and fair treatment regardless of gender, race, religion, age, sexual orientation and disability.

At Fleet220 we do not accept any kind of discrimination.

We safeguard resources

We are all part of the Fleet220 "family" and for this reason we avoid unjustified waste of resources and adopt behaviors based on savings.

We respect all the materials and equipment made available by Fleet220, avoiding behaviours that could put their integrity at risk.

We manage resources according to common sense with the aim of offering the best possible service to our customers and our interlocutors.

We respect animals

At Fleet220 we respect animals, which is why employees have the opportunity to bring their puppies into the office

Competition makes us better

Competition, both internal and external, helps us to improve.

For this reason, we believe that it should be based on principles of loyalty, transparency and fairness towards all company stakeholders.

Sustainability is our pillar

We are aware of the impact that our activity has in economic and social terms on the territory in which we operate and this is why we are committed to, making sustainable choices on a daily basis, reducing consumption and CO2 emissions and impacting as little as possible.

We are used to travel with electric vehicles: we believe, in fact, that behaving in line with the business in which we operate and with the values we believe in is the best example and the best "business card" to make our reality known

We protect information

For Fleet220 information is important.

For this reason we are committed to protect the privacy of all suppliers, customers and employees, avoiding unnecessary disclosure.

Our employees must safeguard Fleet220's intellectual property and any confidential information such as contracts, pricing, specifications techniques and personal information.

Fleet220, for its part, is committed to protect the privacy of its employees in accordance with its obligations under applicable law and not to disclose any information or personal data without the consent of those concerned..

We represent Fleet220

Each of us during business trips, events and on social networks represents Fleet220: we are real Brand Abbasadors.

For this reason it is necessary to behave accordingly and in line with the principles and values of Fleet220.

In our private life we can dedicate ourselves to political, religious or other activities, as long as these points of view are associated to the individual

person and not to the whole company.

We are committed to performing our duties by avoiding or encouraging the following behaviors:

- corruption,
 - fraud against companies, PA, institutions or individuals
 - performing unlawful favours to colleagues or third parties
 - improper use of the channels social, also towards competitors, suppliers and customers of Fleet220
 - consumption of alcohol and drugs during the performance of service
 - insults, defamation, violence or threats
 - lack of respect for property rights or copyrights
 - use of company resources in the pursuit of personal goals
- dissemination of confidential information concerning the company's activities

In itself, Fleet220 is committed, as mentioned above, to offering its employees equal opportunity treatment, without any kind of discrimination in the work environment.

Fleet220 also guarantees the adequacy and safety of the working environment.

We want to satisfy our customers

Our aim is to offer an efficient service that satisfies our customers as much as possible, in compliance with all the principles mentioned above.

All of us collaborators of Fleet220, with this in mind, are committed to:

- Comply with all behavioral norms and procedures, both internal and external, in order to establish a successful and lasting relationship with all our customers.
 - avoid discrimination and the establishment of positions of strength towards our clients
 - keep promises and obligations made to customers
 - adopt behavior that is always marked by courtesy, collaboration and cordiality, both internally within the company and externally with customers and suppliers.
- adopt a truthful and transparent approach in relations and communications with customers

We are fair to our competitors

We believe that competition should be based on principles of loyalty, transparency and fairness

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Violent behavior, agreements, collusion and acts of unfair competition do not belong to our way of acting and are strictly prohibited within our company

We believe in our co-workers

Fleet220 believes deeply in the skills and potential of each of his collaborators.

The entire staff of Fleet220 is considered fundamental for the achievement of the company objectives and for the execution of the economic activity.

It is for this reason that each one of us, regardless of the company task performed, has the opportunity to take responsibility and make decisions.

Each of us must be driven by professionalism, commitment and seriousness in carrying out our duties: although some decisions often seem difficult, Fleet220 believes and trusts in the judgement and common sense that guide employees' choices

We believe in on-the-job training: all of us employees are invited to support, advise and exchange information, experiences and skills

with our colleagues with the aim of establishing a collaborative relationship and mutual professional and personal growth.

Fleet220 believes in training its employees, offering them the opportunity to participate in external training courses

Fleet220 also considers important the participation of its employees in events in the sector, as speakers and ambassadors of the company, promoting experience and direct exposure

In compliance with current regulations, Fleet220 promotes and encourages the development of the potential of each of us.

In this perspective, the company is committed to:

- avoid behaviours that could damage the dignity of the individual or behaviours that, during the selection phase, could put the candidate in great discomfort
- subdivide roles, tasks and duties in order to allow for a distinction and definition of the responsibilities to which each individual employee must be subject, or for which he or she is responsible
- provide a suitable and safe place of work in relation to needs

In Fleet220, career developments are regulated internally by means of special procedures, criteria and regular review and feedback sessions.

In general, Fleet220's aim is to create a proactive and dynamic working environment, based on the involvement of each of us.

To ensure this, relationships between us employees must be based on collaborative, respectful, honest and civilized behavior.

We all have duties

Each of us is committed to comply with the provisions of this Code: ignorance is not allowed.

We undertake to refrain from any type of activity that may conflict with or damage the principles on which the company is based and to adopt behaviour that may be contrary to the above

In the event of situations or acts that may be considered contrary to the law or the Code, we must promptly notify our superiors

Fleet220, for its part, undertakes to make decisions based on transparency and common sense,

rejecting any form of privilege, and to refrain from putting strong pressure on its employees

Failure to comply with the Code may generate disciplinary consequences

Fleet220 reserves the right to take measures commensurate with the seriousness of the non-compliance and the damage caused, choosing from the following alternatives:

- simple recall, in written or verbal form
- penalty
- suspension from their employment, for a fixed period of time, or from their remuneration
- Termination of employment

The category of defaulting parties also includes those who make untrue/false communications and reports with the intent to obtain harassment, blackmail or abuse, as this behaviour causes damage to the company's image and that of the individual.

We are smart in the use of IT systems

We use computer systems responsibly, avoiding improper use of them.

This means that we undertake not to use them in a way that differs from their business use or in a way

that could damage the company's image.

It is therefore forbidden to alter these devices in order to make improper use of data, information and/or programs contained in them.

We do not accept gifts and gratuities

We are not promoters of favorable treatment or behavior aimed at obtaining advantages or altering decision-making processes.

This is why, on Fleet220, we do not ask for hospitality or gifts and we invite all our employees not to accept them and/or offer them to third parties

We only allow to receive or give gifts and/or gratuities if they improve, or at least do not affect, the reputation of the company itself

Code of Ethics: diffusion and updating

Fleet220 is committed to disseminating the Code of Ethics and making it available to all interested parties through the use of the tools at its disposal such as meetings, sending the document

by email and publication on our official website

All employees are required to know the content of the documentation and to respect it: ignorance is not allowed

Fleet220 is committed to promptly notify any changes and updates to the document: such changes are considered valid only after their publication.

**“Imagine a world where recharging is simple
and the recharge times are opportunities ”**

FLEET 220