

NSSG's Code of Conduct

NSSG is today a globally recognised leader in the provision of risk management services in the most challenging environments, thanks to its ability to learn from the unique challenges that we've faced in twenty years of experience, lessons which have since become the DNA of our organisation.

The way we conduct our operations, affects our reputation as a responsible organization and our employees, consultants, collaborators, suppliers, vendors, partners and whoever is involved in the services' delivery and provision chain play a crucial role as enablers of our sustainable and ethic growth and overall success.

Because of this, NSSG requires all the above mentioned parties to adhere to the principles embodied in this Code of Conduct and to use all possible efforts to ensure fully compliance with these principles.

The present Code of Conduct specifies NSSG attitude in any situation, and it reaffirms NSSG commitment to a culture of accountability and responsibility as a provider of risk management services.

Laws and Ethical Standards

NSSG's employees, stakeholders and all other third parties shall conduct their business in an ethical manner and act with integrity.

This includes:

1. All NSSG' personnel, stakeholders and all other third parties, shall comply with all laws of the applicable legal system.
2. All NSSG' personnel, stakeholders and all other third parties, shall comply with international and local anti-corruption and bribery laws and standards. This includes that all other third parties may not offer services, gifts or benefits to NSSG's employees in order to influence employee conduct in representing NSSG.
3. All NSSG's personnel, stakeholders and all other third parties, should be encouraged to report concerns or illegal activities in the workplace.

Definition of **"Third party"** - a third party is, but is not limited to, suppliers, consultants, freelancers, agents, representatives, subcontractors, collaborators, and whoever is involved in the services' delivery and provision chain.

Labour and conduct of personnel

NSSG will, and will require their personnel, stakeholders and all other third parties, to treat all persons humanely and with respect for their dignity and privacy and will report any breach of this Code of Conduct.

All NSSG's personnel, stakeholders and all other third parties shall be committed to uphold internationally proclaimed human rights of workers.

The labor elements include:

1. Prohibition on child labor: NSSG's personnel, stakeholders and all other third parties will respect the rights of children and should not employ minors under the age of 18. If national laws or regulations allow children to perform light work, such work is not permitted in any case if it hinders a minor from the completion of compulsory schooling or training, or if the employment would be harmful to their health or development. NSSG's personnel, stakeholders and all other third parties will protect children from all forms of slavery or practices similar to slavery, from selling and trafficking of children, from using, procuring or offering of a child for prostitution, from using, procuring or offering of a child for illicit activities, from any circumstances in which work it is carried out and is likely to harm the health, safety or morals of children.

NSSG's stakeholders and all other third parties will require their personnel to report any instances of the activities referenced above that they know of, or have reasonable suspicion of, to Competent Authorities.

2. Prohibition of slavery and forced labor: NSSG's personnel, stakeholders and all other third parties will not use slavery, forced or compulsory labor, or be complicit in any other entity's use of such labor.

3. Working hours and compensation: NSSG's personnel, stakeholders and all other third parties shall comply with local laws and regulations regarding working hours, wages, and benefits.

4. Non-discrimination: NSSG's personnel, stakeholders and all other third parties shall provide a workplace free of harassment and discrimination and is committed to a work environment in which all individuals are treated with respect and dignity. NSSG's personnel, stakeholders and all other third parties shall expressly prohibit any form of discrimination for reasons such as race, color, age, gender, religion, sexual orientation, ethnicity, disability, genetic information, marital status is not tolerated.

NSSG's personnel, stakeholders and all other third parties shall comply with applicable state and local laws governing nondiscrimination in employment in every location in which the company has employees. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, and transfer, leaves of absence, compensation, and training.

5. Diversity, inclusion, and anti-harassment: a diverse, inclusive, and equitable workplace is one where all personnel feel valued and respected. NSSG's personnel, stakeholders and all other third parties shall provide equal employment opportunities to all employees and applicants for employment without regard to race, color, age, religion, gender, sexual orientation, ethnicity, national origin, disability, genetic information, marital status.

NSSG's personnel, stakeholders and all other third parties shall respect and value diverse life experiences and heritages and ensure that all voices are valued and heard, value the diversity among the employees and all those with whom we do business.

6. Rules for the use of force: NSSG's personnel, stakeholders and all other third parties will require to their personnel to take all reasonable steps to avoid the use of force. If force is used, it shall be in a manner consistent with applicable law. In no case shall the use of force exceed what is strictly necessary and should be proportionate to the threat and appropriate to the situation.

7. Human trafficking: NSSG's personnel, stakeholders and all other third parties will not, and will require their personnel not to engage in trafficking in persons and to remain vigilant for all instances of trafficking in persons and, where discovered, report such instances to Competent Authorities.

8. Sexual exploitation and abuse: NSSG's personnel, stakeholders and all other third parties will not benefit from, nor allow their personnel to engage in or benefit from, sexual and abuse violence or crimes, either within the company or externally, including rape, sexual harassment, or any other form of sexual abuse or violence. NSSG's personnel, stakeholders and all other third parties will, and will require their personnel to, remain vigilant for all instances of sexual or gender-based violence and report such instances to competent authorities when discovered.

9. Torture or other cruel, inhuman, or degrading treatment or punishment: NSSG's personnel, stakeholders and all other third parties will require their personnel, not to engage in torture or other cruel, inhuman, or degrading treatment or punishment and to report any acts of torture or other cruel, inhuman or degrading treatment or punishment, known to them, or of which they have reasonable suspicion. Such reports will be made to the competent authorities in the country where the acts took place, or the country of nationality of the victim, or the country of nationality of the perpetrator.

10. Anti-bribery and corruption: NSSG's stakeholders and all other third parties shall establish an anti-bribery and corruption policy to reinforce the intention and obligation to act with integrity in all the business operations. Bribery and corruption are not only illegal but against NSSG core values. The consequences of being at risk will not only affect NSSG's reputation and finances but our personnel as well. At NSSG bribery is never permitted, either directly or indirectly, it is considered unethical, illegal, and harmful to NSSG's reputation of honesty and integrity. NSSG's employees, stakeholders and all other third parties are expected to decline any opportunity which would place the ethical principles and reputation at risk. If an employee is offered a bribe from a person or entity doing business with or seeking to do business with NSSG, they are required to report it immediately.

11. Conflicts of interest: No NSSG's employee, stakeholders or other third parties may engage in any activity that would conflict with or be contrary to the best interests of NSSG. A "conflict of interest" occurs when an individual's private interest interferes in any way - or even appears to interfere - with the benefits of NSSG.

12. Confidentiality: NSSG's employee, stakeholders or other third parties must not disclose any confidential information, except that disclosure may be made to professional advisors (such as NSSG's lawyers and auditors) or, if required to the Competent Authorities.

Disclaimer

No one has the authority or right to order, direct, request, or even attempt to influence someone else to violate this Code of Conduct. Any attempt to breach NSSG's Code of Conduct, whether successful or not, shall be a violation of this Code and may be a violation of the law. Any retaliation or threat against an individual or a company for refusing to violate or for reporting suspected abuse of this Code of Conduct will be considered a violation.

Alessandro Martello
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