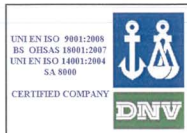




**PRIANO
MARCHELLI & C. s.r.l**

**INTERNATIONAL
FREIGHT
FORWARDERS**



Social Responsibility SA8000

Management meeting minute - 30th May 2011 (extracted document)

On 30th May at 11.30 CET the first Management meeting has been held to check documents provided, activities carried out for SGSA and their compliance with SA8000.

Participants:

- > Andrea Giachero – Managing Director and SA8000 Management Representative
- > Ernesto Rivarola – SA Manager
- > Nicola Maione – Workers' representative for Security and SA8000
- > Enrico Drovandi – Consultant from Progetto Sicurezza S.r.l

At the opening phase of the meeting, Mr. Giachero has confirmed that DNV auditor will carry out the relevant checks on documents on 31/05/2011.

He has highlighted the reasons which have led the Company to proceed with "Ethical" Certification: on one hand, he has focused on being sensitive towards these considerable issues; on the other hand, he has pointed out that PM vocation is to empower employees and meet their needs and expectations.

Mr. Rivarola has informed that on 27/05/2011 external auditors Mr. Drovandi, Puppo and Vannucchi have carried out SGSA auditing activity and confirmed compliance with regulations;

In particular, it has been confirmed with Mr. Puppo, labour consultant and owner of the Labour Consultancy Agency for Company HR, that the check-list for regulatory compliance has resulted in a positive outcome.

Mr. Rivarola has illustrated the audit mechanism, which clearly reflects the Company position towards regulatory requirements.

- 1) Company policy on Social Responsibility and working conditions

SA policy was re-examined and confirmed;

- 2) Performance outcomes compared to SA8000 requirements.

Child work

PM have decided not to employ child workers especially for responsibilities and attention to be paid to working tasks.

Forced Work

PM is certainly against any form of forced work and thus is compliant with SA8000 requirements.

In order to make a further check on how employees feel their working relationship, a questionnaire has been distributed. Outcomes have proved to be positive.

Safety at work

The Company has always been committed to these aspects; they have managed to obtain and keep BS OHSAS 18000; no accidents or diseases have been detected.

Freedom of association and right to collective negotiation

Nothing to be pointed out; due to employees' exclusive choice, no registrations to trade Unions have been made within the company.

Discrimination

Some questionnaires have pointed out that no women currently cover higher positions within the company. This is due to family responsibilities which is supposed to be an obstacle towards personal career.

No issues related to foreign employees were detected.

It should be taken into account that the role of "Forwarding agent" is essentially masculine; however, PM has opened this working opportunity also to women; most of them are young, thus they have not been mothers yet.

The company is aware that that critical aspects included in the questionnaires are not real and will commit themselves to communicate it to employees.

Working Hours / holiday

Overtime is generally limited; the period of financial crisis shall always be considered; this current situation forces companies to keep a balanced management, as well as characteristics of marine services (ships rule).

Management will ensure a regular utilization of holidays and working permissions.

Salary

Nothing to be pointed out

The Company is fully compliant with this issue. There are no outstanding Severance Pay issues or litigations.

Payments to suppliers are usually 60 days invoice date, which is positively included in the current financial framework.

This payment term allows suppliers to monitor exposure for products and services provided.

Management system

Since implementation of SA8000, one NC related to delayed utilization of holidays and working permissions has been detected. As a result, one AC, which consists of making managers aware that all workers and collaborators utilize their holidays and working permissions in an appropriate way. No AS measures have been taken so far.

To make suppliers aware on social responsibility, an appropriate questionnaire has been sent, in compliance with SA8000 standards (outcomes are in progress).

Since the start of the Management System, no communication from external parties involved has been found.

Management has decided that, once they have obtained SA8000 certification, they will spread their social responsibility policy and certification itself by means of appropriate pages on the internet and specific communication.

As a conclusion, on 12/05/2011 Costa Crociere auditors have carried out an auditing activity on Priano Marchelli's HR management and SA8000 system and confirmed compliance with regulations in force.

3) Decisions for improvement

- Management has approved as follows:
- MO internal audit program for 2011;
- 2011 Training program for employees.

Andrea Giachero
Chief Executive Officer

