

# **CODE OF ETHICS**

## **1. PREAMBLE**

This Code of Ethics (hereinafter, for the sake of brevity, referred to as the “Code”) consists of a set of principles that must be observed to ensure the smooth running, reliable management and good reputation of Sir Safety System S.p.A. In fact, respecting moral values in carrying out its corporate activities and providing services is essential and of primary importance to the company.

For this purpose, Sir Safety System S.p.A. has adopted this Code which, in line with the principles of loyalty, fairness and lawfulness that are shared within and embraced by the company, is aimed at regulating – through rules of conduct – its activities and the provision of services, establishing the general principles to be complied with.

For all those who work for Sir Safety System S.p.A. and for all third parties, following the ethical principles set out in the Code is necessary in order for the relationship with the company to continue: to this effect, the Code is an integral part of each contract signed.

## **2. FIELD OF APPLICATION**

The Code adopted by Sir Safety System S.p.A. is binding for the conduct of all directors, employees, collaborators, suppliers, business partners, consultants and, in general, of all those who cooperate with the company or supply it with goods or services.

The Board of Directors, the CEO and the executive officers of Sir Safety System S.p.A. are required to comply with the contents of the Code when proposing and implementing projects, actions and investments aimed at increasing the value of the company’s assets and management as well as the well-being of its employees. Sir Safety System S.p.A. demands that all suppliers of goods and services, its collaborators and employees conduct themselves in line with the general principles of this Code while respecting the religious, cultural and social background of each person.

The whole corporate body of Sir Safety System S.p.A. cooperates actively and fully with public authorities and institutions.

## **3. UNETHICAL CONDUCT**

Any conduct by anyone – individual or organisation – acting on behalf of Sir Safety System S.p.A., which constitutes a violation of the rules of civil coexistence and proper social, commercial and cooperative relations, as set out and regulated by the laws and regulations in force, is considered unethical.

Engaging in unethical conduct compromises the relations between Sir Safety System S.p.A. and the members of the corporate bodies, employees, collaborators and consultants as well as between Sir Safety System S.p.A. and its commercial, entrepreneurial and financial stakeholders, both public and private.

#### **4. REFERENCE VALUES OF SIR SAFETY SYSTEM S.p.A.**

The principles and values that inspire Sir Safety System S.p.A., which are an integral and essential part of its activities, are the following:

- integrity, which means acting in a fair, loyal and lawful manner both inside and outside the company. By sharing these principles, strong relationships are established with customers and suppliers;
- mutual trust between staff and management, which is essential for conducting business properly and managing projects effectively;
- a team spirit, underpinned by the desire to help each employee grow, which also applies to Sir Safety System S.p.A.'s partners and customers;
- a good reputation, which encourages customer loyalty and attracts the most talented people, ensuring peace of mind for suppliers and reliability towards creditors;
- transparency, through which Sir Safety System S.p.A. undertakes to provide all its stakeholders with clear and complete information on the company's activities and the services provided.

#### **5. THE STRUCTURE OF THE CODE.**

The Code consists of:

- general principles, which define the main values that Sir Safety System S.p.A. adheres to in carrying out its activities;
- the rules of conduct to be followed by Sir Safety System S.p.A. and the other parties to which this Code applies, in accordance with the general principles, in order to prevent the risk of unethical conduct;
- procedures for implementing the Code.

#### **6. GENERAL PRINCIPLES**

##### **6.1. Compliance with rules**

Within the scope of the activities entrusted to each of them, those in top positions as well as employees, collaborators and consultants must diligently comply with the laws in force, this Code, internal rules, instructions, guidelines and policies that regulate the company's daily activities.

In no case may the pursuit of the interests of Sir Safety System S.p.A. justify conduct that violates the above-mentioned rules.

## **6.2. Principle of “non-discrimination”**

In its relations with external and internal stakeholders, Sir Safety System S.p.A. avoids any discrimination based on age, gender, race, sexual preferences, state of health, nationality, political opinions or religious beliefs.

## **6.3. Conflicts of interest**

In carrying out all its activities, Sir Safety System S.p.A. strives to avoid incurring in situations of real – or even potential – conflict of interest. Cases of “conflict of interest”, in addition to those defined by law, also include any economic, family or friendship ties or ties of any other nature existing between top management and the employees of Sir Safety System S.p.A. and its customers that could affect the independence of decision making and pose a potential risk of unfair conduct in that they conflict with the interests of Sir Safety System S.p.A.

In the event of doubt regarding the issue in question, those concerned must inform and contact their line manager and/or the Supervisory Body.

## **6.4. Duty of confidentiality**

Sir Safety System S.p.A. ensures the confidentiality of the information it possesses and refrains from searching for confidential data, unless expressly and knowingly authorised by the holder and in full compliance with the regulations in force.

The directors, executive officers, employees and collaborators of Sir Safety System S.p.A. must consider any information on the company’s activities that they possess in relation to their respective duties as confidential and in the exclusive interest of the company, until it is made public. They are also required to ensure the utmost confidentiality, even outside working hours, in order to protect the company’s technical, financial, legal, administrative and commercial know-how.

All those who, in performing their duties, have access to confidential and important information are required not to abuse their privileged access to such information, thus minimising the risks arising from its disclosure and misuse, both inside and outside the company.

## **6.5. Human resources**

The employees and collaborators of Sir Safety System S.p.A. are the company’s greatest and best asset and are crucial to its success.

Sir Safety System S.p.A. therefore protects and promotes the professional growth of its staff by striking a balance between the company’s goals and the needs and expectations of its employees, encouraging teamwork and supporting continuous training and lifelong learning activities.

## **6.6. Fairness in relationships with employees**

As for hierarchical relations, Sir Safety System S.p.A. ensures that the principle of authority is not applied in a manner that affects the dignity, professionalism and independence of each worker.

Sir Safety System S.p.A. makes its organisational choices by taking into account the professional value of its employees, enhancing their competencies, potential and commitment.

## **6.7. Personal integrity**

Sir Safety System S.p.A. ensures the physical and moral integrity of its employees and collaborators, guarantees working conditions that respect individual dignity and is responsible for ensuring a safe and healthy working environment.

In order to do this, Sir Safety System S.p.A. adopts all the measures laid down by current legislation on health and safety in the workplace, periodically analysing its internal processes with the aim of identifying, eliminating and, in any case, monitoring risk situations.

## **6.8. Transparent and complete information**

Information is one of Sir Safety System S.p.A.'s main strengths in managing its activities. Sir Safety System S.p.A. therefore undertakes to provide complete, transparent, comprehensible and accurate information so as to allow the recipients to make informed decisions when it comes to their relations with the company.

## **6.9. Public contracts**

Sir Safety System S.p.A. complies with the laws and legal obligations regarding goods and services purchased by the State at all levels, including laws that prohibit influencing public officials. Sir Safety System S.p.A. is committed to fair knowledge, utmost reliability and accuracy and, when obtaining a contract, to perform it in compliance with all contractual and legal obligations.

## **6.10. Transparent accounting**

Sir Safety System S.p.A.'s accounting is based on the principles of truthfulness, accuracy, completeness and transparency of recorded data.

Sir Safety System S.p.A. must refrain from any conduct, whether active or omissive, that directly or indirectly violates the regulatory principles and/or internal procedures involved in preparing accounting documents and their disclosure to third parties.

In particular, Sir Safety System S.p.A. undertakes to ensure that every operation and transaction is promptly and correctly recorded in the company's accounting system in accordance with the criteria set out by law and by the applicable accounting principles, and, if required, duly authorised and verified.

For every operation or transaction carried out, Sir Safety System S.p.A. is also required to keep and make available, in accordance with the applicable regulations, adequate supporting documentation in order to allow for:

- a) accurate accounting records;
- b) immediate identification of underlying characteristics and motivations;
- c) easy formal and chronological reconstruction;
- d) verification of the decision-making, authorisation and implementation process in terms of legitimacy, consistency and appropriateness, and identification of the various levels of responsibility.

Sir Safety System S.p.A. promotes the launch of training and refresher programmes in order to make its staff aware of the rules (legal or regulatory provisions, internal regulations, provisions of trade associations) concerning the preparation and management of accounting documents.

If the employees, collaborators or consultants of Sir Safety System S.p.A. should become aware of any omissions, forgery or negligence in accounting records, or in the supporting documentation, they must promptly report this to the Board of Directors, the CEO and the Supervisory Board.

#### **6.11. Internal control**

Sir Safety System S.p.A. promotes compliance with internal control processes, which is required at all levels, as a means of improving company efficiency and of observing current legislation and the principles of this Code.

Specifically, within the scope of the competencies and responsibilities of each of its departments, Sir Safety System S.p.A. is responsible for the correct functioning of the internal control system and, for this purpose, provides all the assistance required and cooperates to create an effective and efficient system.

Internal control is intended as the set of all processes and means adopted by Sir Safety System S.p.A. for the purpose of directing, managing and checking company activities, with the aim of ensuring compliance with laws and company procedures, protecting company assets, efficiently managing activities, and providing accurate and complete accounting and financial data.

Sir Safety System S.p.A. assures its employees, corporate bodies with supervisory powers and the external parties appointed to audit the accounts or to provide consultancy on the drafting of the financial statements, free access to the data, documentation and to any information that may be useful to carry out their activities, and that behaviour that obstructs these checks will not be tolerated.

### **6.12. Money laundering**

Sir Safety System S.p.A. operates in compliance with the anti-money laundering regulations in force and with the provisions issued by the competent Authorities, and therefore undertakes to refuse to establish business relations with persons of dubious or unproven moral integrity.

Sir Safety System S.p.A. therefore:

- checks in advance the information available on commercial counterparts, suppliers, partners and consultants in order to ascertain their respectability and the legitimacy of their activities before establishing business relations with them;
- operates in such a way as to avoid being involved in any way that could, even potentially, encourage the laundering of money from illegal or criminal activities, by acting in compliance with primary and secondary anti-money laundering legislation and internal control procedures.

### **6.13. Environmental protection**

All activities carried out by Sir Safety System S.p.A. are managed in compliance with current environmental legislation.

In order to emphasise the duty to protect the environment, all employees and collaborators must strictly comply with legal requirements and other directives on environmental protection and hygiene, and must always behave in a correct and careful manner.

Sir Safety System S.p.A. undertakes to disseminate and consolidate among all its employees, collaborators and suppliers a culture of environmental protection, proper waste management and pollution prevention, developing risk awareness and encouraging everyone to behave responsibly.

### **6.14. Protection of identifying marks and the exclusive rights of others**

All the activities carried out by Sir Safety System S.p.A. are managed in compliance with the industrial and intellectual property rights laid down by current national and supranational regulations on the protection of copyright, patents, trademarks and other distinguishing features.

Sir Safety System S.p.A. undertakes to promote and consolidate among all its employees, collaborators and suppliers a culture of protection of trademarks and of other distinguishing features, namely patents, models and designs belonging to others, by prohibiting, prosecuting and condemning all forms of counterfeiting, alteration and undue use thereof.

## **7. RULES OF CONDUCT**

### **7.1. RELATIONSHIPS WITH CUSTOMERS**

#### **7.1.1. Impartiality towards customers**

Sir Safety System S.p.A. must treat all customers in an equal and honest manner regardless of the volume of their business.

#### **7.1.2. Quality of the products and services provided**

Sir Safety System S.p.A. is committed to providing its customers with quality products and services that meet their needs.

In order to do this:

- it defines and adopts specific service improvement programmes;
- it promotes awareness-raising and training activities in service quality;
- it checks for possible risks to community safety linked to the company's activities and takes specific measures to reduce and eliminate such risks.

#### **7.1.3. Relationships with customers**

Sir Safety System S.p.A. maintains relations with customers that are based on availability, fairness, respect and participation.

Sir Safety System S.p.A. undertakes to always reply to the suggestions and complaints made by customers and consumer protection associations by using suitable communication systems in a timely manner.

#### **7.1.4. Contracts and customer communications**

Contracts and communications with Sir Safety System S.p.A.'s customers must be:

- clear and simple, using a style as close as possible to that normally used by the stakeholders;
- compliant with the regulations in force, without resorting to elusive or otherwise unfair practices (e.g. the inclusion of unfair practices or clauses against consumers);
- complete, so that no element relevant to the customer's decision is overlooked;
- available at any time at the customer's request;
- compliant with national and supranational privacy regulations.

Sir Safety System S.p.A. also undertakes to promptly communicate all information relating to any changes made to the contract, any variations in the economic and technical conditions concerning the provision of the service and/or sale of the products, and the results of checks carried out in compliance with the standards required by the Control Authorities.

### **7.1.5. Gifts, freebies and favours**

Sir Safety System S.p.A. does not give or accept gifts or complimentary items of any kind that could be considered to be beyond normal commercial activities or courtesy.

Specifically, any kind of gift, complimentary item or favour made to customers that could influence their decisions or induce them to grant any kind of favour to Sir Safety System S.p.A. or its professionals is prohibited.

### **7.1.6. Confidentiality and privacy**

Sir Safety System S.p.A. undertakes not to disclose confidential, sensitive or private information relating to its customers, except when required or permitted within the scope of a project or contract.

## **7.2. RELATIONS WITH EMPLOYEES AND COLLABORATORS**

### **7.2.1. Personnel selection**

When selecting and promoting personnel, decisions are based on the suitability of the expected profiles and related merit considerations.

Access to departments and positions is established by taking into account competencies and skills; in addition, provided that it is compatible with the general efficiency of work, flexible working arrangements promoting work-life balance are encouraged.

All Sir Safety System S.p.A.'s departments involved in personnel selection must ensure:

- compliance with transparent and impartial selection criteria;
- checking that the candidates' profiles match the company's needs and, in particular, the company's recruitment planning policy;
- the application of regular employment contracts;
- respect for the right of workers to working conditions that respect their dignity.

### **7.2.2. Establishing employment relationships**

Personnel are hired with an employment contract in accordance with current legislation and collective bargaining agreements. Unreported employment is not permitted in any way.

When entering into a contractual relationship, each worker receives adequate information on the regulatory provisions and remuneration applicable to the relationship itself, on the rules and procedures to be complied with in order to avoid occupational health risks, as well as on the provisions contained in this Code and in the Organisational, Management and Control Model adopted by the company. In this way, acceptance of the position is based on effective knowledge and understanding of the position itself and of the related responsibilities.



### **7.2.3. Personnel management**

Sir Safety System S.p.A. does not discriminate against its workers in any way.

With regard to personnel management processes, the decisions taken are based on matching the company's needs with the profiles of the candidates, as well as on considerations of merit.

Personnel are requested to provide only information that is useful to check that they meet professional and work requirements, ensuring their privacy is respected.

### **7.2.4. Health and safety.**

Sir Safety System S.p.A. is committed to creating a safe and healthy working environment at all its sites, with the same level of quality in every location.

Health and safety risk assessment is conducted at all sites and during the implementation of projects.

All employees must report any dangerous situations they may witness or incidents that reveal them, and participate in the implementation of preventive actions.

All employees must comply with safety regulations.

### **7.2.5. Equal opportunities and diversity.**

All employees of Sir Safety System S.p.A. must abide by laws and follow rules that prohibit discrimination based on age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual preferences, political or philosophical thoughts, membership in trade unions, or any other characteristic protected by law.

### **7.2.6. Protection of privacy**

Sir Safety System S.p.A. undertakes to protect, in compliance with the provisions set out in the amended text of the Personal Data Protection Code (Legislative Decree No. 196/2003), updated with the new legislative decree (Legislative Decree No. 101/2018) adapting the Italian regulations to the EU's General Data Protection Regulation (Reg. (EU) No. 679/2016, GDPR), the personal data acquired, stored and processed within the scope of its activities in order to avoid any unlawful, or even improper, use of such information. In particular, Sir Safety System S.p.A. adopts special standard procedures in order to:

- a) provide data subjects with adequate information on the purposes and related methods of data processing and storage;
- b) identify the cases in which, by law, data may only be processed, communicated and disseminated after the data subject has given his/her consent;

c) adopt security measures aimed at preventing the loss or destruction of personal data held by the company and unauthorised processing;

d) establish the implementation rules for exercising the rights that applicable legislation grants to the persons whose data is processed.

In any case, any investigation into the ideas, preferences, personal tastes and, in general, the private life of members, employees and collaborators is prohibited.

### **7.2.7. Personal integrity and protection**

Sir Safety System S.p.A. undertakes to protect the moral integrity of its employees and collaborators and to ensure the right to working conditions that respect personal dignity.

It therefore protects workers against acts of psychological violence and condemns any attitude or behaviour that may be considered oppressive or harmful to people, their beliefs and preferences.

Sexual harassment is not allowed and any behaviour that is likely to upset people must be avoided. Sexual harassment means any act or behaviour, including verbal, of a sexual nature, which offends the dignity and freedom of the person being harassed or is likely to create an intimidating, hostile or humiliating working environment for that person. Specifically, sexual harassment includes conduct such as:

- explicit or implicit requests for sexual performance or attention of a sexual nature that are unwelcome and considered offensive by the person who receives them;
- threats, discrimination and blackmail suffered as a result of rejecting conduct of a sexual nature, which directly or indirectly affects the establishment, performance or termination of the employment relationship;
- annoying and unwanted physical contact;
- offensive verbal comments about a person's body and sexuality;
- inappropriate and provocative sexual gestures or winks;
- showing pornographic material in the workplace;
- writings and verbal expressions directed at people who are considered inferior due to their gender, or denigrating people because they express their sexuality in a different way.

Conduct that is likely to upset people means any moral violence and psychological persecution that may, even indirectly, undermine the dignity and physical and mental health of employees in the workplace. Specifically, moral harassment and psychological persecution include:

- repeated and persistent humiliation and verbal abuse;
- systemically denigrating people for the way they look and discrediting them in the workplace, also in the presence of third parties;
- acts and conduct aimed at discriminating against and damaging workers with regard to: career, status, assignment or removal from positions or duties;

- unjustified exclusion or marginalisation from ordinary corporate communication;
- systematically underestimating achievements without justification on the grounds of inadequate performance or failure to carry out assigned tasks.

Sir Safety System S.p.A. shall take the necessary measures to prevent sexual harassment, mobbing and any other form of violence or discrimination, as well as to protect the person who has reported such conduct in good faith and in detail from any retaliation.

#### **7.2.8. Alcohol or drug abuse**

Sir Safety System S.p.A. requires all employees and collaborators to personally contribute to maintaining a working environment that respects the sensitivities of others as well as being healthy, respectful and useful to those who use the services. Therefore, the following will be considered a conscious assumption of the risk of impairment of these environmental characteristics, during work and in the workplace:

- working under the influence of alcohol, drugs or substances with similar effects;
- consuming or selling drugs for any reason whatsoever while at work.

#### **7.2.9. Dealing with company assets**

Anyone working in the interest of Sir Safety System S.p.A. is directly and personally responsible for protecting and preserving the assets entrusted to them in order to carry out their duties, as well as for using them in compliance with the rules laid down for their preservation and protection.

The use of telephones (landline and mobile), mailboxes and internet connections will be limited to pursuing the company's objectives.

The use of company cars and of all the goods and services made available to everyone according to the duties assigned by Sir Safety System S.p.A. is strictly limited to the company's needs. Personal use is only possible in the cases, in the manner and within the limits in which it is permitted by internal regulations or formally authorised.

It is strictly forbidden for employees to use e-mails, the Internet or any other means of communication of Sir Safety System S.p.A. for improper purposes and to send or receive messages or images that may be insulting, offensive or disrespectful to people.

#### **7.2.10. Agreements and arrangements with competitors**

Employees must not enter into agreements with competitors that have the purpose and effect of limiting production or boycotting a customer or supplier. Employees must not exchange confidential information with competitors.

### **7.2.11. Prevention of corruption**

Employees may not offer or provide financial benefits to public officials, political parties, customers' employees or agents, whether in the public or private sector. It is also forbidden for employees to offer or provide benefits, as well as to give in to pressure from people who claim to have actual or supposed influence over a public or private agent and, as a result, propose to use their influence to obtain favourable contracts or decisions.

### **7.2.12. Social relations**

Sir Safety System S.p.A. respects the right of employees to form or join trade unions or workers' organisations of their choice and to organise themselves in order to participate in collective negotiations.

### **7.2.13. Ethical relations between employees, collaborators and the company**

Without prejudice to the obligations and duties laid down in the regulations and in the individual and collective bargaining agreements in force, each employee and collaborator must not engage in behaviour that goes against the ethical principles to which Sir Safety System S.p.A. adheres, as identified in this Code, and that has a negative impact on its reputation and image.

### **7.2.14. Information management**

All employees, collaborators and consultants must be aware of and implement Sir Safety System S.p.A.'s information security procedures in order to ensure the integrity, confidentiality and availability of such information.

### **7.2.15. Conflict of interest**

All employees, collaborators and consultants must avoid situations in which conflicts of interest with the company may arise, and must not personally benefit from business opportunities of which they become aware while carrying out their activities.

In the event of a conflict of interest, all employees, collaborators and consultants must inform their line managers.

### **7.2.16. Relationships between colleagues**

All employees and collaborators must treat their colleagues respectfully and collaborate together, showing solidarity and respecting other people's dignity.

## **7.3. RELATIONSHIPS WITH SUPPLIERS**

### **7.3.1. Choosing suppliers**

In choosing its suppliers of goods and services, +Energia S.p.a. with the aim of achieving the maximum competitive advantage, behaving in a non-discriminatory, impartial and autonomous manner, to:

- avoid any form of discrimination and allow anyone who is eligible to compete for the award of contracts;
- avoid conflicts of interest, illegal and immoral practices that harm individuals or society.

When choosing its suppliers of goods and services, Sir Safety System S.p.A. takes into consideration the quality and cost-effectiveness of the services, technical and professional suitability, respect for the environment and corporate reliability, with reference to the specific nature of the services to be provided.

### **7.3.2. Dealing with suppliers**

Relations with suppliers of goods and services are always governed by specific contracts.

When signing a contract, Sir Safety System S.p.A. provides clear and detailed information on the characteristics and risks of production, on payment methods and times, as well as on other aspects of major importance to the supplier.

These principles also apply to financial and consultancy contracts.

### **7.3.3. Purchasing management**

Sir Safety System S.p.A. does not accept any orders that violate this code or that do not comply with the regulations in force concerning occupational safety and environmental protection.

Sir Safety System S.p.A. disseminates this code to its suppliers.

All suppliers are required to read and accept it and must be aware of the fact that Sir Safety System S.p.A. considers any conduct that violates the principles of the Code to be a breach of trust and a just cause for terminating contractual relations.

## **7.4. RELATIONS WITH OTHER STAKEHOLDERS**

### **7.4.1. Activities of corporate bodies and top management**

The activities carried out by the corporate bodies of Sir Safety System S.p.A. are based on strict compliance with the rules set out in the Statute, internal regulations and current legislation.

Members of corporate bodies and those in top positions must comply with this Code, making sure that their activities are aligned with values of honesty, fairness and integrity.

#### **7.4.2. Supervisory Board**

Sir Safety System S.p.A. has established a Supervisory Board (hereinafter, for the sake of brevity, also referred to as “Board” or “SB”).

The Board is a monocratic or collegial body, in a top position in the company, which reports to the Board of Directors, the CEO and the appointed executive officers on the results of the activities it has been entrusted with, on any criticalities that have emerged, and on any corrective and improvement measures. The SB receives reports from directors, employees, collaborators and consultants who openly and promptly inform it of any violation or attempted violation of this Code.

#### **7.4.3. Gifts, complimentary items, benefits and other advantages**

It is forbidden for members of corporate bodies, directors, appointed executive officers, employees, collaborators and consultants of Sir Safety System S.p.A., in relations with public officials and persons in charge of a public service, to give or promise money or other benefits in any form, whether the conduct is carried out in the exclusive interest of the party concerned or to the advantage or interest of the company.

It is forbidden to try to influence the Public Administration by directly or indirectly offering or promising gifts, money, favours or benefits of any kind. Anyone who receives instructions to do so must immediately inform the Supervisory Board.

It is prohibited to give or promise money or other benefits, or to hand out any kind of gift, complimentary item or grant benefits to directors, general managers, managers in charge of preparing the company’s financial reports, statutory auditors and liquidators of another company or body, or to those who, within the organisational framework of the company or body, carries out various management tasks, or to those who are subject to the management and supervision of the above-mentioned parties, so that they perform or omit acts in violation of the obligations inherent to their office or obligations of loyalty, except where such gifts, complimentary items or benefits are of modest value and are an ordinary practice or custom.

In any case, each member of the corporate bodies, the CEO, the appointed executive officers, employees, collaborators and consultants of Sir Safety System S.p.A., before proceeding to hand out any kind of gift, complimentary item or benefit that exceeds a modest value, as considered in Italy, must request authorisation from the Board of Directors.

Whoever operates in the name of and on behalf of Sir Safety System S.p.A. must not engage in practices that are not permitted by law, by commercial practices or by codes of ethics – if known – of the public and/or private stakeholders with whom they have relations both in Italy and abroad.

The members of the corporate bodies, the CEO, the appointed executive officers, the employees, collaborators and consultants of Sir Safety System S.p.A. who, due to the activities carried out in favour of the company, receive a donation or

promise of money or other benefits, or any kind of gift, complimentary item or benefit, must inform the Board of Directors, which will take the most appropriate measures and notify the internal control bodies.

#### **7.4.4. Relations with public institutions, parties and trade unions**

Sir Safety System S.p.A. undertakes not to take any initiative that may directly or indirectly constitute undue forms of pressure towards representatives of public institutions, political organisations or trade unions.

In its relations with the public bodies, authorities and officials with which it interacts, Sir Safety System S.p.A. strictly complies with the applicable regulations.

Sir Safety System S.p.A. does not grant contributions, whether direct or indirect and in any form, to parties, movements, committees and political and trade union organisations, nor to their representatives and candidates.

#### **7.4.5. Contributions and sponsorships**

Sir Safety System S.p.A. may accept requests for contributions, limited to proposals from organisations and associations operating on a non-profit basis and with valid statutes and certificates of incorporation, which are of cultural, charitable, social and sporting value.

Sponsorship activities, which may relate to social, environmental, sporting, entertainment and art issues, are only intended for events or entities that offer a guarantee of quality and in which any form of personal or corporate conflict of interest can be excluded.

Sponsorship activities are managed in accordance with specific internal procedures, which are aimed at ensuring that the allocation of donations and resources is clear and documented.

#### **7.4.6. Media relations**

Information to the outside world must be truthful and transparent.

Media relations are reserved exclusively for the Board of Directors, the CEO and those specifically authorised by them.

## **8. IMPLEMENTATION PROCEDURES**

### **8.1. Detecting Code violations**

In compliance with the regulations in force and with the aim of planning and managing the activities and services provided by the company, in order to ensure efficiency, fairness, transparency and quality, Sir Safety System S.p.A. takes the necessary organisational and management measures to prevent, detect and promptly report any unlawful conduct or conduct which, in any case, is against the rules of this Code by anyone who acts in the interest of the company or has relations with it, or to eliminate related risk situations.

Specifically, it is the responsibility of the Board of Directors, the CEO, the appointed executive officers and each department manager to detect any violations of this Code on the part of employees, collaborators or those who work professionally with the company but are not employed by it.

### **8.2. Reporting Code violations. Investigation by the Supervisory Board**

All interested parties, internal and external to Sir Safety System S.p.A., are required to report in writing any non-compliance with this Code.

Reports are to be submitted to the Board, in the specific manner laid down by internal procedures.

Sir Safety System S.p.a. undertakes to protect the authors of the reports against any retaliation they may suffer, and to keep their identity confidential, unless specifically required by law.

The Board may carry out checks on its own initiative to check that this Code is complied with.

The Board carries out its own preliminary investigation with regard to the reports it receives or any circumstances it finds concerning violations of this Code.

The Board shall hear the author of the report and the person responsible for the alleged violation separately. Reports that are found to be manifestly unfounded are subject to sanctions.

If the person responsible for the breach is an employee of Sir Safety System S.p.A., the investigation is carried out after the person concerned has been notified in advance of the breach of this Code and of the counter-arguments submitted by the latter, in accordance with the provisions contained in art. 7 of Law no. 300 of 20 May 1970 and in the collective agreement applied to the employment relationship.

At the end of the investigation, if it finds that this Code has been breached, the Board will submit its own explanatory report to the body responsible for adopting the necessary decisions in accordance with the provisions of the Disciplinary System, which is an integral part of the Organisation, Management and Control Model adopted by the Company, proposing to the latter the sanction to be imposed.



### **8.3. Sanctions**

The observance by Sir Safety System S.p.A. employees of the rules of the Code must be considered an essential part of their contractual obligations pursuant to art. 2104 of the Italian Civil Code. Violation of the rules of the Code by the company's personnel constitutes a breach of the primary obligations of the employment relationship or a disciplinary offence, subject to legal consequences. Similarly, the Board of Directors, the CEO, the appointed executive officers and all those who exercise, even de facto, management and control of the company, as well as the Board of Auditors and all Sir Safety System S.p.A. personnel who violate the provisions of this Code, shall be subject to the Disciplinary System, which is an integral part of the Organisation, Management and Control Model adopted by the company.

When drawing up contracts with consultants and suppliers of goods and services, including professionals, and with anyone who carries out activities in the interest of the Company for any reason, the Company assesses, depending on the type of relationship, whether it is appropriate to include clauses that expressly bind the other contracting party to comply with the principles and rules contained in this Code. In the event of violation of the above-mentioned provisions, these will give Sir Safety System S.p.A. the right to withdraw from the contract or request its termination.

### **8.4. Validity of the Code**

This Code will apply to the conduct of the parties concerned after it has been formally adopted by Sir Safety System S.p.A.

For this purpose, after it has been adopted, this Code will be brought to the attention of the members of the corporate bodies, the CEO, the appointed executive officers, the employees and collaborators of Sir Safety System S.p.A. and all those who provide services to or perform activities for the company.

A copy of the Code will be posted in a place that is accessible to all workers and will be brought to the attention of suppliers of goods and services as well as those who enter into negotiating relations with Sir Safety System S.p.A.