
	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	REV.	DATE
	CE231	0	17/05/2018



CODE OF ETHICS

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	REV.	DATE
	CE231	0	17/05/2018

DOCUMENT STATUS: LIST OF REVISIONS

REVISION DATE /	DESCRIPTION
00 / 17/05/2018	First issue.

DOC:CE231 REV.: 00 DATE:17/05/2018	DRAFTING AND VERIFICATION: Signature: _____	AUTHORISATION <u>Signature:</u>
---	---	---



	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	REV.	DATE
	CE231	0	17/05/2018

TABLE OF CONTENTS

1.	CODE OF ETHICS.....	4
2.	DISSEMINATION OF THE CODE.....	4
3.	OBLIGATIONS OF RECIPIENTS.....	4
4.	VIOLATIONS OF THE CODE.....	5
5.	MISSION AND VALUES.....	5
6.	GENERAL PRINCIPLES OF CONDUCT.....	6

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	REV.	DATE
	CE231	0	17/05/2018

1.CODE OF ETHICS

This Code of Ethics (hereinafter referred to as *Code*) is a document **expressing the values and principles of conduct that SA FIRE PROTECTION S.R.L. follows in the management of its business activities and in relations with all those who interact with it.**

In order to regulate mutual cooperation, the *Code* shows the standards of conduct addressed to **Recipients**, whether internal or external to the Company:

- the corporate bodies (Sole Director or Board of Directors, Auditor, Board of Statutory Auditors, Shareholders' Meeting);
- employees;
- workers, even temporary;
- consultants and collaborators of any kind;
- Stakeholders in general;
- and any other person who may act in the name and on behalf of **SA FIRE PROTECTION S.R.L.**

With particular reference to the Legislative Decree 231/2001, the purpose of the *Code* is, moreover, the definition of the legal obligations, the clarification of the conduct resulting from the aforementioned obligations and the identification of the responsibilities of each person who collaborates in any way with SA FIRE PROTECTION S.R.L.

For all those who work in favour of **SA FIRE PROTECTION S.R.L.** and for all third parties, adherence to the ethical principles provided for in the *Code* is a necessary condition for the continuation of the relationship with the Company itself: **The *Code* constitutes an integral part of the contract signed.**

2.DISSEMINATION OF THE CODE

SA FIRE PROTECTION S.R.L. in compliance with **Legislative Decree 231/2001**, disseminates the *Code* in particular:

- to internal personnel, through the posting in the workplace and its presentation at specific training sessions, in order to promote awareness and practice on the conduct indicated therein;
- to external collaborators, suppliers and other third parties who carry out activities in the name and on behalf of **SA FIRE PROTECTION S.R.L.**, by means of timely and clear communication, paper and/or electronic, so as to put the Recipient in the conditions of fully understand its content and to sign it consciously.

In order to obtain a maximum diffusion of the *Code*, it is published on the Website.


3.OBLIGATIONS OF RECIPIENTS

All Recipients are required **to read and accept the *Code***, i.e. to know and learn the rules of conduct contained therein as well as all those behavioural rules regulating the different business activities. More specifically, internal Recipients are required to:

- contact their superiors, or company contacts, in the event of a request for clarification on the methods of application of the rules contained in the *Code*;
- promptly report to their superiors, company representatives or, in non-anonymous form, to the Supervisory Body (deputed to supervise the functioning and effective implementation of the Management and Control Organisation Model pursuant to Legislative Decree 231/ 2001 and subsequent amendments) any news, of direct detection or reported by others, regarding possible violations or attempted behavioural violations;
- collaborate with the divisions appointed to verify possible behavioural violations;
- adequately inform each third party, with whom they come into contact in the context of work activities, on the existence of the *Code* and on commitments and obligations imposed by the same to external parties.

Furthermore, every company manager is required to:

- provide an example to the direct collaborators with their own behaviour;

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	RE V.	DATE
	CE231	0	17/05/2018

- emphasize that compliance with the Code is a fundamental part of their work;
- carry out, where appropriate, a control function on the correct implementation of the Code;
- adopt, when required by the context, immediate corrective measures;
- prevent any kind of retaliation.

4. VIOLATIONS OF THE CODE

Violations committed by Employees in relation to behavioural standards, procedures and operating instructions, which descend from the general guidelines formalized in the *Code*, are sanctioned pursuant to the *Disciplinary System* of **SA FIRE PROTECTION S.R.L.**, drafted in accordance with the regulations of the Labour Law and in particular pursuant to and for the purposes of Art. 7. of the Workers' Statute and the National Collective Labour Agreements (CCNL) applicable in the Company. A specific violation will, therefore, constitute a disciplinary offence and, as such, will be prosecuted and sanctioned.

Violations of the rules of the *Code* and the failure to comply with the other principles of conduct, which they descend from, when perpetrated by members of the corporate bodies may result in the adoption, by the competent authorities, of the most appropriate measures provided and permitted by law.

Violations committed by third parties, finally, will be punished in accordance with the provisions provided by the relevant contractual duties, except for violations of the law of greater importance. **SA FIRE PROTECTION S.R.L.** undertakes, in any case, to do everything necessary and permitted in order to protect itself and to take due distance from such unlawful conduct.

5. MISSION AND VALUES OF SA FIRE PROTECTION S.R.L.

The objectives of **SA FIRE PROTECTION S.R.L.** are:

- excellence in every aspect;
- innovation based on scientific research;
- to create value for customers through presence and sharing;
- to offer employees a rewarding job and career opportunities;
- to create value for partners and shareholders.

SA FIRE PROTECTION S.R.L. believes that the ability to excel is linked to:


- integrity;
- ethical behaviour;
- open-mindedness;
- knowledge;
- creativity;
- expertise;
- team work.

SA FIRE PROTECTION S.R.L. expresses the aforementioned values in the daily business activity to seek continuous improvement in processes and products.

6. GENERAL PRINCIPLES OF CONDUCT

SA FIRE PROTECTION S.R.L., in following its ethical principles, undertakes to:

- manage business relationships in accordance with all laws and regulations in force;
- always act in mutual respect;
- observe their moral and social obligations;
- fulfil all regulations on the protection, health and safety of persons;
- save resources and protect the environment;
- never use company resources and/or assets to make a personal profit;

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	RE V.	DATE
	CE231	0	17/05/2018

- never make decisions based on personal gain;
- to contribute to the development of the local communities in which **SA FIRE PROTECTION S.R.L.** operates, adopting a code of ethics able to ensure commitment, honesty, correctness and respect for the rules.

6.1 Legality

SA FIRE PROTECTION S.R.L. recognizes legality as a fundamental principle for the conduct of any activity and encourages its employees **to respect this Code, the Law, the legislation in force and the specific company regulations: SA fire PROTECTION S.R.L. does not justify any contrary conduct even if motivated by the pursuit of an interest of the Company itself, and sanctions such conduct according to the articles of its Disciplinary System.**

SA FIRE PROTECTION S.R.L. prevents, with specific controls, the establishment and maintenance of any form of relationship with subjects whose conduct is not based on principles of verified legality.

6.2 Loyalty and correctness

The conduct of **SA FIRE PROTECTION SRL** personnel with regard to competing companies, Competitors, is based on the principles of loyalty and fairness, always in compliance with the Law: **SA FIRE PROTECTION S.R.L. disapproves and condemns any conduct that may constitute a hindrance or disturbance to the exercise of a company or which may nevertheless be aimed at the commission of offences against industry and commerce (illegally obtaining trade secrets, supplier lists and other information relating to the economic activity of third parties,...).**

6.3 Quality of the product

Quality is measured in customer satisfaction. Products and services must respond to rigorous demands, which can only be met by applying high-quality standards.

In **SA FIRE PROTECTION S.R.L.**, Total Quality Management is much more than a simple technical term: the personnel are responsible for satisfying the customer's requests.


Profound know-how and sophisticated manufacturing processes are necessary to meet the demand for outstanding performance in terms of technology and quality and in a cost-efficient way.

The production procedures and processes of **SA FIRE PROTECTION S.R.L.** have been certified according to the International ISO 9001:2008 standard. The development of production processes and systems is a consequence of the technical capacities and the constant will of **SA FIRE PROTECTION S.R.L.** to innovate.

6.4 Enhancement of human resources

All the employees of **SA FIRE PROTECTION S.R.L.** help to define, maintain and improve the image of the Company and the quality of the products supplied. For this reason, **SA FIRE PROTECTION S.R.L.** constantly promotes the value of its human resources, stimulating collaboration and teamwork and supporting actions of continuous training and lifelong learning.

For **SA FIRE PROTECTION S.R.L.** employees are a strategic resource and multiculturalism is a strong point for the whole Group. **SA FIRE PROTECTION S.R.L.** underlines the importance of attracting and retaining the best talents and stimulates the honest, open and constructive interaction, participation and collaboration, sharing of information and knowledge: the degree of satisfaction and

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	RE V.	DATE
	CE231	0	17/05/2018

performance of employees are regularly assessed on the basis of individual and collective results, respect of compliance and rules of conduct.

SA FIRE PROTECTION S.R.L. enhances its human resources by implementing a serious policy of personnel management and more precisely by promoting the criterion of meritocracy and the recognition of the quality of work as well as the growth and development of employees through training activities.

SA FIRE PROTECTION S.R.L. knows how to seize the productive potentials coming from the community and must put in place all those conditions that make the right to work effectively, without distinction of sex, race, language, religion, political opinions and personal and social conditions.

6.5 Health and safety in the workplace

SA FIRE PROTECTION S.R.L. is committed, therefore, to the protection of the psychophysical integrity of its employees, and of all those who move in the workplaces of its competence: strictly adopting the provisions of the legislation in force regarding health and safety in the workplace and periodically analysing their business processes to identify and eliminate or monitor risk situations.

Special attention is also paid to raising awareness among employees on the subject of prevention, through information and training actions as well as the training of personnel.

6.6 Environment

SA FIRE PROTECTION S.R.L. produces and works with a broad vision: respect for the limited resources of the planet and the awareness of the delicate balance between technology and nature, this has induced **SA FIRE PROTECTION S.R.L.** to continuously seek new more environmentally friendly production processes.

Further developing this approach **SA FIRE PROTECTION S.R.L.** ensures that its products are durable, energy-saving and easy to use, while providing at the same time excellent performance. The mission of **SA FIRE PROTECTION S.R.L.** is to conduct its activities in a manner consistent with the balance between environmental and economic needs of the community in which it operates.


The Company thus promotes strategies aimed at improving the environmental performance of its processes and promoting resource saving: **SA FIRE PROTECTION S.R.L.** emphasizes the responsibility of each employee in terms of environmental results; ensures that appropriate operating procedures and personnel training programmes are carried out; controls each process in order to safeguard the centrality of the worker, its own and third-party assets and the community where it operates.

SA FIRE PROTECTION S.R.L. prohibits any activity that leads to pollution of water, soil and subsoil and undertakes to ensure that the maintenance activities of the systems and the management of waste are carried out with the utmost respect for the environment.

If potential phenomena of pollution are detected, **SA FIRE PROTECTION S.R.L.** undertakes to intervene promptly to manage the emergency and, if necessary, to proceed with remediation interventions.

SA FIRE PROTECTION S.R.L. prohibits any activity that constitutes unlawful traffic of waste and selects only environmental service providers who possess the necessary authorization requirements.

6.7 Participation and reciprocity

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	RE V.	DATE
	CE231	0	17/05/2018

SA FIRE PROTECTION S.R.L. recognizes in the observations and suggestions coming from its Stakeholders an important participatory and involvement tool for improvement and to satisfy the relevant stakeholders.

For this reason, both internally and externally, it diffuses a policy of extreme openness to dialogue and confrontation, promoting and facilitating the achievement of balanced solutions and limiting the occurrence of inconveniences and conflicts.

With this in mind, **SA FIRE PROTECTION S.R.L.** considers the sharing and signing of the principles of the *Code*, an essential requirement for the relationship with Stakeholders to take place and be maintained.

6.8 In the management of the drafting of the corporate accounting documents and corporate communications

SA FIRE PROTECTION S.R.L. observes the rules of correct, complete and transparent accounting, according to the criteria indicated by the Law and by the national and international accounting standards. **SA FIRE PROTECTION S.R.L.** also adopts corporate communications (financial statements, notes, reports and other documents) in compliance with the shareholders pursuant to the articles of the Civil Code.

SA FIRE PROTECTION S.R.L. prohibits any action that could be an obstacle to the activity of public Supervisory Authorities.

In particular, in the management of the drafting of corporate accounting documents and in corporate communications, the employee acts in compliance with the principle of diligence and loyalty. Diligence means all the precautions and attentions to be observed in performing the service. The obligation of loyalty consists, instead, in the prohibition of divulging information related to the organization and the operating procedures and to make use of the acquired knowledge in such a way as not to damage the Company.

The employee shall carry out the provisions concerning the fulfilment of his/her functions or duties which are given to him/her by his/her superiors. If he/she considers that the order is clearly illegitimate, the employee demonstrates the reasons for the illegitimacy to those who issued it; if the order is renewed in writing he/she has the duty to execute it. The employee, however, does not execute the order when the act is prohibited by criminal law or constitutes an administrative offence.

6.9 Protection of data and IT systems

SA FIRE PROTECTION S.R.L. protects the privacy and confidentiality of information and data, belonging to employees, collaborators or third parties, collected for the performance of the work activity, and each employee and collaborator is obliged to comply with these principles; the management of the processing of personal data is in full agreement with the current legislation on the subject. The Recipients ensure maximum confidentiality on the news and information constituting the corporate assets of **SA FIRE PROTECTION S.R.L.** in compliance with Legislative Decree 196/2003 (Personal data protection code).


SA FIRE PROTECTION S.R.L. prohibits any practice that may violate the confidentiality of its own and third-party IT systems, or otherwise cause damage to it, or aimed at falsifying a public computer document and/or with evidential effectiveness.

7. SPECIFIC PRINCIPLES OF CONDUCT

The following are some specific principles of conduct referring to different types of Recipients and/or to particular relationships with SA FIRE PROTECTION S.R.L.:

7.1 In relations with Employees

Selection and recruitment of personnel

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	RE V.	DATE
	CE231	0	17/05/2018

All the company functions of **SA FIRE PROTECTION S.R.L.** involved in the selection and recruitment of personnel must ensure:

- compliance with transparent and impartial selection and recruitment criteria;
- verification of correspondence between candidates' profiles and the needs of the Company;
- the application of regular forms of work;
- respect for workers' right to working conditions based on the dignity of the person.

Transparency in business relations and communications

Transparency in the company's relationships and communications between the employees of **SA FIRE PROTECTION S.R.L.** is an important prerequisite for achieving business objectives. Transparent relationships and communications allow continuous improvement both in the quality of the product supplied and in the quality of life within the Company. Transparency, clarity and communicative effectiveness are also elements that make the complete and authentic implementation of this *Code* possible.

Any unfounded report, made in bad faith, in order to cause damage to colleagues and/or collaborators is also considered a disciplinary infraction.

7.2 In relations with the Public Administration and the Supervisory and Control Authorities

7.2.1 Towards the Public Administration

SA FIRE PROTECTION S.R.L. shall rigorously adopt, in relations with the public administration, and with the entities which carry out activities of public utility or public interest, the strictest observance of the international, national and corporate regulations applicable.

SA FIRE PROTECTION S.R.L., and, every employee, collaborator or consultant, on behalf of the same, must not attempt to improperly influence the decisions of the institution concerned, in order to obtain the fulfilment of acts complying with or contrary to the duties of office, in particular by offering or promising, directly or indirectly, gifts, money, favours or utilities of any kind. The Employee or the collaborator who should receive indications to operate in this sense is required to immediately notify the Supervisory Body (SB).

SA FIRE PROTECTION S.R.L. asks the personnel responsible for the request and submission of declarations, documents and information for the granting of contributions, subsidies and financing, to act in accordance with the Law, drafting the necessary documentation without artifice or deception.

SA FIRE PROTECTION S.R.L. undertakes to ensure that the disbursements granted are allocated to the purposes for which they were requested.

7.2.2 Towards the Supervisory and Control Authorities

7.2.3 Legal proceedings


Any legal action must be approved by the Board of Directors of **SA FIRE PROTECTION S.R.L.**, which must also be informed of any possible legal action by third parties against the Company itself. The Management verifies that the persons involved in the management of legal, judicial and arbitration proceedings are authorised to take care of documents until they are archived in particular to prevent the offence of falsification of IT documents having evidential effectiveness.

The Management also ensures that no one is induced not to make statements or false statements to the Judicial Authorities, both in Italy and abroad.

SA FIRE PROTECTION S.R.L. prohibits any conduct that may unlawfully influence the outcome of legal proceedings.

7.3 In relations with Suppliers

7.3.1 Selection and choice of suppliers

	CODE OF ETHICS PURSUANT TO LEGISLATIVE DECREE 231/2001	RE V.	DATE
	CE231	0	17/05/2018

The management of suppliers must be based on criteria of impartiality, autonomy and independence in order to:

- avoid any form of discrimination and allow all those who have the relevant requirements to compete for the awarding of contracts;
- avoid conflicts of interest, illegal and immoral practices that harm individuals and the entire corporate system.

7.3.2 Purchase management

SA FIRE PROTECTION S.R.L. does not accept the signing of orders which violate this *Code*, or which conflict with the current regulations concerning occupational safety and environmental protection.

SA FIRE PROTECTION S.R.L. discloses this *Code* to suppliers. All suppliers are required to read and accept it, aware that **SA FIRE PROTECTION S.R.L.** considers conduct contrary to the principles of the *Code*, ground for interrupting the fiduciary relationship and just cause for termination of the contractual relations.

See, in this regard, the *General Conditions of Purchase* of **SA FIRE PROTECTION S.R.L.**

7.4 In relations with the Competitors

7.4.1 Respect for industrial and intellectual property

SA FIRE PROTECTION S.R.L. respects its own and other industrial and intellectual property rights, including copyrights, patents, trademarks and identification marks: **SA FIRE PROTECTION S.R.L.** prohibits the unauthorized reproduction of computer programs, documentation or other materials protected by copyright or respects the restrictions indicated in the licence agreements.

7.4.2 Patent management of **SA FIRE PROTECTION S.R.L.**

SA FIRE PROTECTION S.R.L. activates all the necessary procedures to ensure compliance with copyright laws, as well as on the protection of recognition marks, such as trademarks and patents. The Management of **SA FIRE PROTECTION S.R.L.** is responsible for the management of trademarks and patents. All patents and trademarks must be registered in the name of **SA FIRE PROTECTION S.R.L.**

7.5 In relations with Customers

7.5.1 Accuracy and completeness of information

Employees are asked to define and make communications to Customers:

- clear, simple and understandable;
- compliant with the regulations in force, without resorting to practices that are elusive or misleading in any way;
- complete, avoiding omissions or interpretable exposures, to allow the Customer to make a fully conscious decision.

SA FIRE PROTECTION S.R.L. also undertakes to communicate promptly to its Customers, using the most effective means of communication, any modifications to the contracts and changes to the economic and technical conditions of the product.

7.5.2 Customer involvement

Paying attention to alerts and indications from the Customer is essential to provide a satisfactory product. For this purpose, **SA FIRE PROTECTION S.R.L.** provides direct communication channels between the customer and the many professional skills available, from designers to post-sales assistants.