

CODE OF ETHICS

SACECA s.r.l.

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INTRODUCTION

The Code of Ethics defines the principles and the rules of behavior which the subjects who work for and with Saceca S.r.l. need to respect and to which they must inspire themselves in their daily activities. The Code of Ethics configures itself as tool of warranty and reliability, for the protection of the assets and the reputation of the Company and is a constituent element of the company's ethical system.



01. RECIPIENTS AND SCOPE

The recipients of this Code of Ethics are the administrators, the majors, the executives and the employees of Saceca and all those who, directly or indirectly, permanently or temporarily, establish relationships with Saceca S.r.l., each within their functions and responsibilities. The recipients are to respect the laws and regulations applicable in the different geographical contexts in which Saceca S.r.l. operates, and to set their behavior according to what provided in this Code. The recipients are also called to know and respect, in relation to the function exercised and the level of responsibility assumed, the company procedures applicable to them. **Saceca S.r.l. firmly believes in the respect of legality** and, for this reason, in no circumstance the pursuit of business interests may justify a conduct contrary to the laws in force and the rules herein. **The present Code of Ethics is valid in Italy and abroad**, here finding reasonable application in relation to the different cultural, political, social, economic and commercial realities of the various Countries in which Saceca S.r.l. operates.



02. ETHICAL PRINCIPLES

Saceca S.r.l. pursues in its activities the creation of value for all the stakeholders, through an attentive management of the profile of company risk and **a conduct always correct and transparent towards all stakeholders.**

Each employee acts daily on the basis of the Ethical Principles which represent Saceca S.r.l.:

- **INTEGRITY:** Saceca S.r.l. promotes legality, honesty, fairness, impartiality in all behaviors inside and outside the company, establishing and developing **relationships of trust with the clients, the business partners, the suppliers and all the other stakeholders.**
- **CORRECTNESS:** Saceca S.r.l. adopts the **maximum diligence in the implementation of every negotiation, agreement or company activity.**
- **RELIABILITY:** Saceca S.r.l. utilizes all the necessary tools for a clear, complete and prompt communication and it strives so that the market and the other individuals may adopt informed and aware decisions.
- **SUSTAINABILITY:** Saceca S.r.l. **promotes a sustainable development** through the quality and excellence of its work and of the raw material used, pursuing a constant dialogue with its stakeholders, characterized by the respect towards human rights and work, the safeguarding of the physical and moral integrity of the employees and the safeguarding of the environment.



03. RULES OF BEHAVIOR

The Ethical Principles of Saceca S.r.l. declares in rules of behavior which every recipient of the Code must know and to which it must abide by:

A. CLIENTS

Saceca S.r.l. adopts, in every moment, **behaviors aimed at satisfying the clients' expectations**, maintaining very high levels of quality, performance and reliability. It is a priority to identify and satisfy the requirements and the needs of the clients, best utilizing the resources and synergies of the Company and maintaining a constructive discourse. Saceca S.r.l. builds the contractual relationship on correctness, transparency and fairness, prohibiting the exploitation of possible conditions of others' negotiation weakness or the not knowing of facts and conditions to improperly influence the clients during any negotiation. Saceca S.r.l. does not follow nor promotes solicitations aimed at obtaining confidential information protected by the laws in force. Any act aimed at persuading, even only potentially, the clients and their representatives to carry out activities in violation of the laws of the system they belong to or to omit due activities is forbidden.

B. SUPPLIERS

The selection of the suppliers is executed on the basis of the principles of correctness and impartiality, according to selection rules built on the verification of **quality, technical-professional suitability**, respect of the standards applicable on the matter of human rights, **of the regulation on the matter of work, health, safety and environment** and of the criteria of cost. The signed acceptance of this Code by the supplier represents one of the standard of selection and becomes integral part of the contractual relationship. Saceca S.r.l. encourages its suppliers to apply the same selection criteria in choosing its sub-suppliers, with the objective of incentivizing and promoting the respect of this Code in the entire supply chain.

Saceca S.r.l., in respecting the obligations taken with its suppliers, commits to protect the privacy of the company's information and of the professional know-how and to request the same correctness in the handling of the relationship to the counterpart. The payment to be remitted to the suppliers is exclusively in proportion to the service indicated on the contract and the payments are not executed to a party different than the contracting party nor in a Country different than that agreed upon formally. Saceca S.r.l. shapes the contractual relationships on correctness and transparency, committing to not exploit possible conditions of dependency or weakness of the supplier.

C. PERSONNEL

Saceca S.r.l. promotes behaviors aimed at developing the competencies, abilities and potential of the personnel, offering, without any discrimination, equal employment opportuni-



ties based on professional qualifications and ability to perform. Furthermore, it recognizes and gives value to the diversity of its personnel as essential element for the growth of the Company. Decisions on the working life of the personnel must not be based on the accepting of favors, also sexual, or on personal and cultural diversities. In the limits of the available information, opportune measures have been adopted to avoid favoritisms, nepotisms, or forms of cronyism in the phases of selection and hiring as well as for the whole duration of the work relationship.

Saceca S.r.l. safeguards the integrity of the personnel, guaranteeing **work conditions respectful of the dignity of the person and the human rights and of the work universally recognized**, protecting the employees from acts of physical, psychological or bullying violence and contrasting any attitude or discriminatory or harmful behavior of the person, of his beliefs and inclinations, with particular reference to disabilities and physical or psychological disablement or to forms of cultural, religious diversities or of sexual orientation. No form of irregular, underage, forced or obligated work is tolerated. Saceca S.r.l. forbids and opposes sexual harassment, behaviors or discourses which might disturb the sensibility and discretion of the person, as well as the use, even occasional, of alcoholic substances or drugs during the work activity and at the work locations. It is not allowed to take advantage of one's own role to dictate to one's collaborators the accomplishment of favors, personal favors or any other behavior not provided by the work contract or by the company regulations. The purchasing, dissemination and use of pornographic and pedo-pornographic material through the use of the company's resources is forbidden.

D. LOCAL COMMUNITIES

Saceca S.r.l. respects the rights and the culture of the communities affected by its activities, while maintaining an open dialogue with them. As far as possible, Saceca S.r.l. **supports and promotes the employment of local workforces and suppliers, thus contributing to the economic and social development of the Countries in which it operates.**

E. HEALTH AND SAFETY

Saceca S.r.l. is determined to maintain the maximum levels of protection of the health, safety and hygiene for its own workers, and to ensure the necessary preventive and protective measures to avoid or minimize professional risks to the maximum.

All recipients of the Code are called to evaluate and manage the risk in a preventive manner and to actively intervene to avoid unsafe situations and behaviors, contributing to keep the work environment in which they operates healthy and safe while ensuring the safety of their colleagues and collaborators. Saceca S.r.l. **commits to disseminate the culture of health and safety in the work places**, involving the entire personnel in activities of information and training. All employees, regardless of their role, are expected to contribute to the health and safety of the workplace, through the active participation in the management of these aspects.



F. ENVIRONMENT

Saceca S.r.l. **undertakes to safeguard the environment in each of its activities**, utilizing processes, technologies and materials which allow the reduction of consumption of energy and of natural resources, avoiding or limiting the impact deriving from the company's activities in terms of pollution, emission of greenhouse gases, production of waste and inconveniences for the local communities, as well as restore the job site work areas at completion of the project. All recipients of the Code are required to evaluate and manage with great attention the natural environments in a preventive manner and to actively intervene to avoid incorrect situations and behaviors. Saceca S.r.l. **commits to disseminate the environment culture in the workplace**, involving the whole personnel in information and training activities.

G. COMPETITION

Saceca S.r.l. commits to ensure the observing of the laws on the matter of competition in any jurisdiction and to collaborate with the market regulating Authorities, in the respect of the **correct competition** and abstaining from collusive and abusive behaviors of dominant position. Saceca S.r.l. forbids the gathering of information on the competition (ex. activities, methods of manufacturing, technologies) with illicit methods contrary to the ethic (ex. theft, corruption, false declarations, electronic espionage).

H. INFORMATION

Saceca S.r.l. undertakes to promptly supply to the public truthful, correct and authentic information to allow access to the information necessary to execute informed and aware decisions connected to the Company. Saceca S.r.l. forbids any behavior aimed at altering the correctness and truthfulness of the data and information contained in the balance sheets, in the relations or in the other social communication provided by the law.

Saceca S.r.l. **maintains the total discretion on the information pertaining the suppliers, clients, business partners, managers and employees** both in reference to strategic information and personal data. Company data is handled exclusively for the finalities declared and pursued in the agreements taken and, however, always with the consent of the interest party where required by the applicable laws. Privileged information is processed and communicated according to the legislation of reference and the company procedures exclusively by the authorized functions. Saceca S.r.l. condemns any abuse of information of which administrators, executives, employees or external collaborators could have get knowledge of for reason of their function or of their office, with particular reference to those behaviors aimed at exploiting said information for operations on financial tools of Saceca S.r.l.

I. ANTICORRUPTION

Saceca S.r.l. adopts a **“zero tolerance” policy towards any corruption phenomenon** and commits to respect the anticorruption laws in force in all the countries in which it operates, requiring its shareholders to act with honesty and integrity at any time. For no reason are accepted behaviors aimed at improperly influence the decisions of representatives of public or private bodies.



J. COMPANY ASSETS

Saceca S.r.l. **makes the personnel responsible** so as to operate with diligence, in order to safeguard, supervise and preserve the assets and resources of the Company entrusted to them in the sphere of the work activity, and to use them in a mode proper and in compliance to the social interest, forbidding any improper use. Saceca S.r.l. commits to respect the regulation which **protects the author's rights and the intellectual property and prohibits the use of software of data banks not authorized on the Company's computers.**

K. GRATUITIES AND BENEFITS

Saceca S.r.l. adopts procedures which **prohibit** the Company's personnel and, in general, everyone who executes activities on behalf of the Company, to request/promise/offer or receive, directly or indirectly, gratuities and/or benefits to/from executives, officials or workers of clients, suppliers, representatives of the Public Administration, Italian or foreigner, or to their relatives or similar, public institutions or other organizations, directed at obtaining an **unjust benefit** of any type whatsoever, not only for the interest and/or advantage, even only potential, of the Company, but also for the personal interest and/or advantage, or of family members and acquaintances. Ordinary and reasonable entertainment expenses, presents of moderate value, that is forms of hospitality in the limits of normal relationships of courtesy and in accordance with the defined company procedures are allowed.

L. SPONSORSHIPS AND FREE CONTRIBUTIONS

Saceca S.r.l. adopts procedures aimed at ensuring that the sponsorships are **finalized to the promotion of the Company's image** and its activities, guaranteeing the professionalism and honorability of the recipients of the activity and the coherence of the operation in comparison to the principles described in this Code. Saceca S.r.l. does not dispense contributions to political and union organizations constituted in any form (parties, movements, committees, etc.), nor to their representatives.

M. FINANCIAL FLOWS

Saceca S.r.l. **respects all the regulations and dispositions, both national and international, about anti-money laundering and financing to terrorism.** In no way and in no circumstance, it is tolerated to receive or accept the promise of cash payments or to launder money, goods or other benefits originating from illicit or criminal activities as well as execute operations to obstruct the identification of their origin. Contributions, subsidies or financing obtained by any public or private body, even if of modest value and/or amount are used in a coherent way to the objective for which they were granted.

N. CONFLICT OF INTERESTS

Administrators, executives, employees and external collaborators should **avoid any situation of conflict of interest**, ensuring that every decision connected to the business activity is taken in the interest of the Company, avoiding any situation which might damage their



independence of judgement and choice or that it is in contrast with the responsibilities and the tasks that they fulfill within the structure or on behalf of Saceca S.r.l.

0. REWARDING SYSTEMS

Saceca S.r.l. **provides forms of payment appropriate for the corporate objectives** and structured in such a way as to avoid incentives not consistent with the company's interest. The activity of each one is determined on temporal and project objectives set and focused on a possible, specific, concrete, measurable and related with the time envisaged for its achievement.



04. METHOD OF ACTUALIZATION AND CONTROL

The Ethical Code is a binding instrument for anyone who works for and with Saceca S.r.l. and, to this end, has been adopted a system of actualization and control of the principles set forth by the same. The Administration Body is responsible for the updating of this Code. The recipients of the Code are called to recognize it and to actively contribute to its actualization, suggesting areas of improvement to the designated functions and/or through the signaling of potential violations. **Possible noticed violations should be opportunely communicated through the email address info@saceca.com**

Any retaliation, discrimination or penalization against the person signaling the violation shall be avoided, ensuring also the anonymity of said person and the privacy of the facts signaled, save as expressly provided by law and the safeguarding of the rights of Saceca S.r.l. **The violation of the Code by the recipients shall be reason for disciplinary penalty, included the possible resolution of the work relationship or the interruption of the business relationship.** Saceca S.r.l. undertakes to provide the maximum dissemination of the Ethical Code, in particular at the time of hiring new resources and through specific activities of communication and training aimed at making more easily usable the contents of the text and applicable in the daily work of all the recipients.

