

# SANCO

Fire Protection and Safety Technology

## SANCO S.P.A

### ETHICS POLICY



SANCO S.p.A.  
the Board of Directors

## **INDEX**

<b>INTRODUCTION</b>	<b>3</b>
<b>OUR VALUES</b>	<b>4</b>
<b>OUR POLICIES</b>	<b>5</b>
<b>THIRD PARTY</b>	<b>6</b>
<b>SUSTAINABILITY AND SOCIAL RESPONSABILITY</b>	<b>7</b>
<b>PRIVACY</b>	<b>8</b>
<b>RESPECT OF THE ETHICS POLICY</b>	<b>8</b>

## INTRODUCTION

SANCO has always been founded on values such as quality, authenticity, integrity and excellence.

Moved by the idea that ethical and sustainable behavior is the basis of our success and growth, we believe that the responsibility of each of us is to adopt exemplary conduct every day, promoting the values and principles that guide us and which are reflected in all our daily activities.

SANCO adopts this ETHICS POLICY in order to formalize and disseminate its principles, values and corporate responsibilities which constitute the basis that guides the Company in every choice and action.

SANCO is committing to managing all its business and activities in compliance with applicable national laws and regulations.

In particular, SANCO is subject to the provisions of Legislative Decree No. 159, dated September 6<sup>th</sup> 2011, which regulates Italian anti-corruption legislation against any type of mafia associations, national and international crimes, and any act of corruption committed by directors, employees or collaborators.

## OUR VALUES

Our values constitute the shared and identifying heritage of our corporate culture and represent the point of reference from which to inspire our conduct.

### **Integrity**

We pursue our goals with honesty, integrity and responsibility, in full and substantial compliance with the rules, the professional ethic and the spirit of the signed agreements.

### **Excellence**

We set the goals to continuously improve, looking far away, anticipating challenges, cultivating widespread creativity aimed at innovation and valuing merit.

### **Transparency**

We put transparency at the basis of all our actions, communications and contacts in order to allow anyone who interacts with us to make informed, conscious and autonomous choices.

### **Inclusiveness**

We promote inclusiveness, respecting people and any place where we operate. We believe that inclusiveness is an enabling factor for the development and expression of the individual potential.

### **Value of the individual**

The value of the individual guides our way of acting: we adopt listening and dialogue as levers for continuous improvement in relationships.

We take care of people's health and safety for a professional experience which respects the physical and psychological well-being.

### **Environmental Protection**

We promote an efficient and conscious use of all resources, avoiding waste and always favoring sustainable choices over time.

We are committed to protect the nature and the biodiversity and to support the transition path towards a sustainable, green and circular economy over time.

## OUR POLICIES

### MANAGEMENT OF WORKING CONDITIONS AND HUMAN RIGHTS

#### Relation with human resources

The success of the enterprise is the result of the professional and human contribution of the people who work within the company.

Respect for people is promoted and its importance is recognized, pursuing the maximum valorization of individuality, merit, talent, competence and managerial skills.

#### Rights and Trade Unions freedom

SANCO respects the right for workers to have a suitable representative as well as freedom for the employees to form and/or join workers' organizations or trade union representatives.

#### Health & Safety

SANCO makes efforts to guarantee to all employees a healthy and safe workplace that complies with health and safety laws, undertaking to keep workplaces safe and productive, minimizing the risks of accidents or injuries.

Employees are involved in the continuous improvement of the state of health and safety in the workplace in compliance with the current laws.

#### Diversity and equal opportunities

SANCO fights against every kind of discrimination, orientating all working relationships in the name of correctness, equality and fairness.

We protect and value our employees, respecting diversity and individuality which are considered a precious wealth to be preserved and enhanced.

We develop the company's ability to include and value everyone's contribution, taking into account everyone's needs and sharing a model of open communication where everyone can express himself and realize his full potential, within a framework of loyalty and trust.

According to this, we do not tolerate any kind of discrimination, offense or intimidation, protecting and promoting a workplace free from discrimination, harassment, bullying or any other form of abuse.

Moreover, we guarantee equal opportunities at every stage of the collaboration relationship, from recruitment to development paths and career progression; we avoid that prejudice or discrimination can influence processes that affect people's working lives, orientating every decision exclusively on merit criteria.

#### Child and forced labor

SANCO is daily committed to promoting an internal culture based on the respect for individual dignity, to safeguard workers' rights and counter any form of forced or child labor, even indirect, protecting the physical and moral integrity of everyone through a management orientated to the personal and professional respect, within a framework of reciprocal loyalty and trust.

## **Conflicts of interest**

We do not allow personal or third party interests to be pursued.

We ask to all our employees to inform about any conflict situations that may arise, even partial, regarding their interest (direct or indirect) or those of the company within they work.

## **Salary and work condition**

The salaries of SANCO collaborators comply with the provisions of applicable national legislation and industry standards.

The company acts fully in compliance with the current laws in material of salary, benefit, working time and overtime.

The methods by which salary remuneration is defined are based on objective criteria.

SANCO ensures that overtime work is correctly remunerated as well as that employees have suitable rest.

## **THIRD PARTY**

### **Clients**

The trust of our Clients is an essential purpose for us.

We act by constantly aiming for the excellence of the services offered, with dedication and competence, in order to satisfy Clients' expectations and needs.

We base all contractual relationships on transparency, professional correctness, respect for the current sector regulations, as well as on courtesy and collaboration in accordance with the logic that places the client at the center, and that we significantly promote.

### **Suppliers**

Our Suppliers' selection takes place in compliance with fairness and impartiality, according to the regulations aimed at the verification of the following requirements: quality, safety, environmental protection and attention towards sustainability.

### **Community**

We believe in a free and fair competition, which serves the interest of all market players, customers and stakeholders in general.

We avoid forbidden behaviors, as well as those collusive, restrictive, of abuse or any kind of misconduct, by committing ourselves to reach our goals on the basis of quality, safety and innovation which characterized all our products.

## **SUSTAINABILITY AND SOCIAL RESPONSIBILITY**

We live sustainability as a value and a duty.

Value intended as accountability for everything that our Company can do to contribute to make people feel the need of a greater respect for the environment.

Duty because we believe that everyone can and should contribute to do everything in his power to respect the environmental and guarantee its best condition.

Environmental is not only a part of our work but also, and especially, a Company's assets: a resource to be protected and safeguarded.

### **Environmental protection**

Among our main ambitions, there is promoting, in every possible way, the reduction of carbon emission, to improve waste and water management, vehicle emissions, energy and gas consumption.

### **Respect for Human Rights**

Always taking into consideration the Values which guide our Company, the respect for Human Rights represents for us an essential requirement in all our business activities.

For this purpose, SANCO is committed to promoting respect for Human Rights and to eliminate any kind of their violation found both inside and among its suppliers.

The respect for the principles expressed in the present Policy is to be considered part and parcel of the duties of all employees and their suppliers.

SANCO bases relationships with its collaborators on transparency and mutual confidence.

For this reason, SANCO applies and supports the Human Rights internationally recognized.

### **Corruption prevention**

SANCO is firmly against bribery, and all kind of corruption.

Any payments, gifts or incentives carried out by or on behalf of SANCO and which have the purpose to lead someone to act improperly and any payments, gifts or incentives to public officials aimed to influence them in their duty (different from payments, remuneration, etc. which have the right to be pretended by law) are matters which will be subject to investigation and that may eventually result in disciplinary action, even added together, towards the employees involved.

Both sales of SANCO services and goods and purchases of services and goods from suppliers will be made only on the basis of quality, performances, prices, value and / or for the benefit of the Company and never managed on the basis of giving or receiving incentives in the form of payments, gifts, entertainments, favors or in any other form.

The employees have not to accept gifts, money or entertainments from organization or third party individuals if they can reasonably be considered capable of influencing commercial transactions.

## PRIVACY

SANCO adopts a privacy management system in compliance with GDPR 2016/679. It is a system of data management and control, substantial and strictly interconnected with the activities performed and that constitutes an efficient security tool for personal data, their valorization and full information assets protection.

The data subject to processing are identified in the “Register of processing activities”.

The following are subject to treatment:

- Personnel recruitment and selection;
- Personnel and intermediary’s management;
- Suppliers management;
- Customer management;
- Access to database and company server (including management Software)

SANCO has identified and named the subjects in charge of managing these activities.

## RESPECT OF THE ETHICS POLICY

### Management’s commitment

Our managers represent a model for responsibility and integrity on which rely on. They undertake to give substance to those contents expressed in the present Code, by setting, personally, a good example.

We ask them to transmit our values in their daily actions and business, maintaining an ethical workplace, respectful and inclusive.

### Violations

Any lacks and violations (effective or potential) with regard to Human Right Policy are reportable to the Board of Directors.

The ethics is a commitment for all people, which can be achieved not only thanks to safe and correct rules of conducts carried out during works activities, but also building, actively and continuously, the conditions aimed to make this result possible.

### Reports (Whistleblowing)

We ask to all Recipients of the Code to promptly communicate the followings through the reporting tools establish by the “Whistleblowing” Procedure and available on Sanco S.p.A. website:

- Any violations, requests or inductions to laws or rules violation, to prescriptions regarding the present Code or internal procedures, with reference to the relevant activities and performances;
- Any kind of conduct contrary to the contents including in the ETHICS POLICY;
- Any act attributable to sexual or gender abuse or any other act of bullying;

- Any irregularity or negligence regarding the financial and accounting protection, relating record keeping, fulfillment of the obligations regarding accounting report or internal management.

We guarantee that no negative consequence can occur directed at the person who made the report in good faith, and we ensure, in any case, the privacy for the reporting agents as well as for the content of the report, in compliance with SANCO S.p.A. "Whistleblowing" Procedure, except as provided by the legal obligation.

## **Diffusion**

We undertake to promote the ETHICS POLICY through its distribution in electronic format, on company web portal and on SANCO S.p.A: website.