

SANCO S.P.A.

CODE OF ETHICS



SANCO S.p.A.
The Board of Directors

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PREAMBLE

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

Guided by the belief that ethical and sustainable conduct underpins our success and growth, we believe that each of us has a duty to act in an exemplary manner every day, promoting the principles that guide us and are reflected in our daily activities.

SANCO adopts this Code of Ethics to formalise and communicate its principles, values and corporate commitments, which form the foundation for every decision and action taken by the company.

This Code of Ethics applies to all offices, local units and operational activities of SANCO S.p.A. and, where applicable, to activities carried out at customer premises, construction sites and external locations, and to relationships with suppliers, contractors, consultants and business partners.

SANCO is committed to conducting its business in conformity with all applicable national laws, rules and regulations.

The principles set out in this Code of Ethics are consistent with the company's QHSE Policy and with the commitments undertaken by SANCO S.p.A. in the areas of quality, occupational health and safety, the environment, ethics, human rights and sustainability.

In particular, SANCO operates in compliance with applicable laws and regulations, with particular regard to the principles of legality, integrity, corruption prevention and the fight against unlawful conduct, as defined in D. Lgs. 6 settembre 2011, n. 159.

OUR VALUES

Our values form the shared foundation and identity of our corporate culture and provide the point of reference that inspires our conduct.

Integrity

We pursue our objectives with honesty, fairness and responsibility, in full and substantial compliance with rules, professional ethics and the spirit of the agreements entered into.

Excellence

We aim to continuously improve, looking ahead, anticipating challenges, fostering widespread creativity aimed at innovation, and valuing merit.

Transparency

We place transparency at the heart of our actions, our communication and our contracts to enable anyone interacting with us to make informed, aware and autonomous decisions.

Inclusion

We promote inclusion by respecting people and every environment in which we operate. We believe in inclusion as an enabling factor for the development and expression of individuals' potential.

Value of the individual

Respect for every individual guides the way we act: we use listening and dialogue to foster continuous improvement in our relationships. We protect people's health and safety to ensure a professional experience that respects physical and psychological well-being.

Environmental protection

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

We are committed to protecting nature and biodiversity and to supporting, over time, the transition towards a sustainable, green and circular economy.

OUR LINES OF CONDUCT

MANAGEMENT OF WORKING CONDITIONS AND HUMAN RIGHTS

Relations with human resources

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

We promote respect for people and recognise their importance, seeking to maximise recognition of individuality, merit, talent, skills and managerial capabilities.

Trade union rights and freedoms

SANCO respects workers' right to appropriate representation and employees' freedom to establish and/or join workers' organisations or trade unions.

Health and Safety

SANCO endeavours to ensure that all employees and collaborators have a healthy, safe workplace that complies with health and safety legislation. It is committed to maintaining productive and safe working environments and minimising the risk of accidents or injuries. This commitment includes the assessment and management of psychosocial risks, formalised in the Risk Assessment Document (DVR) pursuant to D.Lgs. 81/08 e s.m.i., with particular focus on preventing acts of violence and harassment, including gender-based harassment, as provided for by DL 159/2025. Employees are involved in continuously improving workplace health and safety in line with legal requirements.

Diversity and Equal Opportunities

SANCO combats all forms of discrimination, shaping working relationships on the basis of fairness, equality and equity.

We protect and enhance our people, respecting diversity and the individuality of each person, regarded as a precious asset to preserve and enhance.

We develop the company's ability to include and value everyone's contribution, taking into account each person's needs, and we promote a model of open communication in which everyone can express themselves and fully realise their potential, within a framework of loyalty and trust.

For this reason, we do not tolerate any form of discrimination, insult or intimidation, preserving and promoting a workplace free from discrimination, harassment, bullying or any other form of abuse.

We also guarantee equal opportunities at every stage of the employment relationship, from hiring, to development paths, to career progression, and we do not allow prejudices or discrimination to influence processes concerning people's working lives, basing every decision solely on merit-based criteria.

Child and forced labour

SANCO is committed on a daily basis to promoting an internal culture based on respect for individual dignity, to protecting the rights of workers and to combating all forms, including indirect forms, of forced or child labour and to protecting the physical and moral integrity of all, through management based on respect for the personality and professionalism of each person, within a framework of loyalty and mutual trust.

Conflicts of interest

We do not allow personal or third-party interests to take precedence. We ask our people to report any actual or potential conflict between their own direct or indirect interests and those of the Company for which they work.

Salary and working conditions

The remuneration of SANCO employees and collaborators complies with applicable national legislation and industry standards. The company fully complies with current laws on wages, benefits, working hours and overtime.

Remuneration is determined on the basis of objective criteria.

SANCO ensures that overtime is properly remunerated and that its employees receive adequate rest.

THIRD PARTIES

Customers

The trust of our customers is an essential objective for us.

We constantly strive for excellence in the services we provide, working with dedication and professionalism to meet our customers' expectations and needs.

We base our contractual relationships on transparency, professional integrity, compliance with industry regulations, courtesy and cooperation, in keeping with our customer-centred approach.

Suppliers

Suppliers are selected in accordance with the principles of fairness and impartiality and on the basis of objective criteria relating to quality, health and safety, environmental protection and sustainability. In its relationships with suppliers, contractors and business partners, SANCO promotes conduct consistent with the principles of this Code of Ethics and the commitments set out in the company's QHSE Policy.

Community

We believe in free and fair competition, which we recognise as serving the interests of all market participants, consumers and stakeholders in general.

We refrain from prohibited, collusive, restrictive, abusive or otherwise unfair conduct, committing to achieve our objectives on the basis of the quality, safety and innovation that characterise our products and services.

SUSTAINABILITY AND SOCIAL RESPONSIBILITY

We view sustainability as both a value and a duty.

It is a value because it means taking responsibility for everything our company can do to raise awareness of the need for greater respect for the environment.

It is a duty because we believe that everyone can and must do everything within their power to protect the environment and preserve it in the best possible condition.

The environment is not only part of our work, but above all a social asset: a resource to be protected and safeguarded.

Environmental Protection

One of our principal ambitions is to reduce carbon emissions by every possible means and to improve the management of waste, water, vehicle emissions, and energy and gas consumption.

Respect for Human Rights

In keeping with the values that guide us, respect for human rights is an essential requirement in the conduct of our activities. To this end, SANCO is committed to promoting respect for human rights and eliminating any violations identified within the company or among its suppliers.

Compliance with the principles set out in this Code of Ethics is an integral part of the duties of all employees and, where applicable, of suppliers and business partners. SANCO bases its relationships with its employees and collaborators on transparency and mutual trust. Accordingly, it upholds and supports internationally recognised human rights.

Prevention of Corruption

SANCO is firmly opposed to extortion and corruption in all their forms.

Any payments, gifts or incentives made by or on behalf of SANCO that induce, or are intended to induce, someone to act improperly, as well as any payments, gifts or incentives offered to public officials to influence the performance of their duties (other than payments or compensation to which they are legally entitled), will be investigated and may result in disciplinary action, including summary dismissal, against the employees concerned.

Sales of SANCO services and products and purchases of services and products from suppliers shall be carried out exclusively on the basis of quality, performance, price, value and/or to the benefit of the Company, and never on the basis of giving or receiving incentives in the form of payments, gifts, entertainment, favours or in any other form.

Employees must not accept gifts, money or entertainment from organisations or third-party individuals where these could reasonably be considered capable of influencing commercial transactions.

PRIVACY

SANCO adopts a privacy management system in accordance with GDPR 2016/679. This substantive data management and control system is closely integrated with the activities carried out and provides an effective means of protecting personal data, ensuring their appropriate management and safeguarding the company's entire information assets.

The data subject to processing are identified in the "Record of Processing Activities".

The following are subject to processing:

- Recruitment and selection of personnel;
- Management of personnel and intermediaries;
- Supplier management;
- Client management;
- Access to company server databases (including management software).

SANCO has also identified and appointed the persons responsible for the management of such activities.

COMPLIANCE WITH THE CODE OF ETHICS

Commitment by management

Our managers are role models of responsibility and integrity on whom others can rely. They undertake to put the principles set out in this Code into practice and to lead by example. We ask them to embody our values in their daily actions and to preserve an ethical, respectful and inclusive working environment.

Violations

Any deficiencies and any actual or potential breaches of the Human Rights Policy may be reported to the Board of Directors.

Ethics is a commitment for everyone, realised not only through safe and correct behavioural standards in the performance of one's work, but also by actively and continuously creating the conditions that make such an outcome possible.

Reporting (Whistleblowing)

We ask all Recipients of the Code to report promptly, using the reporting channels provided for in the "Whistleblowing" Procedure available on SANCO S.p.A.'s website:

- Any violations of, requests to violate, or inducements to violate laws or regulations, the provisions of this Code, or internal procedures in connection with relevant activities and services;
- Any form of conduct contrary to the contents of the Code of Ethics;
- Any act attributable to gender and/or sexual harassment and any act of bullying;

- Any irregularity or negligence in the keeping of accounting records, in the preservation of the related documentation, in the fulfilment of accounting reporting obligations or internal management reporting.

We guarantee that no adverse consequences will arise for anyone who makes a report in good faith. In all cases, we protect the confidentiality of the whistleblower's identity and the content of the report, as provided for in SANCO S.p.A.'s "Whistleblowing" Procedure, subject to applicable legal obligations.

Dissemination

We are committed to ensuring the widest possible dissemination of the Code of Ethics by distributing it electronically through the company portal and SANCO S.p.A.'s website.