



CODE OF ETHICS



EXTRACT OF THE CODE OF ETHICS (download [here](#))

Attachment of the Organization and Management Model

(D.Lgs 8th June 2001, n. 231 art. 25-septies & art. 30

D.Lgs 9th April 2008, n.81)

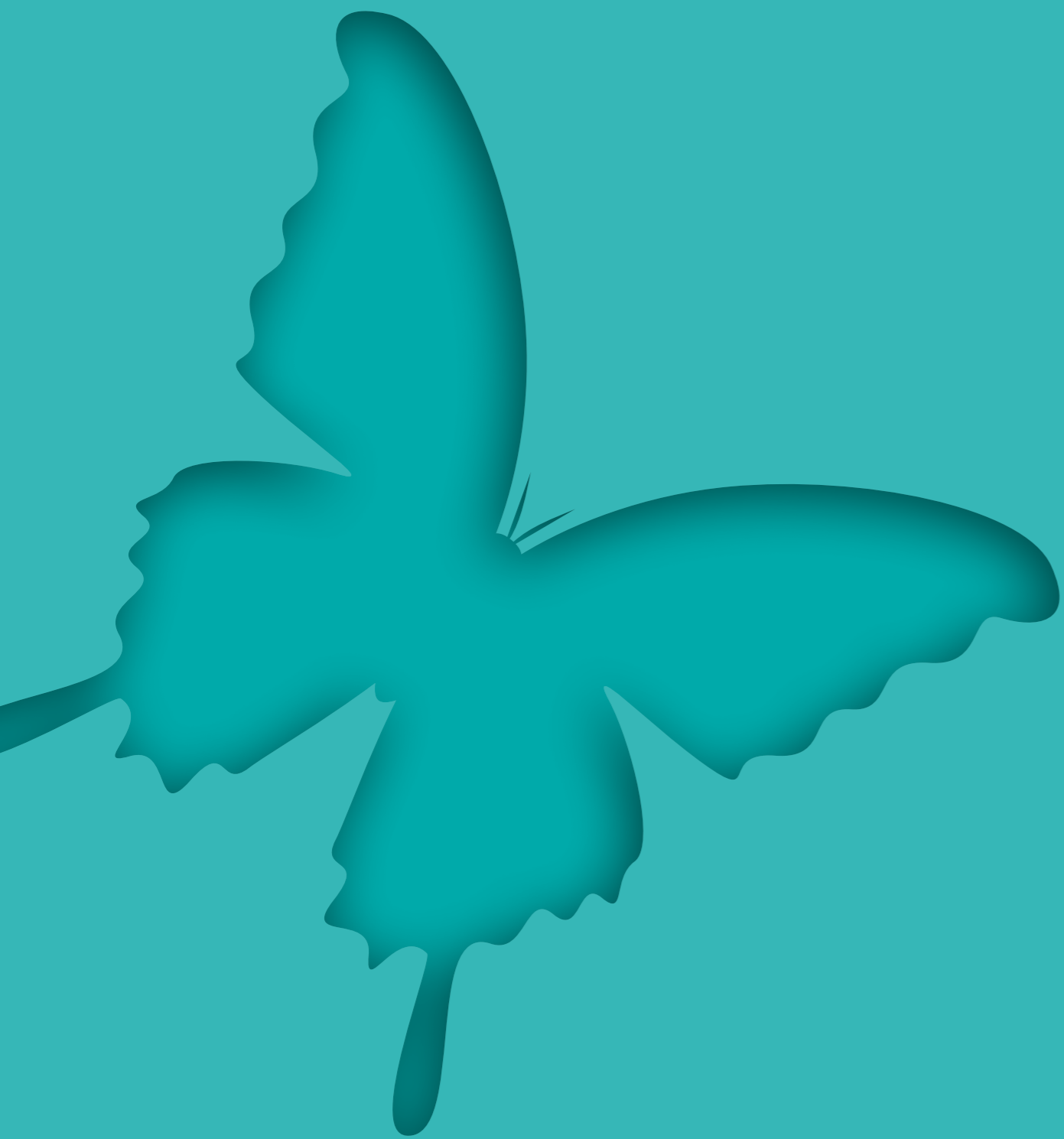
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THE IMPORTANCE OF CONTINUOUS IMPROVEMENT

To continue to be a leader and to successfully meet the challenges of the global market, we must continue towards the goal of excellence, pursuing employee satisfaction, customer satisfaction and environmental protection.

We base our ethical principles on the continuous improvement of health and safety in the workplace and of the environment. The direct consequence is evident in the context of everyday business, in which workers can operate in a healthy environment, in the certainty of constant risk control, with greater reliability and quality and with a reduced environmental impact.



CODE OF CONDUCT

The Code of Conduct is based on everyone's intelligence capacity and willingness to work with passion, enthusiasm, and positive energy.

They are:

The professional commitment is necessary to allow all internal and external collaborators to exercise their skills, use their experiences, carry out their tasks and improve over time. An adequate professional commitment is fundamental for the achievement of our Health and Safety objectives, minimizing our environmental impact.

Respect for others is necessary for everyone's professional and individual development. To achieve this, it is necessary that everyone works in coherence, transparency and responsibly, favouring teamwork, and with a positive attitude. We achieve our goals by working in a healthy environment with complete respect for the people who we work with;

Integrity, seriousness and respect for honesty are the basis for building our professional activity, both towards internal and external collaborators and with third parties.

The dedication to one's work must not be self-serving and instead must be the result of shared corporate objectives. We are committed to spreading a culture of respect for the environment, the territory and health;

Loyalty requires rectitude and correctness in relations with superiors, colleagues, subordinates and external collaborators. It implies compliance with provisions and internal rules of the company, with attitudes of transparency towards everyone at all times;

Participation is based on the sense of responsibility of each person, in their professional field, in excluding self-serving behaviours and favoring teamwork and mutual contributions.



PRINCIPLES OF ACTION

We want to lead. Quality is our core principle; we base our established reliability on this. We work with economic sensitivity, respecting the law, the environment and the health and safety of our workplace. We plan our activities and monitor the results in compliance with the principles of transparency in corporate administrative accounting responsibilities. The following principles of action govern the activities of all our directors, managers and employees in the performance of their duties.

Respect for the law

We apply, in every field, the laws, regulations and standards in force in the countries where we operate, in order to achieve the standards of quality, health, safety and environmental protection. Every employee, regardless of his or her qualification, is aware of and is trained and informed about the implications of laws relating to his or her activity through planned internal courses and the provision of documents. We explicitly prohibit knowingly taking advantage of any gaps or deficiencies in laws and regulations.

Respect for health and safety at work

With a view to continuous improvement, we have established a policy to ensure the best possible protection of health, safety in the workplace, and prevention from all potential forms of risk. It is applied equally to both our employees and to the employees of third parties as part of their interventions at the company's sites. This system is based on the Risk Assessment Document, shared, updated and periodically verified, referring to international standards (BS OHSAS 18001), to national guidelines (UNI INAIL 2001 Guidelines) and to the Policy for Quality, the Environment and Security. All employees, collaborators and third parties are required to comply with all the measures required by the internal procedures and regulations on health and safety at work. Each person is asked to report to the immediate superior any dysfunctions or possible improvements.

Respect for the environment and the community

We are aware of the influence, even indirect, that we may have on the context in which we operate, on economic and social development and on the general wellbeing of the community. For this reason, we have always been committed to improving the environmental impact of our activities, as well as to preventing risks for the population and the environment, in compliance with current legislation and taking into account the development of scientific research and the best practices on the subject. We intend to conduct our investments and our development in a sustainable way, respecting the environment and the local communities.

Compliance with the principles of transparency in accounting, administrative and corporate responsibilities

We adopt adequate standards of financial planning, control and accounting systems, operating with maximum accounting transparency. We base this transparency on the truth, accuracy and completeness of the necessary accounting records. In implementing the company's policies, we take care of the timely processing of complete, accurate, reliable, clear and comprehensible periodic financial reports.



Respect for the rules of free competition

We protect the value of fair competition, abstaining from collusive behavior and abuse of a dominant position.

Relations with suppliers

We always base the signing of a contract with a supplier on extremely clear relationships, avoiding forms of dependence. The choice of suppliers and the purchase of goods and services are based on objective assessments about the competitiveness, quality, possession of technical / professional requirements, cost effectiveness, price, integrity, reliability of the supplier. The contractors must be carefully evaluated, in order to guarantee all the requirements in terms of health and safety in the workplace, with a view to preventing environmental pollution, with reference to coordination activities.

Relations with customers

Correctness and respect towards customers and third parties play a central role in defining the paths to follow. We base our relationships with our customers on mutual trust and satisfaction. In particular, we commit to providing them with quality products, services, assistance and advice that exceed their expectations.

Economic relations with associations, contributions and sponsorships

To ensure consistency in contributions and sponsorships, we always base their management on the following criteria:

- clear and documented use of resources;
- express authorization from the relevant departments that manage these relationships within the company;
- compliance with the applicable ethical and deontological principles, as well as with the applicable legal requirements.

Conflict of interests

Conflicts of interest are forbidden with all collaborators, with particular reference to personal ones, and to immediately report to a superior any situation that constitutes, generates or may appear to be a conflict of interest.

Protection of company information

All collaborators must know and implement the company policies on information security, including those in electronic form, to ensure its integrity, confidentiality, and availability. Any information obtained by a collaborator in relation to its activity is the property of Sacco s.r.l. and it is treated in full respect of the privacy of the interested parties, in accordance with current legislation. Employees who become aware of non-public information must exert the utmost caution and care in using it, avoiding disclosure to unauthorized persons, both inside and outside the company. This obligation will remain in force even after the termination, for any reason, of the employment relationship.

Protection of company assets

Each collaborator is required to work diligently to protect corporate, physical and intangible assets, including computer applications, using them with care and parsimony and avoiding improper and / or personal uses in conflict with the company's interest.



CONTROL
MEASURES

This document represents an extract from the Code of Ethics, which is one of the founding elements of the control system and is an integral part of the Organizational Model implemented by Sacco S.r.l. in compliance with Legislative Decree 231/2001. The complete document can be downloaded [here](#).

Its observance must be considered an essential part of the contractual obligations of employees pursuant to and by effect of art. 2104 of the Civil Code. It must also be considered an essential part of the contractual obligations assumed by non-subordinated collaborators and / or subjects having business relations with Sacco s.r.l.

Any cases of non-compliance with the company's code may be reported, through the appropriate email: odv@saccosrl.it in a non-anonymous form. Following the report, the company will promptly follow appropriate checks and, if necessary, appropriate sanctions.

Any form of retaliation against those who have reported possible violations of this Code or have requested for clarification on its application methods also constitutes a violation of this Code of Ethics.

In order to protect its image and safeguard its own resources, the Company will not maintain any kind of relationships with subjects that do not intend to operate in strict compliance with the current legislation. Furthermore, the Company will not enter into relations with those who refuse to behave according to the values and principles established by the Code of Ethics and to comply with the procedures and regulations envisaged by the annexed protocols.



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