



FOREWORD

The values and principles declared in this Code of Ethics reflect the ethical standards on which SITA Srl's work is based, constantly considering the needs expressed by each single company stakeholder.

SITA Srl builds, elaborates projects and feasibility studies, putting side by side the traditional executive operations with the design and drafting phases in a new conception of the relationship with the customer.

The COMPANY places Quality of Work at the centre of its development vision, through the adoption and certification of its Quality Management System in compliance with the UNI EN ISO 9001:2015 standard.

OUR VISION

SITA Srl intends to operate effectively in order to provide the best overall solution aimed at creating "value" for the CUSTOMER.

OUR MISSION

In order to achieve the objective defined in its Vision and to consolidate its role of knowledge transfer, SITA Srl is daily committed to:

- ☑ enhance the company know-how in terms of resources and activities towards the market;
- ☑ expand, also territorially, its offer to customer companies and organisations in order to respond more promptly and accurately to market needs;
- ☑ devote particular attention to understanding the specific expectations and needs of CUSTOMERS;
- ☑ design and deliver services and products that meet contractual requirements and comply with applicable laws;
- ☑ operate with a view to pursuing maximum satisfaction of its CUSTOMERS' needs and expectations;
- ☑ maximise efficiency by leveraging technological solutions to support staff operations;



☑ consider the contribution of partners and suppliers equally important for the quality of the services provided;

☑ constantly monitor company performance through meaningful indicators as a basis for continuous improvement and the development of future strategies.

SCOPE OF APPLICATION

The provisions contained in the CODE OF ETHICS are applied by all the subjects who, according to the principles of sound and prudent management and in compliance with the laws, regional, national and community laws, as well as with the policies, plans, regulations and internal procedures, contribute to the activities of the COMPANY.

In particular:

- all the RECIPIENTS, without any exception, shall conform the performance of their duties within the scope of their responsibilities to the principles set forth in the CODE OF ETHICS;
- the THIRD PARTIES shall be encouraged to comply with the principles defined in the CODE OF ETHICS, to this end the COMPANY shall disseminate its CODE OF ETHICS as it sees fit.

The COMPANY undertakes to provide itself with the most appropriate tools to ensure that the CODE OF ETHICS is fully applied by the RECIPIENTS.

It is the duty of all the RECIPIENTS to know the content of the CODE OF ETHICS, to understand its meaning and to ask for any clarification thereof.

The CODE OF ETHICS takes on a complementary dimension to the existing Quality System, which the COMPANY has adopted in compliance with the UNI EN ISO 9001:2015 Standard.

ETHICAL PRINCIPLES OF REFERENCE

By adopting the CODE OF ETHICS, the COMPANY reaffirms its commitment to comply, in the performance of all its activities, with the international, national and regional laws in force in Italy and in each country in which it operates.



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In compliance with the principle of Legality set out above, the COMPANY undertakes to ensure that its activities are aimed at respecting the following principles:

- **HONESTY:** in the relationships with the CUSTOMERS, between the RECIPIENTS and towards the THIRD PARTIES, the adherence to and the concrete application of what is stated in this CODE OF ETHICS is an essential element of the company's good management.
- **TRANSPARENCY:** the COMPANY imprints its relations of any nature and towards any stakeholder on the clarity of intentions and the absence of will of concealment, while complying with the obligations deriving from the regulations in force concerning the treatment of confidential data.
- **IMPARTIALITY:** the COMPANY bases its relations with the outside world on the total absence of discrimination with regard to gender, social condition, ethnic group, religion, ideological and political beliefs.
- **VERIFIABILITY:** all the COMPANY's activities are adequately recorded so that the decision-making, authorisation and performance processes can be verified.
- **VALUE OF HUMAN CAPITAL:** Knowing, knowing how to do and knowing how to be is the philosophy of SITA Srl, which focuses on human capital, the value and commitment of people, emphasising the desire and awareness of being a concrete part of every change, the real capital that is identified with the purpose of every human process.
- **SERVICE VALUE:** the daily commitment of the COMPANY is lavished on creating value for the CUSTOMER, starting from the understanding of the needs expressed to the full satisfaction of his expectations.
- **ENVIRONMENTAL AND SOCIAL VALUE OF THE WORK:** the COMPANY pursues the achievement of its objectives by taking into due consideration the social and environmental impact resulting from the performance of its activities and committing itself to minimising any negative impact it may cause.
- **CAPACITY FOR INNOVATION AND CUSTOMER ORIENTATION:** SITA Srl operates in the continuous search for innovative methods that can enrich its know-how, so as to fully satisfy its CUSTOMERS by adapting to the specific needs of each of them.
- **RESPECT:** the COMPANY and all Addressees undertake to recognise the rights, decorum, dignity and personality itself of all the subjects with whom they work, refraining from deliberately infringing them through actions, messages or other harassing acts of any kind and nature.

PRINCIPLES GOVERNING THE MANAGEMENT OF THE COMPANY

The COMPANY implements an administrative, accounting and financial management aimed at ensuring, in addition to sound and correct management, business continuity in the interest of the RECIPIENTS, THIRD PARTIES, CUSTOMERS and, in general, of all subjects with an interest in the COMPANY.



The company accounting system guarantees the recording of every operation of an economic and financial nature in compliance with the principles, criteria and methods for preparing and keeping accounts dictated by the regulations in force.

RELATIONS WITH CUSTOMERS

The COMPANY pursues and maintains adequate quality standards in the performance of its activities in the various fields in which it operates.

The COMPANY exhibits - upon request - the Quality certifications and any other document attesting to its suitability to operate; moreover, it discloses the parameters of excellence achieved and recognised by the institutions in charge and by the market.

The COMPANY believes in a relationship with the CUSTOMER based on trust, fairness, loyalty and the recognition of different professional and technical prerogatives.

It is strictly forbidden for CUSTOMERS to promise and carry out favourable practices for the benefit of CUSTOMERS, likely to constitute unequal treatment or privileged positions in the provision of services rendered.

Any communication addressed outside the COMPANY, made in documentary, radio-television, computerised or oral form, shall take place in compliance with the regulations, the corporate policies and this CODE OF ETHICS.

In order to guarantee completeness and coherence of the information, it is defined that the relations of the COMPANY with the mass-media are kept only by the RECIPIENTS from time to time specifically identified by the top management.

RELATIONSHIP WITH THE RECIPIENTS

The COMPANY standardises its processes of selection and acquisition of its EMPLOYEES and EXPERTS in compliance with the principles and values set forth in its CODE OF ETHICS according to comparative criteria based on merit. The COMPANY, moreover, provides for the optimisation of the employment of human resources, standardising its decision-making processes on the subject to the criterion of seeking maximum efficiency and the achievement of objectives. To this end, the COMPANY's human resources are employed according to criteria of merit, effectiveness and efficiency, in compliance with the Law, the specific contractual obligations adopted and the ethical principles of reference.



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The RECIPIENTS shall perform their office duties in compliance with the obligations subscribed to in the contract concluded with the COMPANY and shall conform their actions to the provisions received by the COMPANY and to this CODE OF ETHICS.

The RECIPIENTS and EXPERTS are bound to operate according to what is defined in the Quality Management System adopted by the COMPANY, with a technical/economic viewpoint and a sense of responsibility towards the various principals, be they private or public subjects.

It is strictly forbidden for RECIPIENTS and EXPERTS to give and promise money or other benefits to CUSTOMERS and THIRD PARTIES, in order to obtain an advantage, even of a non-economic nature, in the interest of the COMPANY or of the agent.

RECIPIENTS and EXPERTS are prohibited from receiving money, gifts or any utility (whose modest value does not constitute a sign of mere courtesy) from CUSTOMERS and THIRD PARTIES.

RECIPIENTS who receive gifts or other benefits outside those of modest value, constituting practices of ordinary courtesy, shall promptly inform the Management, which shall assess their entity and relevance, possibly providing for their restitution and at the same time informing the CUSTOMER or THIRD PARTY about the COMPANY's policy on the matter.

Each RECIPIENT is bound to comply with the principles set forth in this CODE OF ETHICS in any occasion in which he/she has relations with other RECIPIENTS, CUSTOMERS and THIRD PARTIES or makes through any means of communication, including mass media, statements that may have any reflection on the image of the COMPANY.

The RECIPIENTS undertake to build and maintain the value of the COMPANY, also intangible, consisting of the relationship of trust and credibility with CUSTOMERS and THIRD PARTIES.

The RECIPIENTS also undertake not to disclose confidential information of the CUSTOMERS and of the COMPANY, including information deriving from the contractual relations existing and/or existing between the COMPANY and the RECIPIENTS.

The observance of the provisions contained in the CODE OF ETHICS is an integral and essential part of the contractual obligations of the RECIPIENTS and EXPERTS. The violation of the principles at the basis of this ETHIC CODE shall entail the application of the provisions of the disciplinary system contained in the General Part of the Organisation, Management and Control Model, as well as the right of the COMPANY to claim for the compensation of the damages suffered for the lesion of its image and honour.

To this end, the regulation of the COMPANY's relations with the EXPERTS may provide for termination clauses.



RELATIONS WITH THIRD PARTIES

In the selection of suppliers of any kind, the COMPANY shall adopt comparative evaluation criteria suitable for identifying the best contractor, on the basis of the quality of the good/service in relation to the best price or the most advantageous offer and the supply conditions of the good/service requested.

It is absolutely forbidden for the RECIPIENTS to carry out favourable practices for the benefit of THIRD PARTIES, likely to constitute unequal treatment or privileged positions in the procedures for the purchase of goods and services.

The RECIPIENTS in charge of entering into contracts or assigning tasks of any kind on behalf of the COMPANY, shall base their negotiation procedures on the pursuit of the utmost advantage for the same, in the light of the criteria established by the sector regulations and of the corporate execution guidelines set to guarantee the choice of the contractor, conforming their actions to the principles of Transparency and Impartiality and in compliance with the provisions of the Quality Management System adopted.

The RECIPIENTS referred to in the previous point, when performing the functions they are in charge of, must act in the exclusive interest of the COMPANY, refraining from any conduct in which a conflict of interest situation may be recognised, or which may constitute a crime or other offence.

The violation by the THIRD PARTY of the principles at the basis of this CODE OF ETHICS may entail the termination of the existing contractual relationship, as well as the right of the COMPANY to claim compensation for the damages suffered for the damage to its image and honour.

To this end, the regulation of the COMPANY's relations with THIRD PARTIES may provide for termination clauses with the above-mentioned contents.

Whistleblowing

The COMPANY promotes the prevention and verification of any unlawful conduct or, in any case, conduct contrary to the Code of Ethics and Conduct.

The COMPANY encourages the Addressees to promptly report to the Management any unlawful conduct or, in any case, conduct contrary to the Code of Ethics and Conduct, of which they become aware due to their relations with the COMPANY.

Except in cases of liability for libel or slander, or for the same title pursuant to Article 2043 of the Civil Code, the Addressee who reports in good faith to the Management any unlawful conduct or, in any case, conduct



contrary to the Code of Ethics and Conduct, of which he/she has become aware by reason of his/her relations with the COMPANY, may not be sanctioned.

Reports should be forwarded to the Management using the following e-mail address:

a.gaifami@sita-international.eu

DISCIPLINARY AND SANCTIONS SYSTEM

GENERAL PRINCIPLES

The preparation of an adequate sanctioning system for the breach of the prescriptions contained in the MODEL is an essential condition to ensure the effectiveness of the MODEL itself.

In this regard, in fact, Article 6 paragraph 2, letter e) of the DECREE provides that the organisation and management models must "[...]introduce a disciplinary system suitable to sanction the non-compliance with the measures indicated in the MODEL[...]".

The application of disciplinary sanctions is irrespective of the outcome of any criminal proceedings, since the rules of conduct imposed by the MODEL are assumed by SITA SRL in full autonomy and regardless of the type of offence that violations of the MODEL may determine.

SANCTIONS FOR EMPLOYEES

Any conduct by workers in violation of the MODEL and the organisational system referred to therein shall be considered a disciplinary offence pursuant to the National Collective Labour Agreement for workers employed by private engineering and plant installation companies in force.

With reference to the sanctions against workers governed by the aforementioned CCNL, these are imposed in compliance with the procedures set forth in Article 7 of Law No. 300 of 20 May 1970.

In particular, pursuant to Articles 8, 9, 10 and 11 of Section Four - Title VII of the National Collective Labour Agreement in force for workers employed by private metalworking and plant installation companies, it is provided that



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Incurs the measures of:

- ☒ verbal warning;
- ☒ written warning;
- ☒ fine not exceeding three hours' hourly pay calculated on the minimum wage scale;
- ☒ suspension from work and pay for up to three days;

The worker who violates the internal procedures referred to in this MODEL (e.g. who does not observe the prescribed procedures, omits to inform the Management of the prescribed information, omits to carry out controls, etc.) or adopts, in the performance of his activities, a behaviour that does not comply with the prescriptions of the MODEL itself, as such behaviour must be considered a non-compliance with the provisions of Article 9 point I) of Section Four - Title VII of the aforementioned CCNL.

1. In the event of particularly serious or repeated offences as per the previous point, SITA SRL may resort to dismissal with notice, pursuant to art. 10, letter A) of Section four - Title VII of the CCNL applied.
2. In compliance with the regulations in force, dismissal without notice is envisaged for workers who cause serious moral or material damage to the company or who perform, in connection with the performance of the employment relationship, actions that constitute offences within the meaning of art. 10, letter B) of Section Four - Title VII of the CCNL applied above.

The disciplinary system and related measures are constantly monitored by the Management and Executive Board of SITA SRL.

MEASURES AGAINST DIRECTORS

In the event of violation of the MODEL by Directors and Auditors of SITA SRL, the Management shall promptly inform the Board of Directors, the Board of Auditors and the Shareholders' Meeting.

Bearing in mind that these subjects are appointed by the above-mentioned bodies; in the event that a breach of this MODEL is detected and ascertained, the body that made the appointment will be convened to deliberate on the measures it deems appropriate.

MEASURES AGAINST EXTERNAL COLLABORATORS

Any behaviour adopted by external collaborators (both RECIPIENTS and THIRD PARTIES), regardless of the contractual form applied, in contrast with the lines of conduct indicated by this MODEL may determine, through the activation of appropriate clauses, the termination of the contractual relationship. The Management shall take care of the drafting, updating and insertion in the letters of appointment or partnership agreements of such specific contractual clauses, which shall also provide for the possible claim



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for damages deriving to SITA SRL from the application by the judge of the measures provided for by the DECREE.