

COMPANY'S CODE OF ETHICS

Summary

GEN	IERAL INTRODUCTION – GUIDE TO USE THE CODE	3
W	/hat is the Code?	3
	Recipients of the Code of Ethics of the company	3
	Where does the Code apply?	3
	Where can I find the Code?	3
PRINCIPLES OF CONDUCT FOR ORGANIZATION		3
C	ONDUCT IN BUSINESS	3
	Conflict of interest	4
	Confidentiality and inside information	4
	Corruption and illicit payments	5
	Money laundering	5
	Competition	5
	Reputation	5
	Confidentiality	6
D	EPENDENTS	6
	Centrality, development and enhancement of human resources and equity of the authority	6
	Principles of conduct to be followed by staff	7
	Child labour and forced labour	7
	Freedom of association	7
	Equal opportunities	8
	Harassment	8
	Working environment	8
	Pay and working hours	8
	Recruitment and promotions	8
	Internal control system, company information and accounting books	8
	Company assets	9
	External activities	9
	Obligations	9
	Employees in positions of responsibility	10
Н	EALTH AND SAFETY	10
	Health and safety in the workplace	10



SOCIAL ACTORS - RELATIONS WITH THIRD PARTIES	10
Customers	10
Suppliers	11
Public administration	11
Employment relationships with former employees of the Public Administration	11
Grants and funding	12
ACCOUNTING AND INTERNAL CONTROL	12
Controls and verifications	13
Supervision of the implementation of the Code of Ethics	13
FINAL PROVISIONS	
Conflicts with the Code of Ethics	14
Approval process and changes	



GENERAL INTRODUCTION – GUIDE TO USE THE CODE

What is the Code?

The Code is a document approved by the Director of SICUREZZA FORMAZIONE SRL, which summarizes the principles of conduct in the affairs of SICUREZZA FORMAZIONE SRL, as well as the respective obligations and responsibilities of directors and employees. The Code is a fundamental element to ensure the effective prevention and detection of violations of laws and provisions applicable to the Group's activities.

Recipients of the company's Code of Ethics.

Through the adoption of the Code of Ethics, the company intended to define moral values, clear rules and procedures to be complied with.

The Code of Ethics is aimed at:

- Administrators;
- employees (both fixed-term and open-ended); "
- project collaborators;
- external and internal consultants; "
- suppliers of goods and services;
- any other person who may act in the name and on behalf of the company either directly or indirectly, permanently or temporarily, and those who establish relationships or relations with the company and work to pursue its objectives.

The recipients of this Code of Ethics are required to learn its contents and to comply with its precepts.

Where does the Code apply?

The Code applies in all countries where SICUREZZA FORMAZIONE SRL is present and applies to all aspects of the company's activity.

Where can I find the Code?

The Code of Ethics will be made available to them, as specified below.

The Management, or a delegate, of the company is responsible for the effective implementation of the Code of Ethics and its dissemination inside and outside the company organization.

Company employees, in addition to the compliance per se due to the regulations in force and the provisions of collective bargaining 3 where applicable - undertake to adapt the methods of performance of the work activity to the purposes and provisions provided for by this Code of Ethics.

The Code of Ethics will be published on the website, made available on paper in the company and digitally through All Badge.

PRINCIPLES OF CONDUCT FOR ORGANIZATION

CONDUCT IN BUSINESS

SICUREZZA FORMAZIONE SRL carries out its activities in line with the principles contained in this Code and requires all Recipients of the Code to carry out their activities in the same way.

All Recipients of the Code must be aware of the fact that they represent SICUREZZA FORMAZIONE SRL and that their actions influence the reputation of the company and its internal culture.

Therefore, they must conduct business by observing the following policies.



Conflict of interest

All the Recipients of the Code, according to their respective powers and competences, are committed to acting 3 in the strictest compliance with the law, regulations, best practices in the sector, as well as this Code 3 in the exclusive institutional interest in SICUREZZA FORMAZIONE SRL for the most correct and effective pursuit of its corporate purpose, avoiding any conflict of interest, or those of third parties, with those of the company of any involvement, in the business to be dealt with and/or concluded and/or executed, of their own interests or those of third parties, even if not conflicting, specifying their nature, terms, origin and scope, and refraining from any further activity relating to the same business until it is expressly authorized to proceed, possibly following particular precautions and instructions.

By way of example, the following may lead to a conflict of interest:

- economic interests of the employee and/or collaborator and/or their family in the activities of suppliers, customers and competitors;
- use of your position in the company or the information acquired in your work in a way that creates a conflict between your personal interests and those of the company;
- acceptance of money, favors or benefits from persons, entrepreneurs, or companies that are or intend to enter into business relations with SICUREZZA FORMAZIONE SRL;
- 19 existence of stable work activities or collaborations with companies or professionals who have contractual relations with SICUREZZA FORMAZIONE SRL.

Confidentiality and inside information

All Recipients of the Code are required to strictly comply with the laws in force on privacy. SICUREZZA FORMAZIONE SRL adopts the minimum and suitable security measures to reduce, as far as possible and according to technical and technological progress, the risks of unauthorized communication/dissemination of the data of which it is the Owner, unauthorized access or, in any case, unauthorized processing. All the Recipients, in the exercise of their functions and within the scope of their competences, are responsible for the implementation of these security measures, both with regard to IT tools and with regard to paper archives and dossiers.

Except as far as they are legally and/or contractually permitted, the Recipients of the Code must not use, communicate or disseminate any company news however learned, to be considered unconditionally confidential from now on, as well as trade or industrial secrets, or, in any case, any company news/document objectively confidential or even only indicated as such by SICUREZZA FORMAZIONE SRL and acquired by it by virtue and/or in the occasion of the relationships that have taken place. By way of example, it is specified that all know-how and all information relating to research and development, products, patented or registered or not, owned and/or in any case available to SICUREZZA FORMAZIONE SRL or its customers and/or suppliers, all related documents, drawings, codes, formulas, computer data, programs, ideas on any support stored, as well as all the information relating to the organization of SICUREZZA FORMAZIONE SRL, etc.

Particular attention must be paid by the Recipients regarding the communication and/or dissemination outside of documents, news and information relating to the sphere of activity of SICUREZZA FORMAZIONE SRL not in the public domain.

The communication of such information, even if the directors or managers in charge have authorized its dissemination, will always take place through the channels and subjects in charge for this purpose within the policy dictated by SICUREZZA FORMAZIONE SRL.



Corruption and illicit payments

All Recipients, in the exercise of their functions and within the scope of their competences, are responsible for the implementation and implementation of these precautions.

SICUREZZA FORMAZIONE SRL and the Recipients of the Code are committed to respecting the highest standards of integrity, honesty and fairness in all relations within and outside the Group, in accordance with national and international anti-corruption laws.

SICUREZZA FORMAZIONE SRL does not tolerate any type of corruption (accepting or offering money to obtain an improper commercial advantage) regarding:

- nor of public officials, persons in charge of public service or any other party connected or connected with public officials, so that they exercise their functions and/or their powers, or omit or delay or for having omitted or delayed an act of their office;
- nor of directors, general managers, managers responsible for preparing corporate accounting documents, statutory auditors and liquidators of companies so that they perform or omit acts, in violation of the obligations inherent in their office or the obligations of loyalty.

No director, employee, agent or other representative may directly or indirectly accept, solicit, offer or pay any money or other benefit (including gifts or gifts, except for commercial items of modest economic value that are commonly accepted internationally and permitted by applicable law) even under unlawful pressure. Where required by law or where appropriate, SICUREZZA FORMAZIONE SRL establishes organizational models to assess and ensure compliance with applicable law and the Code.

Money laundering

SICUREZZA FORMAZIONE SRL and the Recipients of the Code must not carry out or be involved in activities that imply money laundering (i.e. the acceptance or processing of proceeds from criminal activities in any form or way) and/or self-laundering (i.e. the use in economic, financial and entrepreneurial activities of money, goods or other benefits resulting from a non-culpable crime committed by the offender himself).

Competition

Aware of the fundamental importance of the existence of a competitive market, SICUREZZA FORMAZIONE SRL undertakes to comply with all the laws and regulations in force on competition and transparency in commercial operations.

Therefore, SICUREZZA FORMAZIONE SRL and the Recipients of the Code will not engage in practices (such as the creation of cartels, market partitions, etc.) that may represent a violation of competition laws. In the context of fair competition, SICUREZZA FORMAZIONE SRL will not knowingly violate the intellectual property rights of third parties.

Reputation

The corporate image of SICUREZZA FORMAZIONE SRL, as well as the reputation and sustainability of its products and services are necessary conditions for its present and future existence.

Therefore, directors, managers and other employees of SICUREZZA FORMAZIONE SRL are required to always and scrupulously comply with the Code.

It is of fundamental importance that employees share among themselves the commitment to comply with the Code and cooperate with SICUREZZA FORMAZIONE SRL for the application of its provisions.



Confidentiality

As part of its normal business activities, SICUREZZA FORMAZIONE SRL collects a significant amount of personal data and confidential information, which it undertakes to process in compliance with all privacy laws in force in the jurisdictions in which it operates and best practices for the protection of confidentiality.

To this end, SICUREZZA FORMAZIONE SRL guarantees a high level of security in the selection and use of its information technology systems intended for the processing of personal data and confidential information.

DEPENDENTS

Centrality, development and enhancement of human resources and equity of authority.

The company recognizes the centrality of human resources and believes that an essential factor for success and development is the professional contribution of the people who work there.

L9 company has always placed the professionalism and individual contribution of people at the center of its work, giving continuity to a style of relationship that aims to recognize the work of each person as a fundamental element of business and personal development.

At the same time, the company places dialogue and the exchange of information at any level at the center of its daily work - the enhancement and professional updating of its employees and the establishment of a corporate identity and the relative sense of belonging.

This value translates:

- in the creation of a work environment capable of enhancing the contribution and potential of the individual through the gradual empowerment of staff;
- in the creation of a relationship system that privileges teamwork over hierarchical relationships;
- in the daily effort aimed at sharing skills and knowledge also through the use of innovative systems.

The company attaches the utmost importance to those who work within its organization, contributing to its development as it is precisely through human resources that the company is able to provide, develop, improve and guarantee optimal management of its services.

Without prejudice to the legal and contractual provisions on workers' duties, employees are required to be professional, dedicated to work, loyalty, a spirit of collaboration, mutual respect, a sense of belonging and morality.

In the management of contractual relationships that involve the establishment of hierarchical relationships, our company undertakes to ensure that authority is exercised with fairness and correctness and that any form of abuse is avoided: in particular, the company guarantees that authority is not transformed into an exercise of power detrimental to the dignity and autonomy of the person.

These values must in any case be safeguarded in making choices regarding the organization of work.



Principles of conduct to be followed by staff

Professionality.

Each person carries out his or her work and services with diligence, efficiency and fairness, making the best use of the tools and time at his or her disposal and assuming the responsibilities related to the obligations to be carried out.

Loyalty.

People are expected to be loyal to the company.

Honesty.

In the context of their work, people are required to know the laws in force. Honesty represents the fundamental principle for all the company's activities, for its initiatives and constitutes an essential value of organizational management. Relations with stakeholders, at all levels, must be based on criteria and behaviour of fairness, collaboration, loyalty and mutual respect. In no case can the pursuit of the company's interest justify dishonest conduct.

Legality.

The company organization undertakes to comply with all national and international standards, laws, directives and regulations and all generally recognized practices. In addition, he inspires his decisions and his behaviour to take care of the public interest that may be entrusted to him.

Fairness and transparency.

Persons shall not use for personal purposes information, property and equipment available to them in the performance of the function or task assigned to them. Each person shall not accept or make any pressure, recommendation or report for himself or for any other person which may be detrimental to the company or undue advantage to himself, the company or third parties. Each person rejects and does not make promises of undue offers of money or other benefits. L9 company is committed to operating in a clear and transparent manner, without favoring any interest group or individual.

Child labour and forced labour

SICUREZZA FORMAZIONE SRL does not employ any form of forced labour, compulsory labour or child labour, or does not employ people under the age established for the start of work by the regulations of the place where the work is carried out and, in any case, under the age of sixteen, except for exceptions expressly provided for by international conventions and local legislation.

SICUREZZA FORMAZIONE SRL also undertakes not to establish or maintain business relationships with suppliers who employ child labour, as defined above.

Freedom of association

Employees of SICUREZZA FORMAZIONE SRL are free to join a trade union in accordance with local laws and the rules of the various trade unions.

SICUREZZA FORMAZIONE SRL recognizes and respects the right of its employees to be represented by trade unions or other elected representatives in compliance with the local legislation and practices in force.



When SICUREZZA FORMAZIONE SRL undertakes negotiations with these representatives, its actions and conduct are aimed at a constructive approach and relationship.

Equal opportunities

SICUREZZA FORMAZIONE SRL is committed to offering equal opportunities in work and professional advancement to all employees.

The head of each department must ensure that for all aspects of the employment relationship, such as recruitment, training, remuneration, promotions, transfers and termination of the employment relationship, employees are treated in a manner consistent with their ability to meet the requirements of the job, avoiding any form of discrimination and, in particular, discrimination on the basis of race, gender, sexual orientation, social and personal position, physical and health condition, disability, age, nationality, religion or belief.

Harassment

SICUREZZA FORMAZIONE SRL considers unacceptable any type of harassment or harassing behavior, such as those related to race, sex or other personal characteristics, which have the purpose and effect of violating the dignity of the person to whom such harassment or behavior is addressed, both inside and outside the workplace.

Working environment

All employees must strive to maintain a decent and collaborative work environment, in which the dignity of everyone is respected.

All employees of SICUREZZA FORMAZIONE SRL:

- they must not work under the influence of alcohol or drugs;
- in places where smoking is not prohibited by law, they must be sensitive to the needs of those who may feel physical discomfort due to the effects of passive smoking;
- they must avoid behaviour that may create an intimidating or offensive climate towards colleagues or subordinates in order to marginalise or discredit them in the work environment.

Pay and working hours

The salaries and benefits paid to SICUREZZA FORMAZIONE SRL employees meet at least the legal requirements established.

In relation to working hours and paid leave, SICUREZZA FORMAZIONE SRL complies with local legislation and the practices of the country in which it operates.

Recruitment and promotions

Employees of SICUREZZA FORMAZIONE SRL are prohibited from accepting or soliciting promises or payments of money or goods or benefits, pressures or services of any kind that may be aimed at promoting the hiring of an individual as an employee or his transfer or promotion.

Internal control system, company information and accounting books

All managers and other employees of SICUREZZA FORMAZIONE SRL are required to maintain effective internal control systems. To achieve this standard, they are required, among other things, to maintain



accurate and complete internal records of all company activities and to ensure that the operations and the assumption of contractual commitments have been appropriately authorized by the competent hierarchical superior. In addition, business expenses must be recorded accurately and promptly.

Company assets

All directors and employees of SICUREZZA FORMAZIONE SRL must use the company assets and resources to which they have access, or which are in their custody in an efficient manner, exclusively for the purpose of achieving the corporate objectives and purposes of SICUREZZA FORMAZIONE SRL and are also required to use these assets in a manner suitable for protecting their value.

In addition, all directors, managers, and other employees of SICUREZZA FORMAZIONE SRL are responsible for protecting such assets and resources against loss, theft, and unauthorized use or disposal. Any use of these assets and resources that may be in contrast with the interests of SICUREZZA FORMAZIONE SRL or that may be dictated by professional reasons unrelated to the employment relationship with SICUREZZA FORMAZIONE SRL is prohibited.

All directors, managers and other employees of SICUREZZA FORMAZIONE SRL are required to follow the Group Guidelines regarding the use, access and security of software and other information technology systems, e-mail, the Internet and the internal portal.

External activities

Employees of SICUREZZA FORMAZIONE SRL may not be part of the Boards of Directors of other companies without the authorization of SICUREZZA FORMAZIONE SRL and may not undertake business activities on a recurring basis that interfere with their respective obligations towards SICUREZZA FORMAZIONE SRL.

Obligations

The Code is an integral and substantial part of the employment relationship of each employee of SICUREZZA FORMAZIONE SRL. Consequently, SICUREZZA FORMAZIONE SRL requires all employees to strictly comply with the provisions of the Code. Any violation of the provisions of the Code is therefore dealt with firmly with the consequent adoption of appropriate sanctioning measures (which in certain cases may lead to the termination of the employment relationship). Therefore, all managers and other employees are required to:

- read and understand the Code and, if necessary, take training courses;
- adopt actions and behaviors consistent with the Code and refrain from any conduct that may damage SICUREZZA FORMAZIONE SRL or compromise honesty, impartiality or reputation;
- comply with all internal provisions introduced by the respective company SICUREZZA
 FORMAZIONE SRL in order to comply with the Code or identify any violations thereof;
- consult the director of the Company to obtain clarification on the interpretation of the Code;
- promptly and in good faith report any violations of the Code for employees to their Direct Superior;
- cooperate fully with any investigations carried out in relation to violations of the Code, maintaining the strictest confidentiality regarding the existence of such investigations.



Employees in positions of responsibility

Anyone within SICUREZZA FORMAZIONE SRL who plays the role of hierarchical superior, sector manager must set an example and foster a positive climate among employees, encouraging a transparent exchange of ideas and proposing leadership and guidance in accordance with the principles of business conduct contained in the Code and, with his behavior, must demonstrate to employees that compliance with the Code is a fundamental aspect of their work, ensuring that employees are aware that business results should never be separated from compliance with applicable laws and the Code.

All hierarchical superiors, sector managers and managers must report any case of non-compliance with the Code and are responsible for ensuring the protection of those who have reported violations of the Code in good faith and for adopting and applying, having heard the Company's Human Resources Office, sanctions commensurate with the violation committed and sufficient to act as a deterrent to further violations Violations.

HEALTH AND SAFETY

Health and safety in the workplace

SICUREZZA FORMAZIONE SRL recognizes health and safety in the workplace as a fundamental right of employees and a key element of the company's sustainability. All decisions taken by SICUREZZA FORMAZIONE SRL must respect health and safety in the workplace.

SICUREZZA FORMAZIONE SRL has adopted and continues to improve an effective Workplace Safety Management System with an occupational health and safety policy that is based on individual and collective preventive measures to minimize the potential risks of injury in the workplace.

SICUREZZA FORMAZIONE SRL intends to guarantee excellent working conditions at an industrial level, according to the principles of hygiene, industrial ergonomics and individual organizational and operational processes.

SICUREZZA FORMAZIONE SRL believes in the dissemination of a culture of accident prevention and risk awareness among workers, and actively promotes it, in particular through appropriate training and information courses.

Employees must consider themselves personally responsible and adopt the preventive measures established by SICUREZZA FORMAZIONE SRL for the protection of their health and safety communicated through specific directives, instructions, training and information. Each employee is responsible for the proper management of safety and must not expose himself or other workers to hazards that may cause injury or harm to themselves.

SOCIAL ACTORS - RELATIONS WITH THIRD PARTIES

SICUREZZA FORMAZIONE SRL and its employees are required to maintain and improve their relations with the various categories of third parties by acting in good faith, with loyalty, fairness, transparency and with due respect for the fundamental values of SICUREZZA FORMAZIONE SRL.

Customers

SICUREZZA FORMAZIONE SRL pursues the objective of fully satisfying the expectations of the end customer. All directors of SICUREZZA FORMAZIONE SRL, its managers and other employees are required to act in such a way as to exceed customer expectations and continuously improve the quality of products and services.



For SICUREZZA FORMAZIONE SRL it is essential that its customers are treated with fairness and honesty and therefore requires its employees and other recipients of the Code that every relationship and contact with customers is based on honesty, professional correctness and transparency.

Employees must follow the Company's internal procedures aimed at achieving this goal through the development and maintenance of profitable and lasting relationships with customers, offering safety, assistance, quality and value supported by continuous innovation.

SICUREZZA FORMAZIONE SRL in their relations with customers must avoid unfair discrimination in negotiations with them and must not make improper use of their bargaining power to the detriment of any customer.

Suppliers

Suppliers play a fundamental role in improving the overall structural competitiveness of SICUREZZA FORMAZIONE SRL.

In order to constantly guarantee the highest level of customer satisfaction, SICUREZZA FORMAZIONE SRL selects suppliers through the use of adequate and objective methods that take into consideration not only quality, innovation, costs and services offered, but also social and environmental performance and the values outlined in the Code.

All employees of SICUREZZA FORMAZIONE SRL are invited to establish and maintain stable, transparent and cooperative relationships with suppliers.

Public administration.

The term Public Administration means any person, subject, interlocutor who can be qualified as a Public Official or Public Service Officer, who operates on behalf of the central or peripheral Public Administration, or of Public Supervisory Authorities, Independent Authorities, Community Institutions as well as private partners who are concessionaires of a Public Service.

L9 company inspires and adapts its conduct, in relations with the Public Administration, to the principles of fairness and honesty. On this basis, the persons appointed by the company to follow any negotiation, request or institutional relationship with the Public Administration, whether Italian or foreign, must not for any reason try to improperly influence its decisions or engage in illegal conduct, such as the offer of money or other benefits, which may alter the impartiality of judgment of the representative of the Public Administration.

The people appointed by the company organization to manage relations with any authority of the Public Administration must verify that the information provided in any way and for any reason is true, accurate and correct. The people who are allowed to have direct contact with the Public Administration on behalf of the company are the only people expressly indicated by the company itself; to this end, no other collaborator may have relations of any kind with the Public Administration for activities related to the company's corporate purpose.

When carrying out tenders, the people appointed by the company must comply with the regulations in force.

Employment relationships with former employees of the Public Administration.

Any recruitment of former employees of the Public Administration who, in the process of their functions, have had relations with the company or their relatives and/or relatives, will take place in strict compliance with the standard procedures defined by the organization for the selection of personnel.



The definition of other employment and/or consultancy relationships with former employees of the Public Administration or with their relatives and/or relatives must also take place in strict compliance with standard procedures.

Grants and funding.

Contributions, subsidies or funding obtained from the European Union, the State or other Public Body, even if of modest value and/or amount, must be used for the purposes for which they were requested and granted. The company prohibits the recipients of this Code of Ethics from using funds received from Public Administrations and/or interprofessional funds for purposes other than those for which they were disbursed.

ACCOUNTING AND INTERNAL CONTROL

SICUREZZA FORMAZIONE SRL adopts accounting systems that are consistent and adequate to the accounting principles applicable to the company and in compliance with the laws in force. In carrying out this practice, SICUREZZA FORMAZIONE SRL operates with the utmost transparency in line with the best business practices, with the aim of:

- ensure that all transactions are duly authorized, verifiable and legitimate;
- ensure that all transactions are carried out in a timely manner, accurately recorded and accounted for and appropriately documented in accordance with applicable accounting standards and best practice;
- Produce comprehensive, accurate, reliable, clear and understandable periodic financial statements in a timely manner;
- identify, analyze and manage with professional diligence the entrepreneurial risks associated with all the activities of SICUREZZA FORMAZIONE SRL;
- establish rigorous business processes that ensure management decisions (including those relating to investments and disposals) based on sound economic analysis that includes a prudent risk assessment and provide assurance that company assets are used optimally;
- ensure that decisions on financial, tax and accounting issues are taken at an appropriate managerial level and in full compliance with the laws in force.

SICUREZZA FORMAZIONE SRL considers transparency in the accounting methods of the individual transactions carried out to be of fundamental importance for its success.

Therefore, SICUREZZA FORMAZIONE SRL requires all employees to have accurate, timely and detailed reports on financial transactions and other business transactions.

Employees must keep true and accurate records of all financial and other business transactions, accompanied by appropriate supporting documentation.

Irregular bookkeeping is a violation of the Code and is considered illegal in almost all legal systems. It is therefore forbidden for all employees to adopt behaviors or give rise to omissions that may lead to inaccurate or incomplete information, including:

- the recording of fictitious transactions;
- incorrect recording of transactions or not sufficiently documented;
- the failure to record commitments, even if only of guarantee, from which responsibilities or obligations of Società di SICUREZZA FORMAZIONE SRL may derive.



Controls and verifications.

The company guarantees its availability, through the persons in charge, to provide all the information and the viewing of the documents and requests necessary to the auditing and control bodies.

The company guarantees the accessibility of all information and documents to those entitled and provides, through the availability of its directors and employees, all the information that facilitates the exercise of supervisory functions.

The organization prohibits its directors and employees and/or collaborators from making false declarations rather than the presentation of false documents or attesting to untrue situations, including through computer systems, with the aim of unduly receiving public funds and/or obtaining and maintaining any benefits.

Supervision of the implementation of the Code of Ethics.

SICUREZZA FORMAZIONE SRL is committed to achieving the highest standards of excellence in relation to its moral, social and business responsibilities. The Code defines the expectations of SICUREZZA FORMAZIONE SRL towards directors and employees and third parties with whom it has business relationships and the responsibility that they are required to assume in order to implement these policies.

The management of the various Divisions of SICUREZZA FORMAZIONE SRL is responsible for ensuring that these expectations are understood and put into practice by employees. Management must ensure that the commitments expressed in the Code are implemented at the Divisional level.

SICUREZZA FORMAZIONE SRL organizes training courses on the Code and its values within its organization.

SICUREZZA FORMAZIONE SRL encourages employees to seek guidance from the Company's Human Resources Department regarding any situation relating to the Code in which they may be in doubt as to what is the most appropriate behavior.

All requests for clarification are promptly answered without there being any risk for the employee of suffering any form, even indirect, of retaliation. Any sanctioning measures for violations of the Code, commensurate with the particular violation of the Code, are adopted by hierarchical superiors in accordance with the laws in force and with the relevant national or company employment contracts.

Any form of retaliation against those who have reported in good faith possible violations of the Code or requests for clarification on the methods of application of the Code itself constitutes a violation of the Code. The conduct of those who accuse other employees of violating the Code with the knowledge that such a violation does not exist also constitutes a violation of the Code.

Violations of the Code may determine, among other consequences, including the initiation of legal proceedings, the termination of any fiduciary relationship between SICUREZZA FORMAZIONE SRL and the employee in question, with the contractual and legal consequences with respect to the employment relationship provided for by current regulations.

Any exceptions, even if only partial and limited in time and purpose, to the provisions of the Code may be authorized exclusively for serious and justified reasons only by the Administrator of SICUREZZA FORMAZIONE SRL.

Reports and requests for information can be addressed to:

SICUREZZA FORMAZIONE SRL 3 Piazza Trento Trieste, 21 - 12043 Canale (CN) nicole@sicurezzaformazione-srl.it



FINAL PROVISIONS

Conflicts with Code of Ethics.

In cases where even one of the provisions of this Ethical Cadiz should conflict with the provisions of the internal regulations or procedures, the Ethical Cadiz shall prevail over any of these provisions.

Approval and amendments.

This Ethical Code was originally approved by the Board of Directors.on the following date 06/06/2022.

Any variation and/or integration of this Ethical Code must be approved by the Board of Directors. which deliberates accordingly, making the approved amendments immediately operational.

Canale (CN), 11 06/06/2022

SICUREZZA FORMAZIONE S.R.L.

Piazza Trento Trieste, 21 - tel. 0173.970061 12043 CANALE (CN) Cod. Fisc. e Partita IVA 03B01500046 e-mail: info@sicurezzaformazione-srl.it SDI:

M6UXCR1