

SIA®

FIRE FIGHTING SYSTEMS

CODE OF ETHICS

- 1. Introduction**
- 2. Mission and General Principles**
- 3. Rules of Conduct**
- 4. Implementation and Compliance**
- 5. Supervisory Body**
- 6. Legal Appendix**

1. Introduction

S.I.A. Safety Industrial Applications (hereafter called “S.I.A.” or “Company”) operates worldwide in the engineering, production, installation and the sale of fire fighting systems and equipment for the petroleum, gas power and water industries.

This Code of Ethics (hereafter called “Code”) has been prepared in accordance with the standards applicable to the Company, to Guidelines and National and International requirements concerning human rights and Corporate Social Responsibility and Governance.

The Code also refers to:

- the Charter of Rights of the United Nations, the Charter of Rights of European Community and the Italian Constitution;
- the “core labour standards” mentioned in the ILO (International Labour Organization), the guidelines of OCSE (Organization for the Economic Cooperation and Development), the Global Impact of the United Nations, the fundamental of Social Accountability 8000, etc..
- the existing best-practice of code of ethics.

The scope of this Code is to define the rules that S.I.A. applies in its business, according also to the Italian Legislative Decree no. 231 dated 2001.

S.I.A. applies this code of ethics in its dealings with all interested parties (collaborators, associates, clients, suppliers, public administration, etc..) in order to guarantee appropriate ethical and behavioural standards thereby distinguishing itself for its reliability and excellence.

The Code defines those standards of behaviour that the interested parties must respect, make respect and act upon in order to best represent the Company’s style and to strengthen its reputation.

The Code of Ethics is divided in three sections:

1. Mission and General Principles
2. Rules of behaviour
3. Implementation and observance of the Code
4. Monitoring
5. Modifications to the Code

2. Mission and general principles

Mission

S.I.A. has always given priority to safety and respect of the environment and towards its employees.

The aim of the company is the fully satisfy the requirements of its clients through a wide range of high quality products, intense Research and Development, activity, provide pre and post sales service, 7 days a week, 24 hour a day and in all cases superior quality of operations.

General Principles

Below are the general ethical principles followed by the Company.

Legality

S.I.A. ,undertakes to act in compliance with the Code and with the laws in force in those countries where its products are used or where it operates.

The company does not commit crimes or illegal acts in contrast to the principles of this Code.

Loyalty

Both internal and external activities are based upon loyalty and integrity, thereby facilitating professional and ethical relationships.

Fairness and transparency

Relationships with the company's interested parties and in particular with Public Administrations are based on fairness, transparency, completeness, reliability and promptness in the provision of information thereby avoiding misleading communications.

Respect for the person

S.I.A., applying the United Nations Universal Declaration of Human Rights, establishes as focal point of its identity and business the respect of dignity and values of the person, rejects any form of intolerance, violence, harassment and discrimination, based on gender, race, nationality, age, policy orientation, religion, sexual orientation, health, economic and social condition.

Health and Safety in the Workplace

S.I.A. is committed to guarantee healthy, safe and functional workplaces allowing employees to best operate from a human and professional point of view.

S.I.A. is also committed to guaranteeing the application of all rules and regulations which regulate employment relationships and recognise all forms of free aggregation between workers, in compliance with the laws in force in the countries in which it carries out its activities.

Merit and equal opportunity

S.I.A. is committed to make available equal opportunities to its employees and collaborators and to assure personnel selection exclusively based on merit.

Protection of health and safety in the workplace

S.I.A. considers of the utmost importance safety in the workplace and the health of its personnel and is committed to guaranteeing the respect the international rules, to promote and consolidate the safety and the health of workers and to carry out appropriate accident prevention and training activities.

Sustainable Development

S.I.A. places environmental protection at the centre of its strategies and activities, is committed to respect national and international rules in force and to adhere to a model of sustainable development, utilising all measures and technologies available to minimise the impact of its operations on the environment, maximise power efficiency and guarantee the proper management of natural resources, waste recovery and the containment of polluting emissions.

Responsibility Towards the Community

S.I.A. is committed to promote a constant dialogue and cooperation with the local communities through involvement in economic, social, and civic development.

Customer Orientation

The aim of the company is to guarantee customer satisfaction and is committed to establish loyal and productive relationships, guaranteeing high-quality products and service to satisfy the client's requirements.

Excellence, Experience, Innovation and Reliability

S.I.A. values highly investments in innovation to strength its own competitiveness.

S.I.A utilises know-how, methodologies and/or production technologies resulting from its long experience in the field of fire safety systems and equipment to create added-value for its customers through successful initiatives, designing technically advanced products complying with appropriate international standards.

Flexibility

S.I.A is fully aware that its success is determined by its capability to react and to adapt itself to the high flexibility required by the markets in which it operates.

Sharing of Knowledge

S.I.A. believes in team building, in the sharing of knowledge and experience and in the contribution that interested parties can provide to achieves desirable goals.

3. Rules of Conduct

This section establishes the *rules of conduct* that all persons are required to comply with, in order to be coherent with the conduct and values of S.I.A.

I. Collaborators

Collaborator means:

1. Any person who performs activities of management, control activities within the Company or in any of its independent units;
2. The employees of the Company, operating both nationally and internationally.
3. Those who are temporary employees or representatives of the Company

Ethical and Transparent Conduct

Ethical and Transparent conduct is required in both internal and external activities of the company and includes the respect of all rules, laws and generally accepted procedures.

All collaborators are required to be aware of the law and requirements pertaining to his/her tasks, to detect possible risks and apply necessary mitigations wherever required.

In particular S.I.A. promotes correct conduct during the activities carried out within the Company, which excludes any form of illegal actions.

Protection of Physical and Moral Integrity

S.I.A. is committed to guarantee safety in the workplace and to comply with the relevant regulations in force, through the prevention, monitoring and management of risks associated with the execution of the activities.

The aim of the Company is to prevent incidents or diseases within the workplace by implementing all appropriate and necessary actions, such as a certified system for the management of health and safety at work, personnel training, investment in quality machinery and equipment..

All collaborators are encouraged to contribute, respect and comply with the indications received from the company.

Co-operation and Sharing

Co-operation and sharing are fundamental as they facilitate the creation of a stimulating workplace based on mutual trust and respect, thereby encouraging the efficient resolution of problems, improving operational efficiency and achieving excellence in performance.

Conflict of Interest

All decisions and actions adopted during work activities are taken exclusively in the interest of the Company.

All collaborators avoid situations which may lead to conflict of interest thereby avoiding all possibility of personal gain.

By way of example, but not limited to, the following situations may constitute a conflict of interest:

- financial and/or economic interests, with relatives, customers, suppliers, competitors, Public Administration, etc..
(e.g. ownership of shares or professional assignments)
- use the position in the Company or the company's know-how to create conflict between personal and Company's interests.

Any person who finds himself/herself in a conflict of interest situation must immediately notify his/her senior manager or the Managing Director and to refrain from any such activity until such time as the conflict is resolved.

Consequently it is the responsibility of the senior manager or the Managing Director to immediately and fully inform the Supervisory Board.

Gifts and Benefits

The Company's collaborators (and relatives) are forbidden to give to or receive from money, gifts, or benefits from and to third parties (Public Administration, customers, suppliers, etc.) to obtain personal unfair or benefit for himself/herself or the Company.

Any act of commercial courtesy must be of moderate value, in compliance with the law and not be inappropriate.

It is forbidden to give or accept cash or other benefits which are deemed to be acts of corruption.

Use of Company Resources

Each collaborator is required to act in a responsible manner when using the company resources in order to avoid damages or efficiency reduction or conflict with the interests of the Company.

Collaborators shall also protect company property and prevent improper use. All persons, without discrimination of roles, shall take due care to promote safety in the workplace.

Transparency and Correctness of Information

Each collaborator shall guarantee the truth, transparency, attention and completeness of any documentation and information provided.

S.I.A. disapproves any action that can modify the truth and the correctness of the data and information contained in financial reports, or in corporate communication required by the law, or supplied to public bodies, collaborators, monitoring authorities or auditors.

In particular collaborators who are involved in the preparation of accounting documents or financial statements must use due diligence to ensure that these records and statements are true and correct.

Confidentiality of information

The Company's collaborators shall guarantee the proper management of the confidential information and shall not divulge such information either inside or outside of the company, unless required by law.

By way of example, information concerning projects, new products, workshop tests, commercial strategy, company organization are considered confidential.

Privacy Protection

During its activity, S.I.A. protects the personal data of collaborators and third parties according to legal requirements and internal procedures.

Selection, Professional Development and Protection of Collaborators

S.I.A. recognises that qualified and loyal collaborators are fundamental to achieve corporate objectives and maintain high standards of quality.

S.I.A. considers it important to maintain a suitable work environment, respecting the privacy of its employees and to guarantee the protection of and equal opportunities for its collaborators adopting processes of personal professional development based upon merit.

During the candidates' interviews, S.I.A. compares candidate profiles with the requirements of the company, avoiding nepotism or discrimination for nationality, colour of skin, religion, politics, sex etc.

Respect of Ethical Principles

The respect of the Principles of the Code by collaborators is considered to be an integral part of the obligations of collaborators towards the Company.

II. Suppliers and Partners

“Supplier and Partner” are those persons or organisations who act in the name of or on behalf or in the interest of the Company through a contractual relationship (e.g.: promoters, mediators, agents, consultants, joint venture partners, suppliers of goods and /or services.)

Good Faith

The Company works with long-term suppliers and partners, basing commercial agreements on correctness and transparency standards, requiring them to operate in the respect of persons and environment.

Choice of Suppliers and Partners

Selection of the suppliers is based on objective evaluations complying with principles of operational correctness, quality, innovation, continuity, loyalty, timing and ethics and, wherever possible, through the promotion of local suppliers.

Payment, Gifts and Benefits

Reward to suppliers shall always be in compliance with the performance as shown in the contract and payments cannot be re-directed to third parties but the contractor.

S.I.A. prohibits the provision of or receipt of gifts and/or benefits (money, objects, services, goods etc.) to/from suppliers and partners and/or their representatives which may be construed as illegal conduct or be understood by an impartial observer to provide any form of gain or advantages, economic or otherwise.

Protection of the safety and health of suppliers

S.I.A. is committed to communicate the concept of health and safety at suppliers' facilities and in particular for those suppliers who carry on their activities on the company's premises.

S.I.A. ensures that its suppliers satisfy appropriate quality control procedures.

Confidentiality of information and intellectual property

S.I.A. guarantees and requires from its suppliers and partners maximum confidentiality in the management of strategic and confidential information or intellectual property.

Compliance with Ethical Principles

S.I.A. communicates to its suppliers the ethical principles as described in this document.

III. Customers***Quality and Efficiency of the Products and Services***

Customer satisfaction is the main objective S.I.A.

S.I.A. is committed to achieve and maintain top quality standards for its products and services, complying with the quality requirements of its customers and by the relevant laws in force.

S.I.A's. Quality Management System is certified ISO 9001 : 2015

Safety and Product Innovation

S.I.A. pays particular attention to research and technology to offer reliable and innovative products. It guarantees maximum safety in the use of products, informing its clients of tests performed by independent bodies and/or the clients themselves.

Negotiation and Contractual Fairness

Relationships with clients are intended to be long-term, based on fairness and professional principles excluding any deceiving behaviour. In the event of unexpected events, the Company will not take advantage of client weaknesses or difficulties.

Rewards, Gifts and Benefits

Reward resulting from the sale of products shall always comply with the contract and performance. Relevant payments from customers shall be made by the client.

S.I.A. prohibits to give or receive, directly or otherwise, gifts and/or benefits (money, objects, services, performance or others) to/from customers which may be construed as illegal conduct or anyway to be understood by an impartial or be understood by an impartial observer to gain advantages, even if not of economic nature.

Protection of personal data

S.I.A. guarantees the maximum privacy of personal data in full compliance with the regulations in force and in particular with the principle of transparency, lawfulness, quality and correctness.

Respect of ethical principles

Together with the confirmation of orders, S.I.A. communicates to its customers the ethical principles described in this document.

Public Administration

The term Public Administration means all those persons or organisations, which perform a “public service” or a “public function” with whom S.I.A. and its collaborators interact.

By way of example, but not limited to: territory public authority (Municipalities, Provinces, Regions, etc.), INPS, ASL, Privacy Guarantor Authority, Finance Police, NAS, Fire Brigade, Police, ISPESL, notify bodies, as well as all those subjects appointed to perform public services (ENI, SNAM gas branch, ENEL, EDF, etc.)

Legality, correctness and transparency in relationship with the Public Administration

S.I.A. maintains its relationship with the Public Administration through operations based on correctness and transparency.

Collaborators involved in negotiation or request with the Public Administration, shall not influence decisions nor adopt illegal behaviour, such as giving money or other benefits, which could affect the neutral judgment of the Public Administration’s representatives.

Donations to an authority linked to the Public Administration shall be given complying with the contents of the present Code of Conduct in transparent manners and be giving timely communicated to the Legal Directors of the Company.

Modified or counterfeit declarations/documents, or the omission of information, or any other actions aimed to acquire contracts or any other concessions, authorizations, loans, subsidies from European Community, government or other Public Authority are considered as illegal behaviour.

Selection of third parties for the management of relations with the Public Administration

In the event that the Company uses a consultant or a third party to further its interests with the Public Administration, these subjects shall be informed about of the contents of the present Code.

S.I.A. shall not be represented by person or organisation nobody that could be in possible conflict of interest with the Public Administration.

Management of IT or telematic systems of the Public Administration

It is forbidden to modify the operation of an I.T. system or telematic system of the Public Administration or to manipulate the data it contains with the aim to gain an unjustified profit.

Employment relationships with employees or former employees of the Public Administration

Hiring of employees or former employees of the Public Administration, who during their mandate have/had held relationships with the Company, shall occur in full compliance with S.I.A. procedures for the selection of the collaborators.

The previous/actual title of the candidate shall not affect the final decision regarding the formalisation of the future relationship between S.I.A. and the candidate.

Grants and Subsidies

S.I.A. guarantees the correctness and completion of the documentation needed to obtain grants, loans, authorizations and concession from the Public Administration (European Community, Government, Local Authorities, etc.)

S.I.A. also guarantees that such subsidies or loans shall be used with the scope for which they were requested.

IV. Business Partners***Business sustainability***

S.I.A. applies a prudent, medium-long term policy to mitigate entrepreneurial risk. At the same time, this policy is aimed to promote economic competitiveness, efficiency and operational effectiveness.

Transparency and Correctness

S.I.A. avoids favouritism towards its shareholders thereby guaranteeing correctness, clarity and equal access to information to all and avoiding the improper use of the same.

V. *Financiers*

Transparency of the information

S.I.A. provides timely and transparent information required by the providers of finance regarding the granting of loans and/or grants to the Company.

Respect of Commitments

S.I.A. honours the contractual commitments with the providers of finance.

VI. *Community and Environment*

This includes all the interlocutors who are directly or indirectly influenced by the activities of S.I.A. (e.g. the community, mass-media and environment).

Economic and Social Environment

S.I.A., in order to improve the environment in which it operates, commits itself to evaluate arguments of importance to the community within which it operates (e.g. the promotion of co-operation with the Local Authorities)

Support for social and cultural initiatives

While supporting social and cultural ventures, S.I.A. takes into high consideration those initiatives coherent with its objectives and with the principles of environmental and social responsibility.

S.I.A. does not support illegal organisations, factions or representatives, political candidates or Trades Unions either in Italy or abroad.

Donations and Generosity

S.I.A. supports only those ventures which discern themselves for the ethical message which they transmit and for the contribution which they make towards ethical social development.

Media

Communication of data and information to “The Media”, shall be true, transparent, proper, correct and in compliance with Company policy. Collaborators shall refrain from behaviour which may cause damage to the Company.

4. Implementation of and Compliance with the Code

Through its own Code of Conduct, S.I.A. reiterates its adhesion to the highest ethical standards in which it firmly believes.

All collaborators are called upon to respect and ensure compliance with the principles described in the Code.

S.I.A. is committed to respect the Code applying penalties as per the disciplinary procedures included in the Italian 231 law concerning organization, management and monitoring of the company's activities and those prescribed by Italian National Collective Agreements with labour organisations and contracts with interested parties.

5. Supervisory Body (OdV)

a. Supervisory Body

The body appointed to supervise the application of the Code is the Supervisory Body established of S.I.A. as per Legislative Decree 231/2001 (hereafter “OdV” or “Body”). The OdV collaborates with the Statutory Bodies to ensure the correct implementation and adequate monitoring of the contents of this document.

Statutory Bodies, Collaborators and third parties acting on behalf of S.I.A. are required to fully collaborate with the OdV.

b. Knowledge and application

The present Code is supplied to the Statutory Bodies, Collaborators and third parties through proper communications that facilitate a clear understanding of all aspects of the Code.

c. Reporting of violations

Statutory Bodies, Collaborators and third parties shall report, anonymously any violation of the Code to the OdV, by internal mail or relevant e-mail (organismodivigilanza@sia-italia.com).

The OdV shall timely evaluate the report relevant to the possible violation to whom it may concern.

The OdV and S.I.A. guarantee the privacy of the reporting body or person, without prejudice to legal obligations.

d. Disciplinary measures

The OdV is responsible for the investigation of possible violations of the Code as described in this document. In the event that a violation is confirmed the violator is called upon to accept penalty appropriate for the violation.

e. Changes and Updates

All modification and/or updates to this Code of Conduct shall be approved by the Board of Directors of S.I.A.

Statutory Bodies shall communicate to all interested parties this Code of Conduct and all modification and/or updates.

All collaborators, are required to respect, and make respect, the principles described in the Code.

S.I.A. is committed to respect the Code applying penalties as per the disciplinary procedures included in the Italian 231

law concerning organization, management and monitoring of the company's activities and those prescribed by Italian

National Collective Agreements with labour organisations and contracts with the third parties.

6. Legal appendix

Updated on November 14, 2019 (last provision inserted: Law Decree 21 September 2019, n.105)

1. Undue receipt of funds, fraud against the State or a public body or for the achievement of public funds and IT fraud against the State or a public body (Art. 24, D.Lgs. n. 231/2001) [art. modify by L. 161/2017]
2. Computer crimes and illegal data processing (Art. 24-bis, D.Lgs. n. 231/2001) [art. added to L. n. 48/2008; modified by D.Lgs. n. 7 e 8/2016 and by D.L. n. 105/2019]
3. Offenses of organized crime (Art. 24-ter, D.Lgs. n. 231/2001) [art. added by L. n. 94/2009 and modified by 69/2015]
4. Extortion, undue inducement to give or promise other benefits and corruption (Art. 25, D.Lgs. n. 231/2001) [modified by L. n. 190/2012 e dalla L. 3/2019]
5. Forgery of coins, public credit cards, revenue stamps and identification instruments or signs (Art. 25-bis, D.Lgs.n. 231/2001) [art. added by D.L. n. 350/2001, converted with modifications from L. n. 409/2001; modified by L. n. 99/2009; modified by D.Lgs. 125/2016]
6. Crimes against industry and commerce (Art. 25-bis.l, D.Lgs. n. 231/2001) [art. added by L. n. 99/2009]
7. Corporate offenses (Art. 25-ter, D.Lgs. n. 231/2001) [art. added by D.Lgs. n. 61/2002, modified by L. n. 190/2012, dalla L. 69/2015 e dal D.Lgs. n.38/2017]
8. Crimes with the purpose of terrorism or subversion of the democratic order provided for by the criminal code and special laws (Art. 25-quater, D.Lgs. n. 231/2001) [art. added by L. n. 7/2003]
9. Female genital mutilation practices (Art. 25-quater.l, D.Lgs. n. 231/2001) [art. added by L. n. 7/2006]
10. Crimes against the individual (Art. 25-quinquies, D.Lgs. n. 231/2001) [art. added by L. n. 228/2003; modified by L. n. 199/2016]
11. Market abuse offenses (Art. 25-sexies, D.Lgs. n. 231/2001) [art. added by L. n. 62/2005]
12. Other offenses relating to market abuse (Art. 187-quinquies TUF) [art. modified by dal D.Lgs. n. 107/2018]
13. Crimes of manslaughter and serious or very serious negligent injuries, committed in violation of accident prevention regulations and the protection of hygiene and health at work (Art. 25-septies, D.Lgs. n. 231/2001) [art. added by dalla L. n. 123/2007; modified by L. n. 3/2018]
14. Receiving, laundering and use of money, goods or benefits of illicit origin, as well as self-laundering (Art. 25-octies, D.Lgs. n. 231/2001) [art. added by D. Lgs. n. 231/2007; modified by L. n. 186/2014]
15. Copyright infringement offenses (Art. 25-novies, D.Lgs. n. 231/2001) [art. added by L. n. 99/2009]
16. Inducement not to make statements or to make false statements to the judicial authority (Art. 25-decies, D.Lgs. n. 231/2001) [art. added by L. n. 116/2009]
17. Environmental crimes (Art. 25-undecies, D.Lgs. n. 231/2001) [art. added by D.Lgs. n. 121/2011, modified by L. n. 68/2015, modified by D.Lgs. n. 21/2018]
18. Employment of illegally staying third-country nationals (Art. 25-duodecies, D.Lgs. n. 231/2001) [art. added by D.Lgs. n. 109/2012, modified by L. 17 ottobre 2017 n. 161]
19. Racism and xenophobia (Art. 25-terdecies, D.Lgs. n. 231/2001) [art. added by L. 20 novembre 2017 n. 167, modified by D.Lgs. n. 21/2018]
20. Fraud in sports competitions, abusive gambling or betting and gambling carried out by means of prohibited devices (Art. 25-quaterdecies, D.Lgs. n. 231/2001) [art. added by L. n. 39/2019]
21. Liability of entities for administrative offenses resulting from a crime (Art. 12, L. n. 9/2013) [They are a prerequisite for entities operating in the virgin olive oil supply chain]
22. Transnational crimes (L. n. 146/2006) [The following crimes are a prerequisite for the administrative liability of entities if they are committed transnationally]