


	<b>CODE OF ETHICS</b>	<b>MQA 5 A8</b>
		Revision 0
	Date 29/03/2018	
	File Name: Sig-05A8 - Codice etico_eng.docx	Page 1 of 3

# Code of ethics

## LIST OF REVISIONS TO THE SECTION

Rev.	Date	RSI Verification	DIR Approval
0	29/03/2018	<i>André Elise</i>	<i>André Elise</i>

	<b>CODE OF ETHICS</b>	<b>MQA 5 A8</b>
		Revision 0
	Date 29/03/2018	
	File Name: <b>Sig-05A8 - Codice etico_eng.docx</b>	Page 2 of 3

## 1. Introduction

With this Code of Ethics Sigmar Vernici s.r.l. intends to formally define the set of fundamental ethical values which inspires it in the performance of its activities, as well as the rights, duties and responsibilities with respect to the subjects with which it interacts for the purposes of its mission.

In order to protect its image and safeguard its resources, the Company will not maintain relationships of any kind with those who do not intend to uphold strict respect for the current legislation and/or who refuse to comply with the ethical principles and rules of conduct laid out in this Code.

This Code contains the ethical values that the Management of Sigmar Vernici srl, all those under their management and supervision, employees, consultants, collaborators, suppliers, business partners and all those who work for and/or on behalf of Sigmar Vernici srl are required to comply with.

The employees and collaborators of Sigmar Vernici s.r.l. are obliged to acquire the necessary knowledge of the rules and principles contained in this Code, to refrain from any conduct contrary thereto, and to report any such conduct should they become aware of it. Anyone working in the company, who detects a possible fraud, danger or other serious risk that could damage customers, colleagues, equipment, people or the reputation of the company itself is obliged to make a report. Whatever channel used, Sigmar Vernici s.r.l. undertakes to safeguard the anonymity of the person making the disclosure and to ensure that he/she is not subjected to any form of unfair treatment (Whistleblowing).

## 2. Protection of the environment, safety and health of workers

As part of its activity, Sigmar Vernici s.r.l. pursues the objective of protecting the health and safety of workers and the community, by adopting the measures set out in law to achieve this purpose.

Each recipient must pay the utmost attention in carrying out his/her activity, strictly observing all established safety and prevention measures, to avoid any possible risk to themselves, collaborators and colleagues, and the community.

In particular, all the provisions with reference to the Consolidated Law on Safety (Legislative Decree n° 81 of 9 April 2008, and amendments) and any other law applicable to Sigmar Vernici s.r.l. must be observed. Moreover, each recipient must comply with instructions and directives provided by the persons delegated with the fulfilment of the safety obligations.


## 3. Conflicts of interest

The Recipients of this Code, in carrying out their activities, shall pursue the objectives and general interests of Sigmar Vernici s.r.l. and therefore shall refrain from activities, conduct and acts that are incompatible with the obligations connected to the relationship with the company. All business decisions must be taken in the interest of Sigmar Vernici s.r.l. avoiding any situation of conflict of interest between personal or family activities and duties covered in the Company that could compromise a fair judgement.

## 4. Privacy

Sigmar Vernici s.r.l. ensures the confidentiality of all information in its possession and compliance with the legislation on data processing. The Company undertakes to guarantee privacy, especially with regard to information concerning the private life and opinions of its employees and, more generally, of those who interact with it.

Recipients have the duty to respect and protect any news and information regarding the activity of Sigmar Vernici s.r.l. acquired and/or processed while performing their duties or functions, and to use them correctly in the interests of the company, protecting the confidentiality thereof.

	<b>CODE OF ETHICS</b>	<b>MQA 5 A8</b>
		Revision 0
	Date 29/03/2018	
	File Name: Sig-05A8 - Codice etico_eng.docx	Page 3 of 3

## 5. Dignity and respect

Sigmar Vernici s.r.l. recognises that the key factor to the success of the Company is the professional contribution of the people who work for it.

The Company considers the person, the person's principles and rights as intangible values to be protected. The Company promotes and respects the personal dignity and fundamental human rights, protecting the moral integrity thereof.

Furthermore, it considers impartial treatment a fundamental value in any relationship and promotes equality, committing to guaranteeing equal opportunities.

In both internal and external relationships, behaviour that is discriminatory towards the personal dignity, privacy or rights of individuals on the basis of race, nationality, social conditions, political and trade union opinions, religious belief, sexual orientation, health status, or in general any other personal characteristic of an individual is not permitted.

## 6. Compliance with laws and regulations

All the activities carried out for and on behalf of Sigmar Vernici s.r.l. must be carried out in full respect of the current EU, national and international laws and regulations. Each Recipient therefore undertakes to diligently acquire the necessary knowledge of the laws and regulations that apply to the performance of their roles, in effect at that time.

## 7. Fundamental principles

Sigmar Vernici s.r.l. considers its image and reputation values that must be protected and developed through the full dissemination, sharing and observance of the ethical and behavioural principles set forth below, to which the Company is inspired and which it requests compliance by all Recipients.

## 8. Relations with local communities

A constant relationship with the local communities is the foundation of the work of Sigmar Vernici s.r.l. Therefore the Company, aware of its social role, respects the economic, social and cultural fabric of the Communities in which it operates, evaluating the contents it offers/presents/distributes and their social impact, and trying to contribute to positive developments/changes in the Communities .

## 9. Relationships with external collaborators and/or consultants

Sigmar Vernici s.r.l. identifies and selects the professionals and consultants to whom the execution of services of any type is entrusted on behalf and/or in the interest of the Company, with absolute impartiality, autonomy and independent judgment. Furthermore, it ensures that it is primarily inspired by objective parameters of competence, professionalism, confidentiality and ethics, which makes it possible to set up a mutual trust.

The Company expects external collaborators and consultants to behave in accordance with the principles of this Code and applicable legislation. Any conduct that is contrary to the principles expressed in the Code of Ethics and current legislation can be considered a serious breach of the duties of correctness and good faith in the performance of the contract, a reason for breach of the relationship of trust and just cause to terminate the contractual relations.

	<b>CODE OF ETHICS</b>	<b>MQA 5 A8</b>
		Revision 0
	Date 29/03/2018	
	File Name: Sig-05A8 - Codice etico_eng.docx	Page 4 of 3

## 10. Supplier relations

In relations with suppliers of goods or services, Sigmar Vernici s.r.l. operates in compliance with the law and the principles of this Code, establishing relationships only with subjects who maintain a respectable reputation, who are committed to correct lawful activity, and whose ethical culture is equivalent to that of Sigmar Vernici s.r.l.

In the selection of suppliers, Sigmar Vernici s.r.l. promotes the reliability of the supplier and its ability to correctly fulfil the obligations assumed, as well as the quality/price ratio of the goods or services offered, without any discrimination or preconceived evaluation. Sigmar Vernici s.r.l. selects suppliers and manages the relationships in an impartial and correct manner, avoiding situations that might present a real or even a potential conflict of interests.

It is prohibited to promise or pay monetary sums or other benefits to representatives and/or employees of suppliers or potential suppliers (or persons associated thereto) with the intention of influencing their activity in the interests of Sigmar Vernici s.r.l., also as a result of unlawful pressure.

## 11. Customer relations

In managing customer relations, the Company complies with the laws and principles of this Code of Ethics, and requires its employees and collaborators to avoid any situation of conflict of interest with Sigmar Vernici s.r.l., with the aim of maximising added value with the customer.

It is prohibited to promise or pay monetary sums or other benefits to representatives and/or employees of customers or potential customers (or persons associated thereto) with the intention of influencing their activity in the interests of Sigmar Vernici s.r.l., also as a result of unlawful pressure.

## 12. Employee relations

Sigmar Vernici s.r.l. distributes the Code of Ethics to employees. To this end all employees are required to acquire knowledge and comply with the provisions of the Code of Ethics, within their competence, and that, compatibly, they promote knowledge among newly hired employees as well as third parties involved in its application, with whom they come into contact in the performance of their duties.

The Company promotes and offers equal opportunities for professional growth, excluding arbitrary discrimination, inspiring all relations to principles of equality, fairness and loyalty, based on merit-based criteria.

Relations between employees, regardless of the level of responsibility are conducted with correctness and respect. Managers exercise the powers connected to their position with objectivity and balance, ensuring the professional growth of his/her collaborators. Each employee shall be cooperative, fulfilling his/her tasks with responsibility, efficiency, diligence and in full respect of the values of the Company.

The selection and hiring of personnel must be based on criteria of transparency in assessing the requirements for competence, professionalism, skill and individual potential. The hiring of personnel takes place on the basis of regular employment contracts, as no form of non-compliant or otherwise elusive employment relationship with the regulatory provisions in force is permitted. Furthermore, the Company does not employ workers without a valid residence permit.

	<b>CODE OF ETHICS</b>	<b>MQA 5 A8</b>
		Revision 0
	Date 29/03/2018	
	File Name: <b>Sig-05A8 - Codice etico_eng.docx</b>	Page 5 of 3

### 13. Penalty system

Compliance with the provisions of this Code must be considered an essential part of the contractual obligations of the employees of Sigmar Vernici s.r.l., as well as that of any other relationship that is regulated ex lege or contractually. Violation of ethical standards constitutes a breach of the primary obligations of the employment relationship with every consequence of law or contractually regulated, and excepting any to compensation for damages caused to the Company.

Sigmar Vernici s.r.l., through the bodies and roles assigned to them, shall impose, with coherence, impartiality and uniformity, sanctions according to the respective violations of this Code and in compliance with current provisions on the labour and contractual relations law.

Provisions against directors and employees resulting from the violation of the ethical principles and the rules of conduct referred to in this Code are those provided for by the labour regulations in force (in Italy the applicable National Labour Contracts).

Any conduct by consultants, collaborators, suppliers and other counterparts connected to Sigmar Vernici s.r.l. through an independent work contract and, in any case not subject to management or supervision, that is in violation of the provisions of this Code, could result, in the event of more severe cases, in termination of the contract, without prejudice to any request for reimbursement if such conduct causes damage to the Company.

San Giovanni al Natisone, 29 March 2018

President

(F. J. Rankl)

