



SOCIETÀ INDUSTRIALE  
COSTRUZIONI MECCANICHE  
E AFFINI

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# COMPANY ETHICS CODE

## PREAMBLE

The Code of Ethics contains the statement of the general principles of legality, fairness, transparency and integrity that are a prerequisite for carrying out activities for Sicma SpA and for the achievement of any economic, productive and social targets. This document is intended as the basic tool for the consolidation of ethical principles within the company and aims to guarantee and support the good reputation of the company. This set of principles, rights, duties and responsibilities, with respect to which Sicma SpA enters into a relationship, is proposed to establish behavioral standards with the intention of fulfilling the code of conduct. The company agrees to comply with the Code and to have high standards of business conduct, characterized by integrity and loyalty and without conflicts of personal and business interests.

## RECIPIENTS AND SCOPE

All employees, and people linked by employment with Sicma SpA, shall receive a copy of the Code of Ethics and are required to observe the principles. Each recipient is obliged to comply with this Code of Ethics, since such compliance is an issue of fundamental importance to pursue an ethically responsible company model.

In relations with third parties, the recipients of the Code of Ethics must act in such a way as to prevent any violations of the regulations. Sicma S.p.A. implements appropriate training initiatives aimed to promote awareness of the Code of Ethics in order that all recipients are aware of its intention and meaning.

## PRINCIPLES OF CONDUCT IN COMPANY MANAGEMENT

### **Honesty**

Relationships with suppliers and customers are based on a criteria of cooperation, loyalty, fairness and mutual respect. Under no circumstances shall the pursuit of company business justify corrupt conduct by employees.

### **Legality**

The essential principle is to respect the laws and regulations: Sicma SpA operates in compliance with the law, with the Code of Ethics and with the company procedures applying them with fairness and honesty.

### **Fairness in case of conflict of interest**

In conducting any activity, we should avoid situations where the parties involved may appear to have a conflict of interest. This refers to the case where a recipient pursues an interest different from the company mission, or takes advantages "on a personal level" of any business opportunities and activities related to it. Employees must act solely in the interest of Sicma SpA and avoid situations or relationships that create conflict between their interests and those of Sicma SpA, each one has the duty of preventing a potential conflict of interest.

### **Confidentiality**

Sicma S.p.A. guarantees the confidentiality of the information in its possession and the protection of information acquired in relation to the business activity. Sicma S.p.A. also ensures that none of the collected information shall be used for purposes in conflict with the law or in a way which may harm the company objectives.

### **Value of human resources**

We believe that respect for the physical, moral and cultural integrity of people represents a fundamental concept for our company. Sicma S.p.A. ensures it operates under working conditions that respect individual dignity and are suitable workplaces as indicated by law.

Recipients undertake to comply with the stated measures for accident prevention and security. In addition, the company protects and promotes the value of human resources in order to increase and improve the heritage and the competitiveness of the skills of each employee.

### **Environmental protection**

The company is committed to safeguard the environment by contributing to the adoption of a constructive path of ecological sustainability for all activities. For years, the company line has been directly focused on improving environmental performance and use of resources, considering the environment as a core value.

Improvements in environmental issues are derived from the installation of the 190kW photovoltaic system the upcoming installation of a 75 kW hydroelectric power plant. These two

systems will make our company independent from energy: i.e the energy consumption is less than the energy generated

### **Health and safety**

The company has always been involved in spreading the safety culture with respect to existing legislation, in particular:

- Implementing preventive actions aimed at preserving health and safety of all the company activities.
- Replacing dangerous equipment with safer equipment.
- Doing everything reasonably practicable to avoid risks.
- Activating training programs within the company on specific issues of health and safety, as actually provided by the relative safety at work acts.
- Ensuring continuous training, at all levels of the company, with respect to correct operating procedures under current Health and Safety law

All employees are encouraged to be active participants in issues related to health and safety including constantly improving safety conditions at work.

### **Workplace**

Each recipient is required to contribute to build and maintain a climate of mutual respect, showing attention and sensitivity to colleagues within a climate of full cooperation and help.

### **Services and products quality**

Sicma S.p.A. is committed to being attentive to the needs of the market by ensuring continuous development in the quality of products and services offered to its customers. The results are monitored and analyzed to ensure the best possible quality level is in place and to ensure any possible improvements can be implemented.

## **APPLICATION, MONITORING AND DIFFUSION OF THE CODE OF ETHICS**

The company is committed to encourage and ensure adequate knowledge of the Code of Ethics with the most effective methods, including paper-based system and the application within the company notice-board, easily accessible and visible to all recipients of the Code. Sicma S.p.A. undertakes to inform recipients of any changes, implementations and variations of this Code if there was a need. In order to ensure that recipients can align their behavior to those described above, the company ensures the proper disclosure of the Code and the awareness of the values expressed and contained in this document.