

Ethics expresses the set of rules of conduct followed by a person or a group of people and defines a reflection on the rules and principles to be followed in practical life.

The ethics in the Company is the ability to integrate its business activities with the respect and protection of the interests of all partners and of all the individuals it relates to, with the protection of environmental resources and their conservation for future generations.

The ethical code adopted by Sirius S.p.a. is a set of principles and rules whose observance is of fundamental importance for the proper functioning and improvement of the reliability of the Company. It represents the “Charter of Fundamental Rights and Duties” by which the Company clarifies its ethical and social responsibilities towards different stakeholders of internal or external interests. **This code uses and integrates the ETI Code.**

The adoption of this Code has the primary objective of satisfying, in the best way, the needs and expectations of the interlocutors of the Company, aiming to recommend and promote a high level of professionalism and to prohibit those behaviors that are in contrast not only with the relevant legislative provisions, but also with the values that the Company intends to promote.

The individual and collective behavior of the Company employees and collaborators must be in line with company policies and must be evident in a concrete collaboration, social responsibility and respect of current regulations following the standards of behavior identified by The Ethical Code.

The adoption of this Code completes and enriches the CCNL (National Labour Contract) rules and the procedures of the Quality Management System.

The ethical Code is addressed to all those employees or collaborators, who establish direct or indirect relations with the Company, in a permanent or temporary way, or operate to reach the Company targets. They will be defined as “recipients”.

Recipients who violate the principles and rules contained in this Code, harm the relationship of mutual trust established with the Company.

All the recipients are required to know the Ethical Code, to contribute to its implementation, to its improvement and its diffusion. The Company undertakes to distribute to all employees and collaborators a copy of this Code and to disseminate its contents and objectives.

Rules and standards of behavior (ETI Code)

The Sirius Code of Ethics adopts and refers to the ETI Code as to the following link:

<https://www.ethicaltrade.org/resources/eti-base-code>