



S.I.R. Srl – Società Italiana Resistor

23th December 2022

Ethical Code of SIR srl – Società Italiana Resistor

Introduction

The Ethical Code is a fundamental component of the Organization, Management, and Control Model pursuant to Legislative Decree 231/01, aligned with the Confindustria Guidelines for developing such models. This Ethical Code reflects our commitment to operate with integrity, transparency, and respect towards all stakeholders, including employees, customers, suppliers, and the community. Every member of our organization is expected to adhere to the principles outlined herein.

All recipients are required to observe and uphold the principles of this Ethical Code within the scope of their functions and responsibilities, committing to pursue their objectives in alignment with our core values, including respect, competence, merit, innovation, excellence, internationality, multiculturalism, rights, and sustainability.

1. Integrity and Honesty

Ethical Behavior: We are dedicated to maintaining the highest standards of integrity in all our interactions. Truthfulness and honesty are fundamental to our communications and business decisions.

Conflict of Interest: Employees must avoid situations where personal interests may conflict with those of the company. It is mandatory to report any potential conflicts of interest to a supervisor.

2. Respect and Diversity

Fair Treatment: All employees must be treated with respect and dignity, without discrimination of any kind, including race, gender, sexual orientation, religion, or disability.

Promotion of Diversity: We are committed to fostering an inclusive and diverse work environment, valuing differences and encouraging collaboration.

3. Social Responsibility

Environmental Impact: We are committed to sustainable operations, striving to minimize the environmental impact of our activities. We promote eco-friendly practices and responsible resource use. Recognizing the importance of minimizing environmental impact and continuously improving our environmental protection efforts, we have obtained the international certification UNI EN ISO 14001:15.

Community Development: We support the communities in which we operate by contributing to local projects and social initiatives that enhance quality of life.

4. Occupational Safety

We are committed to providing our employees and collaborators with a safe working environment that protects their health, safety, and overall integrity, in accordance with current laws and regulations. Our ISO 45001:2018 certification for "Occupational Health and Safety Management

Systems - Requirements with Guidance for Use" certifies the implementation of an effective system for managing worker safety and health, ensuring compliance with applicable regulations.

5. **Confidentiality and Information Security**

Data Protection: We are dedicated to safeguarding the confidentiality of sensitive information belonging to our customers, employees, and partners. We implement security measures to prevent unauthorized access.

Ethical Use of Information: Business information must be used solely for professional purposes and must not be disclosed without proper authorization.

6. **Legal Compliance**

Compliance with Regulations: We are committed to adhering to all applicable laws and regulations in our operations. Each employee is responsible for ensuring their own compliance.

Reporting Violations: We encourage employees to report any illegal or unethical behavior. Reports will be treated confidentially and without retaliation.

7. **Relationships with Customers and Suppliers**

Transparency in Transactions: We are committed to maintaining transparent and fair business practices. Information regarding our products and services will always be accurate and truthful.

Quality and Safety: The quality of our products and services is paramount. We are dedicated to adhering to high standards of safety and quality in all our offerings. Our products are managed under a Quality Assurance regime according to the excellence standard UNI EN ISO 9001:2015. Thus, we focus not only on the control of finished products and on the sourcing of raw materials and components but also on ensuring that all controls and related decisions are implemented with adequacy assurance.

8. **Training and Development**

Investment in Employees: We support the professional growth of our employees through continuous training and development opportunities. We encourage everyone to actively participate in courses and training programs.

Performance Evaluation: Performance will be assessed fairly based on clear and measurable objectives, ensuring merit-based growth.

Conclusion

Adherence to this Ethical Code is fundamental to the success of SIR srl. Every employee is called to set an example and promote these values both within and outside the organization. In case of doubts or questions regarding this Code, please contact your superior or the human resources department.