



ALBERTO
SASSI
HIGHER LIFT TECHNOLOGY



ALBERTO SASSI S.p.A.

CODE OF ETHICS

Revision of 18 July 2023

This document was approved by resolution of the Board of Directors.
Revisions, to be approved by the same procedure, are not excluded,
also on the basis of changes and additions according to internal and external changes
in the Company, and of experience gained by the Company over time.

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1 - INTRODUCTION

The following document aims to define the rights, duties and responsibilities with which all persons (Employees, Suppliers, Collaborators, Institutions, Customers) who directly or indirectly have relations with the Company must comply, establishing rules of conduct based on the values that have always distinguished the Company.

Consistent with the above, the Management has decided to adopt this Code of Ethics (hereinafter referred to as the "Code") in order to build a transparent reality directed towards compliance with ethical and behavioural standards, typical of a mature civilised context.

This Code aims, in particular, to contribute to the implementation of environmental sustainability and occupational health and safety by minimising risks and reinforcing existing practices, making them commonplace.

1.1 THE COMPANY

ALBERTO SASSI S.p.A. has been a leader in the design, manufacture, sale and service of traction geared machines with motors and gearless for passengers and goods lifts since 1946, the year Commendator Alberto Sassi founded the Company. For more than 70 years now, the Company, which still belongs to the founder's family, has been manufacturing and selling its products in Italy and around the world through a network of selected Customers and Distributors so as to guarantee that its products can most definitely be certified "*Made in Italy*".

ALBERTO SASSI S.p.A. is part of the SASSI HOLDING S.p.A. group, which comprises companies that invest capital, commitment and human resources in technological research to achieve constant improvement in production.

1.2 INTRODUCTION

The Company, in the context of its activities, has as its guiding principles compliance with

domestic and EU legislation, as well as that of the countries in whose markets it operates, with the aim of pursuing the principles of legality, fairness, transparency and respect for human dignity.

1.3 PURPOSE OF THE DOCUMENT

ALBERTO SASSI S.p.A. proposes, with this Code, to clearly and transparently define the values to which it intends to adhere and compliance with which is required of all those who, in any capacity, cooperate in the exercise of Company activities.

Corporate reputation is the intangible resource essential to the very functioning of the Company and is closely linked to compliance with the commitments and ethical aims expressed therein.

ALBERTO SASSI S.p.A. undertakes to inform and spread knowledge about and use of this Code.

1.4 SCOPE AND ADDRESSEES

The following document aims to define the rights, duties and responsibilities with which all persons (Employees, Suppliers, Collaborators, Institutions, Customers) who directly or indirectly have relations with the Company must comply, establishing rules of conduct based on the values that have always distinguished the Company.

Consistently with the above, the Company has decided to adopt this Code in order to build a transparent reality directed towards compliance with ethical and behavioural standards, typical of a mature civilised context, attentive to the implementation of environmental sustainability and occupational health and safety by minimising risks and reinforcing existing practices, making them commonplace.

2 - PRINCIPLES AND VALUES

This Code is intended to set out the fundamental values of the Company, handed down through the generations by its founder Commendator Alberto Sassi.

2.1 ATTENTION TO THE PERSON

Attention to the person is at the very heart of the Company's actions, with its commitment to respect, care and attention for the individual from a work point of view, through the continuous stimulation of professional and personal training, in order to allow and promote a work-life balance. The Company favours long-term working relationships, to transmit trust and give importance to people, who are an integral and constituent part of the Company itself, in a climate of engagement and sharing.

Human resources have always been the main corporate asset and essential for achieving business success.

This is why, in addition to compliance with employment law principles, the Company encourages the development of each resource's professional abilities by:

- respecting each individual's personality and dignity;
- prohibiting all forms of discrimination and abuse and assuring appropriate preventive measures against such conduct in the workplace;
- creating a working environment that grants and encourages equal opportunities for all;
- respecting the confidentiality of personal data and privacy;
- ensuring workplaces comply with health and safety regulations for workers.

In relations with colleagues too, the worker must behave in a spirit of fairness and in a spirit of full cooperation and harmony, so that everyone can work in a positive and productive working environment.

2.2 TERRITORIAL ROOTS

The Company promotes the development of the territory through a connection established with the different players of the local community.

It tends to act within the local community, for the development of a prosperous and fertile society, capable of recognising and enhancing the resources that make it as well as the skills and potential present, while respecting differences in gender, culture and ethnicity, promoting well-being, integration, social development and enhancing the recognition of the same principles by those who work for the Company.

Taking responsibility for the local community and future generations is intrinsic to the Company's

DNA; the Company is aware that its business actions must reflect the interests of the territorial context in which it operates.

To this end, the Company undertakes to maintain and take care of relations with local authorities and social subjects active in the area, also through support actions of various kinds (sponsorships).

2.3 RESPONSIBILITIES

ALBERTO SASSI S.p.A. is obliged to act responsibly in the context of its business activities and, in general, in relations with its Employees and Collaborators and with Third Parties, paying attention to the provisions of the law and safety at work, to the person, and to respect for work by its Employees.

The Company attaches particular importance to respect for the environment in relation to energy supply, the waste cycle and direct and indirect environmental impacts.

In particular, the Company endorses the principle enshrined in Article 9 of the Constitution of the Italian Republic:

“The Republic promotes the development of culture and of scientific and technical research. It safeguards natural landscape and the historical and artistic heritage of the Nation. It protects the environment, biodiversity and ecosystems, also in the interests of future generations. The law of the State regulates the ways and forms of animal protection”.

2.4 DIALOGUE, SHARING AND COLLABORATION

Employees and Collaborators operate in an environment open to discussion in order to allow the Company to listen to them and make them participate in the construction of the corporate purpose and the development of the business.

Professionalism and sharing are the basis of the work and this, with a view to continuous development, makes it possible to combine work and human experience, professional skills, “*special*” and “*soft skills*”.

2.5 TRANSPARENCY, TRUST AND FLEXIBILITY

The Company makes corporate topics known in a clear and timely manner as this is the best prerequisite for a relationship based on trust.

Likewise, ALBERTO SASSI S.p.A. complies with the principle of fairness towards business partners, Suppliers, Consultants and Third Parties, to whom it seeks to provide an overview of the work, specifying and arranging, where necessary, support in the search for alternatives that can guarantee the same level of efficiency as the solutions already proposed.

2.6 RELIABILITY, CREDIBILITY AND LEGALITY

The Company's presence in the market for over 70 years has enabled it to finalise its products and crystallise the brand as a synonym for "quality" by promoting legality and fairness within the production and industrial processes.

2.7 DIVERSITY, INCLUSION, GENDER EQUALITY AND EQUAL OPPORTUNITIES

ALBERTO SASSI S.p.A. considers it essential to ensure gender equality, inclusivity and respect for diversity within structures, guaranteeing equal positions and contracts to both sexes. In line with what has been implemented up to now, the Company's criterion of respect for diversity and gender equality is based on meritocracy and the constant search for professionals with qualifications appropriate to the Company's activities, who can grow over time within the Company and to whom it entrusts progressively more responsible tasks and assignments. The Company protects and promotes equal opportunities for its employees, regardless of gender, age, social or ethnic origin, birthplace and citizenship, disability, wealth, sexual orientation, political, religious and other personal beliefs.

2.8 ASSOCIATIONS AND INSTITUTIONS

The Company is historically associated with Confindustria Emilia Area Centro, the largest association of industrialists in the area, with which it maintains a system of industrial relations. It is a member of industry associations and actively contributes to the drafting of standards in the lift sector through UNI.

2.9 FAIRNESS OF WORKING CONDITIONS

The remuneration and social benefits reserved for employees correspond to national or local legal standards, as well as to the relevant provisions and specific supplementary agreements. National regulations on working time and holidays are also observed.

2.10 PROTECTION OF EMPLOYMENT AND HEALTH

The Company is committed to disseminating and consolidating a culture of safety, developing risk awareness and knowledge of and compliance with the regulations in force concerning the prevention and protection of health and safety at work, promoting and demanding responsible behaviour from all Employees and Collaborators, working to preserve and improve, especially through preventive actions, the working conditions, health and safety of workers.

The Company's activities must be carried out in full compliance with the regulations in force on prevention and protection, with particular reference to the provisions of Italian Legislative Decree no. 81/2008 as subsequently amended and supplemented and specific applicable prevention regulations; the operational management must refer to advanced criteria of environmental protection and energy efficiency, pursuing the improvement of health and safety conditions at work, also for the purpose of preventing the crimes of manslaughter and serious or very serious culpable personal injury committed in violation of the rules protecting health and safety at work.

The fundamental principles and criteria guiding the Company's decisions in this regard are as follows:

- avoid risks;
- assess risks that cannot be avoided;
- combat risks at source;
- adapt the work to the person, in particular, with regard to work stations, choice of equipment and working and production methods, in order to mitigate, as far as possible, the monotony and repetitiveness of work and thus reduce its effects on health;
- take into account the degree of technical and technological evolution and provide for continuous updating;
- replace what is dangerous with what is not dangerous or is less dangerous;
- plan prevention, aiming at a coherent whole integrating technique, work organisation, working conditions, social relations and the influence of social factors on the workplace;
- prioritise collective protection measures over personal protection measures;
- give adequate instructions to Employees and Collaborators, also by means of specific training courses;
- protect and promote the value of human resources in order to improve and enhance the skills possessed by each Employee and/or Collaborator.

The Company undertakes to guarantee the protection of working conditions in the protection of the psycho-physical integrity of the worker and respect for his or her moral personality, avoiding that it suffers undue conditioning or inconvenience.

2.11 ENVIRONMENTAL PROTECTION

The Company is constantly striving to protect the environment. To this end, it directs its choices in such a way as to ensure compatibility between economic initiative and environmental needs, not only in compliance with current legislation, but also taking into account the development of scientific research and important experience in the field.

The fundamental principles by which the Company is inspired in environmental matters are:

- reduce, as far as is technically possible, the production of pollutants;
- optimise waste collection and the waste cycle;
- constantly optimise the use of resources;
- develop increasingly environmentally friendly products and production cycles;
- promote responsible behaviour towards the environment in people.

2.12 QUALITY, ENVIRONMENT AND SAFETY POLICY

The Company considers the protection of the health and safety of its staff to be a priority responsibility and an ongoing commitment to help improve processes and performance. For this reason, it is committed, through the development of risk awareness and the promotion of responsible behaviour, to spreading a culture of safety among its Employees.

ALBERTO SASSI S.p.A., in fact, operates in compliance with the framework regularly in force and is committed to using human, professional, instrumental and economic resources to ensure compliance with regulations, directing its efforts towards constant improvement.

In particular, with the help of the Environment and Safety Service, the Company adopts a Health, Hygiene, Safety and Environment Policy based on the following principles:

- carry out a specific risk assessment;
- organise methodologies and procedures according to the specific type and complexity of business processes;
- increase the levels of safety, health, ergonomics and psychological-physical well-being of workers;
- spread a culture of safety and respect for the environment within the Company;
- make staff aware of the importance of carrying out their work in a correct, systematic, planned manner, with maximum efficiency and in compliance with safety and environmental protection issues.

The Company's environmental policy is also supported by the knowledge that caring for the environment can be a competitive advantage in an increasingly large and demanding market in the field of quality and behaviour.

The Company's strategy is geared towards activities and investments that meet the principles of sustainable development. In particular:

- there is an internal committee dedicated to sustainability topics, which periodically studies and evaluates the actions to be taken in the social and environmental field, as balanced as possible with the economic one;
- awareness-raising and training activities on the topic of sustainability are carried out in order to spread an ever-increasing culture on the topic.

2.13 TRAINING

The Company is committed to maintaining constant growth in the skills of its employees, providing training even during periods of great change, such as the pandemic due to the spread of COVID-19.

The constant evolution of technologies and the increasing competitiveness of the market determine the need for a continuous redefinition of work processes and consequently require the adaptation of professionalism and the level of qualification of resources. In this scenario, training represents a strategic lever for the enhancement of resources and the development of new skills, making professionalism a key element for the quality of work performance in the Company.

3 - CRITERIA OF CONDUCT IN THE MANAGEMENT OF ACTIVITIES

3.1 GENERAL PRINCIPLES

The Company conducts its business according to the principle of legality. The activity is aimed at satisfying the Customer through correct and non-deceptive behaviour, meeting the needs of the market. Close cooperation with business associations and credit institutions ensures the proper conduct of the Company. The Company acts according to the criterion of correct and lawful responsible behaviour.

3.2 CARE IN COMMERCIAL TRANSACTIONS

The Company undertakes to respect the fairness of commercial transactions also with regard to exports within and outside the Union. The Company constantly strives to comply with and observe international tax and customs laws and regulations.

3.3 PRIVACY AND CONFIDENTIALITY

ALBERTO SASSI S.p.A. acts in compliance with the specific legislation on the protection and processing of personal data (Single European Regulation GDPR 2016/679), processing those of its knowledge and competence with respect for confidentiality, identity, dignity and image of the persons to whom the data belongs.

In particular, the personal information collected is processed in accordance with the principles set out in the GDPR in a manner that is correct, consistent and appropriate to the purposes of collection.

The Company also promotes the confidentiality of information in its possession in the management of all its business activities. All Employees, Collaborators and Consultants of the Company are bound not to use the information acquired in the performance of their activities for purposes not related to the strict performance of those activities.

The strategic value of information is recognised, ensuring the necessary confidentiality in order to avoid improper disclosure. In particular, specific caution is required in proces-

sing information relating to the Company and the data of Employees, Collaborators and Third Parties, in compliance with the principles of privacy, protection of personality and corporate interest. All Employees and Collaborators of the Company are required to take the utmost care not to disclose confidential Company information, by any means adopted internally within the Company.

Staff involved in any capacity in the management of computer data on the Company's server and the use of the software available, as well as those authorised to use Internet navigation tools, are required to use such computer equipment to the extent strictly necessary for the performance of the activities (administration, database management, etc.), files and work to be performed and developed.

The IT activity shall be carried out by each individual using his or her own credentials and refraining both from accessing IT systems by means of third-party credentials or authorisations and from providing any other individual with his or her personal credentials to access IT systems.

3.4 INSTITUTIONS AND COMMUNITIES

The Company identifies internally the persons required to have relations with the Public Administration.

These persons must operate with independence and integrity in cooperating with the Public Administration:

- it is prohibited to offer/promise sums of money, goods or other benefits to public officials and/or persons in charge of a public service;
- it is prohibited to produce false documents and/or documents containing false and/or altered information/data or to omit due information;
- it is prohibited to present false declarations and/or declarations containing false and/or altered information/data or to omit due information.

The Company believes that it is important to develop a relationship with the main players active at local level and beyond, in the social, cultural, or environmental fields or operating for the common good.

3.5 PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

The Company bases its activities on the ideals of legality and transparency and condemns all possible forms of unlawful competition, fraud, counterfeiting or usurpation of industrial property rights, calling on all those who work in the interest of the Company to comply with the existing legislation, protecting industrial and intellectual property rights.

3.6 PROHIBITION OF OPERATIONS CONDUCTED FOR MONEY LAUNDERING AND SELF-MONEY LAUNDERING

The Company, also through the banks with which it has business relations, ensures proper conduct that complies with anti-money laundering regulations and rejects practices that are contrary to legality in business operations.

3.7 PRODUCT INNOVATION

The Company creates added value for the benefit of Customers and the Company itself by harnessing creative ideas and technological expertise, striving for continuous improvement and committing itself at every level.

Building on the excellence of its products, processes and services, ALBERTO SASSI S.p.A. aims to maintain a leading position in the industry.

The Company's production and operations follow a pragmatic approach in order to maintain the quality standards achieved over the years and, at the same time, continue to excel in the market sector, through valuing work, guaranteeing quality and speed, and respecting safety.

3.8 DISSEMINATION AND COMMUNICATION

This Code is brought to the attention of all those to whom it is addressed by means of appropriate dissemination activities, aimed at ensuring that the ethical principles expressed herein are adopted by all those who work in the name and on behalf of the Company and, more generally, by all those who contribute to the Company's mission. This Code is published on the Company website. In order to ensure proper understanding, the Management implements a communication plan aimed at fostering awareness of the principles and rules contained therein.

3.9 RELATIONS WITH CUSTOMERS

The Company guarantees the truthfulness of the statements made in its commercial and promotional communications concerning its products. In addition, it guarantees their compliance with

this communication and what is contractually declared, including through a ready and effective Quality, Sales and After-Sales Control system.

The After-Sales Service verification and resolution system in place for Customers ensures that information is provided through constant and timely communication, with clear roles and responsibilities.

ALBERTO SASSI S.p.A. guarantees that its products can be certified "*Made in Italy*" by exercising targeted control over each product component.

3.10 CUSTOMER SATISFACTION

ALBERTO SASSI S.p.A. has always put the Customer and Customer satisfaction at the very heart of its activities, making sure to provide the utmost professionalism in the services and products offered. The Company, in its relations with Customers, orients its conduct according to three cardinal principles: fairness, efficiency and quality. It is therefore committed to ensuring high quality services that meet the requirements. The Company is also committed to fostering interaction with Customers through the rapid handling and resolution of requests by means of a Customer and After-Sales Service.

3.11 RELATIONS WITH SUPPLIERS

Relations with Suppliers are based on the principles of honesty, fairness and transparency and economic balance; it is the will of ALBERTO SASSI S.p.A. to ensure continuous collaboration over time that also pursues the environmental, social and economic sustainability of mutual activities.



ALBERTO SASSI S.p.A.

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