

# **CODE OF ETHICS OF GERICO SECURITY S.R.L.**

Approved by:	Board of Directors
Date:	03/11/2020
Version	1.0

This document is the English version of Doc.07 – Codice Etico Aziendale

## Table of contents

<b>1 INTRODUCTION.....</b>	<b>3</b>
1.1 PURPOSE.....	3
1.2 GERICO SECURITY SRL'S COMMITMENTS .....	3
1.3 RECIPIENTS' COMMITMENTS .....	4
<b>2 CORE VALUES .....</b>	<b>5</b>
<b>3 ETHICAL PRINCIPLES AND RULES OF CONDUCT - GERICO .....</b>	<b>6</b>
3.1 LEGALITY .....	6
3.2 RESPECT FOR PEOPLE .....	6
3.3 CONFIDENTIALITY.....	6
3.4 PRIVACY AND PERSONAL DATA PROTECTION.....	7
3.5 INFORMATION SECURITY.....	7
3.6 INDUSTRIAL AND INTELLECTUAL PROPERTY RIGHTS.....	7
3.7 WORKPLACE SAFETY AND HEALTH .....	8
3.8 ENVIRONMENT PROTECTION AND ENVIRONMENTAL SUSTAINABILITY .....	8
3.9 INNOVATION AND CULTURAL DISSEMINATION.....	8
3.10 SERVICE QUALITY STANDARDS .....	9
3.11 FAIR COMPETITION.....	9
<b>4 CRITERIA OF CONDUCT.....</b>	<b>10</b>
4.1 CONFLICTS OF INTEREST MANAGEMENT, INDEPENDENCE AND IMPARTIALITY .....	10
4.2 GERICO'S CRITERIA OF CONDUCT IN A RELATIONSHIP WITH PERSONNEL .....	10
4.3 GERICO'S CONDUCT IN A RELATIONSHIP WITH PARTNERS, PROVIDERS AND COLLABORATORS .....	11
4.4 GERICO'S CRITERIA OF CONDUCT IN A RELATIONSHIP WITH CLIENTS .....	11
4.5 CONDUCT IN A RELATIONSHIP WITH PUBLIC INSTITUTIONS AND THIRD PARTIES .....	11
4.6 INTERNAL AUDITS .....	12

## 1 Introduction

The Board of Directors (BOD) of Gerico Security Srl (hereinafter referred to as “Gerico” or “Company”) has adopted the present Ethics Code (hereafter the “Code”) which must be known and adhered to by all Directors, Members, Personnel, Consultants, Providers and Partners. They are required to actively contribute to its dissemination and fulfilment throughout the period of the activities to be carried out for Gerico Security Srl.

The present Code of Ethics is published on the official Company’s website for the purpose of maximizing the dissemination of the company’s values and their knowledge among all the recipients.

### 1.1 Purpose

Gerico Security Srl has been set up for the purpose of satisfying the clients’ security needs. The clients entrust the ability and expertise of Gerico’s staff to achieve their security goals. The clients provide Gerico with business critical information for the above-mentioned purpose.

The Company bases its activity on the respect and trust of its clients, natural and legal persons, who/which directly or indirectly come into contact with it throughout its activity.

The BoD of Gerico believes that the trust gained must be reflected in a code of conduct, based on a concrete professional ethics to ensure that the Company adheres to a virtuous path throughout the development and the evolution of its activities. Therefore, it has adopted the present Code of Ethics establishing the ethical principles and standards of behaviour guiding Gerico Security Srl’s activity and the conduct of those with whom it comes into contact during the course of the business or professional activities.

Gerico acknowledges the above rights, duties, and responsibilities as essential elements of its identity. The values and standards of behaviour outlined in the Code are mandatory and constitute a reference point to those who work with or on behalf of the Company or interact with it in any capacity.

Furthermore, the Code constitutes an integral part of the organizational, management and control model, adopted by Gerico to prevent crimes ex Italian Legislative Decree 231/2001.

### 1.2 Gerico Security Srl’s commitments

With the aim of ensuring the observance of the Code and the fulfilment of its principles, Gerico:

- ascertains the dissemination and the adherence to the Code of Ethics by all the recipients;
- takes care of updating it in accordance with the changes in law, regulations, social and ethical sensitivity of reference;
- monitors the Code implementation and prevents its violations;
- establishes appropriate sanctions where necessary.

### **1.3 Recipients' commitments**

The observance of the Code of Ethics constitutes a fundamental part of contractual obligations undertaken by the personnel, collaborators, entities having business relationships and anyone that comes into contact with the Company.

The recipients of the Ethical Code are required to carry out their professional activities in compliance with the guiding values of the Code, embracing and fostering its principles . The recipients undertake to operate correctly in accordance with the principle of transparency, contributing to the growth and protection of the Company's values.

All the directors, personnel and collaborators of Gerico, all natural or legal persons, having business relationships with the Company, are required to adhere to the principles of the Code. The violation of the Code of Ethics constitutes a breach of the contractual obligations and entails legal consequences. Where appropriate, penalties are inflicted on the recipients possibly causing the termination of the contractual relationship with the Company and consequent compensatory damages, considering the Company's interests and the current law.

## 2 Core Values

- Gerico Security Srl considers the clients' needs, the correctness, earnestness and principles of transparency in its business relationships and toward the people with whom it comes into contact throughout its activity.
- Gerico Security Srl acknowledges and ensures the values of confidentiality, respect for secrets, know-how, intellectual property and legitimate interests of its Clients, Partners, Providers, Collaborators, Competitors and of anyone that may come into contact with the Company unless the information is manifestly unlawful or in conflict with the Ethical values described in this document.
- Gerico Security Srl conducts its activity in compliance with the principles of loyalty, responsibility and good faith in accordance with the highest standards of ethics, professional and business integrity.
- Gerico Security Srl undertakes to carry out and manage its activities strictly adhering to the criteria of independence and impartiality, adopting transparent and traceable procedures and rigorous repeatable methodologies.
- Gerico Security Srl embraces the core values of Legal and Regulation compliance regardless of the country in which it is operating.
- Gerico Security Srl repudiates all forms of corruption, crime and terrorism.
- Gerico Security Srl believes in respecting and valorising people and diversity in full compliance with human dignity and personality rights, rejecting discrimination in any form.
- Gerico Security Srl works in the national and international contest in full compliance with the usages and customs of the communities within which it operates. It acknowledges that the diversity of the cultures and bodies constitutes an essential value.
- Gerico Security Srl's activity promotes the development of knowledge, innovation and community growth. It is aimed at overcoming inequalities, respecting and protecting future generations.

### **3 Ethical principles and rules of conduct - Gerico**

#### **3.1 Legality**

Legality and compliance with current regulations are core values of Gerico Security Srl, its personnel, internal and external collaborators and anyone who works with the Company.

Gerico Security Srl acknowledges the importance of general taxation for the social and community development and contributes to pay such necessary taxes in accordance with the law.

Gerico Security Srl condemns and counters any kind of corruption resulting from its members or third parties abusing public officials, public service representatives, Italian or foreign parties.

#### **3.2 Respect for people**

Gerico Security Srl promotes respect for human Rights and Fundamental Freedoms, the rights to physical and moral integrity of people when interacting with them. The credibility and mutual trust arising from human and professional relationships are vital to Gerico. The enhancement of the person is at the core of the Company' activity success .

Gerico Security Srl acts in accordance with human rights without any distinction based on sex, race, ethnic or social origin and religion. It is committed to respecting the free of thought, beliefs, political opinions and different kinds of opinions. Gerico repudiates any discrimination based on: disability, age, physical or genetic features, sexual orientation, ethnic origin, nationality and birth , social condition, or any discrimination based on any ground against Human Dignity and Personality. It protects and values diversity of Human resources basing the related relationships on mutual respect, loyalty and transparency.

#### **3.3 Confidentiality**

Gerico and all recipients of the ethical code protect technical, financial, legal and administrative know-how and any information received in the operation of or needed for its activities. They avoid its unauthorized disclosure or acquisition when such know-how and data are proprietary rights of third parties or of the Company.

All activities carried out for or at the Client's premises are confidential, including issues, topics, types of activities and information treated.

Gerico Security Srl ensures that information, which is directly or indirectly collected during or as a part of his work for the Clients, will not be disclosed outside its perimeter or used for any personal benefit, profit or competitive advantage on the market.

Gerico signs specific confidentiality agreements with the parties involved in the confidentiality protection activities to strengthen and ensure the goal achievement.

### **3.4 Privacy and personal data protection**

Privacy and confidentiality of Gerico Security's clients are at the core of its business relationships and in this respect, it adopts a security policy which is meant to be strategic to the Company encompassing every connected aspects of information security and integrity. The Company collects the personal data solely in connection with the purpose of carrying out its professional activities. Therefore, it identifies and assesses possible related criticalities directing the activities needed.

Information can be disclosed to third Parties upon prior consent of the party duly informed of the purpose of disclosure and without prejudice to the case of legal compliance.

Gerico undertakes to protect the confidentiality of all data and information received from the Client during its professional activity. For this reason, it prohibits the transfer of the personal and contact data of its clients, providers and partners to third parties for commercial and/or profiling purposes.

### **3.5 Information security**

Information security and information assets are core values of Gerico and are vital to its mission accomplishment.

Therefore, the Company has adopted an Information Security Management System in compliance with the principles of information security.

In the course of its activities, Gerico operates in accordance with law, guidelines, best practices and standards for the protection of its own information, Clients' information and information of other interacting entities

Gerico's personnel, collaborators and providers acknowledge their duties of confidentiality, loyalty, compliance with the requirements for the protection and acceptable usage of the Company and third parties' tangible and intangible assets in accordance with the law and specific agreements in force.

Confidential information is disclosed and communicated to third parties solely in connection with the purpose of carrying out the professional or business activities. Such parties undertake to keep strictly confidential and manage the information received in accordance with the highest security standards.

### **3.6 Industrial and intellectual property rights**

Gerico acknowledges the strategic value of investments into research and innovation according to a modern concept of wealth production, aimed at the growth and development of the Countries and Communities.

Therefore, all the recipients of this Code are required to comply with the above-mentioned measures for the intellectual and industrial protection as a value of their own and others' Company for the protection of trademarks and distinctive signs, certificates, authentication, or other identification processes, including intellectual property, patents, trade secrets, further know-how, registered or not.

### **3.7 Workplace safety and health**

Gerico Security Srl is committed to ensuring and promoting law and regulations relating to safety and health in the workplace for physical and moral integrity protection. It operates in accordance with legal provisions and standards relating to the accident prevention and safety in the workplace. Gerico promotes responsible behaviours among its collaborators.

### **3.8 Environment protection and environmental sustainability**

Gerico Security Srl acknowledges the importance of the role of social responsibility in protecting the environment. The Company is aware that its action can affect and may have significant impacts on the environment and quality of life. It recognises the opportunities created for the innovation and sustainable development.

Gerico undertakes to meet its Client needs through its activity while satisfying the needs arising from the institutions and the community. Its activity embraces the protection of the environment, meant both as ecological protection and a bigger picture including social and economic concern. It is aimed at protecting the needs of future generations, duly conserving resources, avoiding the overexploitation of non-renewable resources, respecting ecosystems and conserving biodiversity.

### **3.9 Innovation and cultural dissemination**

Gerico Security Srl promotes knowledge dissemination in the security sector in which it operates. It respects and generates value added within the communities of reference in a long-term perspective. The Company adheres to a culture and business strategy which is based on the economic, social and environmental improvement of the society in which it operates through the continuous innovation and improvements in processes and products. It takes care to express the above by providing quality services to its clients. The Company's policies are aimed at combining and integrating business and social considerations into its strategies, processes and activities.

Gerico's activity disseminates knowledge about threats, preventive measures and controls to counter such current threats. Therefore, it ensures the organizations' information security, cyber security, business continuity.

### **3.10 Service quality standards**

Gerico Security Srl meets its clients' needs providing services of the highest quality. It hires partners and collaborators adopting an interdisciplinary approach of combined knowledge across different specializations. Such approach provides mutual enhancement and therefore maximizes Client satisfaction.

Gerico Security Srl promotes a culture of continuous training of the personnel and collaborators to keep knowledge up-to-date with the latest technologies, security threats, international best practice and countermeasures .

The company does not accept professional activities provided by those who are not qualified to accomplish an activity on such matters, and it refuses improvisation in providing services and advice. On the contrary, it ponders its services and advice in accordance with rigorous and repeatable procedures and methodology.

### **3.11 Fair competition**

Gerico's activity operates within the principle of free and fair competition and acknowledges its role as a stimulus for enterprise growth and development.

Therefore, the Company prohibits anticompetitive behaviour and unfair practises of any kind that may affect, restrict, prevent the freedom to conduct and exercise industrial or commercial activities.

## **4 CRITERIA OF CONDUCT**

### **4.1 Conflicts of interest management, independence and impartiality**

Gerico Security Srl considers the criteria of impartiality and independence as core values, solid and guiding principles of conduct.

Therefore, the Company undertakes to ensure its independence and impartiality when carrying out its activities, avoiding all activities that constitute a conflict of interest, may influence the parties involved, or interfere with the ability to provide objective assessments or may affect the rigour of such evaluations. Gerico considers adherence to the upon criteria as a sign of earnestness and professionalism towards all parties who interact with the Company or rely on its activities.

Gerico Security Srl carries out Inspections, Audits or related activities in compliance with rigorous criteria of independence, objectivity of judgement and absence of interference both when carrying out the activities and providing the results. The activities are accomplished by adopting formal procedures and respecting the organizations inspected with the same due diligence for the Clients.

Gerico Security Srl bases the inspections and Audits results on fair evaluations providing a real picture of the situation in accordance with rigorous criteria of equitable and impartial assessments.

While inspecting and carrying out Audit activities, Gerico Security Srl ensures a neutral approach to technology manufacturers and companies of security solutions. Therefore, it does not offer or propose any specific brand or technology present on the market.

Should absolute independence and impartiality be required, Gerico Security Srl's personnel and collaborators are required to refrain from accepting activities that constitute a conflict of interest.

Gerico Security Srl's employees and collaborators are prohibited from taking assignments that involve a breach of contract with the Company or between the Company and the Client or that involve a violation of the criteria of correctness and impartiality of the Code.

### **4.2 Gerico's criteria of conduct in a relationship with personnel**

Gerico Security Srl's human resources are recognized as central for the accomplishment and the success of the Company's activity. The Company undertakes to comply with and to apply labour laws among employees, collaborators and partners.

Gerico Security Srl rejects illegal work or activities not arising from a formal contract between the parties. Personnel is employed under a formal employment contract, external collaborators are hired under contractual terms and emoluments are made in accordance with their skills, knowledge and market.

The physical and moral integrity of the personnel is considered a primary value of the Company. Therefore, it guarantees working conditions in accordance with the respect for human dignity, the protection of health, safety, physical and moral integrity in compliance with law and regulations in force in the sector. It ensures the compliance with laws on safety and protection of health and hygiene at work. Gerico Srl fosters the appropriate and responsible behaviour of its entire staff.

### **4.3 Gerico's conduct in a relationship with partners, providers and collaborators**

Gerico bases its relationships with external collaborators, providers and partners on the principles of correctness, transparency and mutual loyalty. The Company acknowledges the work and the professional contribution of its personnel, collaborators and providers ensuring that they are paid regularly as a tangible evidence of appreciation whereas it considers late payment as an unfair practice.

Gerico Security Srl adheres to the conditions, terms of the agreements and commitments for a constructive and fruitful cooperation, aimed at professional growth and continuous improvement of the strategies and innovations applied.

### **4.4 Gerico's criteria of conduct in a relationship with clients**

Gerico believes in direct, loyal and transparent relationships with its clients, based on listening and aimed at establishing trust about its activity trustworthy, objectivity and impartiality. For this reason, it uses the most appropriate knowledge, skills and experiences in accordance with a specific job assignment.

The company proposes advanced innovative and personalized services giving the utmost consideration to the Clients' peculiarities and real needs. Gerico protects and fulfils the various and complex needs through effective and timely responses by providing only high-quality professional services.

### **4.5 Conduct in a relationship with public institutions and third parties**

Gerico's relationships with local authorities and bodies, public institutions and third parties are based on honesty, fairness, transparency and good faith principles.

## **4.6 Internal Audits**

Gerico undertakes to be compliant with the content of the Code and regulatory requirements. It lays down procedures and plans in order to ensure its compliance and control.

<end of document>