

CODE OF ETHICS OF GERICO SECURITY GROUP

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1 INTRODUCTION

The Board of Directors (BOD) of Gerico Security Srl (hereinafter referred to as “Gerico” or “the Company”) has adopted the present Ethics Code (hereafter the “Code”) recognised, accepted, and implemented by Gerico Security Srl and Gerico Lab Srl. The Code of Ethics is extended to all subsidiaries and/investee companies (hereinafter collectively or individually also referred to as “Gerico” or “the Company”).

All Directors, Members, Personnel, Consultants, Providers and Partners must adhere to the Code of Ethics, contributing to its dissemination and observance throughout the period in which they carry out the activities for Gerico Security Srl and/or Gerico Lab Srl and/or other Companies of the Group.

The present Code of Ethics is published on the official Company’s website to disseminate the values to which Gerico is inspired among all the recipients.

1.1 PURPOSE

Gerico Security Srl and the Companies of the Group have 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, both natural and legal persons, with whom/which it interacts during the activity.

The BoD of the Group Companies believes that the trust gained must be reflected in a code of conduct, based on concrete professional ethics to ensure adherence to a virtuous path throughout the development and the evolution of the professional and technical activities. Therefore, the present Code of Ethics is adopted establishing the ethical principles and standards of behaviour guiding the activity of Gerico Security Srl and Gerico Lab Srl while conducting the company 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 COMMITMENTS OF GERICO SECURITY GROUP

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 interacts 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 promoting its principles. They undertake to operate correctly in accordance with the principle of transparency, contributing to the growth and protection of the values of the Company.

1.4 VIOLATION OF THE CODE OF ETHICS

Partners, personnel, and collaborators of Gerico and any person linked to the Companies of the Group or who contribute to the work of the Company in other capacities are required to adhere to the principles of the Code of Ethics. Its violation constitutes a breach of contractual obligations and entails legal consequences. Where appropriate, the consequences for violating the Code of Ethics may include penalties, termination of the contract, and consequent compensatory damages, considering the Company's interests and the law in force.

2 CORE VALUES

- Gerico Security Srl and the Group Companies acknowledge the importance of clients' needs, correctness, earnestness, and principles of transparency in business relationships and when interacting with others during the business and professional activity.
- Gerico Security Srl and the Group Companies acknowledge and ensure the values of confidentiality, respect for secrets, know-how, intellectual property and legitimate interests of the Clients, Partners, Providers, Collaborators, Competitors and of anyone that may interact with the Group unless the information is manifestly unlawful or in conflict with the Ethical values described in this document.
- Gerico Security Srl and the Group Companies conduct their activities 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 and the Group Companies undertake to carry out and manage their activities strictly adhering to the criteria of independence and impartiality, adopting transparent and traceable procedures and rigorous repeatable methodologies.
- Gerico Security Srl and the Group Companies embrace the core values of Legal and Regulation compliance regardless of the country in which they operate.
- Gerico Security Srl and the Group Companies repudiate all forms of corruption, crime, and terrorism.
- Gerico Security Srl and the Group Companies believe in respecting, valorising people, and diversity in full compliance with human dignity and personality rights, rejecting discrimination in any form.
- Gerico Security Srl and the Group Companies work within a national and international contest in full compliance with the usages and customs of the communities in which they operate.

They acknowledge that the diversity of the cultures and bodies constitutes an essential value.

- Gerico Security Srl and the Group Companies promote the development of knowledge, innovation, and community growth through their activities to overcome inequalities, respect and protect future generations.

3 ETHICAL PRINCIPLES AND RULES OF CONDUCT - GERICO

3.1 LEGALITY

Legality and compliance with the regulations in force are core values of Gerico Security Srl, Gerico Lab Srl and of the Group Companies, personnel, internal and external collaborators and of anyone who works with the Group.

Gerico Security Srl, Gerico Lab Srl and the Companies of the Group acknowledge the importance of general taxation for the social and community development and contribute to pay the necessary taxes in accordance with the law.

Gerico Security Srl, Gerico Lab Srl and the Group Companies condemn and combat any form of corruption resulting from their members or third parties that may abuse of public officials, public service representatives, Italian or foreign parties.

3.2 RESPECT FOR PEOPLE

Gerico 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 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 diversity of opinions. The Company 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 and bases its 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 the acquisition or unauthorized disclosure of information when 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 the information treated.

Gerico ensures that information, directly or indirectly collected during or as a part of its 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 to ensure confidentiality, strengthen, and fulfil the goals.

3.4 PRIVACY AND PERSONAL DATA PROTECTION

Privacy and confidentiality of Gerico's clients are at the core of its business relationships and in this respect. Gerico adopts a security policy, meant to be strategical to the Group encompassing every connected aspect of information security and integrity. The Company collects the personal data solely in connection with the purpose of carrying out its professional activities. Therefore, the Companies of the Group identify and assess 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, all the Companies of the Group shall not transfer 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.

During 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, maintaining compliance with the requirements for the protection and acceptable usage of tangible and intangible assets of the Companies and of third parties in adherence to 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. The 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 strategical 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 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 for accident prevention and ensuring workplace safety. Gerico promotes responsible behaviours among its collaborators.

3.8 ENVIRONMENT PROTECTION AND SUSTAINABILITY

Gerico acknowledges the importance of the social responsibility role 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 of innovation and sustainable development for development.

Gerico undertakes to meet its client needs and satisfy the needs arising from the institutions and the community. Its activity embraces the protection of the environment, meant 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 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 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 policies of the Company are aimed at combining and integrating business and social considerations into its strategies, processes, and activities.

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

3.10 SERVICE QUALITY STANDARDS

Gerico 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. This approach provides mutual enhancement and therefore maximizes the Client satisfaction.

Gerico 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 operates in compliance with the principle of free and fair competition and acknowledges its role as a stimulus for enterprise growth and development.

Therefore, it 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, Gerico Lab Srl and the Companies of the Group acknowledge that the criteria of impartiality and independence are core values, solid and guiding principles of conduct.

Therefore, the Company undertakes to ensure independence and impartiality when it conducts professional activities, avoiding the 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 their 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 and Gerico Lab Srl carry out Inspections, Audits, security verification services, Digital forensics 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 bases the Inspections, Audits, security verification services, Digital forensics on fair evaluations providing a real picture of the situation in accordance with rigorous criteria of equitable and impartial assessments. During the above activities, Gerico 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, the personnel and collaborators of Gerico are required to refrain from accepting activities that constitute a conflict of interest.

The employees and collaborators of Gerico shall not take 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 CRITERIA OF CONDUCT IN A RELATIONSHIP WITH PERSONNEL

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

Gerico rejects illegal work or activities not arising from a formal contract between the parties. Personnel are employed under a lawful contract of employment, 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 adherence to the law on safety and protection of health and hygiene at work. Gerico fosters the appropriate and responsible behaviour of its staff.

4.3 THE CONDUCT OF GERICO 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. It acknowledges the work and the professional contribution of its personnel, collaborators and providers ensuring that they are paid regularly as tangible sign of appreciation whereas it considers late payment as an unfair practice.

Gerico 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 CRITERIA OF CONDUCT OF GERICO IN A RELATIONSHIP WITH CLIENTS

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

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

4.5 CONDUCT OF GERICO 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 and commits the Companies of the Group to adhere to the Code of Ethics and regulatory requirements. It lays down procedures and plans to ensure the compliance and control.

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