



**CODE OF
ETHICS**

Approved by the Board of Directors on 31.01.2021

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1. INTRODUCTION

Gruppo Sicurezza, founded in 1980 by Fabrizio Bernasconi, is a family-owned company and security sector leader in the Ticino region.

Across its divisions, **Sistemi, Servizi, Cyber, Satel and Galli Sicurezza**, hereon known collectively by the name **Gruppo Sicurezza**, provides custom security services for individuals and companies, from the design through the installation of security systems and the protection of property and valuables of all genres.

Any and all activities performed by **Gruppo Sicurezza** are based upon the entrepreneurial spirit of the Bernasconi family according to the moral principles of business ethics, honesty and transparency.

Given the delicate fiduciary nature of the activities performed and the particular trust customers confer on the company, all subjects with whom **Gruppo Sicurezza** interacts during the development of its activities must necessarily share and subscribe to the specific ethical principles of the company, as specified in this document.

PURPOSE

The main purpose of the Code of Ethics is to remind everyone, at all times, of the spirit which animates **Gruppo Sicurezza**, and to clearly state their company values, mission and vision.

An ethical business approach is an essential prerequisite for proper functioning and the credibility of the company in respect to clients, suppliers, the press, contractors and the overall working environment in general.

The Code of Ethics is a self-disciplinary tool that regulates the relationships and activities taking place between the company and all associated subjects.

This a moral contract to convey the key aspects of the corporate image, the morality of its actions, the competitiveness and quality of its conduct, so as to transmit and earn trust.

ADDRESSEES

All those who act on behalf of **Gruppo Sicurezza**, or those who represent or collaborate with it in any way: employees, administrators, supervisory bodies, outside contractors, suppliers, business and operational partners.

Each and every one of whom undertakes the moral duty to agree with its contents and subscribe with their formal approval. The Code of Ethics completes and integrates all relationships otherwise regulated in contractual terms.



2. GENERAL PRINCIPLES

ETHICAL GUIDE

The fundamental ethical principles of the company represent a reference guide for the correct orientation of company choices. They are meant to define and inspire all strategic decisions and the operational conduct of all collaborators.

This code determines the set of values to be referred to by all employees and anyone else whose professional activities are in any way associated with **Gruppo Sicurezza**.

All activities undertaken within the company must be performed with respect for the individual, while always considering the protection of customer interests, in full compliance of legal and ethical conduct.

Moral uprightness, administrative diligence, careful use of resources, confidentiality, professional correctness, and constant dedication to updating personal competencies are fundamental for pursuing the good of the company and to foster the trust of all those with ties to or interests with the company, customers in particular.

TRUST

All actions undertaken in the security field are based upon a strong fiduciary mandate: loyalty and transparency assume decisive importance and therefore the trusted relationship that forms between the company and customer must never be damaged in any way.

The company must constantly reaffirm the strength of this bond through its conduct, through detailed examination of every interaction with customers and during any and all occasions of outwards expression.

All employees, contractors and suppliers express and communicate on behalf of the company, and thereby participate in the creation and maintenance of the trusting relationship which is established with the clientele.

Therefore, it is necessary for each of them to carefully consider their own role and the impact of their actions and conduct, in both their professional and private life, as it must be consistent with the ethical principles that characterize **Gruppo Sicurezza**.

Furthermore, the correct interpretation of their professional duties also includes the expectation of ethical conduct in their private life.

Consequently, the addressees of the present Code of Ethics are expected to live an appropriate lifestyle aligned with the moral principles indicated here within, marked by sober, dignified behavior. This also applies to the handling of social communication and a decorous care concerning their physical appearance and attire.



3. COMPANY VALUES AND CULTURE

Over time, beginning with its founding principles, **Gruppo Sicurezza** has established and developed a corporate culture based on solid, indispensable values.

This set of moral rules characterizes and determines their corporate style, providing an indelible impression that is present in each and every external manifestation.

HONESTY AND TRANSPARENCY

These constitute the essential elements on which a trusting relationship is built, they are thus the primary values behind all activities performed by **Gruppo Sicurezza**.

Honesty is the common thread that can be found throughout all of the company's endeavors: when providing products and services, the administration, client relations, suppliers and contractors, reporting, communication, personal relationships.

Their transparency conveys their values and characterizes their open and clear relations with all stakeholders, through mutual respect of the principles of correctness, loyalty and sharing.

RESPECT FOR THE INDIVIDUAL

The individual is a central theme for **Gruppo Sicurezza**. The pursuit of human and social growth is an objective worth striving for at all times, as is guaranteeing the protection of health, the freedom to express cultural and religious values, incentivizing integration and inclusion, ensuring equal opportunities and valorizing the personal skills of each individual.

Every kind of work is safeguarded and acts of discrimination of any kind are not tolerated, whether based on gender, age, skin color, health status, disabilities, marital status, geographic provenance, or one's moral, political or religious beliefs.

SOCIAL RESPONSIBILITY

Gruppo Sicurezza operates in compliance with human rights and environmental laws, striving for social wellbeing, the integration of people, and the protection of natural resources.

The company believes in participatory development and is convinced that corporate growth must, within the limits of its possibilities, contribute to the general improvement of the community it serves.

Their full engagement in the social context of the Ticino region represents a distinct and intentional choice: to effectively contribute to the territory's growth in the ways and forms that best meet local needs, in accordance with company values.

SAFEGUARDING THE ENVIRONMENT

The environment deserves particular attention: it is everyone's duty to protect it, so that all can responsibly enjoy it, and to ensure a sustainable future for upcoming generations.

Gruppo Sicurezza, through its choices and conduct, aims to make the lowest possible environmental impact, in coherence with the best execution of its services.

Care is taken during the purchase and use of vehicles, tools and materials, with eco-sustainability taken into account. Likewise, the company is committed to the responsible and appropriate use of energy resources.

CUSTOMER CENTRICITY

The customer is always at the center of attention: the objective is to satisfy their needs and safeguard their integrity in all forms.

All activities are performed to their benefit, using detailed information to motivate every choice made, focusing decisions towards finding the best possible solutions and in full compliance of professional ethics.

The clientele is an integral part of the corporate patrimony. All personal data and information related to the mandates it receives are considered inviolable and inalienable.

FEEL SECURE

Gruppo Sicurezza is convinced that security is a non-renounceable value as well as an individual right to be pursued and defended with great care, in life and the workplace. It is an important indicator of the quality of life and an essential starting point for all companies.

Feel Secure is the company mission of **Gruppo Sicurezza**. All activities are aimed at ensuring maximum protection and the best defense against multiple attacks, with one primary objective: to transmit the feeling of security.

This is the end point to be attained through a codified corporate method: a coordinated approach based on risk analysis and the installation of an integrated system for global protection which enables free and autonomous intervention.



4. RULES OF CONDUCT

The aforementioned principles and values find direct application in the various reciprocal relationships held between **Gruppo Sicurezza** and several categories of subjects with whom it naturally interacts during business activities.

As a reaffirmation of the previously defined ethical logic, which was indicated as a focal element behind decision making and conduct in every and all situations, the following rules of conduct apply to the primary categories normally associated with the company.

CLIENTS

Gruppo Sicurezza guarantees correct and transparent business and operational practices, by undertaking and diligently fulfilling their commitments, in full compliance with the agreed upon methods of execution, confidentiality and business ethics.

The company ensures that every job is performed to the best of their professional abilities, by providing all their experience and every available tool.

This requires that the clientele provides them with complete and true information, effective collaboration for the proper completion of the entrusted tasks, and fairness and transparency in all interpersonal and administrative relations.

The appointed personnel will receive detailed indications about the services required of them and they must strictly observe company agreements and the methods of execution settled with the clientele.

SUPPLIERS

To ensure the perfect execution of services to its clientele, **Gruppo Sicurezza** selects its contractors with great care, based on their ability to offer premium quality goods and services, in accordance with the high standards required, and respectful of a fair value for money and appropriate time and service conditions.

Every relationship undertaken with total transparency and loyalty, in compliance with all applicable laws.

An internal surveillance service oversees all services provided, for both material and non-material goods, services or consulting, in order to protect the interests of the company, the suppliers themselves, and ultimately the clientele.

The company reserves the right to verify the conformity of what is supplied and check whether it fulfils the specific requirements, legal provisions, and the security of the clientele and its own personnel.

Transparent communication, technical and operational collaboration, and the respect of settled agreements are the insuperable limits which regulate supply relationships.

Suppliers are required to behave with good moral conduct, in compliance with all contents of the present Code of Ethics. The exploitation or discrimination of individuals or any irregular employment by suppliers is absolutely unacceptable.

EMPLOYEES

Human capital constitutes a fundamental element in company growth and success. **Gruppo Sicurezza** promotes and safeguards its human resources by valorizing their skills and aptitudes and incentivizing their development and personal integration.

Equal opportunities are guaranteed, professionally and in terms of treatment, to protect everyone against personal discrimination and exploitation.

The company is committed, to the best of its possibilities, to allowing everyone to operate with environmental conditions which adequately safeguard their health and moral and physical integrity.

The company selects, remunerates and organizes all personnel based upon their specific skills, merits, professional qualifications and effective working capacities, in compliance with the laws and collective agreements in their sector of employment.

This fosters teamwork and mutual collaboration, by promoting the construction of an inclusive working environment that is attuned to individual needs.

The employees, who act as custodians of a particularly delicate fiduciary task concerning the security services they provide to the clientele, mutually agree to fully respect all the duties and specific operational instructions they are given.

They are under a moral obligation to provide any and all information in their possession which may assist the fulfillment of their duties and at the same time provide protection for their customers. This also includes constantly updating their professional skills, including courses and training opportunities offered to them by the company, in order to safeguard the privacy of clientele in every way, and to protect corporate patrimony and confidentiality.

OUTSIDE CONTRACTORS

Gruppo Sicurezza avails of external consultants and professionals to develop some of the company's functions. In some cases, the assigned duties require accessing confidential information for operational, administrative or strategic purposes.

Given the particularly confidential nature of their services, outside contractors are comparable to internal personnel and are therefore subject to the same ethical rules as those set forth for employees.

Particular attention is paid during their selection, when verifying their completed tasks, and concerning the loyalty of their collaboration.

COMPETITION

Gruppo Sicurezza believes in fair competition and seeks commercial success through the development of its capabilities and the search for optimal efficiency.

Mutual respect and fair play constitute the basis for determining how to handle relationships correctly with companies operating in the same sector and, when necessary, remotely through third parties.

Professionalism, honesty and loyalty are factors which characterize the fabric and conduct of the company, and thereby complete the criteria for how to manage situations in which there is contact with competitors present in the same area of competence.

PUBLIC ADMINISTRATION

The respect for roles, loyalty, absolute observance of the laws, fairness and operational transparency characterize all relations between **Gruppo Sicurezza**, public offices and authority figures with public responsibilities.

For the purpose of corporate and public protection, no encounters are undertaken by a single person, every act is made immediately accessible to institutional supervising bodies and is subject to internal verification. Any and all outside contractors that may be involved in interactions with the public administration must respect the same rules.

COMMUNITY

Corporate participation in the social life of the operational territory represents the added value **Gruppo Sicurezza** provides to the Ticino region, as the area it identifies with.

Frequenting and, when opportune, organizing various kinds social engagements is one of the ways in which the company strengthens its bond with the territory.

This bond can include activities for “giving back”: the company has a sincere desire to contribute to local growth, by supporting, whenever possible, initiatives and projects that are particularly close to the company’s core propriety.

MEDIA

Company press relations and communication branches reflect the transparent and open style that characterizes all activities performed by **Gruppo Sicurezza**.

All corporate information is based on truthfulness and the faithful transmission of real facts in compliance with reciprocal roles and a mutual interest in correct communication.

All information concerning products and/or services is treated according to the professional ethics of journalism, commensurate with their specific objective characteristics, and compliant with the rules of conduct applicable to the press and media.

MARKETING AND CORPORATE COMMUNICATION

All of **Gruppo Sicurezza** marketing and communication activities hinge on respecting the corporate principles of loyalty and transparency. Thus, it is characterized by the linear and accurate specification and transmission of its true operational scope.

Commercial communication underlines the informative and instructive aspects: describing the quality and technical characteristics of the systems and services offered, highlighting their ability to provide concrete answers to the users’ security needs, avoiding the use of excessively emphatic elements in their advertising promotion.

Given the fiduciary nature of the tasks provided, the communication of **Gruppo Sicurezza** undertakes an additional moral duty: to consistently maintain a sincere, transparent and professional relationship with users and the public, congruent with an ethical relationship based on respect and honesty.



5. METHODS OF IMPLEMENTATION AND SUPERVISION

In compliance with current regulations, the company is internally organized through an articulated implementation system for the Code of Ethics and the supervision of its effective application on the part of addressees.

Suitable organizational measures are determined in accordance with managerial needs, based on transparency, loyalty and efficiency, so as to prevent any and all conduct that is illegal or in any case inconsistent with the provisions of this Code of Ethics.

Code compliance checks of the addressees, at various levels, are delegated to an internal division selected from amongst the leaders of different areas, all of whom are coordinated and supervised by the Gruppo Sicurezza Board of Directors.

The Board of Directors has the power to approve, modify and set the rules for the implementation of the Code of Ethics, as well as receive and settle any disputes that might arise in its application.



6. PENALTIES

As stated, the Code of Ethics represents a moral code that completes and integrates all existing relationships between the Addressees and **Gruppo Sicurezza**.

Sharing its contents is an essential prerequisite for the proper fulfillment of all contracts.

Any violation therefore constitutes a breach of the fiduciary duty which sustains each and all relations between the addressees and the company.

Without prejudice to the terms of the law and governance regulations, the Board of Directors determines and scales all penalties based upon the nature of any possible infringements of the Code of Ethics.



7. FINAL PROVISIONS

The present Code of Ethics takes effect from the date of approval and is valid up until the next revision.

All subjects addressed, upon receiving a copy, are invited to read thoroughly and respect the rules, and to confirm their approval by signing below.