



# SEISMIX CODE OF ETHICS

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The Legal Representative

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## Sommario

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## art. 1 – premise

The company SEISMIX SRL, given the social relevance of its activities, along with the objective of meeting the legitimate needs and expectations of its employees and collaborators, as well as other stakeholders, recognizes the necessity of clearly defining and outlining its rights and duties.

## art. 2 – introduction

This Code of Ethics establishes, through the explicit definition of moral rights and duties, the ethical-social responsibilities and behaviours that each member of the organization must adhere to.

The Code of Ethics addresses both regulatory aspects related to compliance with laws and regulations, primarily Legislative Decree 231/01 and its subsequent amendments, as well as non-mandatory aspects, with the dual objective of ensuring greater protection against criminal offenses and promoting a path of widespread responsibility and awareness that all SEISMIX SRL collaborators must follow.

The Code of Ethics represents the codification of policies for controlling individual behaviours and serves as an effective tool to prevent irresponsible or unlawful conduct by those acting on behalf of the company. It provides a clear and explicit definition of the ethical and social responsibilities of its administrators, managers, employees, collaborators, and suppliers. The Code of Ethics is the main instrument for implementing ethics within the company and ensures the fair and effective management of transactions and human relations, thereby supporting the company's reputation and fostering external trust.

## art. 3 – definitions

**Activities** The set of services provided to Users.

**Code of Ethics:** The Organization's self-regulation system.

**Recipients:** All employees of SEISMIX SRL, regardless of their qualification and function, as well as other collaborators who, individually or as members of a professional association, provide services in a coordinated and continuous manner in the company's interest, including administrators.

**Third Parties:** Any natural or legal person obligated to perform one or more services in favour of SEISMIX SRL or who maintains relationships with it without being classified as



a Recipient.

**Users:** Any natural person who, by interacting with SEISMIX SRL, benefits from the services it provides.

## art. 4 – scope of Application

This Code of Ethics applies to all activities of the organization. The principles and provisions of the Code of Ethics are binding for administrators, employees, and all those who work with SEISMIX SRL based on a contractual relationship, even temporary. All such individuals are collectively referred to as "Recipients."

In particular, the Management is required to adhere to the principles of the Code when setting SEISMIX SRL's objectives, proposing investments, carrying out projects, and making any decisions or taking actions related to institutional activities.

The Management must follow these same principles in implementing its leadership role, both within the organization—thus strengthening cohesion and a spirit of mutual collaboration—and in its interactions with third parties engaging with the company.

The Management is committed to promoting the Code of Ethics among the Recipients through dedicated communication initiatives and by publishing it on the company's website: <https://www.seismix.it/en/>

## art. 5 – regulatory principles

Recipients and Third Parties are therefore required to act in full compliance with the applicable laws and in accordance with the principles set forth in this Code of Ethics, in all areas where SEISMIX SRL operates. Under no circumstances can the pursuit of corporate interests justify conduct that does not align with these principles.

SEISMIX SRL is firmly committed to neither initiating nor continuing any relationship with groups, associations, or individuals who pursue unlawful objectives or whose conduct is inconsistent with the principles outlined in this Code.

Therefore, SEISMIX SRL and all its collaborators must act in compliance with current regulations and, in particular:

- Promote and strengthen a culture of health and safety by raising awareness of risks and encouraging responsible behaviour among all collaborators (Legislative Decree No. 81/2008, also known as the Consolidated Law on Safety);



- Protect the privacy of employees and clients by adopting standards that specify the type of information SEISMIX SRL requires and the procedures for its processing and storage (EU Regulation 2016/679 and its implementing legislative decrees);
- Ensure compliance with regulations in recruitment and employment processes, as well as in the management of collective and individual labour contracts;
- Guarantee equal opportunities (in accordance with Legislative Decree 198/2006, the "Code of Equal Opportunities") in organizational processes related to hiring, training, evaluation, remuneration, assignment of responsibilities, and professional development, ensuring that employees are treated based on their ability to meet job requirements. This includes preventing all forms of discrimination, particularly those based on gender, sexual orientation, ethnicity, religion, gender identity, nationality, political affiliation, age, and disability;
- Ensure all rights related to maternity and paternity, with particular reference to parental leave and child illness leave (Legislative Decree 151/01, Consolidated Law on the Protection and Support of Maternity and Paternity).

## art. 6 – general Ethical principles

The values that inspire SEISMIX SRL in pursuing its objectives are reflected in its commitment to the following general ethical principles:

- ✓ **Centrality of the Person:** SEISMIX SRL is committed, in line with its ethical vision, to promoting the value of the individual by respecting their physical, cultural, and moral integrity, as well as their relationships with others. This is achieved through working and hospitality conditions that uphold individual dignity and by ensuring safe and healthy work and living environments.
- ✓ **Equality:** SEISMIX SRL is committed to providing its services based on uniform rules for everyone, regardless of age, gender, ethnicity, sexual orientation, gender identity, health status, nationality, language, religious beliefs, or political opinions.
- ✓ **Impartiality:** The company is committed to providing services with fairness, objectivity, and impartiality.
- ✓ **Continuity:** The company strives to create and maintain the necessary conditions to ensure the long-term continuity of the services provided. In cases of service



disruptions due to force majeure, SEISMIX SRL aims to minimize inconveniences for clients.

- ✓ **Participation:** SEISMIX SRL ensures users the right to access relevant information and to submit feedback and suggestions for service improvement.
- ✓ **Responsibility:** The company is committed to making conscious decisions and actions that meet the needs of stakeholders. Every employee recognizes the right and duty to expand their knowledge to better serve users' needs.
- ✓ **Transparency and Completeness of Information:** SEISMIX SRL provides complete, transparent, comprehensible, and accurate information. In particular, contract terms are clearly and understandably outlined.
- ✓ **Efficiency and Effectiveness:** The company aims to achieve expected results efficiently while optimizing resource use.
- ✓ **Professional Diligence:** SEISMIX SRL delivers its services with competence, precision, punctuality, and caution.
- ✓ **Dialogue and Collaboration:** The company promotes dialogue and collaboration with citizens and their social volunteer organizations.
- ✓ **Non-Discrimination:** SEISMIX SRL rejects any form of discrimination against its employees, ensuring equal treatment regardless of gender, sexual orientation, gender identity, ethnicity, religion, nationality, political affiliation, age, or disability.

All forms of physical or moral violence are strictly prohibited.

## art. 7 – corporate Administration

SEISMIX SRL adopts governance, management, and control methods consistent with the best administrative practices to ensure the appropriate use of economic resources, financial balance, risk management, and the protection of the interests of all "Recipients."

Therefore, SEISMIX SRL commits to adhering, throughout all organizational "Administration" processes, not only to applicable regulations and the general ethical principles outlined earlier but also to the following rules:

- **Transparency:** SEISMIX SRL is committed to providing, to anyone with an actual and legitimate interest in compliance with current regulations, information regarding corporate procedures.



- **Traceability of Corporate Actions:** SEISMIX SRL commits to making accounting records based on accurate, comprehensive, and verifiable information, ensuring that related documents are based on and reflect the nature of the transaction they refer to, in compliance with external constraints (such as laws and accounting principles), as well as internal policies, plans, regulations, and procedures.
- **Impartiality in the Selection of Contractors/Suppliers:** SEISMIX SRL is committed to using selection mechanisms for contractors and suppliers that comply with the applicable regulations and internal provisions. In particular, it guarantees equal opportunities to all suppliers of goods and services or companies performing work, through the use of objective and transparent evaluation criteria. It also commits to drafting contracts in a comprehensible manner, both regarding the terms of the supply and the payment methods and terms.
- **Relations with Public Entities and Judicial Authorities:** SEISMIX SRL is committed to formally identifying the Recipients authorized to interact with entities representing general interests, and to managing relations with institutional interlocutors in a clear and explicit manner. During inspections and checks by the competent public authorities, the Recipients must maintain the highest level of availability and cooperation with the inspection and control bodies. It is also prohibited for authorized individuals of SEISMIX SRL to engage with such bodies in ways that improperly influence the decisions of Public Officials or Public Service Officers engaged externally.
- **Gifts, Favors, and Benefits:** SEISMIX SRL commits to refraining from offering gifts, payments, material benefits, or other utilities of any kind to external interlocutors for the purpose of obtaining advantages.

## art. 8 – relations with Clients

In compliance with the current regulations and the general ethical principles outlined above, SEISMIX SRL is committed to focusing on the needs of its clients, ensuring adequate service quality standards, and pledges to adhere to the following rules throughout all organizational processes:

- **Respect for Individual Values:** SEISMIX SRL is committed to respecting the individuality of each person, recognizing their needs, and implementing interventions that are tailored to these needs, considering all parameters of



their quality of life.

- **Fairness of Services and Conditions:** SEISMIX SRL is committed to ensuring the right to receive appropriate services and to providing respectful, courteous, and professional behaviour, in line with human dignity, cultural values, ethical and religious beliefs, gender, sexual orientation, gender identity, ethnicity, nationality, political affiliation, age, and health conditions, excluding unjustified disparities of treatment. It also commits to ensuring uniform economic conditions applied to all customers, excluding preferential treatment based on personal or clientelist factors.
- **Information:** SEISMIX SRL is committed to providing entitled individuals with complete, truthful, and clear information about how to access services, and to delivering this information in language that is understandable and appropriate for the audience's knowledge.
- **Service Quality:** SEISMIX SRL is committed to periodically analyzing customer satisfaction, monitoring service quality, and managing complaints in an objective and transparent manner.
- **Right to Submit Complaints:** SEISMIX SRL is committed to ensuring the possibility for customers and other stakeholders to submit feedback and complaints, with appropriate response times and methods.

## art. 9 – relations with Human Resources

SEISMIX SRL considers its collaborators as the core of its continuity and long-term value and therefore intends to develop its relationships with employees in a context of fundamental values such as trust, integrity, fairness, professionalism, and mutual respect.

Throughout the entire organizational process of "Human Resources Management and Development" (from candidate selection to the termination of the relationship), and with regard to both employees and collaborators, SEISMIX SRL commits to adhering to, in addition to the applicable laws and the general ethical principles previously stated, the following rules:

- **Health and Safety:** SEISMIX SRL is committed to safeguarding the health and safety of its collaborators, ensuring both working conditions that respect individual dignity and safe, healthy working environments, in full compliance with current regulations on workplace accident prevention and worker protection.





Additionally, SEISMIX SRL is dedicated to spreading and consolidating a culture of safety among all its collaborators by raising awareness of risks and promoting responsible behaviour from everyone.

- **Protection of the Individual:** SEISMIX SRL is committed to maintaining a climate of mutual respect for the dignity, honour, and reputation of each individual, as these are essential conditions for a collaborative work environment and for preventing discriminatory behaviour of any kind. This requires the cooperation of all.

## art. 10 – duty of the Recipients

All “recipients” are required to honour the following duties:

- 1) Knowledge and Application of the Code of Ethics: They are committed to understanding this Code of Ethics and correctly implementing its provisions, informing third parties about the content of the Code of Ethics and the obligation for third parties to align their conduct with the Code’s requirements. They must highlight any critical situations or challenges in implementing the Code to the Management, as well as inform the Management about any proven and documented violations of the Code by other recipients and/or third parties that they have become aware of during the performance of their duties.
- 2) Behaviour: They are committed to refraining from behaviours that could undermine moral and professional reliability. Specifically, it is prohibited to possess, consume, offer, or distribute any kind of drugs or substances with similar effects during work hours or within the workplace. Additionally, smoking and consuming alcoholic beverages in the workplace are also prohibited.
- 3) Diligence and Good Faith: They are committed to acting loyally and in good faith, respecting the obligations outlined in their employment contract and ensuring the required performance. They are also committed to understanding and adhering to the ethical guidelines contained in this Code, shaping their behaviour based on mutual respect, cooperation, and collaboration.
- 4) Conflict of Interest: They are committed to avoiding situations where conflicts of interest may arise and to refraining from personally benefiting from opportunities they become aware of in the course of their duties. Any real or potential conflict of interest must be communicated in advance to the direct



supervisor or to management for appropriate evaluation. Examples of conflicts of interest include: the involvement—whether open or hidden—of the recipient or their family members in the activities of suppliers; the use of information acquired during work activities for personal gain or for the benefit of third parties, in contradiction with the interests of SEISMIX SRL; performing any type of work (including manual labour or intellectual work) for suppliers or third parties in conflict with the interests of SEISMIX SRL.

5) Protection of the Organization's Assets: They are committed, through responsible behaviour and in accordance with the operational procedures established to regulate their use, to act with diligence to safeguard the company's assets: movable and immovable property, technological resources and IT equipment, tools, information, and skills. In particular, each recipient must:

- Use the means and equipment of SEISMIX SRL by following all safety programs to prevent unauthorized use or theft;
- Avoid improper use of SEISMIX SRL's assets that could cause damage or reduce efficiency, or in any case, contradict its interests;
- Do not disclose confidential information regarding SEISMIX SRL;
- Gifts, presents, and benefits: They are committed to not receiving or offering, directly or indirectly, gifts, payments, material benefits, or other utilities of any kind to third parties (public officials or private individuals). Gifts that do not exceed common courtesies and do not compromise the integrity or reputation of either party, nor can they be interpreted as aimed at obtaining preferential treatment in the conduct of any activity of SEISMIX SRL, are permitted;
- Exercise of authority: Those in positions of responsibility are committed to exercising their authority based on responsibility, trust, respect, and cooperation;
- **Use of computer systems:** All operators are responsible for the security of the systems used and are committed to not using them improperly. This includes using network connections for purposes unrelated to work or sending offensive, threatening messages, or messages that could harm the company's image.



## art. 11 – relations with Third Parties

It is the duty of all Third Parties to commit to observing the contents of this Code of Ethics and to implement it in their relations with SEISMIX SRL.

At the time of approval of the Code of Ethics, SEISMIX SRL commits to communicating it to Third Parties.

## art. 12 – implementation and Control of the Code of Ethics

It is the duty of SEISMIX SRL employees to comply with the provisions of this Code, which must be considered an essential part of their contractual obligations in accordance with Article 2104 of the Civil Code.

The principles and contents of this Code of Ethics specify, by example, the obligations of diligence, loyalty, and impartiality that qualify the proper fulfillment of work performance and the behaviours in general that employees and collaborators must respect towards SEISMIX SRL.

Violation of this Code by employees may constitute non-fulfillment of the primary obligations of the employment relationship or a disciplinary offense with all consequences provided by law and the Collective Bargaining Agreement.

Violation of this Code by non-employee recipients may provide grounds for the termination of the relationship with SEISMIX SRL and potential compensation for damages.

SEISMIX SRL commits to imposing, with consistency, impartiality, and uniformity, sanctions proportionate to the violations of the Code, in accordance with the provisions of the applicable Employment Contracts.

In order to ensure the full implementation of the Code, the Management will also:

- Constantly monitor the application of the Code of Ethics by the concerned parties, including by receiving any reports or complaints;
- Provide binding opinions regarding the potential revision of the most relevant company policies and procedures, in order to ensure their consistency with the Code of Ethics;
- Propose the periodic revision of the Code, if necessary;
- Propose or apply appropriate disciplinary measures in case of violations;



- Anyone who becomes aware of, or reasonably believes there is a violation of this Code, any specific law, or company procedures, has the duty to immediately inform their supervisor;
- Management will assess behaviours that may warrant the application of disciplinary sanctions or the activation of contractual dispute resolution mechanisms.

### art. 13 – final provisions

The Company, through its Management, is committed to ensuring the widest possible dissemination of the Code of Ethics, facilitating its understanding by Users and other stakeholders.

Palermo, 24 Febbraio 2025

Il Legale Rappresentante  
Stefano Limonta