



SEFIN s.p.a.

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CODE OF ETHICS

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1. INTRODUCTION

Purpose

To define and publicize the ethical principles, moral values and related rules of conduct by which the Sefin Spa Group (hereinafter also simply SEFIN or the Company) inspires in the management of its activities and in its relations with Collaborators, Clients, Public Administration and Suppliers, also with a view to preventing the offenses referred to in Legislative Decree No. 231 of June 8, 2001, and to comply with the provisions of the United Nations "Global Compact".

Contenuto

This Code of Ethics governs SEFIN's activities aimed at the dissemination of its ethical principles, values, and moral and professional standards by which the Company is inspired in the performance of its business and activities, the first foundation for preserving and enhancing its reputation and own reliability.

The purpose of the Code of Ethics is to supplement the rules of law or regulations, ethically directing the Company's actions with consequently binding provisions for the behavior of all Recipients as better specified in the following point.

It supplements what is already provided concerning behavioral matters by the Company policies listed on the Company intranet ("File server") and the procedures for maintaining ISO 9001 certification. In case of any discrepancy between the texts, the provisions of the Code of Ethics prevail.

The principles on which it is based also constitute the foundation of Sefin's organization to ensure reasonable prevention of the crimes provided for in the aforementioned Legislative Decree 231/01, represent the common value base and essential non-derogable assumption that must guide, within the scope of its functions, the behavior of all recipients.

Recipients

The Code of Ethics is directed to:

- Members of collegiate bodies and management;
- Employees (both temporary and permanent);
- Project collaborators;
- External and internal consultants;
- Suppliers of goods and services;
- Any other persons who may act for and on behalf of the Company either directly or indirectly, permanently or temporarily, or those who establish relationships or relations

with the Company and work to pursue its objectives.

Recipients of this Code of Ethics are required to learn its contents and abide by its principles.

Under no circumstances does the claim of acting in the best interests of the Company justify the adoption of conduct contrary to those set forth herein.

Contractual value

This Code constitutes an integral part of the obligations and contractual relationships entertained by the Company, and any relationship of collaboration with the Company is subject to compliance by all Recipients with the principles and provisions contained in this Code of Ethics.

The Company is committed to disseminating the code of ethics using all available means of communication and opportunities. All people must be able to access the code of ethics, know its contents and observe what is prescribed.

This document is made available through publication on the Company's official website (www.sefin.it) and a copy is delivered when entering into contracts or agreements with other Recipients, who at the same time undertake to comply with its requirements. Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of all Recipients and in particular employees pursuant to and in accordance with Articles 2104, 2105 and 2106 of the Civil Code.

With particular reference to Company employees, in addition to the respect per se due to the regulations in force and to the provisions provided for by collective bargaining – where applicable – they undertake to adapt the methods of performance of their working activities to the purposes and provisions provided for by this Code of Ethics; this is the case both in intra-Company relations and in relations with parties outside the Company and, in particular, with Public Administrations, other public authorities and Customers. The Code of Ethics is made available to them at the time of their employment, with relative signing of acceptance of the principles contained therein, as specified above. SEFIN has also implemented a notification flow when the Code of Ethics is updated, in order to inform, in a timely manner, all personnel.

All Recipients may implement Reports (whistleblowing) if they believe in good faith that there is any illegal conduct or violation of the Code of Ethics of which they have become aware due to the functions performed. The Report must be made on the basis of a reasonable belief based on factual and circumstantial evidence, in the manner described in the section "Reporting of Problems or Suspected Violations".

Company Mission

Design, implement and manage IT Solutions customized to customer needs in order to automate and optimize business processes, reduce Time-to-Market and improve business profitability.

Company Vision

To be an industry leader in terms of professional fairness, listening skills, and professional competence with full respect for all stakeholders.

Contents of the Code of Ethics

Il Codice Etico si articola in tre componenti:

- Charter of values;
- Code of conduct;
- Methods of implementation and control.

2. CHARTER OF VALUES

The Charter of Values defines the Company's fundamental ethical principles and values, both for itself and for all Recipients.

Principles of behavior for the organization

The principles set forth below are considered fundamental so the Company is committed to abide by them and to have the Recipients abide by them in their dealings with anyone.

- **Compliance with laws and regulations:** the Company monitors and works to ensure that those working internally and/or on its behalf act in full compliance with applicable national and international laws and regulations. This commitment must also apply to consultants, suppliers, customers and anyone who has dealings with the Company;
- **Behavior integrity:** the Company is committed to providing quality services and competing in the marketplace in accordance with principles of fair and free competition and transparency, maintaining fair relations with public, governmental and administrative institutions, the public and third-party companies, and Customers. In particular, those who work on behalf of the Company must adopt a correct and honest attitude, both in the performance of their duties and in their relations with other members of the Company, avoiding the pursuit of illicit or illegitimate purposes, or the generation of hypotheses of conflict of interest in order to procure an undue advantage, either their own or that of third parties. Under no circumstances may the interest or advantage of the Company induce and/or justify dishonest behavior;
- **Equity:** in the management of contractual relationships involving the establishment of hierarchical relations, the Company undertakes to ensure that authority is exercised with equity and fairness and that all forms of abuse are avoided. In any case, these values must also be safeguarded in choices regarding the organization of work. The Company is committed to operating fairly with all collaborators, treating them all as equals. The Company is committed to developing a Company climate of aggregation, a Company climate that does not give rise to discriminatory attitudes or attitudes detrimental to individual dignity. As a responsible employer, it is also committed to fostering personal development, particularly through training, promoting gender equality, diversity of paths and profiles, helping people with disabilities, fostering social dialogue and quality of work life, and ensuring a safe working environment in which the respect and dignity of all employees are ensured;
- **Personal protection:** the management of human resources is based on respect for

the personality of each person, guaranteeing his or her physical and moral integrity; personnel must always conduct themselves with respect for the people with whom they come into contact on behalf of the Company, treating everyone fairly and with dignity. The Company REFUSES any form of forced labor, or work performed by minors, or with pay not in keeping with current regulations, and will not tolerate violations of human rights;

- **Equality**: the Company avoids and repudiates all forms of xenophobia or discrimination on the basis of age, gender, sexuality, health status, race, nationality, political opinions and religious beliefs of its interlocutors. The same criterion is adopted in the choice of recruitment and relations with personnel;
- **Transparency (and completeness of information)**: in the formulation of any contracts or in any case of rules governing relations with third parties, the Company ensures transparent information appropriate to the context with clear and comprehensible clauses always based on mutual respect, so that each person can make autonomous and informed decisions;
- **Health and security**: The Company pays the utmost attention to the health and safety of its workers and collaborators and strives to consolidate a safety culture by developing risk awareness while preserving, with preventive actions, a serene and collaborative environment marked by teamwork;
- **Environmental protection**: the Company intends to conduct its business in a socially responsible and environmentally sustainable manner; contributing to the dissemination and awareness of environmental protection issues;
- **Protection of personal data**: the Company collects and processes personal data of customers, collaborators, employees and other individuals, both natural and legal persons. Such data consists of information of any kind that could allow a person to be identified directly or indirectly and could also include sensitive data (revealing ethnic origin or health status). The Company undertakes to process such data within the limits of and in accordance with the provisions of the current legislation on Privacy;
- **Information processing**: all data, documents and information both its own and those of its Clients are treated by the Company and those working for it with the utmost respect for their confidentiality; in particular:
 - Information are classified by level of criticality and appropriate protection measures are adopted accordingly;
 - Third parties involved in the processing of information are subjected to the

signing of adequate confidentiality agreements.

The Company does not intend through its activities to take part and/or position in political and labor issues.

The Company is also unwilling to fund or support any political group and / or trade union, wishing to maintain itself in every situation independent and super partes.

Principles of behavior for personnel

The Recipients, in their conduct towards the Company must observe the following principles:

- **Diligence**: each person performs his or her work and services with professionalism, efficiency, and fairness using the tools and time at his or her disposal to the best of his or her ability, and assuming the responsibilities associated with the fulfillments;
- **Loyalty**: people are expected to be loyal to the Company;
- **Honesty**: within the scope of their work, people are required to know and diligently comply with applicable laws and this Code. Under no circumstances may the pursuit of the Company's interest justify conduct that is not honest or respectful of regulations;
- **Correctness**: persons shall not use for personal purposes information property and equipment available to them in the performance of the function or assignment assigned to them. Each person shall not accept or make for him/herself or for others, pressures, recommendations or reports, which may be detrimental to the Company or undue advantages for him/herself, the Company or third parties; each person shall reject, and shall not make, promises of undue offers of money or other benefits;
- **Confidentiality**: persons shall ensure the utmost confidentiality with respect to news and information constituting the Company's assets or pertaining to the activities of the Company or its Clients, in compliance with the provisions of the law, current regulations and internal procedures. In addition, persons are required not to use confidential information for purposes unrelated to the exercise of the position held by them;
- **Conflict of interest**: the persons shall inform, without delay, their superiors or contact persons of situations or activities in which there may be a conflict of interest with that of the Company or its Clients, on the part of themselves or their close relatives, and in any other case in which relevant reasons of convenience exist. Individuals undertake to respect the decisions that, in this regard, will be made by the Company.

The employees of the Company carry out their political and social activities under conditions of independence, in no way representing the opinions and intentions of the Company.

3. CODE OF CONDUCT

The Code of Conduct defines rules in the management of social activities and standards of conduct.

Principles of conduct of the Directors

The Directors of the Company are responsible for the strategies, organization, management and operations of the Company. They must therefore base their activities on the guiding principles enshrined in the Charter of Values of this Code of Ethics and have a duty to make effective the implementation and dissemination of the same within and outside the organization.

Directors must promote the general interests represented by the Company and must refrain from exploiting their position for the purpose of improperly benefiting themselves.

Shareholder and Stakeholder Relations

The Company is committed to providing shareholders with accurate, truthful and timely information while protecting and strengthening the Company's assets through the use of available resources in compliance with applicable laws, the Articles of Association and the Code.

Staff relations

The Company refers to the provisions of Law 300/70 with regard to the protection of the dignity and freedom of workers, in particular with reference to what is stated in Protection of the Person, Equality, Health and Safety Protection of Privacy and Protection of Personal Data with particular reference to the European Regulation on the Protection of Personal Data 2016/679 - General Data Protection Regulation (GDPR) and in accordance with the provisions of Legislative Decree 196/03 - Privacy Code, as amended by Legislative Decree 101/2018.

Privacy protection

The organization has an external Data Protection Officer (DPO) in addition to internal references. The name of the DPO is listed on the organization's home page www.sefin.it.

Any breach (verified or suspected) of personal data must be reported to the Data Protection Officer and your supervisor.

Any request for access to personal data processed by the organization should be reported to the Data Protection Officer and to their supervisor.

Protection of workers' health and safety

The Company promotes responsible and safe behaviors and adopts all safety measures required by technological evolution to ensure a safe and healthy working environment in full compliance with current prevention and protection regulations under Legislative Decree 81/2008.

Obligations of employees

Individuals must act loyally in order to comply with the obligations signed in the employment contract and the provisions of the Code of Ethics, ensuring the required services, in particular they undertake to comply with the following rules of behavior:

- Company information and know-how must be protected with the utmost confidentiality. Persons not expressly authorized to answer questions or provide materials requested by internal or external stakeholders of the Company will be required to consult with contact persons and comply with the instructions given in this regard. Both during and after the termination of the employment relationship, persons may use the data in their possession exclusively in the performance of their duties, in full compliance with the regulations and principles enshrined in this Code of Ethics and never for their own benefit or for the benefit of third parties;
- any personal situation or activity that could result in a conflict of interest with the Company and/or its Clients or the attainment of a personal advantage as a result of information known during the assignment must be avoided;
- it is prohibited to offer, accept or receive either directly or through an intermediary any gift, gratuity or other gratuity that may influence the actions to be taken in the performance of one's work duties. Gifts of modest value (e.g., Christmas gifts) as defined in Company policies remain permitted;
- each person is required to work diligently to protect Company assets by behaving consistently with current Company policies. In particular, attention is drawn to the improper use of Company tools such as e-mail or browsing websites with unseemly content;
- it is explicitly forbidden to have any kind of relationship with organizations and elements involved in anti-social and criminal activities that threaten society and/or the lives of citizens.

Relations with the public, business partners and suppliers

The Company's relationship with its partners is based on mutual fairness and cooperation; this implies that partners are expected to abide by the principles and rules set forth in this Code of Ethics.

a) External communications

With regard to institutional communications, the Company, in full compliance with the principles of fairness, truth and correctness, is committed to ensuring that the message conveyed is overt, truthful and correct. With particular reference to commercial communication, the Company is committed to ensuring that the message is complete and transparent, recognizable as such (with express prohibition of subliminal advertising) so that the person receiving it does not suffer it passively; does not refer to non-existent qualities or results; and is fair, with particular regard to end customers and competitors.

b) Customer relations

The Company undertakes not to arbitrarily discriminate against its customers.

It does not resort to elusive practices and undertakes to provide Customers with truthful and accurate information regarding the origin, intellectual property and functional characteristics of its products/services, as well as, not to introduce into the relationship with the Customer unfair clauses or otherwise elements likely to mislead his choices.

Staff should show themselves to be helpful, respectful and courteous, with a view to a collaborative and highly professional relationship at all levels.

The Company is committed to respecting the confidentiality and personal data of customers in accordance with applicable regulations and to disclose the use of their data, if any.

c) Provider relations

The Company guarantees, in its choice of supplier, fairness and impartiality by objectively assessing the conditions and costs of the providership. In any case, the Company reserves the right to ask suppliers for additional documentation (e.g., certifications) or adoption of special ethical requirements before entering into any contract.

The Company is committed to protecting the personal data of suppliers by using them within the limits provided by current regulations.

d) Business relationships in general

Business partners shall be chosen according to economic and organizational criteria without

discrimination on the basis of sex, race, political, labor union and religious views. The parties shall behave loyally and fairly in compliance with this Code.

The Company agrees to maintain the confidentiality of information it becomes aware of in the course of the relationship.

Relations with the Public Administration

The term Public Administration (PA) means any person, subject, interlocutor qualifying as a public official or person in charge of a public service, acting on behalf of the Public Administration, whether central or peripheral, or of supervisory authorities, independent authorities, community institutions, as well as private entities granted a public service.

The Company intends to conduct relations with the PA with the utmost transparency and ethics in order not to compromise the integrity of both parties.

Relations with the Public Administration are maintained exclusively through contact persons who have received an explicit mandate from the corporate bodies and who are not in situations of conflict of interest with respect to the representatives of the institutions themselves.

Personnel must therefore refrain from any conflict that may impair the PA's impartiality and autonomy of judgment. Particular caution must be observed in transactions related to any bidding procedures, contracts, authorizations, concessions, licenses, applications for funding from public sources (state or EU).

No person in the Company may give money or offer financial or other types of benefits to any person in the public administration for the purpose of obtaining appointments or other benefits, personal or for the Company, as regulated in the section "Gifts and gratuities and anti-corruption" below.

Gifts and gratuities

Any form of gratuity and gifts that do not fall within customary business practice and within the ordinary criteria of courtesy, business use or charity is strictly prohibited. With particular reference to public officials, any form of gratuity to public officials, or their family members, that may influence their independence of judgment for the purpose of obtaining more favorable treatment or undue benefits or advantages of various kinds is prohibited.

Gifts offered must be properly documented to allow for verification and authorization by the function head or contact persons.

If any person in the Company receives from a member of the Public Administration explicit or implicit requests for benefits, except in the case of gifts of commercial use and of modest value, he or she shall immediately inform his or her immediate supervisor or the person to whom he or she is reporting, for the adoption of the appropriate steps.

Integrity and anti-corruption

Beginning with the analysis of the Legislative Decree 231/01, which recognizes the liability of the Entity in the event that the Company derives interest or advantage from the commission of crimes with corruptive purposes in the public and private spheres (Articles 25 and 25-ter of the Decree, respectively) by a person acting on behalf of the Company, SEFIN believes it is of fundamental importance to:

- call the attention of those who work within the Company and the other Companies that report to it to the strict observance of what is generally provided for in this Code of Ethics and in particular to what is explicated in this section;
- emphasize the need to always adopt irreproachable behavior especially when acting on behalf of the Company;
- while also defining behavioral iterations to counteract such an occurrence.

OBJECTIVES

- Condemn all forms of unlawful behavior as contrary not only to the provisions of the law, but also to the ethical principles stated above.
- Ensure that the Company, through monitoring of activities at risk of crime, has the concrete and effective possibility of taking timely action to prevent the commission of such crimes.

PRINCIPLES

Personnel, in the performance of their activities and in the exercise of their responsibilities, shall inspire their conduct by criteria of fairness, integrity and transparency.

In particular:

- behavior that does not meet these principles will not be tolerated;
- illegitimate or, in any case, improper behavior in relationships inside and outside the Company, and, in any case, any form of corruption in order to achieve personal or business objectives will not be tolerated
- corrupt practices, illegitimate favors, collusive behavior, solicitation of personal benefits will be resisted.

BEHAVIORS

At all times, all applicable national and international anti-corruption laws must be complied with.

The SEFIN Group does not accept or tolerate any kind of corruption and, therefore, will not have any kind of relationship with those who do not intend to align themselves with these principles.

It is not permitted to give, offer, promise, receive, accept, request or solicit money or other favors in order to obtain or maintain an undue advantage in the performance of work activities, as well as to exercise or accept direct and/or indirect solicitations of personal or career advantages for oneself or third parties; this is regardless of whether the recipient of such an act is a public official or a private individual, and regardless of the actual undue advantage that may have been obtained.

In addition, it is not permissible to exploit or boast of existing or asserted relationships with a public entity for the purpose of improperly obtaining benefits from a third party as consideration for illicit mediation to the public entity.

More explicitly: it is prohibited to pay or offer, directly or indirectly, bribes, percentages or other forms of payment in money or in items or services of value of any kind, to anyone, including government officials, employees or representatives, political parties or any other third party, for the purpose of illicitly obtaining or retaining business related, in any way, to products or services provided by SEFIN or for which you are a reseller. This includes the giving of money or services of any kind to third parties, where there is reason to believe that a corporate decision maker will be involved, for the purpose of influencing the decision. Regardless of the provisions of applicable laws and regulations, all travel expenses of meals or lodging and entertainment for the benefit of Clients, Prospects, or State-owned entities must be in a reasonable amount, a connection to the demonstration of the product, and not for the purpose of illicitly obtaining or retaining business related to products or services. In business dealings, it is prohibited to receive or offer, benefits (whether direct or indirect), gifts, acts of courtesy and hospitality, which are of such a nature and value that they could be interpreted as aimed at obtaining favorable treatment and, in any case, not in line with normal business courtesy. It is necessary to ensure that all acts of hospitality offered to private, commercial or governmental customers and others are in compliance with all applicable laws and regulations, are within the ordinary and proper course of business, and cannot reasonably be construed as bribes or inappropriate forms of inducement to purchase.

An act of corruption can also be implemented through:

- purchase of supplies or professional services (e.g., HW equipment, consultants, faculty, etc.);
- proposed hiring of personnel by the Group or other compliant Company;
- offering, donation of goods not of small value, etc.

In dealing with other stakeholders, including other business partners, you must exercise reasonable due diligence to ensure that you are aware of any signs of potential violations of these principles. You should promptly inform management of any potential violations or concerns.

At the same time, great care must be taken to prevent others from interpreting the actions taken as potentially violating the same principles of utmost fairness.

The Company refrains from subjecting itself to any pressure, direct or indirect, from political figures and does not make contributions to organizations, including nonprofit organizations, with which a conflict of interest may exist.

If you become aware of any situation involving unlawful or unethical aspects and involving or related to the sale of products and/or services of the Group, you must immediately notify the Management at PEC :

direzione.sefin@legalmail.it

or, if you presume involvement of the top bodies, the Chairman of the Board of Statutory Auditors at PEC

collegio.sefin@legalmail.it

4. METHODS OF IMPLEMENTATION AND CONTROL

Reporting of issues or suspected violations

Anyone who becomes aware or is reasonably convinced of the existence of a violation of this Code, a particular law or Company procedures, has a duty to report it to Management in writing and in non-anonymous form at the PEC address Direzione.sefin@legalmail.it. The Company guarantees the confidentiality of the identity of the reporter, without prejudice to legal obligations, with the objective of protecting the reporter from possible acts of retaliation.

Any authors of manifestly unfounded or obviously instrumental and irrelevant reports may be reported to the Administration for consideration of possible disciplinary measures against them, always in accordance with the disciplinary system adopted by the Company.

The responsibility for conducting investigations into possible violations of the Code of Ethics rests with Management, which may, if necessary, hear from the author of the report as well as the person responsible for the alleged violation.

In cases of suspected involvement in malfeasance by management, the report to the Chairman of the Board of Auditors will be taken into account when evaluating the Company's financial statements for possible non-approval.

Operational procedures and decision-making protocols

In order to prevent violations of all current regulations, as well as the code of ethics, the Company has provided for the adoption of specific procedures aimed at identifying the persons responsible for decision-making and authorization processes and the proper recording of actions and operations undertaken for their evaluation, the current version of which is posted on the Company intranet ("Company Policies" in the File server).

Disciplinary measures resulting from violations

It should be noted that the provisions of this code are an integral part of the contractual obligations undertaken by personnel, as well as by persons having business relations with the Company.

Serious and persistent violation of the rules of the Code of Ethics by its addressees damages the relationship of trust established with the Company and may result in the imposition of disciplinary sanctions, compensation for damages, and in cases of serious breach, termination of employment.

For the purposes of this Code, the term "serious breaches" is used to identify all those persistent acts of violation from which sanctions against the Company result.

With particular reference to external collaborators, ascertained violations of the Code of Ethics by

them entail the possibility of SEFIN withdrawing from the contractual agreements without incurring penalties or having to pay compensation to the contractual counterparty, as it is considered a serious breach of such contractual agreements.

Disciplinary System

The Company ensures that all Personnel comply with the principles of fairness and loyalty in the performance of their functions, both internal and external, also for the purpose of maintaining the Company's image and the relationship of trust established with Customers and, more generally, with third parties.

The existence of a system of sanctions applicable in the event of non-compliance with the Company's rules of conduct and, specifically, with the requirements of what is set forth in the Code of Conduct section, is an indispensable component in ensuring the effectiveness of the same.

Any act of bribery committed by employees or contractors, in addition to being liable to disciplinary sanctions, as provided herein, is also liable to administrative, civil, and criminal penalties for bribery offenses.

In the event of ascertained violations of the rules, principles and values expressed in this Chapter, the Group will adopt sanctioning measures proportionate to the seriousness of the facts and in any case in line with Company rules, with the CCNL of Commerce in force from time to time and with the laws in force.

For employees and/or managers and/or external collaborators, compliance with the Code of Ethics is an integral part of the conditions that regulate employment relations in the Company and any violation thereof will result in the adoption of disciplinary measures, proportionate to the seriousness or recidivism of the failure or the degree of guilt, in accordance with the provisions contained in the respectively applicable contracts.

Any violation, by Personnel, of the stipulated rules, may result in the issuance of measures proportionate – as mentioned – to the seriousness of the failure or recidivism or the degree of guilt, up to and including the termination of existing contracts with the person.

Adoption of the ethical model

The Code of Ethics was adopted by resolution of the Company's Board of Directors on June 14, 2022.

The Board of Directors, by subsequent resolutions, will issue any updates that may be necessary or even appropriate as a result of:

- Significant changes in the organizational structure of the Company, or in the way the Company's business activities are carried out;
- regulatory changes.

It is the responsibility of the Board of Directors to ensure that the principles contained within the Code of Ethics are communicated to and understood and adhered to by all Recipients.

Recipients are required to read and ensure full understanding of the contents of the Code of Ethics. In particular, the directors and managers of the Company are responsible for creating a culture that is grounded in the principles contained within the Code of Ethics, promoting awareness and encouraging commitment to their observance.

Aware of the moral importance of this Code of Ethics, Sefin intends to make its values and guiding principles public and accessible to all. To this end, the Code of Ethics is available on the Company's official website: www.sefin.it



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