

Sigma S.p.A. designs, manufactures, sells, and provides support for electronic and electromechanical products, systems, and software with high technological content, aimed at meeting the automation needs of customers in order to improve the functionality, safety, efficiency, and availability of the services provided.

Sigma S.p.A. offers services aimed at the installation, maintenance, management and evolution of its own products as well as third-party products.

Sigma S.p.A., aware of the importance of its activities, the protection of the environment and the territory in which it operates, ensures its commitment to continuously improving its impact and interaction in accordance with environmental legislation.

Sigma S.p.A., aware of the importance of protecting the health and safety of workers, ensures its commitment to continually reduce health and safety risks for workers involved in all production processes and service delivery.

Sigma S.p.A., aware of the importance of complying with current anti-bribery legislation, ensures its commitment to continuously reduce the risks of committing bribery-related crimes in reference to the ISO 37001 standard and in accordance with the Italian Legislative Decree 231/01.

Sigma S.p.A. aims to improve and develop its position in the global market through an ever-increasing commitment to:

- Analysing and predicting the needs of customers and stakeholders;
- Ensuring quick and reliable responses that effectively and adequately meet customer needs in terms of products and services;
- Researching and developing innovative and technologically advanced products and services, in compliance with environmental standards;
- Optimizing business processes to offer competitive product and service prices;
- Protecting the internal and external environment, adopting a "Proactive Principle";

SIGMA S.p.A.

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UNI EN ISO 9001:2015
UNI EN ISO 14001:2015
UNI ISO 45001:2018



Certification
ISO/IEC 27001
ISO/IEC 20000-1

- Ensuring control over significant environmental aspects for stakeholders and the environment;
- Applying risk and opportunity analysis principles in the design and implementation of processes within quality, environmental, safety, and anti-bribery management systems;
- Preventing occupational injuries and diseases;
- Ensuring that all employees and collaborators are aware, responsible, and involved in the company's efforts to manage Safety and Health aspects in the workplace;
- Promoting the involvement of all company personnel and stakeholders in quality, environmental, safety, and anti-bribery management systems.

In fulfilling its mission, **Sigma S.p.A.** ensures the satisfaction of the needs of all stakeholders, including **customers, shareholders, employees, suppliers, and business partners**. To this end, the organisation pays the utmost attention on the following aspects:

Customer Focus

Through active listening to the specific needs of the customer and end users, the company orients itself towards an efficient and effective response aimed at meeting those needs.

Attention to Personnel and Collaborators

Through involvement in decision-making, the valorization of human resources, internal communication plans, maintaining a positive and collaborative atmosphere, the definition and respect of safety plans, as well as through due diligence activities in accordance with the ISO 37001 standard.

Attention to the Work Environment

Through the improvement of environments and infrastructures to support the development of business needs at all organisational levels.

Attention to Stakeholders

By establishing clear relationships based on the principles of maximum collaboration and transparency. Through due diligence activities with business partners involved in the ISO 37001 system.

Attention to Society

Through individual and organisational behaviours that respect common assets and values, such as energy savings, minimal environmental impact in waste disposal, and appropriate driving behaviours to safeguard both personal and public safety.

General Objectives

Based on these factors, in the pursuit of continuous improvement, the Board of Directors, in collaboration with the General Management, **Sigma S.p.A.** sets the following general objectives:

- Ensure continuous improvement in the efficiency and effectiveness of responses to customer and stakeholder needs;
- Ensure the application and evolution of quality, safety, environmental, and anti-bribery management systems;
- Promote and support an approach based on risk and opportunity analysis (Risk-Based Thinking);
- Monitor key processes to identify areas for improvement and detect new risks and opportunities;
- Provide accurate and transparent information about the products and services offered and the company's ability to acknowledge and meet customer needs;
- Ensure a high degree of suitability for the intended use of the products, with particular regard to the needs of end users;
- Ensure a high degree of reliability of products and services, through the improvement of technological and methodological skills in the development and control of product and service design and production;
- Ensure the management of non-conformities reported by stakeholders, guaranteeing quick and effective resolution and identifying appropriate corrective actions;
- Adequately manage accidents and near misses, analysing their causes and ensuring appropriate corrective actions;
- Ensure efficient and effective services to minimize product downtime due to malfunctions and breakdowns;
- Innovate and evolve products and services in response to customer, stakeholder needs, and environmental compliance;
- Evaluate customer and stakeholder feedback to enhance and improve products and services;

- Ensure compliance with all relevant laws, regulations, and environmental standards applicable to certified company sites;
- Adopt technologies and processes that offer the best environmental performance based on risks and opportunities;
- Evaluate the environmental aspects and effects of new processes to choose equipment and solutions offering the best environmental protection;
- Develop training and awareness activities for all employees;
- Encourage initiatives for environmental protection;
- Collaborate with authorities, local communities, and environmental associations on environmental issues;
- Adopt the most appropriate control systems for managing environmental aspects related to company activities;
- Design low environmental impact equipment, with a focus on using a high percentage of recyclable materials;
- Pay particular attention to optimizing energy consumption by adopting more technologically efficient solutions;
- Analyse potential bribery risks in business processes and implement all possible preventive measures in line with ethical, legal, and transparency principles;
- Ask continuous commitment from partners and staff in implementing anti-bribery measures;
- Ensure full compliance with mandatory and regulatory requirements for bribery prevention;
- Prevent bribery related to specific categories of business associates (customers, suppliers, collaborators, subsidiaries, joint ventures, public officials, regulatory authorities, and general business partners);
- Adopt maximum transparency and ethics in financial management, commercial and operational management, and stakeholder relations;
- Implement all possible operational control measures to deal with bribery risks.

This policy, directed at Customers, Collaborators, Employees, Suppliers, Shareholders, and Business Partners in general, expressly prohibits any attempt at bribery by anyone acting on behalf of the organisation, even if it results in a significant interest or advantage for the company. This applies to both so-called "active" bribery (i.e., by company representatives towards external parties) and "passive" bribery (i.e., by external parties towards company representatives).

The Management, together with the Chiefs of business functions, ensures the application of the provisions of ISO 9001:2015, ISO 14001:2015, ISO 45001:2018, and ISO 37001:2016 standards, taking responsibility for the adequacy of the management systems and ensuring the achievement of objectives.

The achievement of company quality objectives and maximum customer satisfaction is the responsibility of all business functions.

To promote maximum staff involvement, appropriate training and incentive systems are adopted.

To implement an anti-bribery system in compliance with ISO 37001, the Company has established a Governing Body consisting of the Board of Directors, a Senior Management represented by the CEO, and has appointed a Compliance Function for Corruption Prevention CFPC (Anti-bribery Compliance Function) with the authority and responsibility for the management system. This function is responsible for providing consultancy, information, and awareness to stakeholders on bribery prevention; ensuring compliance with the management system's requirements under the ISO 37001 standard; and reporting on the performance of the management system to Management and the Governing Body.

Violations of this policy and the anti-bribery management system outlined in this document may result in disciplinary measures, including the termination of existing contracts as per the applicable Italian national contract.

For any suggestions for improvement, non-conformities, or violations, the CFPC can be contacted at the e-mail address anticorruzione@sigmaspa.com or through the whistleblowing platform at the following link: <https://whistleblowing.sigmaspa.com>, which ensures the anonymity of the whistleblower.

To meet the requirements of the Organizational Model 231/01 and the ISO 37001 standard, the Company has adopted an Ethical Code for the prevention of crimes under the Italian Legislative Decree 231/01, including bribery-related offences. This Ethical Code is available on our website www.sigmaspa.com.

The Bribery Prevention Management System is part of the company's management systems and is planned considering Governance aspects, Internal Control Systems, Risk Management, and Compliance.

10/06/2024

The President

Alvaro Cesaroni

