

ETHICAL CODE



Apyros S.r.l. Unipersonale

Fire Fighting Engineering

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PLACE ANCONA

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CODICE ETICO APYROS

A) Introductory note

APYROS S.r.l. (hereinafter simply “APYROS”) pursues its statutory purpose and its mission with honesty, respect for the truth, transparency and morality. All persons who collaborate with the Company and are recipients of this Code of Ethics and Conduct (hereinafter simply the “Code”) must act in accordance with these principles at the highest degree of coherence while performing their duties and activities.

This Code is the official document which define the principles which inspire our Company and should inspire all those who work with us.

B) Purpose of the Code

The purpose of the document is to define behavioral and disciplinary criteria to prevent the commission of illegal actions taken in the normal course of the business and in the Company’s interest. This is possible considering that the Company:

- facilitates the daily work, complying with the current legislation and internal Company’s rules;
- align the objectives of all involved parties with the needs of the Company;
- maintains the maximum levels of integrity and confidentiality while performing its operations;
- avoids behaviors that may, although not directly, favor the commission of criminal activities;
- strengthens the trust of stakeholders, preparing each Company’s document in a correct and transparent way.

C) Recipients of the Code

- Company’s management;
- All those who carry-out management and control activity of the Company, regardless of legal and formal status;
- All our employees and collaborators (also temporary). These subjects are defined bound recipients and are therefore subject to sanctions (as provided for by the C.C.N.L) for the violation of the present provisions;
- Suppliers, consultants and partners of the Company are defined as unbound recipients. However, in the event of a serious breach of legal requirements, the Company may decide to immediately terminate the working relationship for just cause.

D) Vision

APYROS is at the forefront of resources and technology in the field of firefighting systems engineering. Nevertheless, the human factor is always in first place and, thanks to this essential feature, it offers timely solutions, perfectly flexible, adaptable to every activity and adaptable to every complexity.

E) Mission

APYROS is born on the need to provide a highly specialized service in the field of firefighting systems engineering, ensures professional support in the daily management of risk, combines the quality of service with attention for the environment and natural resources and is committed in minimizing the environmental impact.

F) Activities

Our skills and capabilities derive from many years of working experiences, in the field of fire protection, realized in different industry sectors, such as Oil&Gas, naval, pharmaceutical, chemical, food, automotive and logistics platforms.

Each project donates us a valuable piece of expertise and shrewdness, let us understand the holistically approach to fulfill customers needs and identifying the reference regulations - European, international, insurance standards, specific guidelines of sectors/major multinational companies - in applying them with intelligence, in pursuing projects that represent a real support, in supervising the building activities necessary for the construction of equipment.

The Company carries out the following activities:

- Advice and feasibility studies on fire prevention in order to ensure an adequate level of safety;
- Design of firefighting protection systems suitable for all types of needs (sprinkler, water mist, foam, chemical gas and oxygen reduction systems);
- Anti-seismic design of firefighting systems;
- Fire Safety Engineering: Fire Performance Design uses state-of-the-art fluid dynamics modeling and simulation techniques that can predict not only how fire may develop, but also human behavior, depending on the specific scenarios and the desired level of security.
- On-site assistance, ensuring compliance with all applicable codes and standards, but also the proper functioning of the equipment;
- Fire Prevention, offering Customers project's conformity assessment, preparation of the Certified Report of initial activity, firefighting certification and renewal of fire prevention certification.

G) Sectors

The sectors in which the company operates are:

- Chemistry and Pharmaceuticals: in this context, the correct identification of risks allows a fire prevention strategy aimed at preventing major accidents and the implementation of an adequate set of operational and precautionary measures that take into account the specific production needs considering criteria, regulatory procedures and guidelines rules;
- Automotive: the use of good management practices and the prevention of fire risk can guarantee safety for people and assets, production's continuity and correct planning of activities; fixed firefighting systems, together with "passive" safety measures represent an essential tool for the achievement of appropriate levels of protection, specific to the specific needs of the customer;
- Food: a wide knowledge of international fire safety regulations in this field represents an added value that can lead to a high level of prevention and protection even the sites most exposed to the risk of accident;
- Logistics: in this sector, not only prevention and protection become fundamental, but also the safeguarding of Business Continuity remains a primary objective. APYROS has been developing for years designs for important distribution groups on intensive warehouses, of high height and equipped with hi-tech operating lines;
- Oil & Gas: having the privilege of providing fire consultancy and design services in the Oil & Gas sector is synonymous with high specialization in the specific sector, with extensive theoretical and practical experience acquired on platforms and in refineries, highly competent for the development of equipment to protect machinery and pumping and transport systems of enormous size, located in remote and challenging places;
- Naval: the presence of fire safety systems is an essential and fundamental factor for navigation to be allowed. The installations used on board are based on different technologies and techniques, each adapted to the specific application.

H) Environmental Protection

In pursuing its mission, the Company is committed in meeting the needs identified in the environmental context and in which it operates, to the point that since 2014 it is certified ISO 14001 ([link ISO-14001](#)).

Therefore, in carrying out its activities, it assumes responsibility towards the environment, respecting without exception all mandatory regulations and taking all necessary measures to reduce the level of environmental impacts deriving from its activities.

I) Relationship with Customers and Suppliers

Customers and Suppliers are considered by APYROS as members and part of the Company's system. There is no inequality of treatment or favoritism. Therefore, are not allowed conducts aimed at obtaining unlawful advantages against Customers and Suppliers.

Our employees are required not to accept from Suppliers or donate gifts to Customers in the amount of more than € 50 each. In the event that the estimated value of the gift received is higher, it must be returned to the sender and notified to the Company's management for appropriate management.

It is prohibited any management of cash in dealings with Customers and Suppliers.

J) Image

The Company, in order to safeguard its image, declares that:

- No internal member may release statements on behalf of the Company to unqualified external subjects (other than public officials) on information that has been defined as confidential or on information regarding other companies whose release may result in damage to them;
- Any employee or collaborator who is solicited to make statements on information concerning the Company, which could cause damage, or is solicited to release information defined as confidential, must direct the applicants to the Company's management.

K) Discrimination and conditions of slavery and exploitation

We do not tolerate behavior, either inside or outside the Company, aimed at discriminating other subjects based on gender, race, age, religion, political affiliation, nor actions that may lead to physical or mental disability, isolation, exploitation or harassment for personal or professional reasons.

With particular reference to the provisions of art. 600 c.p., regarding the reduction, or maintenance in slavery or servitude, the Company identifies any situation that may constitute such a crime whenever it establishes a working relationship or collaboration and rejects any form of coercive conduct carried out by violence, threat, deception, abuse of authority or taking advantage of a situation of vulnerability, physical or mental inferiority, or a situation of need, or by promising or giving sums of money or other advantages to those who have authority over the person.

L) Staff policy

In pursuing its mission and conducting business, the Company takes responsibility for the safety and health of its employees and collaborators:

- complying without exception with all mandatory occupational safety regulations;
- taking all necessary measures to mitigate the health risks of employees;
- ensuring the safety of all those involved in our business activities;
- periodically checking the health of each worker.

The Company acts according to its principles, promoting its values within the Company and striving to create a serene working environment where it is possible to work according to all the ethical and moral principles promoted by the Company. In this regard, since 2014 the Company is certified ISO 45001 (ex OHSAS 18001) ([link ISO-45001](#)).

Human resources represent the fundamental and irreplaceable capital for the success of an institution. The Company, therefore, protects and promotes the value of its human resources in order to improve and expand their skills, having regard to the constitutionally recognized principles of protection of the individual and the worker and the provisions of National and European legislation.

The Company provides penalties for employees and collaborators who voluntarily do not respect the values described in the Code.

Every employee is regularly managed, respecting the current legislation on labor law. It's absolutely repudiated any form of unregulated work, therefore any form of undeclared work.

The Company's management has the obligation to communicate to all employees and external collaborators the task to be performed, in compliance with the established rules on labor law.

M) Conflict of interest

The Company does not tolerate conflicts of interest, therefore, establishes the following rules:

- Apical employers may not engage in commercial relations with competitors that may affect the position of APYROS;
- The non-apical employers of the Company cannot carry out working relationships with competitors representing the interests of the Company and with the aims it pursues as indicated in the statute and in the Code.

In the event that any subject becomes aware of any situation which may generate a conflict of interest, he/she is obliged to promptly notify the fact to the mailbox: apyros2022@gmail.com.

N) Corruption

The Company does not tolerate behavior aimed at the corruption of public, public and private entities.

Every subject who is part of the Company's organization must not violate the obligations relating to his job. The Company forbids them to receive and give any benefit resulting from illegal activities. In particular, it is forbidden the use of cash (Facilitation of Payments), or gifts in the amount of more than € 50 each, to facilitate or speed up transactions in which the Company could have an interest or take an advantage.

O) Transparency and integrity

Transparent behavior of all employees, collaborators and professionals involved in the Company's system is an essential factor for the integrity and proper functioning of the Company itself.

Integrity is considered as an essential element of our professionalism, being aware of the contribution that each of us must make to the safety of people.

At any organization level, management assumes responsibility for the quality of the work carried out by each employee of the Company. No transactions are allowed that could affect the values described in the Code.

P) Personal data

The Company operates respecting the protection of personal data, in accordance with the current legislation (D. Lgs. No 196/2003 - EU Regulation No. 2016/679) of both internal and external who interact with it, limiting the use of data to those purposes, necessary for the performance of the Company activity.

The Company, whenever it enters into a relation with an external party, in particular suppliers of goods and services, formally informs them that their personal data (company name, registered office, VAT number, tax code) will be collected, registered, processed and stored for administrative, accounting and commercial purposes, or, in particular, to carry out the following activities:

- order management;
- invoices and payments;
- fulfilment of legal or contractual obligations.

The above data are stored at the operating headquarters of APYROS, which is the party authorized to carry out the aforementioned processing and is responsible for the same.

Q) Implementation and diffusion of the Code

The Company has an integrated quality management system (quality-ISO 9001, environmental protection-ISO 14001 and safety - ISO 45001) ([link ISO-9001](#)). The Quality Manager in charge of this system is responsible for periodical checks performed to verify the respect of the Code by the Company's management, all employees, collaborators and external parties.

These checks are carried out directly by the Quality Manager, thanks also to the inspections made by the independent certification body RINA-CISQ which through its auditors, annually verify and certify the compliance of the procedures with standards. The integrated quality management system is designed to detect and prevent risks and crimes. In the event that inappropriate and inconsistent behaviors are not in accordance with the provisions of the integrated quality system and this Code, the Quality Manager of this system, upon communication to the Company's management, may use external professionals for the prompt resolution of events.

In the event that any subject becomes aware of actions taken by employees or persons collaborating with the Company which are in conflict with the conducts described in this Code, in accordance with the provisions of the Whistleblowing Law (n. 179 of 30/11/2017) the same person may report the "crime" to the specific e-mail address (apyros2022@gmail.com). The Company, thanks to this email address, will guarantee anonymity and complete respect for privacy of any report received.

The sole Administrator promotes all the initiatives necessary for sharing to the maximum extent the principles stated in the Code within the Company, promoting the knowledge of the contents expressed in the Code towards all employees and the community by publishing the Code on the website.