



CODE OF ETHICS

This document was approved by the Managing Director of the company.

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1 - OVERVIEW

THE COMPANY

Sassi Lift Systems Limited (formally Liftmaterial (GB) Limited) was originally established in 1972 and continued to grow steadily, then in 2000 we were proud to become part of Sassi Holdings, whose machines have been installed worldwide since 1946. Over five decades of trading SLS have gained an enviable reputation within the UK Lift Industry as suppliers of high quality, well engineered and technically well supported equipment.

COMMITMENT TO CONTINUOUS IMPROVEMENT AND QUALITY

All products SLS supply comply with EN81-20/50 in addition to the Lift Directive 2014/33/EU. SLS believe that quality is paramount, and this philosophy is embraced by all our staff working to maintain our UKAS accreditation to BS EN ISO 9001:2015 & BS EN ISO45001:2018. We are full members of LEIA and are actively involved in the development of our manufacturers and suppliers products.

1.1 INTRODUCTION

The Company, in the context of its activities, has as its guiding principles compliant with domestic and EU legislation, as well as that of the countries in whose markets it operates, with the aim of pursuing the principles of legality, fairness, transparency and respect for human dignity.

1.2 PURPOSE OF THE DOCUMENT

To adopt this document as a code, to clearly and transparently define the values to which it intends to adhere to and comply with as fully as possible in all areas of our activities.

1.3 SCOPE OF THE CODE

The following document aims to define the rights, duties and responsibilities with which all interested parties (Employees, Suppliers, Organisations, Customers) who directly or in- directly have relations with the Company must comply, establishing rules of conduct based on the values we believe is both ethical and in best practice.

2 - PRINCIPLES AND VALUES

2.1 ATTENTION TO THE PEOPLE

Human resources have always been the main corporate asset and driving factor for achieving business success, and includes but is not limited to: -

- Respecting each person as an individual.
- Prohibiting all forms of discrimination and abuse and assuring appropriate preventive measures against such conduct in the workplace;
- Creating a working environment that grants and encourages equal opportunities for all;
- Respecting the confidentiality of personal data and privacy;
- Ensuring workplaces comply with health and safety regulations for all interested parties.

In relations with colleagues too, it is important the worker must behave in a spirit of fairness and in a spirit of full cooperation and harmony, so that everyone can work in a positive and productive working environment.

2.2 RESPONSIBILITIES

Sassi Lift Systems is obliged to act responsibly in the context of its business activities and, in general, in relations with its Employees and with Third Parties, paying attention to the provisions of the law and safety at work relating to all business activities.

The Company attaches particular importance to respect for the environment in relation to energy supply, the waste cycle and direct and indirect environmental impacts.

2.3 DIALOGUE, SHARING AND COLLABORATION

Employees and interested parties operate in an environment open to discussion in order to promote positive development of the business and associated relationships internally and externally.

2.4 TRANSPARENCY, TRUST AND FLEXIBILITY

The Company makes where appropriate, corporate topics known in a clear and timely manner as a prerequisite for relationships based on trust.

2.5 RELIABILITY, CREDIBILITY AND LEGALITY

The Company's presence in the market for over 50 years has enabled it to develop its products and services to the highest achievable "quality" by continual review, audit and improvement in all areas of the organisations activities.

2.6 DIVERSITY, INCLUSION, GENDER EQUALITY AND EQUAL OPPORTUNITIES

Sassi Lift Systems considers it essential to ensure gender equality, inclusivity and respect for diversity, guaranteeing equal opportunities and gender equality. The Company protects and promotes equal opportunities for its employees, regardless of gender, age, social or ethnic origin, birthplace and citizenship, disability, wealth, sexual orientation, political, religious and other personal beliefs.

2.7 FAIRNESS OF WORKING CONDITIONS

The remuneration and social benefits reserved for employees correspond or exceed to national legal standards. National regulations on working time and holidays are also followed and supported.

2.8 ENVIRONMENTAL PROTECTION

This environmental policy applies to all of our operations including management, office services, site operations, and procurement. All employees have a responsibility in their area to ensure that the aims and objectives of the policy are met, We aim to:

- Make efficient use of natural resources by conserving energy and water, minimising waste and recycling where possible.
- Meet our duty of care requirements in relation to waste by ensuring the safe keeping, transportation and subsequent recovery or disposal of waste.
- Use recycled packing materials whenever these can be commercially justified.
- Keep transport use to a minimum.
- Work with suppliers to ensure they recognise the importance of reducing the environmental impact of their products and transportation.
- Include environmental considerations in investment decisions for new plant, equipment or working practices.
- Inform and promote environmental objectives and how they can assist in meeting targets (Company culture).
- Integrate climate change considerations in line with ISO Amendment climate change ISO9001 & ISO45001 clause 4.1 & 4.2 CD186, Issue 2, 03.09.2024 Targets To achieve our aims.

We have set ourselves the following targets:

- Reduce vehicle emissions to air by the scheduling of work to reduce mileage and servicing all vehicles.
- Recycle as much paper, cardboard, plastic and metal waste generated as possible.
- Reduce paper usage by increasing the use of e-mail and electronic documentation and storage.
- Reduce energy consumption by monitoring energy usage.

Progress against these objectives will be monitored through:

- Constant monitoring and audit processes.
- Communication.

This environmental policy is available on the Companies intranet. All members of staff will receive training on the environmental responsibilities of their role, and will be informed of any updates or revisions via e-mail or team meetings.

2.9 QUALITY, ENVIRONMENT AND SAFETY POLICY

Quality and Health and Safety are core values which will be set in context with all other business objectives, to ensure the Health, Safety and Welfare of all SLS employees and others who may be affected by our activities and products. SLS management is committed to providing a safe and healthy working environment for the prevention of work-related injury and ill health that are appropriate to the nature of our Health and Safety risks and opportunities. Our business objectives and targets are established according to the nature of our business activities and in accordance with legal requirements and they shall be reviewed at regular intervals to allow us to make improvements to our systems and maintain their performance. SLS recognises and is committed to the fulfilment of its specific duties and statutory requirements, effective management of the SLS IMS is an integral part of our business, which we will achieve by:

- Providing the resources and infrastructure required to ensure objectives are met.
- Supplying products / materials of the highest quality standard to our customers.
- Ensuring that the activities, products, and materials supplied comply to all necessary laws, regulations and standards.
- Ensuring that the delivery of products / materials is met, in accordance with customers' known requirements.
- Maintaining knowledge of legislation and best practice, relevant to our activities and industry Providing and maintaining a safe and healthy working environment.
- Eliminating hazards and reducing risks by putting effective control measures in place where known or identified.
- Maintaining a culture that encourages the consultation and participation of employees and where they exist, employees' representatives on OH&S issues.
- Providing clear instructions, information and training, as may be necessary to ensure employees' health and safety and competence to discharge their duties.
- Providing and maintaining plant and work equipment that is safe and minimising the risk to Health and Safety.

Reviewing this policy at regular intervals, (minimum annually) and making it available to interested parties. At SLS we are committed to the continual improvement of our Quality and OH&S management and performance. All employees and others working for SLS are required to comply with this policy through co-operation and carrying out their activities safely so as not to intentionally or thoughtlessly interfere with or misuse anything that is provided in the interest of Health and Safety.

The Company's strategy is geared towards activities and investments that meet the principles of sustainable development. In particular:

- There is an internal committee dedicated to sustainability topics, which periodically studies and evaluates the actions to be taken in the social and environmental field, as balanced as possible with the economic one.
- Awareness-raising and training activities on the topic of sustainability are carried out in order to spread an ever-increasing culture on the topic.

2.10 TRAINING

The Company is committed to maintaining constant growth in the skills of its employees, providing training even during periods of great change, for example the pandemic due to the spread of COVID-19.

The constant evolution of digital related processes and the increasing competitiveness of the market determines the need for a continuous review of work processes and consequently require assessment of resources. To meet this need, training is a key factor and forms part of our employee program of continual personal and professional improvement.

3 - CRITERIA OF CONDUCT IN THE MANAGEMENT OF ACTIVITIES

3.1 GENERAL PRINCIPLES

The Company conducts its business according to the principle of legality. The activity is aimed at meeting or exceeding customer requirements through dignified and anti-negative behavior. Close cooperation with business associations and credit institutions ensures the company fully complies in all areas legally and commercially within its market areas

3.2 CARE IN COMMERCIAL TRANSACTIONS

The Company undertakes to respect the fairness of commercial transactions also with regard to exports within and outside the Union. The Company constantly strives to comply with and observe international tax and customs laws and regulations.

3.3 PRIVACY AND CONFIDENTIALITY

Sassi Lift Systems acts in compliance with the specific legislation on the protection and processing of personal data (UK General Data Protection Regulation (UK GDPR) and the (Data Protection Act 2018) processing those of its knowledge and competence with respect for confidentiality, identity, dignity and image of the persons to whom the data belongs.

In particular, the personal information collected is processed in accordance with the principles set out in the GDPR in a manner that is correct, consistent and appropriate to the purposes of collection.

The Company also promotes the confidentiality of information in its possession in the management of all its business activities. All Employees, Collaborators and Consultants of the Company are bound not to use the information acquired in the performance of their activities for purposes not related to the strict performance of those activities.

The strategic value of information is recognised, ensuring the necessary confidentiality in order to avoid improper disclosure. In particular, specific caution is required in processing information relating to the Company and the data of Employees, Collaborators and Third Parties, in compliance with the principles of privacy, protection of personality and corporate interest. All Employees and Collaborators of the Company are required to take the utmost care not to disclose confidential Company information, by any means adopted internally within the Company.

Staff involved in any capacity in the management of computer data on the Company server and the use of the software available, as well as those authorised to use Internet navigation tools, are required to use such computer equipment to the extent strictly necessary for the performance of the activities (administration, database management, etc.), files and work to be performed and developed.

The IT activity shall be carried out by each individual using his or her own credentials and refraining both from accessing IT systems by means of third-party credentials or authorisations and from providing any other individual with his or her personal credentials to access IT systems.

3.4 INSTITUTIONS AND COMMUNITIES

The Company identifies internally the persons required to have relations with the Public Administration.

These persons must operate with independence and integrity in cooperating with the Public Administration:

- It is prohibited to offer/promise sums of money, goods or other benefits to public officials and/or persons in charge of a public service;
- It is prohibited to produce false documents and/or documents containing false and/or altered information/data or to omit due information;
- It is prohibited to present false declarations and/or declarations containing false and/or altered information/data or to omit due information.

The Company believes that it is important to develop a relationship with the main players active at local level and beyond, in the social, cultural, or environmental fields or operating for the common good.

3.5 PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

The Company bases its activities on the ideals of legality and transparency and condemns all possible forms of unlawful competition, fraud, counterfeiting or usurpation of industrial property rights, calling on all those who work in the interest of the Company to comply with the existing legislation, protecting industrial and intellectual property rights.

3.6 PROHIBITION OF OPERATIONS CONDUCTED FOR MONEY LAUNDERING AND SELF-MONEY LAUNDERING

The Company, also through the banks with which it has business relations, ensures proper conduct that complies with anti-money laundering regulations and rejects practices that are contrary to legality in business operations.

3.7 DISSEMINATION AND COMMUNICATION

This Code is brought to the attention of all those to whom it is addressed by means of appropriate dissemination activities, aimed at ensuring that the ethical principles expressed herein are adopted by all those who work in the name and on behalf of the Company and, more generally, by all those who contribute to the Company's mission. This Code is published on the Company website. In order to ensure proper understanding, the Management implements a communication plan aimed at fostering awareness of the principles and rules contained therein.

3.8 RELATIONS WITH CUSTOMERS

The company follows the principles of best practice with a firm policy and commitment at all times to provide clients and all interested parties with accurate, responsible, and professional advice, ensuring their best interests are always considered in accordance with Industry Standards and compliance.

The After-Sales verification and contract review system in place for Customers ensures that information is provided through constant and timely communication, with clear roles and responsibilities.

3.9 CUSTOMER SATISFACTION

Sassi Lift Systems place The Customer and Customer satisfaction at the very heart of its activities, making sure to constantly ensure professionalism in the services and products offered. The Company, in its relations with Customers, strives to meet three basic principles: fairness, effectiveness and quality. The Company is also committed to fostering interaction with Customers through the rapid handling and resolution of requests by means of our ISO 9001.

3.10 RELATIONS WITH SUPPLIERS

Relations with Suppliers are based on the principles of honesty, fairness, transparency and economic balance. The ethos of Sassi Lift Systems is to ensure continuous collaboration over time that also promotes the environmental, social and economic sustainability of mutual activities with all interested parties.