

Environment, Social and Governance

SPEA Code of Conduct



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Revision history

Version	Date	Comments
5	06.02.2023	Par. 1.3 upgraded
4	04.10.2022	Integration with Code of Ethics
3	24.02.2021	Alignment with new version of RBA Code
2	30.09.2020	Alignment with RBA Code
1	18.06.2016	First issue (EICC Code)

Introduction

Reasons for a Code of Conduct

The purpose of this Code is to define and describe the principles that SPEA and all its employees must follow every day, with responsible conduct in both their relations and those established with partners, acting in full compliance with current legislation.

Recipients of the Code

This Code applies to all owners of SPEA S.P.A., to all full and part-time employees, to all temporary collaborators and to all those persons and businesses that act in the name and on behalf of SPEA, wherever they are in the world.

For the purposes of this Code of Conduct, the name “SPEA” means SPEA S.P.A. and all its organizations abroad.

Code of Conduct and Legislation

SPEA and its employees are required to comply with all laws and regulations in force. Such compliance must never fail or become compromised.

Compliance with current legislation is the cornerstone of this Code.

If laws are broken, businesses suffer adverse financial and reputational impacts, in addition to administrative and criminal consequences.

The Code of Conduct is the point of reference for identifying the legislative and regulatory infringements applicable to the activities of SPEA.

Obligations and responsibilities of personnel

Personnel must be aware that they represent SPEA by their conduct, both during working hours and when they act, or may be interpreted as acting, on behalf of the Company.

This awareness, regardless of the situation, inevitably affects external opinion about the Company, as well as internal attitudes and conduct.

SPEA expects all personnel to comply in full with the Code of Conduct and all current laws and regulations, to be vigilant and to report promptly any conduct not compliant with the spirit of the Code, regardless of whether or not a law has been broken.

All employees have a duty to:

- **Comply with corporate policies**
Know and, to the extent of their responsibilities, comply with the policies governing Ethics, Work, the Environment and Occupational Safety, the rules listed in this Code and the Corporate Regulations, conducting themselves in compliance with all current laws and, if necessary, requesting clarification from their direct Supervisor or the HR Office.
- **Make ethical decisions**
Apply the principles embodied in this Code, comply with the Corporate Regulations and current regulatory requirements and, as a consequence, decide how to act.
- **“Do the right thing”**
Ensuring the highest standards of propriety is a personal duty of each employee that cannot be delegated to others. In case of doubt, employees must always apply the principles described in this Code.
- **Disseminate good standards of conduct**
To the extent possible at a personal level, promote awareness about the contents of corporate policies and the Code among new recruits and collaborators, as well as among the third parties encountered in a professional capacity.

Infringements and penalties

Infringements of the rules established in this Code may result in disciplinary penalties, ranging from warnings to dismissal and, if appropriate, in penalties levied by the competent civil and criminal courts.

Principles

1 Working conditions

SPEA is committed to applying the legislative frameworks that govern relations between employers and employees in the countries in which it operates.

This commitment extends to all workers and seeks to ensure that their working conditions comply with national legal and regulatory instructions, and are consistent with the applicable international standards governing employment.

The principles applied are listed and described below.

1.1 Freely chosen employment

SPEA never uses or benefits from the use of forced or compulsory labor.

Each job is voluntary and workers are free to terminate the working relationship at any time, in compliance with national legal and regulatory instructions.

SPEA is committed to providing workers with an employment contract, written in a language understood by them, that describes the terms and conditions of their employment.

In the case of foreign migrant workers, their employment contracts must be provided before departure from their country of origin and cannot be changed on arrival, unless such changes represent an improvement in their working conditions.

Each worker is free to move about within the facilities managed by the Company, without any restrictions placed on entry into or exit from those facilities, except as necessary to manage emergencies or to ensure corporate security.

SPEA does not require workers to hand over their identity documents, passports or work permits, or to make payments as a condition for starting or maintaining the working relationship.

1.2 Young workers

SPEA never uses or benefits from the use of child labor.

Corporate personnel selection procedures prohibit the hiring of persons under the age of 18.

Interns (excluding those on educational programs) and apprentices are remunerated, even when not required by local regulations.

SPEA encourages and supports the provision of work experience opportunities to students, as part of training projects arranged with schools in compliance with current legislative requirements.

1.3 Working hours

SPEA respects the right of workers to work the hours established pursuant to the applicable legislation or collective agreements, if any. The working week must not exceed 60 hours, in compliance with the maximum limit established by the local law, except in emergency or unusual situations. In all cases, workers are assured of rest each week and annual vacations, as envisaged in the applicable national collective employment contract. Workers cannot be forced to work overtime, which must be voluntary.

1.4 Wages and benefits

The remuneration of workers and other benefits are recognized by SPEA in compliance with national legal and regulatory instructions, or the applicable collective agreements. Remuneration is paid directly to the workers concerned and is only subject to the deductions required by law. Overtime is paid in compliance with the applicable legislation and collective agreements. SPEA does not make withholdings as a disciplinary measure. When SPEA uses temporary or agency workers, the limits imposed by domestic legislation are respected.

1.5 Humane treatment

In order to ensure a working environment that is free from harassment and abuse, SPEA gives instructions to all personnel that prohibit conduct and treatment in the form of harassment, abuse, corporal punishment, physical or mental coercion, bullying, public humiliation, verbal aggression, threats or similar.

1.6 Prohibition of discrimination and harassment

SPEA respects the non-discrimination rights of all those with whom it has a working relationship, whether they are employees or contacts in the performance of its activities.

SPEA respects the dignity, privacy and rights of each employee and strives to avoid any episodes of discrimination or harassment in the workplace. Accordingly, employees must not discriminate on the basis of race, skin color, age, sex, sexual orientation, gender identity, religion, ethnicity or country of origin, pregnancy, union membership, veteran or marital status, social origin, political opinions or disabilities, or apply any type of verbal or physical harassment based on one of the above factors or for other reasons.

SPEA does not employ discriminatory practices when selecting, promoting or training personnel, or in the event of dismissal.

To the extent possible, SPEA strives to respect the religious practices of its employees.

Employees who believe that the above principles have not been respected are invited to report the situation in the manner specified in the whistleblowing procedure.

1.7 Freedom of association

SPEA respects the right of workers to establish or belong to organizations that promote their interests or engage in collective bargaining; the Company does not impede this via reprisals or threats, whether direct or indirect, that create an atmosphere of intimidation or fear; SPEA respects the freedom of opinion and expression of workers with regard to working conditions and practice, without fear of reprisals or intimidation.

2 Health and safety

SPEA guarantees to safeguard the health and safety of all personnel via the prevention of risks, training and involvement, the reduction of injuries and professional diseases, and the implementation of prevention campaigns in the interests of good health.

SPEA implements an occupational health and safety policy based on a high level of compliance with current regulations and other requirements formally accepted by the Company in this area.

The principles applied are listed and summarized below.

2.1 Occupational safety

SPEA analyses and monitors the health and safety risks generated by its activities, applying a hierarchy of controls that include elimination of the risk, the replacement of processes or materials, proper planning, the implementation of appropriate engineering and plant engineering measures, preventive maintenance and safety-related administrative procedures.

The Company provides the safety equipment, including personal protective devices, needed to prevent injuries, diseases and work-related accidents, as well as to manage emergencies.

SPEA requires personnel to adopt the full range of safe practices all the time, and ensure that the proper procedures are followed.

SPEA provides adequate training to all personnel on all topics relevant to occupational health and safety.

SPEA is committed to keeping updated the risk assessment for working or nursing mothers, assessing on a case-by-case basis the need to modify their duties.

2.2 Emergency preparedness

SPEA identifies, assesses and monitors potential emergency situations and cases, preparing suitable response procedures and training specialist operatives and all personnel, carrying out periodic drills and making available the necessary fire detectors and extinguishers.

The objective of SPEA is to minimize the risks to life, the environment and property.

2.3 Occupational injury and illness

SPEA records and examines all accidents and problems relating to health and safety, in order to minimize or eliminate them. The Company monitors constantly all the risks associated with its activities and those introduced by work carried out by third parties, or externally by its own personnel, in order to eliminate or reduce the possible causes of injuries and professional diseases.

The Company provides the safety equipment, including personal protective devices, needed to prevent injuries, diseases and work-related accidents.

SPEA encourages all personnel to report promptly the health and safety risks that come to their attention.

In order to safeguard the health of workers in compliance with current regulations, SPEA also carries out the required health monitoring activities. Medical examinations are arranged in accordance with a healthcare protocol established by the Company Doctor, who also visits the various working environments.

2.4 Industrial hygiene

SPEA identifies, assesses and monitors the exposure of workers to chemical, biological and physical agents. Appropriate measures are implemented to eliminate or control hazards. Where this is not possible, workers receive suitable training and are equipped with personal protective devices.

2.5 Physically demanding work

SPEA identifies, assesses and monitors the exposure of workers to hazards deriving from the manual or repetitive movement of materials, the lifting of heavy loads, standing for extended periods and, in general, other physically-challenging activities.

Personnel receive specific training in this area.

2.6 Machine safeguarding

SPEA makes safe machines and equipment available for production purposes, in compliance with the relevant legislation and international regulations. Assessments are made to identify any safety risks associated with the machines used for production or other purposes, in order to take the appropriate corrective actions. Machines and equipment are maintained with the frequency and criteria specified by their manufacturers.

2.7 Sanitation, food and canteens

SPEA makes suitable premises available to personnel for their work, including access to clean lavatories and drinking water. It is possible to heat and store food in the canteen facilities.

2.8 Health and safety communication

SPEA provides workers with adequate training and information about occupational health and safety, ensuring that they understand the hazards present in the workplace. Such information is posted on corporate noticeboards and is available on the corporate intranet. Personnel are trained when hired and then with the frequency established with reference to legal requirements and the risk assessment.

3 Environmental responsibilities

SPEA recognizes that its environmental responsibilities cannot be separated from the corporate decisions taken and activities carried out, which inevitably have an impact on the environment.

Accordingly, SPEA has adopted an Environment Management System pursuant to standard ISO 14001, in order to improve its environmental performance. This System is certified by a third-party organization.

This commitment to respect the environment and adopt solutions that safeguard the environment, as well as the health and safety of all, also translates into the constant provision of information and training to increase the awareness of personnel about environmental matters, with a particular focus on the impact of their work, thus promoting a greater sense of responsibility towards the environment.

The principles applied are listed and summarized below.

3.1 Compliance with legal requirements

SPEA determines, applies and monitors the mandatory legal requirements for the environmental factors applicable to the Company.

3.2 Environmental permits and reporting

In compliance with the applicable regulations, SPEA obtains, retains and keeps updated all the environmental authorizations needed for its activities, and complies with the related regulatory and reporting requirements.

3.3 Pollution prevention and resource reduction

In order to prevent pollution by improving its own environmental performance, SPEA uses practices, techniques, materials, products, services and sources of energy that avoid, reduce or keep under control the production, emission or discharge of any types of pollutant, or the generation of waste.

SPEA identifies the sources of pollution and waste associated with its activities and measures, records and reports on those sources, as well as on the reduction of pollution, waste and energy consumption.

The safeguarding of resources involves the responsible use of electricity, fuel, raw and processed materials, the ground and water, combining or, where possible, replacing non-renewable resources with renewable resources.

SPEA implements measures for the efficient use of resources that are designed to reduce the use of energy, water and other resources, considering the related best practices and other points of reference.

SPEA identifies the sources of energy, water and other resources used and measures, records and reports on any significant usage.

3.4 Hazardous substances

Hazardous substances or chemicals may represent a risk if released into the environment during their use, storage or disposal.

SPEA identifies systematically all hazardous waste and chemical substances, labeling, storing, handling and using them under safe conditions, using suitable trained personnel.

Such safe conditions are also adopted when recycling, reusing or disposing of hazardous substances.

In particular, SPEA avoids using chemical substances prohibited by local legislation and any undesirable chemical substances listed in international conventions.

3.5 Solid waste

SPEA identifies the sources that generate waste (whether hazardous or not) and implements suitable measures to guarantee its proper management, reduction, recycling and disposal.

3.6 Air emissions

The emission into the air of pollutants, such as volatile organic compounds, aerosols, the by-products of combustion, particles and ozone-depleting substances, may adversely affect the environment and the health of individuals.

SPEA identifies the sources of such emissions, monitors them periodically and records the data.

3.7 Materials restrictions

SPEA designs and develops products in compliance with the applicable legal and/or customer requirements that prohibit or limit specific substances that might be contained in its products. The products are labeled appropriately in order to promote proper end-of-life recovery and disposal.

3.8 Water management

Water contaminated by productive activities and black water from hygiene facilities may cause contamination if discharged directly into the drainage system, whether deliberately or accidentally.

SPEA adopts measures designed to reduce water consumption and prevent pollution, by checking and monitoring the various installations.

3.9 Energy consumption and greenhouse gas emissions

SPEA records and documents its energy consumption and greenhouse gas emissions in order to identify solutions that improve energy efficiency and reduce both consumption and GHG emissions.

4 Ethical principles

Since its foundation, SPEA adopts business practices supported by integrity, honesty, propriety and respect for all applicable laws. Business decisions are guided by these values and by the principles that SPEA is committed to respect throughout the world.

SPEA and its employees must act in full compliance with the laws and regulations in force in the countries where they work, without ever making compromises.

The principles applied are listed and summarized below.

4.1 Integrity, honesty, respect and legality in commercial activities

SPEA applies the highest ethical standards in all business transactions and decisions, adopting corporate practices based on integrity, honesty, propriety and respect for all applicable laws.

SPEA ensures that its personnel, representatives and collaborators are aware about the ethical significance of their actions, avoiding any pursuit of personal or corporate profit that fails to comply with current laws and the regulations set out herein.

SPEA takes great care to avoid granting unlawful advantages to customers or suppliers. SPEA also ensures that all activities are carried out transparently and can be traced to the accounting records and entries.

Respect and courtesy are fundamental in all relations with customers, suppliers and employees.

In application of the anti-corruption laws, SPEA identifies, implements and maintains practices that fight corruption, extortion and misappropriation. No such breaches of the law will be tolerated.

4.2 No improper advantage

SPEA and its employees must never, directly or via intermediaries, offer or promise personal or unlawful benefits of a financial or other nature, in order to obtain or retain business or other advantages for the Company.

Similarly, they must never accept such benefits in exchange for the preferential treatment of third parties.

Additionally, employees must avoid any conduct that, logically, might give rise to even the mere suspicion of improprieties.

In this regard, SPEA has adopted a specific policy for gifts.

Employees can only offer or accept simple meals and symbolic gifts (e.g. gadgets) appropriate to the circumstances. They must not accept or offer special meals or entertainment that might give the impression of wanting to influence commercial relations in an unlawful manner.

In case of doubt, employees must request advice from their Supervisor or from General Management.

Throughout the year and, in particular, during the Christmas holidays, employees must not offer to or accept from third parties any gifts of the following types, regardless of their value:

- travel
- tangible assets
- money
- financial loans
- loans of fungible assets or real estate
- bribes
- economic benefits of any kind

4.3 Disclosure of information

SPEA is committed to carrying out all commercial transactions with the maximum transparency, in compliance with all laws and regulations in force.

All information about the activities of the Company, its results, its organization and its financial situation is made available in a fully transparent manner, in compliance with all laws and regulations in force.

4.4 Intellectual property

In compliance with current legislation, SPEA respects the intellectual property rights of customers and suppliers, including over the information provided by them, adopting practices that safeguard such rights when transferring technologies and know-how.

4.5 Confidentiality

SPEA protects the confidentiality of its own information and technologies and those of its customers and suppliers.

SPEA guarantees the maximum confidentiality of the information in its possession and avoids searching for private data, unless expressly and knowingly authorized by customers, suppliers or, in general, those that maintain working relations with SPEA. All in compliance with current legislation.

Accordingly, employees cannot disseminate such private data or allow its disclosure, unless this is required by law and specifically authorized by management. This obligation remains even after termination of the working relationship. In addition, employees must do everything possible to avoid the accidental disclosure of private data, paying particular attention when saving or transmitting such data.

4.6 Fair business, advertising and competition

SPEA conducts its activities in a manner consistent with the laws and regulations governing competition. All activities and advertising are founded on respect for propriety, in all its aspects.

Such criteria must be applied by each employee and translated into a promise of fairness and loyalty towards the Company.

4.7 Whistleblowing and non-retaliation

SPEA encourages employees to report any conduct that infringes this Code, or that is deemed illegal or not in conformity with the regulations. SPEA guarantees the confidentiality, anonymity and protection of those who act as informants.

In this regard, the Company has prepared a specific whistleblowing procedure that has been distributed to all personnel and made available on its website.

Infringements must be reported on a confidential basis. All reports will be verified appropriately.

SPEA prohibits all reprisals against employees who have reported perceived transgressions in good faith, while safeguarding at the same time the rights of reported persons.

4.8 Responsible sourcing of minerals

SPEA is committed to checking the source of the minerals used in its products, to using raw materials obtained from legal and sustainable sources, and to avoid purchasing “conflict minerals” that contribute to the financing of armed conflicts or the abuse of human rights.

4.9 Privacy

SPEA ensures and guarantees full respect for the privacy protection regulations.

The privacy of personnel, collaborators and customers is safeguarded by adopting standards that specify the information that the Company may request from them, as well as how it is processed and stored.

4.10 Conflicts of interest

If a conflict of interest arises, or employees expect that a situation may give rise to a conflict of interest, it must be reported to their Supervisor and/or the HR Office, so that the situation can be resolved immediately in a proper and transparent manner.

4.11 Family relationships

Relations by birth or marriage and the life partners of employees and collaborators can only be hired as employees or consultants on the basis of their specific skills, abilities and experience, avoiding as a general principle all direct or indirect hierarchical relationships.

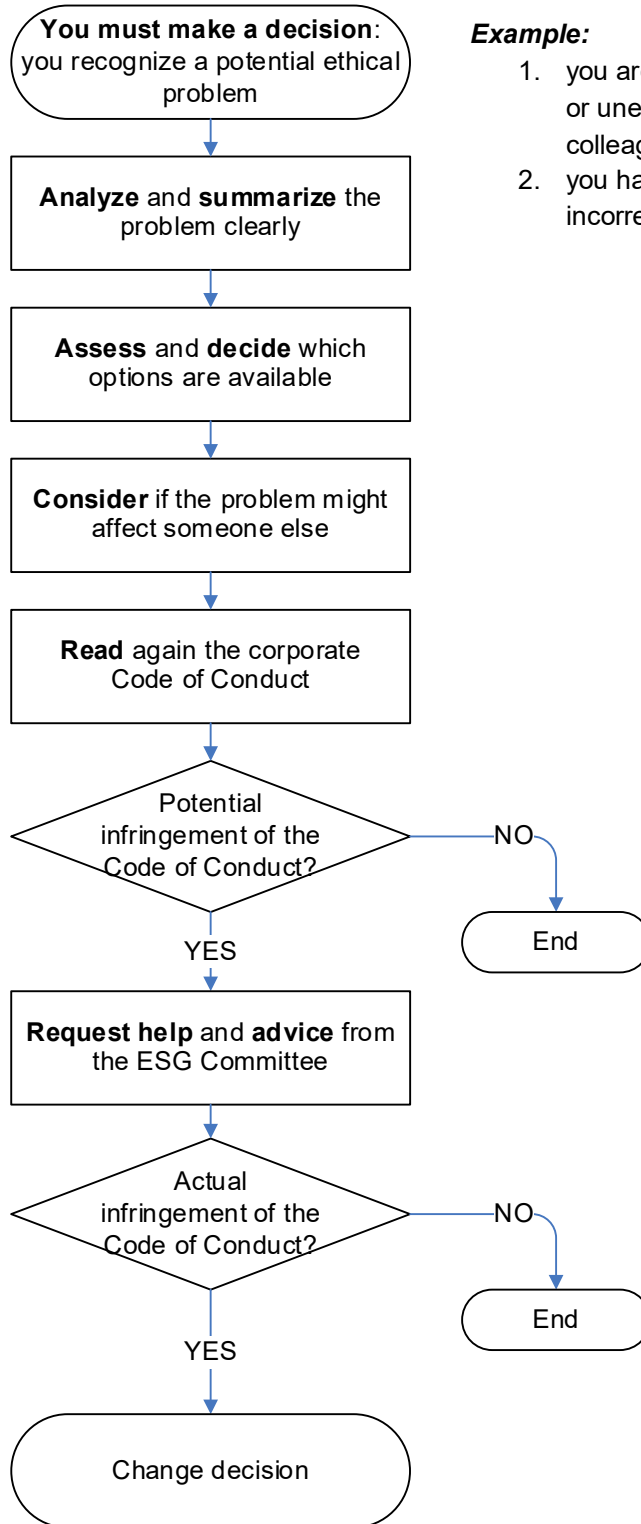
These principles apply to all aspects of the working relationship, including remuneration, promotions and bonuses, even if the relationship forms after joining the Company.

4.12 Protection of SPEA property

Employees must never let themselves become involved in unlawful conduct that might jeopardize the protection of corporate assets. Such conduct may be penalized not only as a disciplinary offense, but also by action in the competent courts.

4.13 Ethical decisions

Although the corporate Code of Conduct establishes guidelines for a specific set of circumstances, it is still possible that doubts may arise about the decisions to be made.



Example:

1. you are aware of potentially illegal or unethical conduct by a colleague, customer or supplier;
2. you have been asked to take incorrect action.

5 Management systems

Recognizing the importance and usefulness of management systems, SPEA has certified its Quality and Environment systems and has developed systems for Occupational Safety, Security, Ethics and Work, although these have not been certified.

The implementation and maintenance of these systems have facilitated corporate compliance with current legislation and regulations, as well as with the requirements of customers and this Code, promoting in addition the continuous improvement of performance.

Such systems must contain the elements described below.

5.1 Policies

A policy for all systems that highlights the commitment of SPEA to compliance and continuous improvement, signed by management and posted publicly on corporate premises in the local language.

5.2 Management accountability and responsibility

The management representatives responsible for implementing the management systems and related programs are clearly identified. They check periodically the status of each management system.

5.3 Legal and customer requirements

A specific process identifies, monitors and implements the laws and regulations in force and the requirements of both customers and this Code.

5.4 Risk assessment and risk management

A specific process identifies all legal and environmental compliance risks, those linked to occupational health and safety, and those relating to the working and ethical practices associated with the operations of SPEA. The importance of each risk is determined and suitable procedural and physical control measures are adopted, in order to contain the risks identified and guarantee compliance with the laws and regulations in force.

5.5 Improvement objectives

Written performance objectives and targets are documented and projects are devised to improve the social and environmental results of SPEA, with periodic assessment of the progress made towards achievement of the various objectives.

5.6 Training

Executives and workers participate in training programs designed to increase their awareness of occupational health and safety matters, the environment and working and ethical practices, as well as to comply with the laws and regulations in force.

5.7 Communication

A specific process communicates clear and precise information to workers, suppliers and customers about the policies, practices, expectations and results of SPEA in the areas of social and environmental responsibility.

5.8 Worker participation

Specific processes assess how well employees understand the practices and conditions envisaged in this Code, considering any infringements, in order to obtain feedback and facilitate constant improvement. Workers are offered a secure process for making complaints and providing feedback, without fear of reprisals.

5.9 Audits

Periodic self-assessments are carried out to determine compliance with legal and regulatory requirements, the contents of this Code and the contractual clauses specified by customers in the areas of social and environmental responsibility.

5.10 Corrective actions

A specific process analyzes and corrects promptly any weaknesses identified during internal or external assessments, inspections, investigations and checks.

5.11 Documentation and records

Documents and registers are created and retained to guarantee regulatory compliance, the satisfaction of corporate requirements and appropriate confidentiality for privacy protection purposes.

5.12 Supplier responsibilities

A specific process communicates the requirements of the Code to suppliers and monitors their compliance with it.

6 References

The following documents were used to prepare this Code and may provide a useful source of additional information.

- RBA Code of Conduct
- Standard ISO 14001
- Standard ISO 26000
- Standard ISO 45001
- Standard ISO 9001
- Domestic laws on Workplace Safety and the Environment, RoHS, Industrial Property, Privacy
- Law on the reform of the financial markets and consumer protection (a.k.a. Dodd-Frank Act)
- OECD guidelines on due diligence
- OECD guidelines for multinational enterprises
- Universal declaration of human rights
- UN Convention against corruption
- SAI

The regulations mentioned in this section refer to the edition in force when this document was prepared, unless stated otherwise.