

Environment, Social and Governance

SPEA Code of Ethics and Conduct

This Code of Ethics and Conduct is to be considered an integral part of the Organization and Management Model adopted by SPEA S.P.A. pursuant to Legislative Decree 231/2001 and it is addressed to all employees and stakeholders of the company.



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Revision history

Version	Date	Comments
1	14.02.25	First Emission

Introduction

Premise

This Code of Ethics and Conduct (hereinafter “Code”), adopted by SPEA S.p.A. (hereinafter “SPEA”), represents the fundamental reference for defining the principles and values that guide the Company in carrying out its business activities and in managing relationships with internal and external stakeholders.

SPEA, a leader in the design and production of test systems for semiconductors and electronic devices, is committed to operate with integrity, transparency and responsibility, promoting an ethical work environment that respects current regulations. Compliance with laws and regulations is an essential principle for the company and all its employees, and must never be compromised.

The Code is an official document, an integral part of the Organization, Management and Control Model adopted pursuant to Legislative Decree 231/2001, and was conceived with the aim of formalizing the essential rules of conduct to prevent the crimes covered by the legislation. It outlines the general principles, values and legal obligations that all parties involved in company activities must respect. Furthermore, it represents a reference tool for identifying any violations of the regulations applicable to SPEA's activities.

SPEA considers compliance with laws and regulations, the protection of workers' health and safety, environmental protection and integrity in relations with third parties to be strategic objectives of primary importance. In no case can the presumed usefulness for the Company justify behaviors contrary to the principles and values expressed in this Code.

Scope of application

The Code applies to all parties involved, directly or indirectly, in SPEA's activities, including:

- Directors, managers and members of corporate bodies;
- Full-time and part-time employees;
- Temporary collaborators;
- Suppliers, consultants and commercial partners;
- Any other party operating in the name and on behalf of the Company, anywhere in the world.

These parties are required to know, accept and respect the principles and values contained in the Code by assuming the same commitments that SPEA assumes. Failure to adhere to or comply with the Code constitutes a breach of contract, with possible disciplinary consequences or termination of the relationship.

Purpose

The Code was conceived to:

- Define the principles and values that guide SPEA's work
- Establish behavioral standards for all Recipients, in order to ensure correct and transparent conduct
- Promote an ethical and responsible corporate culture and prevent the commission of crimes provided for by Legislative Decree 231/2001
- Strengthen the Company's trust and reputation among its stakeholders, ensuring relationships based on integrity and transparency.

SPEA is committed to keeping the Code updated, adapting it to any regulatory or organizational changes and to promoting a corporate culture focused on compliance with the law and ethical values.

Staff obligations and responsibilities

Staff must be aware that their behavior represents SPEA, not only during working hours, but also when they act or can be interpreted as acting on behalf of the Company.

This awareness, whatever the condition, inevitably reflects on the external consideration of the Company and on internal attitudes and behaviors.

SPEA also expects all parties involved not only to fully comply with the Code and all applicable laws and regulations, but also to be vigilant and promptly report behaviors that do not conform to the spirit of the document, regardless of whether a law is broken or not.

It is the duty of every employee to:

- Respect company policies
- Know and observe, to the extent of their competence, the policies on Ethics, Work, Environment, Safety at Work, the rules listed in this Code, the Company Regulations and behave in compliance with all applicable laws, asking for clarification, if necessary, from their Director or the Human Resources Office.
- Decide ethically
- Apply the principles of this Code, comply with the Company Regulations and what is required by current legislation, and then decide how to act.
- “Do the right thing”
- Ensuring the highest standards of correctness is the personal duty of every employee, which cannot be delegated to others. In cases of doubt, employees must always apply the principles illustrated in this Code.
- Disseminate good behavioral practices
- In accordance with your individual possibilities, promote knowledge of the contents of the policies and the Code with new hires and new collaborators, as well as with Third Parties with whom you come into contact for reasons related to your role.

Violation and sanctions

Please remember that any failure to comply with the provisions of this Code may result in disciplinary sanctions, from warning to dismissal, and, if applicable, also sanctions from the competent civil and criminal judicial authorities.

Principles

SPEA bases its activity on compliance with the laws, regulations and any other legal provisions in force in the territorial area in which they operate.

The criteria of honesty, impartiality, correctness, loyalty, transparency and mutual respect, which represent the basic criteria to which all corporate activity must conform, shape the relationships with and between all subjects who interact with the Company.

SPEA promotes respect for the physical, moral and cultural integrity of the person, avoids any discrimination based on age, sex, sexuality, state of health and physical integrity, race, nationality, religious and political beliefs.

Likewise, the activities and behaviors of the Recipients of this Code must be free from any kind of discrimination.

In the context of personnel selection - an activity conducted in compliance with equal opportunities and without any discrimination on the private sphere and opinions of the candidates - we operate in full transparency, avoiding favoritism and facilitation of any kind and inspiring our choice exclusively on criteria of professionalism and competence.

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.

When SPEA uses temporary or agency workers, the limits imposed by national legislation are respected.

1.5 Prohibition of discrimination and harassment and human 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.

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 and breaking down architectural barriers.

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.

1.6 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.

SPEA has therefore adopted a Workplace Safety Management System according to the ISO 45001 standard in order to improve its performance in terms of Health and Safety. The System is certified by a third-party body.

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 emission

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 Material Restriction

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.

All Recipients must act exclusively to pursue corporate objectives, in compliance with the regulations in force in the countries in which they operate and with contractual obligations, ensuring transparency, loyalty and mutual trust.

The principles applied are listed and summarized below.

4.1 Principles of loyalty and transparency

The activity of the Recipients of the Code of Ethics and Conduct must be aimed exclusively at pursuing the company's objectives.

The relationship between SPEA and the Recipients of the Code is based on loyalty, respect and mutual trust, also guaranteed by the commitment to fully comply with the obligations respectively assumed with the employment contract and with any other form of contractual relationship as well as the content of this Code.

4.2 Integrity, honesty, respect and legality in commercial and marketing 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.

All activities and advertising are based on the respect of criteria of correctness.

In application of anti-corruption laws, SPEA identifies, implements and maintains practices that combat corruption, extortion and embezzlement. None of these violations will be tolerated.

4.3 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

4.4 Conflicts of interest

The Recipients of the Code are required to avoid situations in which conflicts of interest may arise; they are also required to avoid situations in which personal interests may influence the impartiality and/or ethics of behavior and, lastly, they must refrain from taking personal advantage of business opportunities of which they have become aware by virtue of carrying out their duties.

In any case, the Recipients of the Code are required to communicate to their hierarchical superior the emergence of any situations of potential conflict of interest with the Company.

4.5 Privacy and data protection

All information and data in the possession of SPEA are processed in compliance with the current legislation on privacy protection and the Recipients of this Code are strictly prohibited from using and processing information and data in the possession of the company for personal purposes and, in any case, for purposes other than those permitted, as well as using information or news, acquired in the performance of their work duties for the Company for their own benefit or that of third parties.

4.6 Management of IT tools

SPEA computers and IT systems must be used exclusively as work tools, in compliance with the applicable legislation.

The Company identifies and adopts suitable systems to prevent the commission of computer crimes and to guarantee the correct use of the IT equipment provided to its employees and collaborators.

In particular, the Company condemns and combats all illegal conduct committed with the use of IT systems, such as, by way of example, the use and exchange of pornographic or child pornography material or unauthorized access to a computer or telematic system.

4.7 Intellectual property and copyright

SPEA, in accordance with current legislation and in accordance with the principles of fairness and competition, respects intellectual property rights such as, by way of example and not limited to, trademarks, patents and copyright and protection of information provided by customers and suppliers, adopting practices that protect such rights in the transfer of technologies and know-how and that may cause damage to third parties or lead to violations of the law in this area.

SPEA also uses IT systems in full compliance with copyright legislation, prohibiting the acquisition, in any way it may occur, of programs, operational applications and any other IT component in the absence of the required licenses.

4.8 Relations with the Public Administration and with the Judicial Authority

The Recipients of the Code act with the Public Administration and with all supervisory and legal authorities in compliance with the regulations in force in the country in which they operate, ensuring full transparency in communications and in compliance with the principles of legality.

It is absolutely forbidden to promise, offer or deliver to public officials, directly or indirectly, money, goods or any other benefit, as well as to seek or establish personal relationships of favor, influence or interference with them.

It is absolutely forbidden to exploit or boast of existing or alleged relationships with public officials or public service officers to obtain an advantage of any kind.

More generally, it is absolutely forbidden to interfere in any way and with any means in the free and autonomous decisions of public officials or public service officers or, in any case, public employees.

The relationships between SPEA and the judicial authorities, supervisory authorities, law enforcement agencies and any public official or public service representative who holds inspection and/or investigative powers are based on principles of loyal collaboration, correctness, transparency and completeness, truthfulness and verifiability of the information provided.

The Recipients of this Code must not hinder in any way, including by omitting the required communications, the exercise of the functions of the aforementioned Authorities and the correct administration of justice.

4.9 Accounting management and preparation of the balance sheet

SPEA adopts principles of correctness, transparency and verifiability in accounting management and in the preparation of the financial statements and any document in which the economic, patrimonial and financial elements of the Company are exposed, ensuring full compliance with industry regulations.

Those who, in any capacity and in any way, are involved in the preparation of the financial statements, accounting records and/or other similar documents, are required to ensure the completeness, truthfulness and clarity of the information provided, as well as the accuracy of the data and processing carried out, operating prudential criteria, applying the most specific accounting techniques and in any case with the diligence required of experts in the sector.

Any behavior aimed at preventing or hindering the performance of the control or auditing activities attributed to the members and corporate bodies towards whom maximum collaboration and transparency are guaranteed is prohibited.

The Company condemns and prohibits any form of receiving, money laundering, self-laundering and use of money, goods or utilities of illicit origin.

Therefore, it is not permitted to carry out financial, corporate and credit operations in violation of the law and/or company procedures.

It is mandatory, before establishing business relationships with commercial counterparties of any kind, to proceed with the verification of the available information in order to ascertain the respectability and legitimacy of their activity.

4.10 Reporting and prohibition of retaliation

SPEA encourages employees to report any behavior that violates this Code, that is deemed illegal or does not comply with the regulations. SPEA guarantees the confidentiality, anonymity and protection of those who act as whistleblowers.

To this end, it has drawn up, distributed to all staff and made available through its website a specific Whistleblowing procedure.

Transgressions must be reported confidentially. All reports will be adequately verified.

SPEA prohibits any retaliation against any employee who has reported in good faith any transgressions, while protecting the rights of the persons reported.

4.11 Responsible Sourcing of Minerals

SPEA is committed to verifying the origin of the minerals used in its products, to using raw materials of legal and sustainable origin and not to purchase "conflict minerals" that contribute to financing armed conflicts and to the abuse of human rights.

4.12 Kinship relationships

Relatives, in-laws and partners of SPEA employees and collaborators may be hired as employees or consultants only on the basis of specific skills, abilities and experience, avoiding, in principle, any direct or indirect hierarchical relationship.

These principles apply to all aspects of the employment relationship, including salaries, promotions and bonuses, even if the relationship arises after the employee has joined the company.

4.13 Protection of SPEA property

Employees must never engage in illicit behavior that compromises the protection of company assets and the image and reputation of the company. Such behavior may be sanctioned not only in disciplinary proceedings, but also in the competent judicial bodies.

5 Management system

SPEA riconoscendo l'importanza e l'utilità dei sistemi di gestione, ha certificato i suoi sistemi Qualità, Ambiente e Sicurezza sul Lavoro e ha sviluppato, pur non certificandoli, i sistemi per la Security, Etica e Lavoro e ritiene opportuno che i propri fornitori, ove applicabile, attuino e mantengano sistemi di gestione che agevolino il rispetto della legislazione e normativa vigenti, dei requisiti dei clienti e del presente codice, e favoriscano il miglioramento continuo delle prestazioni.

L'attuazione e il mantenimento di tali sistemi, ha agevolato il rispetto della legislazione e normativa vigenti, dei requisiti dei clienti e del presente codice; ha favorito, inoltre, il miglioramento continuo delle prestazioni.

Recognizing the importance and usefulness of management systems, SPEA has certified its Quality, Environment and Occupational Safety systems and has developed systems for 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 Policy

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 Audit

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.

The Recipients of the Code agree that SPEA or third parties designated by SPEA may periodically visit and evaluate their corporate facilities and activities.

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
- Social Accountability International (SAI)
- Legislative Decree 231/2001

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