

# Ethical Code of Spanesi Group

Rev. 01

---

## **BUSINESS PARTNER CODE OF ETHICS**

### **(Spanesi Group Customers and Suppliers)**

#### **1. INTRODUCTION AND SCOPE**

The Spanesi Group considers the establishment of a network based on long-lasting and mutually satisfactory relations with its business partners a strategic objective and a source of competitive success.

With this document, the Group intends to share with its Suppliers and Customers (hereinafter collectively referred to as "Partners") the principles of social responsibility, integrity, and sustainability that guide its activities.

Compliance with these principles is an essential condition for establishing and maintaining business relations with the Spanesi Group.

#### **2. BUSINESS INTEGRITY**

The Spanesi Group operates in strict compliance with current laws, professional ethics, and internal regulations. Partners are required to align with these standards:

- **Anti-Corruption:** Spanesi does not tolerate any form of corruption, extortion, or misappropriation. Partners commit not to offer or accept money, gifts, or benefits aimed at improperly influencing business decisions or obtaining undue advantages.
- **Anti-Money Laundering and Sanctions:** Partners must ensure the lawful origin of funds used in transactions with the Group and ensure compliance with national and international regulations regarding anti-money laundering and countering the financing of terrorism.
- **Conflict of Interest:** Business relations must be based on objective criteria. Partners must avoid situations where personal interests may conflict with those of the Group and promptly report any family ties or financial interests with Spanesi employees.
- **Fair Competition:** The Group promotes fair and sustainable competition. Partners must refrain from anti-competitive practices, cartel agreements, or derogatory behavior towards competitors.

#### **3. HUMAN RIGHTS AND WORKER PROTECTION**

Respect for human dignity is essential. In particular, Suppliers are required to:

- Strictly comply with national and international laws (e.g., ILO Conventions) and human rights.
- Not use nor tolerate the use of child, forced, or undeclared labor.
- Ensure a safe and healthy working environment, adopting measures to prevent accidents.
- Not discriminate against workers based on nationality, gender, religion, political opinion, or sexual orientation.
- Respect the right to decent remuneration and freedom of association.

#### 4. ENVIRONMENTAL SUSTAINABILITY

In line with the Group Policy for Environment and Climate, Spanesi asks its Partners to play an active role in environmental protection:

- **Supplier Commitment:** Minimize the impact of production activities through efficient use of natural resources, preference for renewable energy, and correct waste disposal. Suppliers are encouraged to monitor their greenhouse gas emissions to contribute to the Group's climate goals.
- “Suppliers are encouraged to measure and report their greenhouse gas emissions (Scope 1, Scope 2 and, where possible, Scope 3) on an annual basis, in order to promote transparency along the value chain and to support the Spanesi Group’s climate objectives. The Group reserves the right to progressively include such information within its supplier assessment and selection processes.”
- **Customer Commitment:** Use Spanesi technologies and products efficiently and responsibly, favoring material recycling and eco-sustainable behaviors where possible.

#### 5. CONFIDENTIALITY AND INTELLECTUAL PROPERTY

- **Confidentiality:** Partners commit to maintaining maximum confidentiality regarding Spanesi Group's technical, commercial, and strategic information they become aware of. Such information must not be disclosed to third parties without authorization nor used for purposes other than contractual ones.
- **Data Protection:** Personal data of employees, customers, and third parties must be treated in full compliance with privacy regulations (GDPR and local laws).

## 6. REPORTING VIOLATIONS (WHISTLEBLOWING)

Spanesi Group encourages transparency. If a Partner (Supplier or Customer) becomes aware of illicit behaviors, violations of this Code, or unethical requests by Group personnel, they are invited to report it.

Confidential Reporting Channel:

Reports can be sent, even anonymously, through the secure platform:

<https://private.mygovernance.it/mywhistleblowing/spanesi/03385>

- **Guarantees:** The Group ensures the confidentiality of the whistleblower's identity and does not tolerate any form of retaliation against them.
- **Note for Customers:** This channel is reserved exclusively for ethical or legal violations (e.g., corruption, fraud). For commercial complaints, technical assistance, or administrative issues, please use standard Customer Service channels.

## 7. MONITORING AND CONSEQUENCES

- **Right to Audit:** Spanesi Group reserves the right to verify compliance with this Code through requests for information, document audits, or inspections at Supplier premises.
- **Sanctions:** Failure to comply with the principles stated herein shall constitute a serious contractual breach. Spanesi Group reserves the right to apply sanctions up to the immediate termination of the contract and claim for damages.

---

### Declaration of Acceptance

The undersigned Partner declares to have read, understood, and fully accepted the contents of this Ethical Code.

Date: \_\_\_\_\_

Stamp and Signature: \_\_\_\_\_