



HUMAN RIGHTS POLICY

At Spesso Gaskets, we believe that respecting and promoting human rights is fundamental to the success and sustainability of our business. Guided by our core values and an unwavering commitment to integrity, quality, and excellence, we recognize our responsibility to operate not only in compliance with local and international laws and regulations but also in alignment with universal human rights principles.

Our commitment to human rights extends to all areas of our business: from the factory to the boardroom, from our supply chain to the communities we serve. We recognize that respecting human rights is a shared responsibility that requires the collaboration of all our stakeholders, including employees, customers, suppliers, and the communities in which we operate.

This Human Rights Policy reflects our dedication to fostering and continuously improving a workplace that promotes dignity, respect, and fairness for all individuals. It is also aligned with the principles of the United Nations Global Compact, the Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

At Spesso Gaskets, we understand that our success depends on the people and communities we engage with. Therefore, we are committed to building and maintaining relationships based on trust, transparency, and mutual respect, ensuring that our business conduct always upholds the highest ethical and moral standards.

Through this policy, Spesso Gaskets is dedicated to acting with responsibility and integrity, ensuring that human rights are respected and promoted in every aspect of our operations.

1. Fundamental principles

1.1 Commitment for dignity and respect: at Spesso Gaskets, dignity and respect are at the heart of our corporate ethics, as we recognize the fundamental importance of treating every individual with fairness and consideration. Our company is committed to fostering an inclusive work environment, free from discrimination, harassment, or any form of physical or psychological abuse. We respect diversity in all its forms and embrace individual differences as a source of enrichment and growth for our company. This commitment is reflected in our daily practices, our interactions with colleagues, partners, and suppliers, and in the broader community in which we operate. We are dedicated to upholding high standards of ethical and professional conduct, ensuring that all members of our team are treated with the respect they deserve.



1.2 Child labour: Spesso Gaskets recognizes children's human rights, including the right to education, the right to play, and the right to basic needs. The Company adheres to the International Labour Organization (ILO) definitions regarding minimum working age and hazardous work, ensuring compliance with children's rights, corporate principles, and applicable regulations. The Company implements the necessary measures and actions to identify, prevent, and address child labour issues that it may encounter, contribute to, or be linked to within the scope of its business relationships.

1.3 Diversity and inclusion: Spesso Gaskets deeply values diversity within its team and considers inclusion a fundamental strength for the company's success. We are committed to fostering a fair and inclusive work environment, where every employee is respected, valued, and given equal opportunities for professional growth and development. We recognize and celebrate the diverse perspectives and skills that each individual brings to our organization, regardless of ethnicity, gender, sexual orientation, age, disability, cultural or religious background. This commitment extends beyond our company, positively influencing our recruitment practices, business partnerships, and supplier relationships.

1.4 Women rights: We recognize and uphold women's rights in the workplace, committing to ensuring equal employment opportunities and a work environment free from discrimination and harassment.

1.5 Community and minority rights: Spesso Gaskets is committed to respecting and promoting the rights of all communities and minorities it engages with. We recognize the importance of building relationships based on mutual respect, integrity, and transparency. Our company embraces an inclusive approach aimed at ensuring that no community or minority group is marginalized or disadvantaged as a result of our activities.

2. Equal and ethic work

2.1 Policy against modern slavery: Spesso Gaskets is firmly committed to combating modern slavery, servitude, forced labor, and human trafficking in all its forms. We recognize our responsibility to ensure that our business operations and supply chains remain free from these unacceptable practices. Spesso Gaskets is dedicated to upholding high ethical standards, promoting transparency, and collaborating with suppliers, customers, and other stakeholders to strengthen human rights protection practices across the entire value chain. Any suspected case of modern slavery within the company's operations or supply chain must be immediately reported, and Spesso Gaskets guarantees a swift and decisive response to address such issues.



2.2 Fair and ethical recruitment: Spesso Gaskets is committed to upholding the highest ethical standards in all its recruitment practices. We recognize that a fair, transparent, and non-discriminatory selection process is essential for attracting and retaining top talent, as well as for fostering an inclusive and respectful work environment. The company ensures that all recruitment policies and procedures comply with local and international labour and human rights laws. We are dedicated to preventing corruption and unfair practices at every stage of the recruitment process, ensuring that no candidate is subjected to recruitment fees or any deceptive or coercive practices. Furthermore, Spesso Gaskets is committed to regularly reviewing and improving its recruitment policies and procedures to ensure they align with the highest ethical standards. We encourage open dialogue and the reporting of any concerns related to recruitment practices, fostering an environment where everyone feels valued and respected.

2.3 Freedom of association: Spesso Gaskets recognizes and upholds workers' rights to unionize and engage in forms of collective representation, in compliance with local laws and international standards. The company is committed to ensuring a work environment where employees' rights to participate in collective bargaining are respected and promoted. Freedom of association is considered fundamental for fostering positive and constructive labour relations between employees and management. Spesso Gaskets is committed to refraining from interference, discrimination, or any form of retaliation against workers for their decision to join or not join a labour organization. The company actively promotes open and constructive dialogue with worker representatives and is dedicated to fair negotiations on issues related to employment, wages, workplace safety, and other working conditions. Spesso Gaskets also ensures that any disputes are resolved through honest and transparent processes, reinforcing mutual respect and collaboration.

2.4 Fair and safe working condition: Spesso Gaskets promotes a work culture based on mutual respect, integrity, and fairness. The company is committed to ensuring that employees receive fair compensation for their work and that working hours do not exceed the limits set by local regulations and international conventions. Furthermore, Spesso Gaskets strives to create an inclusive and discrimination-free work environment, where every employee has equal opportunities for growth and professional development. The company encourages open dialogue and communication between workers and management as a means to address and resolve any concerns related to working conditions.



3. Health, Safety and Environment

3.1 Occupational Health and Safety: Spesso Gaskets recognizes the fundamental importance of health and safety in the workplace and is committed to ensuring a safe and healthy work environment for all its employees, customers, and suppliers. The company implements strict standards for the prevention of injuries and occupational illnesses, in compliance with local and international laws as well as industry best practices. We promote a safety culture based on continuous training, awareness, and active worker involvement, ensuring that all employees are informed about potential risks and preventive measures. Spesso Gaskets is committed to maintaining an effective Occupational Health and Safety Management System, designed to identify, assess, and mitigate risks, while fostering the continuous improvement of working conditions.

3.2 Environmental impacts: Spesso Gaskets recognizes the importance of preserving the natural environment in all its forms and is committed to assessing and reducing its environmental impact, particularly regarding air emissions, land use, and water resources. The company is dedicated to promoting a culture of sustainable business management, both internally and externally, by encouraging suppliers and partners to uphold the principles outlined in its Supplier Code of Conduct.

4. Privacy, Data protection and Information Security

4.1 Privacy and Personal data protection: Spesso Gaskets recognizes the fundamental importance of privacy and the protection of personal data for employees, customers, and business partners. The company is committed to respecting individual privacy and safeguarding personal data from unauthorized access, misuse, disclosure, alteration, or destruction. Spesso Gaskets' data protection policies and procedures are designed to ensure compliance with relevant local and international laws and regulations, including the European Union's General Data Protection Regulation (GDPR). The company actively promotes a culture of privacy, recognizing the protection of personal information as an essential component of trust and corporate integrity.

4.2 Workplace safety: To ensure the safety of personnel, facilities, and intellectual property, Spesso Gaskets relies on surveillance and security service providers that operate according to the highest quality standards and in full compliance with applicable regulations. Additionally, these services adhere to the TISAX certification, which Spesso Gaskets has obtained.



5. Governance

5.1 Opposition to unacceptable practices: Spesso Gaskets is committed to eliminating all forms of unacceptable practices within the company and its supply chain, including corruption, money laundering, fraud, and other illegal activities. The company upholds a zero-tolerance policy towards such behavior and ensures that all employees and business partners are fully aware of their responsibilities in this regard.

Torino 02/09/2024

Managing Director

Gabriele Orsucci

A handwritten signature in black ink, appearing to read "Gabriele Orsucci", is written over the printed name. The signature is stylized and includes a large, sweeping flourish that extends to the right.