



**IDENTIFICATION**  
DSG-19-QAES

**TITLE**  
**POLITICA PER QUALITÀ, SALUTE E SICUREZZA, AMBIENTALE, ENERGETICA, DIRITTI UMANI, ARTICOLI DI SICUREZZA, CODICE ETICO, CODICE DI CONDOTTA, ORGANIGRAMMA**  
Documento del Sistema di Gestione

**REVIEW STATUS**

**First issue**

Revision 01 dated  
01/01/2022

**Current issue**

Revision 05 del 05/03/2024

**DOCUMENT VALIDATIONS**

Preparation /  
Issue

Surname name Chiodini Alberto  
Role Quality Assurance  
Signature [Signature]

Verification /  
Approval

Surname name Jimmy Martinelli  
Role Plant manager  
Signature [Signature]

The direction

Surname name Claudius Sora  
Role Direction  
Signature [Signature]

**COPY DISTRIBUTION**

Name surname \_\_\_\_\_ Date \_\_\_\_\_  
Role \_\_\_\_\_ Signatur  
e \_\_\_\_\_

Made available on the computer network 01/01/2022

**RESPONSIBILITY**

Main Manager: All employees, collaborators, customers and suppliers of NIRA SpA UNIPERSONALE

Other managers involved: \_\_\_\_\_

**0. INDEX**

	<i>Page</i>
1. CHANGE HISTORY.....	1
2. FIELD OF APPLICATION OF MANAGEMENT SYSTEMS.....	2
3. QUALITY POLICY .....	3
4. HEALTH AND SAFETY POLICY .....	4
5. ENVIRONMENTAL POLICY .....	5
6. ENERGY POLICY.....	6
7. HUMAN RIGHTS POLICY .....	7
8. SAFETY ITEMS POLICY .....	9
9. ETHICAL CODE .....	10
10. CODE OF CONDUCT.....	12

**1. CHANGE HISTORY**

<i>Rev. no.</i>	<i>Date Rev.</i>	<i>Change description</i>	<i>Change Manager</i>
01	01/01/2022	First issue	Alberto Chiodini
02	01/01/2023	Added Human Rights Policy, added updated Organization Chart	Alberto Chiodini
03	08/03/2023	Added Scope	Alberto Chiodini
04	01/07/2023	Updated Organization Charts	Alberto Chiodini
05	05/03/2024	Exclusion Organizational Chart	Alberto Chiodini



## 2. FIELD OF APPLICATION OF MANAGEMENT SYSTEMS

The purpose of the following document is to define and circumscribe the field of application of NIRA SpA UNIPERSONALE (hence NIRA SpA) also defining the system resources following the continuous improvement approach.

NIRA SpA is a company that has been operating since 1967 in the sector of the production of rubber and co-moulded products.

The range of products is vast and has expanded from time to time, satisfying the different requests of customers. In addition to the article in rubber only, NIRA SpA is able to propose multi-component solutions made by co-molding or assembly with metals or plastic materials.

NIRA SpA is among the market leaders at European level, producing and distributing products that find application in the automotive, power tools, household appliances, HVAC, plumbing, construction, industrial, tyre, off-road vehicles and earthmoving sectors.

For Nira Spa the adoption of a quality management system compliant with the ISO 9001-2015 standard and with the standard for the automotive quality management system IATF 16949-2016 (and subsequent SIs) is considered strategic, as well as a ISO 14001 compliant environmental management system as well as an ISO 50001 compliant energy management system since it is believed that all these systems, interconnected with each other, can be the main tools to support the entire organization and all processes that compose it.

The Integrated Management System or Quality, Environmental and Energy Management System is hereinafter referred to as SG QAE.

For Nira SpA, the adoption of certifications compliant with international standards allows for the implementation of an approach based on:

- on the definition of objectives;
- compliance with customer requirements and applicable mandatory requirements ;
- on the planning of activities;
- on resource management;
- on the prevention of defects;
- on the identification of risks;
- on processes;
- on data.
- on the stability and improvement of processes ;
- on performance monitoring and evaluation;
- on continuous improvement;

NIRA Spa believes that a QAE SG certified according to the standards allows to:

- regularly supply products and services compliant with the requirements ;
- increase market shares and economic profits ;
- improve performance over time and increase customer satisfaction ;
- improve performance over time and increase employee satisfaction ;
- face risks and opportunities associated with context and objectives.

The NIRA SpA production consists of technical rubber items such as sleeves, bellows, membranes, flat gaskets, o-rings, washers, frames, pipes, items made according to the customer's design/specification, and rubber-metal and rubber-plastic co-molded always made according to the customer's drawing/specification.

NIRA SpA designs and manufactures the steel molds necessary for the production of rubber products.

Determination of the Field of Application of the SG QAE

NIRA SpA after considering:

- external and internal factors;
- compliance obligations;
- its organizational units, functions and physical boundaries;
- its activities, products and services;
- one's authority and ability to exercise control and influence;

has determined for the factory and registered office located in Via Camozzi 16 - 24060 Villongo (BG), the following Scope **of the SG QAE**:

**Production of industrial rubber articles, rubber-metal and rubber-plastic co-molded articles, through processes of: moulding, finishing, sorting, packaging and shipping for the automotive and non-automotive industries.**

Villongo, 06/30/2022



### 3. QUALITY POLICY

The primary purpose of NIRA SpA UNIPERSONALE (hence NIRA SpA) has always been the full satisfaction of Customers, through the supply of products and services suited to their needs, of its Employees and Shareholders.

The Management of Nira SpA believes that the adoption of a Quality Management System compliant with the ISO 9001:2015 and IATF 16949:2016 standards is a fundamental tool for achieving its objectives and implementing the following principles:

- Operate through a management set for processes;
- Improve your organization by defining responsibilities and authorities to ensure the effectiveness of processes;
- Ensure the necessary resources to allow the maintenance of an effective and efficient quality system and the adequate management of the related processes, the monitoring of which must be guaranteed through appropriate indicators and constant checks;
- Satisfy all the needs and requirements (explicit and implicit) requested by the Customer regarding product conformity, cost, punctuality of deliveries, compliance with technical specifications and any other aspect that may have an impact on your satisfaction;
- Ensure the best possible level of assistance to the Customer (with a pro-active approach), as regards technical support (also on site), product development, resolution of logistical and quality complaints and any other problems that may be encountered;
- Promote a collaborative relationship with Suppliers by fostering a "partnership" aimed at obtaining mutual benefit and the highest level of quality of supplies;
- Promote awareness, updating, training and empowerment of its personnel at all company levels;
- Increase economic competitiveness through the implementation of reviews of production processes and/or the use of new technologies that make it possible to constantly improve the quality levels required by customers at the best price
- Constantly improve production efficiency, using, with maximum efficiency, all available resources for the conduct of company activities;
- Minimize the costs of "non-quality" by preventing product defects and risks (for the customer, the environment and safety) deriving from non-conforming products;
- Ensure the continuous improvement of company performance in the economic, production, commercial and technological fields.

The Management of Nira SpA believes that the principles established in this Policy can only be pursued through the active participation of all personnel.

Villongo, 09/30/2019



## 4. HEALTH AND SAFETY POLICY

NIRA SpA UNIPERSONALE (hence NIRA SpA) considers it essential to safeguard the health and safety of its Workers, who are the basis for ensuring the Company continuous growth and a level of excellence in its sector of expertise.

The Management of Nira SpA therefore undertakes to develop its corporate mission by continuously improving its safety policies for the protection of Workers' health.

The field of application of Nira SpA is:

**Production of industrial rubber articles, rubber-metal and rubber-plastic co-molded articles, through processes of: moulding, finishing, sorting, packaging and shipping for the automotive and non-automotive industries.**

The fundamental objectives that Nira SpA has set itself are:

- commitment to comply with the applicable requirements established by the laws on health and safety;
- ensure complete compliance with the legal provisions concerning safety in the workplace in order to prevent injuries and accidents;
- examine its production processes, identifying areas at risk and for potential improvement and planning objectives and targets to be pursued, in order to prevent accidents, incidents and illnesses at work;
- minimize the risks induced by its activities as much as possible;
- ensure the efficiency and safety of the machinery used thanks to a system of periodic checks and maintenance;
- involvement of Personnel in sharing the company objectives set out in the aforementioned document;
- ensure that all Personnel receive adequate training in relation to their duties, the risks posed by such activities and on the use of the protective devices to be adopted;
- inform Workers of the risk to which they are exposed and of the measures and precautions to be taken to prevent accidents;
- develop safety plans and procedures in order to be able to manage emergency situations;
- train personnel on the behavior to adopt in the event of an emergency;
- ensure the presence and practicability of traffic and evacuation routes;
- ensure the availability and suitability of protective devices;
- ensure effective management for fire prevention, through proper maintenance of fire-fighting systems, training of emergency team members and compliance with applicable legal requirements;
- guarantee its Employees comfortable and ergonomic workstations;
- ensure proper management and handling of any chemicals used during the production process in order to reduce the risk of accidents.

The General Management considers the active participation of all personnel to be of fundamental importance in order to achieve the company objectives and with a view to continuous improvement.

Nira SpA also considers the development of its Suppliers to be of primary importance, making them aware, in addition to the qualitative aspects, also regarding compliance with the legal requirements regarding the environment, health and safety.

Villongo, 22 August 2022



## 5. ENVIRONMENTAL POLICY

The environmental dimension together with the economic and social dimensions represent the three pillars of the Sustainable Development. The Management of NIRA SpA UNIPERSONALE (hereafter only NIRA SpA), aware of the impact that its activity can have on the environment, with the aim of preserving it and in line with the principles of sustainable development, undertakes to activate a System of Environmental Management (EMS) compliant with the UNI EN ISO 14001:2015 standard.

The field of application of Nira SpA is:

**Production of industrial rubber articles, rubber-metal and rubber-plastic co-molded articles, through processes of: moulding, finishing, sorting, packaging and shipping for the automotive and non-automotive industries.**

Nira SpA, in carrying out its activities, is careful to minimize environmental impacts through investments, training and the application of the environmental management system (EMS).

Nira SpA undertakes to protect the environment, comply with applicable compliance obligations and to increase its environmental performance through continuous improvement of the EMS.

Nira SpA intends to carry out its activities by pursuing the following objectives:

- Reduce and eliminate, when possible, environmental aspects that have a significant impact on the environment
- Reducing the consumption of water, energy and raw materials;
- Reduce and, where possible, eliminate the production of waste;
- Producing clean energy resources to be used in normal production activity;
- Involve your Suppliers and Contractors in your environmental commitment.

To achieve the set objectives, Nira SpA intends to:

- Actively and constantly monitor the consumption of resources and plan interventions aimed at reducing them waste;
- Plant and manage on its site technologies suitable for the production of renewable energies;
- Analyzing products and processes in advance in order to minimize their environmental impact;
- Monitor and maintain efficient water discharges, emission points into the atmosphere, soil pollution and subsoil and acoustic climate, with a view to continuous improvement of its environmental performance;
- Use, as far as possible, recyclable materials and seek alternative forms of use for scraps of production that can no longer be exploited in the normal production cycle;
- Systematically apply differentiated waste collection;  
Carry out continuous training and awareness-raising activities for all personnel, with particular reference to the management of emergencies, the reduction of resource consumption and environmental protection;
- Carry out training activities and awareness meetings for Suppliers, preferably by choosing partners capable of ensuring services that are as compliant as possible with the objectives of the EMS;
- Entrust the services to waste transporters and final destination plants that guarantee means of transport suitable for the purpose of reducing emissions into the atmosphere and which favor recovery activities instead of disposal;
- Adopt a responsible chemical management policy through adequate protection of Workers and through proper care in shipment, use, storage and handling disposal of the same;
- Communicate and transmit the principles of environmental sustainability to Suppliers, Customers and Parties Interested parties relevant to the EMS;
- Whenever possible, prevent environmental emergencies, such as fires and/or accidental spills.

Personnel must feel responsible for implementing the principles and achieving the indicated objectives in this document making it an integral part of all its activities.

The Management defines the objectives with the task of monitoring and periodically reviewing them to evaluate the results achieved and to identify new ones, in line with the principle of continuous improvement.

The management function of the Environmental Management System (EMS) is entrusted to the Head of the Environmental Management System (RSGA) who coordinates the actions necessary for the development of the System itself, verifies its effectiveness, proposes continuous improvement actions to increase environmental performance and provides support for their implementation.

This "Environmental Policy" is communicated to Nira SpA personnel by posting it on the bulletin boards present in the various departments and to the Interested Parties by means of publication on the company website.

Villongo, 01/29/2021



## 6. ENERGY POLICY

To maintain competitiveness, consolidate the corporate image and promote environmental and economic sustainability, NIRA SpA UNIPERSONALE (hereafter referred to as NIRA SpA) considers it of fundamental importance to make use of a strategy based on the improvement of energy performance.

as a result, the Management has decided to implement an Energy Management System highlighting its commitment to:

- strengthen the awareness of the Management itself and of all the collaborators regarding the importance of the efficient and correct use of the energy resource;
- comply with its compliance obligations, consisting of legal requirements and other commitments signed in the energy field;
- promote the rational use of all energy sources, minimizing waste and the impact on consumption associated with its processes and products;
- to incentivize the procurement of energy efficient products and services with a lower impact on the environment, considering energy consumption as a key factor in the design of new processes and installations;
- seek continuous improvement of the energy management system and energy performance;
- prevent pollution and minimize the environmental impact;
- involve other interested parties such as suppliers, collaborators and customers themselves so that they support the achievement of common welfare objectives with their work;
- make use of adequate energy supplies at the most advantageous prices;
- establish objectives congruent with the commitments set forth herein in order to be able to measure the level of implementation;
- guarantee the availability of information and human, economic and technological resources suitable for achieving the set goals;
- constantly monitor energy performance in order to build and improve indicators useful for projects and initiate effective corrective actions to deal with non-conformities and deviations from objectives.

The contents of the Company Policy are communicated and shared internally with the people who operate under the control of our organization so that everyone, according to their own operations, contributes to implementing the fundamental principles in the common interest.

The document is made available to interested parties by publication on the company website and the System Manager is authorized to provide a copy to anyone who requests it.

The content of this Policy is subject to periodic re-evaluation to ensure that it continues to be representative of the will of Management and can guide company development.

Villongo, 01/06/2022





## 7. HUMAN RIGHTS POLICY

### Scope

Respect for internationally recognized human rights is a fundamental value of NIRA SPA UNIPERSONALE (hence only NIRA). Nira recognizes that all human rights are universal, indivisible, interdependent, interrelated, inalienable, equal and non-discriminatory.

This human rights policy ("Policy") establishes NIRA's commitment to all of its employees and its suppliers, contractors and subcontractors at any level, business partners and other entities, external stakeholders or individuals in our chain of value ("Partners"). NIRA is committed to ensuring that people are treated with dignity and respect in all of our operations and to working with our Partners to ensure that our commitments in this Policy are met. NIRA's Policy covers international human rights, labor rights, child labour, indigenous peoples' rights and the right to a healthy and sustainable environment.

### Scope

This Policy applies to NIRA and NIRA subsidiaries and affiliates in which NIRA has a controlling interest or management responsibility and to all relevant directors, employees and operational stakeholders worldwide, including part-time employees, temporary and contracted, both in the context of the workplace and during external work-related events (e.g. meetings and social events). This Policy establishes a board-wide commitment to promote and respect human rights throughout NIRA's operations and value chain.

If NIRA does not have a controlling interest or management responsibility in the subsidiary, joint venture, affiliate or distributor, NIRA will take reasonable steps to ensure that the entity complies with this Policy.

NIRA will also take appropriate steps to ensure that our Partners who are located in high-risk locations and/or who may be more exposed to human rights risks due to the nature of the industry they operate in, take relevant steps to mitigate those risks .

### Our human rights policy and commitments

Our Policy and commitments consist of the following core areas: International Human Rights, Labor Rights, Child Labour, Indigenous Peoples' Rights and the Right to a Healthy and Sustainable Environment.

### Human rights

NIRA respects human rights and will not knowingly be complicit in human rights violations either in its own operations or in the supply chain. Respect for human rights is defined by the United Nations Guiding Principles on Business and Human Rights which are referenced in avoiding the violation of the rights of others and addressing adverse human rights impacts. NIRA is committed to preventing, mitigating and remedying any human rights abuses that are related to its business activities, operations, products and services.

### Labor rights

#### Forced labor and human trafficking

NIRA prohibits the use of all forms of forced labor and human trafficking in the making of NIRA products or services, including prison labor, bonded labor, bonded labor, military labor, modern forms of slavery and any human trafficking.

NIRA prohibits any complicity in all forms of forced labor and human trafficking. NIRA and its Partners will not use any form of forced labor or human trafficking. No employee shall be forced to work through force or intimidation of any form, or as a means of political coercion, as punishment for holding or expressing political opinions or based on race, sexual orientation, gender, age, ethnicity, creed, physical or mental disability social status or religion.

#### Freedom of association and bargaining

NIRA respects the rights of employees to join, form or not to join a labor organization or union that aligns with local labor laws without fear of retaliation, intimidation or harassment. NIRA is committed to an open and constructive dialogue with its employees and, if applicable, with their Representative.

### Diversity and inclusion

NIRA values diversity and inclusion within its operations and individual employees. NIRA will not discriminate on the basis of race, sex, color, national or social origin, ethnicity, religion, age, mental or physical disability, sexual orientation, gender identification or expression, political opinion, or any other status protected by applicable law.

NIRA does not tolerate the harassment or discrimination of individuals and provides equal opportunities for the purpose of eliminating discrimination. We are committed to providing and maintaining a workplace free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats.

### Health and safety in the workplace

NIRA recognizes occupational health and safety as a fundamental right of employees. NIRA is committed to providing a safe and healthy work environment for all of its employees. NIRA shall comply with all applicable health and safety laws and regulations, internal policies and requirements.

**Fair working hours, wages and benefits**

NIRA provides fair compensation to employees in relation to the industry and local labor market, and in accordance with the terms of applicable collective bargaining agreements. NIRA is committed to fully complying with applicable laws on wages, working hours, overtime and benefits.

**Child labor**

NIRA does not use child labor and undertakes not to establish or maintain employment relationships with Partners who use child labour. "Mild" means anyone under the age of fifteen, unless national or local law establishes a higher age for the completion of compulsory education or a minimum working age, in which case the higher age will apply in that jurisdiction. "Youth" means anyone under the age of eighteen. "Child labour" means any work performed by a minor or young person, unless it is considered acceptable under the ILO Minimum Age Convention, 1973 (C138).

**The right to a healthy and sustainable environment**

NIRA respects the right to a safe, clean, healthy and sustainable environment as a human right. NIRA recognizes the connection between human rights and the environment. NIRA seeks to meet environmental standards in its business activities, including its business relationships. We are committed to sourcing raw materials for making our products through suppliers who adopt sustainable practices, mitigate damage to the environment, and work with local communities, governments and other stakeholders to address environmental concerns.

**Where to go for assistance**

If you see or suspect any violation of the law, our Code of Conduct or our policies, or if you have questions about what to do, speak to your Manager. Each member of the team and NIRA is responsible for ensuring that the Code of Conduct is adhered to at all times and is obligated to raise any concerns or suspected violations.

If you become aware of any action that you believe is inconsistent with this policy, applicable law or NIRA's Code of Conduct, you should seek assistance.

NIRA will make reasonable efforts to ensure that your concerns are dealt with appropriately.

This Policy supports NIRA's compliance with human rights standards contained in the following international treaties:

- United Nations (UN) International Bill of Human Rights
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights

NIRA will comply with national laws and regulations in the countries where it operates. Where national laws and international human rights standards differ, NIRA will follow the strictest standards. In the event of a conflict, the company will abide by national laws and seek ways to respect international human rights.

Villongo, 01/02/2023





## 8. SAFETY ITEMS POLICY

The company policy of the safety items of NIRA SpA UNIPERSONALE (henceforth only NIRA SpA) aims to:

- To describe;
- To promote;
- Prepare for future activities;

the approach of Nira SpA towards the Security Articles.



This policy describes the activities and principles that govern Nira SpA's corporate management of Safety items.

The Management, the Plant Manager, the Department Managers promote product safety and give them priority so that safety-related activities receive the right attention, time and resources. We make responsibility for product safety clear and ensure people understand what they are responsible for.

Nira SpA and its employees comply with national regulations and international legal regulations, we produce safe products and provide after-sales service within a product safety process based on continuous improvement and continuity.

The activities we manage are:

- Ensure compliance with national and international standards, laws and regulations related to product safety,
- Establishment, management and continuous improvement of a system that will ensure product safety against risks harming human health, safety of life and property or resulting from incompatibility with safety standards,
- Implementation of relevant procedures and instructions and record keeping for continued effectiveness and continuity of product safety processes,
- Priority of product safety in all processes, including supply, co-design, production, storage, shipment, installation and service,
- Carrying out tests, checks and inspections necessary to ensure that our products are used safely by our consumers considering the misuse and environmental conditions,
- Implementation of technical refresher courses and behavioral skills, to increase awareness of product safety

Four principles govern our approach to product safety:

- **Product security level**

We manufacture our products to achieve a high level of safety consistent with their application, always ensuring that we meet or improve on relevant industry, legal, regulatory and business requirements. We evaluate possible causes and failure modes and implement controls to meet required security levels and reduce security risks as much as reasonably practicable.

- **Maintain and improve product safety**

We are committed to continuous improvement of product safety and actively engage in setting industry standards and best practices. We measure our performance and rigorously investigate and resolve security issues, systematically integrating the resulting learning into our practices and processes. Everyone is encouraged to report any product safety concerns.

- **Compliant product**

Robust quality is an essential element of product safety and by following our processes we ensure that our products and those of our suppliers meet their specifications. Nira SpA's target for PPM related to security items is 0.

- **Security awareness and expertise**

Everyone who works at Nira SpA shares responsibility for product safety and we must be aware of the safety implications of our actions. Training is provided so that our personnel understand the Nira SpA product safety policy and processes and can fulfill their collective and personal responsibility.

Villongo, 01/01/2022



## 9. ETHICAL CODE

The mission of NIRA SpA UNIPERSONALE (hence only NIRA SpA) has always been focused on company growth, the creation of added value and customer satisfaction through the supply of quality products and services in compliance with:

- the legitimate interests of the categories of subjects involved in company processes;
- practices of fairness and correctness in the management of the employment relationship;
- the rules on the health and safety of workers;
- the rules relating to respect for the environment;
- of the laws and provisions applicable to its various fields of activity.

This Code of Ethics and Conduct is a binding part for the achievement of the corporate mission.

Nira SpA, in carrying out its business activity, has always been committed to respecting the human rights of its workers and to guaranteeing that they are treated with dignity. It also requires all parties involved, internal and external, to adapt their conduct to the following guidelines:

### Centrality of the Person

Respect for the physical and moral integrity of the person is a primary interest to be protected.

It is necessary to avoid all forms of gender discrimination or discrimination based on age, on the basis of sexual orientation, disability or linked to religious orientation, ethnic origin, race, political orientation, trade union orientation, social conditions, language, physical characteristics, state of health, personal beliefs and anything that may contribute to not giving equal opportunities in the employment relationship.

It is necessary to combat all forms of annoyance and abuse in terms of bullying, harassment, threats, spite, sexual harassment and anything that can prevent the normal performance of one's work, in an atmosphere that should always be one of serenity, decency and respect.

Finally, it is necessary to aim for a constructive working commitment, involving all workers in relation to their relative skills, competences and availability.

### Honesty, Fairness and Transparency

Every action, operation and transaction carried out by every director, employee, collaborator and any other subject, operating inside and outside Nira SpA, must be inspired by the principles of honesty, correctness and transparency, eliminating any possible sort of conflict of interest that may arise between the existing parties.

In this regard, compliance with the laws and regulations in force, at all decision-making and executive levels, is an essential principle.

In particular, all the parties involved must never engage in behavior such as to imply corruption or the laundering of proceeds from criminal activities, in any form or manner.

In addition, it is forbidden for employees and other parties involved to offer or receive commercial gifts, gifts or other benefits that could constitute violations of laws or regulations or are in conflict with the relevant code of conduct, or could, if made public, constitute a detriment, even only in terms of image, towards Nira SpA. Any situation that could constitute or could generate a possible conflict of interest must be immediately reported to one's superior.

### Business ethics

All commercial activities implemented by Nira SpA are in accordance with the current Anti-Trust and Anti-Competition regulations. Nira SpA operates on the market according to the restrictions in force in terms of export or re-export of the goods produced and according to the trade restrictions which may involve certain countries, regions, companies, entities and/or persons.

All operations/transactions of a financial nature are carried out and recorded with the utmost transparency and their disclosure takes place in accordance with the provisions of the laws and regulations currently in force.

Nira SpA has also always sided against any type of counterfeiting that may be carried out against itself or against those of its Customers or Suppliers.

### Confidentiality

Nira SpA ensures the confidentiality of information and sensitive data in its possession and compliance with current legislation on personal data.

All the information available to Nira SpA is treated in compliance with the confidentiality and privacy of the interested parties.

Employees and other parties involved are therefore required not to disclose to third parties information regarding the technical, technological and commercial knowledge of Nira SpA, as well as other non-public information always relating to Nira SpA, except in cases where such information is requested by Laws or by other appropriately regulated provisions.

**Respect for workers' rights**

Nira SpA ensures the non-use of child labor and any form of exploitation. The work must be carried out in dignified conditions and with respect for the person, in relation to the correct use of personal knowledge and skills and with a fair level of remuneration, in full compliance with the laws in force on the matter. Even the disbursement of any benefits to its employees must be done in full compliance with the regulations applicable in this sense. Working hours and any overtime hours are governed by the reference collective agreement. In particular, hiring must take place in full compliance with the regulations in force in the workplace and, prior to hiring, employees and collaborators must be informed about remuneration, working hours, place of work, internal rules and practices.

Nira SpA also undertakes not to establish business relationships with suppliers who employ child labor and condemns any form of forced labor or exploitation.

Freedom of association and the right to collective bargaining are respected:

- Workers have the right, without distinction, to join or form a trade union of their choice and to bargain collectively.
- The employer undertakes to adopt an open attitude towards union activities and their organizational activities.
- Employee representatives are not discriminated against and have the right to carry out their representative duties in the workplace.
- Where freedom of association and the right to collective bargaining are restricted by law, the employer facilitates and does not hinder the development of parallel means for free and independent association and bargaining.

**Respect for the environment and for workers' health and safety**

Attention to the environment is an essential part of the corporate philosophy of Nira SpA.

The work activities are carried out by minimizing the environmental impact and adopting solutions capable of preventing accidents and occupational pathologies and in any case minimising, as far as technically possible and economically compatible, the possibility of their occurrence. Particular attention is also paid to the reduction and/or elimination of "dangerous" substances within our processes and our products.

Nira SpA has already been engaged for several years in a strategic program to reduce energy consumption through the use of renewable sources. Added to this is a precise choice aimed at reducing emissions into the atmosphere, responsible use of raw materials and water resources, reducing waste and optimizing waste management.

All these choices have resulted in the implementation of the official procedure for obtaining the ISO 14001:2015 environmental certification.



## 10. CODE OF CONDUCT

This Code of Conduct is aimed at finalizing the contents referred to in the Code of Ethics defined above.

### Relations with Work Colleagues

Every employee must work to maintain a decent work environment and to respect the dignity of every individual with whom they interact.

In particular, it is prohibited to engage in intimidating, harassing or offensive behavior towards colleagues or collaborators in order to marginalize or discredit them in the workplace.

Any violation will be subject to the application of sanctions and/or disciplinary measures commensurate with the seriousness of the violation.

Therefore, each worker is required to:

- apply the provisions of the aforementioned Code concerning their specific duties;
- refrain from any conduct that may harm or compromise the honesty, impartiality or reputation of Nira SpA;
- promptly report any violations of the Code;
- consult your contact person to obtain any clarifications regarding the interpretation;
- participate actively, in order to obtain the maximum benefit, in the training activities put in place;
- actively collaborate in any investigations carried out in relation to violations of the Code while maintaining the strictest confidentiality regarding their existence.

### Subjects in positions of responsibility

Anyone who holds the role of Manager, at all levels, must demonstrate, with their own behavior, that compliance with the provisions contained in the Code is a fundamental and priority aspect of the work activity, making sure that employees are aware that the business results they must never be separated from compliance with the provisions themselves.

Each person in a position of responsibility has the obligation to report any case of non-compliance with the Code, as well as having the responsibility of ensuring the protection of those who have reported a violation of the same.

### harassment

Nira SpA considers absolutely unacceptable, as well as deplorable, any type of harassment and/or unwanted behavior that has the purpose and effect of violating the dignity of the person to whom such harassment or behavior is aimed, both internally and externally of the workplace.

### Equal opportunities

Nira SpA undertakes to offer equal opportunities in work and professional advancement to all employees.

The Head of each office/department must ensure that for all aspects of the employment relationship, such as hiring, training, compensation, promotions, transfers and termination of the relationship itself, employees are treated in accordance with their ability to meet the job requirements, avoiding any form of gender discrimination based on age, sexual orientation, disability, religious orientation, ethnic origin, race, political choices, trade union social conditions, on language,; on physical characteristics, on the state of health, or on personal beliefs

### Abuse of alcohol or drugs

Nira SpA requires its employees and collaborators to contribute to maintaining the work environment respectful of the sensitivity of others.

It will therefore be considered aware assumption of the risk of injury and of these characteristics:

- perform service under the effects of abuse of alcohol, drugs or substances with a similar effect during work and/or in the workplace;
- consume or sell drugs for any reason during work performance.

Nira SpA undertakes to favor the social actions envisaged on the subject by the relevant collective bargaining agreement.

### Use of Company Assets

Employees are required to use the tangible and intangible assets they have available, efficiently and in ways that are suitable for protecting their value.

Any improper and/or unauthorized use can be prosecuted by criminal and/or civil law, and, in the most serious cases, can generate consequences for job preservation.



### Corruption

Nira SpA does not tolerate any kind of form of corruption and extortion and undertakes to prevent its diffusion internally, without exception, through the application of an adequate culture and precise rules.

All personnel are strictly prohibited from receiving, promising or giving money.

Acts of commercial courtesy towards Customers or other external subjects, such as gifts, forms of hospitality, invitations to events or demonstrations, or any other form of benefit, even in the form of donations, are permitted only if of modest value (maximum €100 or equivalent in foreign currency) and such as not to compromise the integrity and reputation of the parties and not to be interpreted, by an impartial third party observer, as acts intended to obtain advantages and favors improperly. In any case, these acts must always be authorized and adequately documented.

Should the need arise to offer a gift/invitation to an event or manifestation of a value exceeding €100, the person concerned is obliged to contact the Management directly, who, in the figure of the Chief Executive Officer, will have to decide, after careful evaluation, whether or not to follow up on the request received.

At the same time, always in compliance with ethics and correctness, it is permitted to accept acts of commercial courtesy from the Suppliers or other external subjects, such as gifts, forms of hospitality, invitations to events or demonstrations, or any other form of benefit, even in the form of donations only if of modest value (maximum € 100 or equivalent in foreign currency) and such as not to compromise the integrity and reputation of the parties and cannot be interpreted as acts intended to obtain advantages and favors improperly .

The acceptance of a gift and/or invitation, to an event or manifestation, of a value exceeding €100 automatically entails communication to the Management.

### Relations with customers and the public administration

The assumption of commitments towards Customers and the Public Administration and, in general, with the Institutions, is reserved exclusively to the responsible and authorized company functions, in the strictest compliance with the provisions of the law and applicable regulations, such as not to compromise in any way the integrity and reputation of Nira SpA.

Nira SpA, through its employees or representatives, must not promise or offer to Customers, Public Officials or employees of Public Institutions, money, goods or other utilities of various kinds in order to promote and/or favor its interests.

### Relations with Suppliers

The procurement processes are based on the search for the maximum competitive advantage.

The selection of Suppliers and the determination of the purchase conditions are based on an objective evaluation of the quality, the price and the ability to provide and guarantee services of an adequate level.

Persons in charge of the procurement function are prohibited from:

- receive any form of consideration from anyone for carrying out an act of one's office or contrary to one's official duties;
- undergo any form of conditioning by third parties unrelated to the company Nira SpA and unauthorized by the same, for the taking of decisions and/or the execution of acts relating to one's work activity;
- accept gifts or other forms of benefit that are not attributable to normal courtesy relationships (see above).

### Donations

Donations to charitable or non-profit organizations are permitted provided they do not lead to personal, commercial, economic, social and/or political advantages for any third party or for the Company itself.

### Participation in trade union organizations and/or political parties

Any relationship of Nira SpA with trade unions, political parties and their representatives or candidates must be based on the highest principles of transparency and fairness.

Any economic contributions from Nira SpA are allowed only if provided for by law, subject to authorization by the Management.

Any economic contributions from company employees, as well as the activity performed by them, are to be understood as exclusively paid on a personal and voluntary basis.

### Environment, Health and Safety

Each employee is always required to comply with company and legislative provisions on environmental matters, in particular those relating to waste disposal, storage of materials, spills and emissions.

Furthermore, each worker must always comply with what is defined in the company procedures and in the legislative regulations in force on health and safety in the workplace (Legislative Decree 81/08), in particular on the use of personal protective equipment and on operating practices .

No one, in the performance of their duties, must put themselves or must be placed in the face of unnecessary risks that could cause damage to their own or others' health and/or physical safety.

### Application Provisions





The principles and provisions of the Code of Ethics and Conduct are understood to be binding for the directors, employees and all those who maintain relationships, of any nature, even temporary, with the company Nira SpA. Respect for social sustainability, towards its employees and the community, which may arise from the performance of company activities, is the responsibility of the Chief Executive Officer as is ensuring that the highest standards of integrity, fairness and honesty throughout the supply chain, from the purchase of the raw material to the shipment of the finished product.

### Approval

The Code is approved by the Nira SpA Management and is subject to revision based on contributions from third parties, regulatory developments and the experience acquired in its application.

### Disclosure

The Code is brought to the attention of all recipients, as defined above, by:

- posting on company bulletin boards;
- publication on the website [www.nira.it](http://www.nira.it), from which it is freely downloadable.

### Referent for Code of Ethics and Conduct

In order to promote the dissemination and full application of the Code, Nira SpA has provided for the identification of a specific Contact person in the figure of the Human Resources Manager.

The Referent undertakes to:

- ensure the application of this Code by all categories of employees;
- provide the necessary clarifications and support for the application of the same;
- manage the reports received in the strictest confidence;
- promptly report any violations of this Code to the Management.

### Reports

All Recipients can report any complaint, violation or suspected violation of the Code to the Contact Person, in writing and anonymously or otherwise, through:

- the appropriate box located near the stamping machine in the main entrance;
- by mail to the following address:

Nira SpA  
Via G. Camozzi, 16  
24060 Villongo (Bergamo)  
ITALY

- by email to the following address: [info@nira.it](mailto:info@nira.it)

These reports must be sufficiently precise and detailed and attributable to a specific event or circumstance.

The Referent guarantees the authors of the reports maximum confidentiality and the certainty that their communication will be evaluated, in order to adopt the most appropriate measure and, in the event of an ascertained violation of the Code, will report the report and/or any suggestions directly to the Direction. Nira SpA also guarantees that no type of repercussion will be tolerated and may be implemented against the authors of the aforementioned reports.

### Sanctions

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of the Employees pursuant to and by effect of article 2104 of the Civil Code. Violation of the provisions of the Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, in compliance with the procedures set out in art. 7 of the Workers' Statute, with all legal consequences, also with regard to the preservation of the employment relationship, and may also lead to the relative compensation for damages.

Observance of the Code must be considered an essential part of the contractual obligations undertaken by Collaborators and/or persons having business relations with Nira SpA. Violation of the provisions of the aforementioned Code may be considered a breach of contractual obligations, with all legal consequences, also with regard to the termination of the contract and/or assignment and may result in the related compensation for damages.

Information

All possible Recipients may contact the Contact Person for any clarification relating to the interpretation or application of the guidelines indicated in this Code.

All requests for clarification will be given a prompt response and in particular each contribution will be positively evaluated.

Villongo, 12/30/2020