

QUALITY, ENVIRONMENT, SAFETY AND SOCIAL RESPONSIBILITY POLICY OF THE COGEME ORGANIZATION

The Cogeme organization believes that the quality of products, resources and processes, together with compliance with ethical principles, environmental sustainability, respect of human rights and of the health and safety of workers are decisive factors for the success of a company in terms of profit and image.

The quality of company products, understood as compliance with the requirements of the Customer's needs, can't be separated from a concept of total quality in which the aspects related to the protection of the individual and the environment are located.

PROGRAM

In order to obtain, document and guarantee compliance with the requirements of products and services requested by Customers and compliance with environmental and health and safety aspects in the workplace, the organisation has undertaken a program that has its strength point in the application of a Company Management System (Quality/Environment/Safety) which is reflected in the reference standards ISO 9001, IATF 16949, ISO 14001 and ISO 45001.

The Management undertakes to operate in full compliance with the applicable legislative requirements (locally and internationally) and to make available the human, economic and technological resources necessary for the achievement and maintenance, both in the Cogeme Organization and through the supply chain, the Organization's policy expressed through the following principles:

Quality policy

- *Continuous growth of the technical-professional level*

Through training courses and staff updating, the company considers professional growth as an essential condition to take full advantage of technological opportunities, of the system for work organization, of communication and safety systems.

- *Customer Satisfaction*

Improvement the Customer satisfaction through: implementation of the "Zero Defects" and "Zero Interruptions" policy, on-time delivery, maximum attention to all Customer requirements including cost reduction.

- *Reduction of internal charges*

Reduction of working capital both through rational production plans exploiting the potential of automatic calculation and punctual checks of raw materials, semi-finished products and finished products.

- *Control and reduction of non-quality costs*

Sensitising staff with meetings and periodic reports, identifying incentives to stimulate productivity and growth in terms of quality.

- *Supplier involvement*

Through the growth of qualified Suppliers, sharing with them the Customer requirements, providing them the appropriate knowledge, means and/or methodologies, making them part of the necessity for the improvement.

- *Continuous improvement and innovation*

Through the constant analysis of the Organisation's processes and the execution of investments aimed at introducing new production and control methodologies and/or technologies.

- *Risk management*

The commitment to plan, implement, monitor, review and continuously improve the risk management process throughout the organisation.

Environmental policy

▪ *Environmental legislation*

Commitment to operate in full compliance with the applicable requirements of European, Italian or Regional legislation about the environment and energy utilization.

▪ *Protection of natural resources and the environment*

Commitment to the protection of the internal and external environment through: Continuous technological improvement of processes; the promotion of activities and production methods aimed at optimizing energy and natural resources consumption; the use of renewable energy sources where applicable; the reduction of water consumption; to minimize the contamination of the air, water and land.

▪ *Reduction of waste production*

Implement the necessary measures to reduce the production of waste with reference to the production capacity of the organization and actively pursue the opportunities for recycling waste.

▪ *Training and information*

Involvement of all personnel in the responsibility towards environmental aspects, through suitable training, information, awareness raising and knowledge of the Company Policy, in the significant environmental impacts, on energy savings and performance. Training on the significant environmental impacts and risks associated with organization activities.

▪ *Continuous Improvement*

Commitment of all staff to continuous improvement of performance and achievement of environmental objectives. The improvement targets are defined and periodically communicated to all employees.

▪ *External relations*

Commitment to participate in initiatives aimed at protecting and improving the environment by collaborating and providing information to environmental associations, schools, public administrations and interested parties. The Company is also open to dialogue with its employees, the public and the competent authorities on the objectives of improving its environmental performance. The company policy is available to the public through the company website

▪ *Management of environmental emergencies*

Commitment to adopt the operating procedures necessary to prevent, contain and deal with accidental environmental accidents.

▪ *Awareness and Involvement of Suppliers*

Involve and aware the Suppliers to adopting conducts comply with the applicable environmental standards, with this Policy and with the internal procedures to be applied for carrying out works inside the company site. Use materials comply with applicable environmental directives (Reach, ELV, IMDS, etc.), purchased only by suppliers that certify the chemical composition or send the safety data sheet.

Health and Safety policy

▪ *Health and Safety Legislation*

Commitment to operate in full compliance with the applicable requirements of local, national and international legislation on health and safety in the workplace

▪ *Continuous improvement*

Commitment to raise the level of its performance in terms of the safety of its workers, taking into account the Health and Safety standards established by national laws and various local regulations and involving all staff in the continuous improvement of performance and achievement of objectives.

▪ *Change management*

Commitment to re-evaluate aspects of occupational health and safety when defining new activities or reviewing existing activities or processes. Risk assessment activities are planned for the introduction of new processes, new machinery, new management procedures or the modification of existing ones.

- *Training and involvement*

Involvement of all workers for health and safety aspects, through: definition and communication of improvement objectives; training, information and motivation of employees to carry out their duties in compliance with safety procedures and in compliance with the principles of this policy; developing a sense of responsibility for the health and safety of oneself, colleagues and third parties; dialogue and discussion with its employees, who are called to collaborate and report health and safety issues.

- *External relations*

Constant dialogue with its employees, with suppliers, with the public and with the competent authorities on the objectives of improving their performances, through: information actions of the interested parties (workers, trade unions, suppliers) on the commitments of this Policy; publication of the same on the company website in order to make it available to the public.

- *Reduction of risks for the health and safety of workers*

Commitment to operate in such a way as to minimize the risks to health and safety for workers, through: the use of prevention and protection measures; the definition of working methods and procedures; raising awareness and training of employees; the use of dispositive for individual protection (DPI); the definition of working instruction and individual protection for handling dangerous substances.

- *Awareness and Involvement of Suppliers*

Involve and make Suppliers aware of adopting behaviors that comply with the applicable health and safety regulations, with this policy and with the internal procedures to be applied for carrying out work on the company site.

- *Machine safety*

Adoption of periodic inspection and verification plans, aimed at confirming the compliance and safety in the use of its machines and systems, as well as purchasing procedures for new certified machinery in accordance with the applicable directives.

- *Emergency management*

Commitment to provide adequate training and training to the personnel in charge of managing emergencies and to periodically plan and execute the simulations of the scenarios envisaged in its emergency management plan.

- *Workplace ergonomics*

Commitment to monitor and possibly improve the ergonomics of the workstations, carrying out periodic reviews and appropriately defining the workstations in the event of extensions or changes to the existing layouts.

- *Fire protection*

Commitment to keep the fire protection systems in perfect working order, in compliance with the authorizations received and current legislation.

Corporate social policy

- *Adhesion to the ethic code of the automotive sector*

Commitment to operate in compliance with the guidelines defined by the "European Automotive Working Group on Supply Chain Sustainability" (see pages 4 and 5 present document), to which the main European car manufacturers adhere to, and which define rules of: Professional ethics; Environmental standards; Working conditions and human rights.

- *Code of conduct*

Commitment to take measures necessary to promote anti-corruption policies and an employee code of conduct.

Patrica (Fr) – ITALY: 16 April 2021

The General Manager




DAIMLER



HONDA



NISSAN

SCANIA

TOYOTA

VOLKSWAGEN
ACTIENGESELLSCHAFT

VOLVO
Volvo Car Corporation

VOLVO
Volvo Group

Automotive Industry Guiding Principles to Enhance Sustainability Performance in the Supply Chain

We endeavor/endeavour to achieve excellence, innovation and performance in a sustainable manner. People and the environment are the automotive industry's most important resources. For this reason, we are working together to attain the highest standard in business integrity and in the social and environmental performance of our supply chain.

The automotive industry supply chain has a high degree of complexity, therefore we believe in the benefits of a common approach and message. The following guidelines clearly describe our minimum expectations towards business ethics, working conditions, human rights, and environmental leadership; for our suppliers as well as their subcontractors and suppliers. We expect that suppliers will uphold these standards and cascade them down their supply chain.

These guidelines are based on fundamental principles of social and environmental responsibility that are compliant with local law, consistent with international expectations and are supported by the sponsoring Auto Manufacturers. Individual manufacturers may have their own standards, codes and policies that supersede these guidelines.

Business Ethics

Companies are expected to uphold the highest standards of integrity and to operate honestly and equitably throughout the supply chain in accordance with local laws.

- **Responsible Sourcing of Materials:** Companies are expected to responsibly source raw materials used in their products.
- **Anti-Corruption:** Companies are expected to work against corruption in all its forms, including extortion and bribery
- **Privacy:** Companies are expected to put in place appropriate measures to respect privacy, to protect personal data against loss and unauthorized/unauthorised access or use, and to comply with relevant privacy and information security laws and regulations.
- **Financial Responsibility/Accurate Records:** All business dealings are expected to be transparently performed and accurately reflected on the company's financial reports and filings.
- **Disclosure of Information:** Companies are expected to disclose financial and non-financial information in accordance with applicable regulations and prevailing industry practices.
- **Fair Competition/Anti-Trust:** Companies are expected to uphold standards of fair business and conduct business in accordance with all applicable anti-trust or anti-competition laws and regulations.
- **Conflicts of Interest:** Companies are expected to conduct business in a manner that avoids any appearance of impropriety.
- **Counterfeit Parts:** Companies are expected to minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products.
- **Intellectual Property:** Companies are expected to respect valid intellectual property rights and use commercially reasonable practices to protect the transfer of confidential technology and know-how.
- **Export Controls and Economic Sanctions:** Companies are expected to comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.
- **Protection of Identity and Non-Retaliation:** Companies are expected to establish processes that allow concerns to be raised anonymously with confidentiality and without retaliation.

Dated: 12-5-17



Environment

Companies are expected to support a proactive approach to environmental responsibility by protecting the environment, conserving natural resources and reducing the environmental footprint of their production, products and services throughout their life-cycle.

A comprehensive approach includes but is not limited to:

- **Energy Consumption & Greenhouse Gas Emissions:** Companies are expected to implement a comprehensive energy reduction strategy and management program while increasing use of renewable energy.
- **Water Quality & Consumption:** Companies are expected to effectively reduce, reuse, and recycle water with responsible treatment of wastewater discharges to protect the environment and improve overall water quality.
- **Air Quality:** Companies are expected to routinely monitor, appropriately control, minimize/minimise, and to the extent possible, eliminate emissions contributing to local air pollution.
- **Natural Resources Management and Waste Reduction:** Companies are expected to encourage and support the use of sustainable, renewable natural resources while reducing waste and increasing reuse and recycling.
- **Responsible Chemical Management:** Companies are expected to identify, minimize/minimise or eliminate the use of restricted substances in manufacturing processes and finished products to ensure regulatory compliance. Companies should also be aware of any use of reportable substances in processes and finished products, and actively investigate suitable substitutes.

For further details please refer to the
Global Automotive Sustainability Practical Guidance
located at

AIAG: <http://aiag.org/corporate-responsibility> and
Drive Sustainability: www.drivesustainability.org

Human Rights and Working Conditions

Companies should respect the human rights of workers, and treat all people with dignity as recognized by the international community.

- **Child Labor/Labour and Young Workers:** Companies must ensure that child labor is not tolerated in any form. The age of employment for young workers must meet or exceed company guidelines, legal regulations and local labor laws.
- **Wages and Benefits:** Companies should provide compensation and benefits that comply with applicable local laws, including those relating to minimum wages, overtime compensation, and legally mandated benefits.
- **Working Hours:** Companies should comply with local law regarding working hours, including overtime
- **Forced Labor/Labour:** Companies must prohibit any forms of forced, (bonded) or compulsory labor/labour, including human trafficking.
- **Freedom of Association:** Companies should allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation or harassment. Companies should respect employee rights to associate freely, to join or not join labor/labour unions, bargain collectively, seek representation, and join workers' councils in accordance with local law.
- **Health & Safety:** Companies should provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for safety and occupational health.
- **Harassment:** Companies should provide a work place free of harassment against workers in any form.
- **Non-Discrimination:** Companies should not tolerate any form of discrimination in respect of employment and occupation and should provide equal employment opportunities regardless of worker or applicant characteristics such as race, color/colour, age, gender, sexual orientation, gender identity, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union association, covered veteran status, genetic information or marital status.