manufacturing technologies

CODE OF CONDUCT

SUPPLIERS

September, 2022

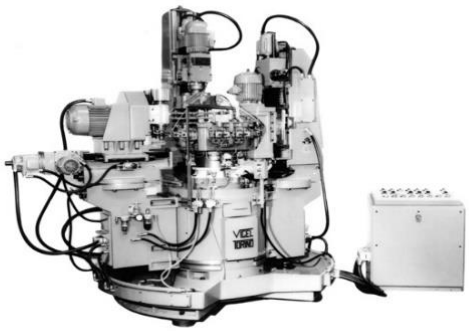
CODE OF CONDUCT SUPPLIERS

Dear Colleagues,

welcome to Vigel Suppliers Code of Conduct, the document we have prepared internally and directed to all Vigel Group S.p.A. commercial partner in order to share our vision on how to achieve our goal of operating more responsibly and sustainably throughout the entire supply chain.

The trust that all of our customers and partners continue to have in our company and on our products is undoubtedly the most valuable asset we have. In order to maintain over time this value that we have created and managed over 75 years, all of us are required to have - both within our company and externally - an ethical behavior because all of us - both individually and collectively - are the primary promoters of the reputation of the company in which we work and its ability to operate in the sector of reference. First and foremost, this entails everyone's knowledge of and compliance with a few simple rules and behaviors - as well as with legal regulations.

As Vigel Group Board of Directors we are convinced that the Code of Conduct we have prepared is an important element in sustaining and enhancing the success of our Group: this document is also driven from the need to involve all of our suppliers on issues of a great importance for Vigel itself and is therefore intended to create a large shared commitment. This is the reason why we ask to our suppliers to adhere to this document and the values that, in line with our Code of Ethics, it is intended to convey.



<u>Board of Directors - Vigel Spa</u>

Mrs. Ettorina Geninat

Dott. Fabrizio Pesce

Dott.ssa Francesca Pesce

⇨ The Code of Conduct: Scope

Integrity is an essential element in the realization of our business activities. Our Code of Conduct illustrates this vision not only to all our employees (for whom a special document to this effect has been already prepared) but also to all the business partners and all other stakeholders involved in the production and commercial chain related to our business. It reflects the core values that should guide us in all the circumstances: it should serve as a guideline in everyday work activity and it is integrated by simple rules to which we must adhere. In addition, we must of course also comply with national and international regulations, which in no way have to be substituted by what is set here below.

In order to amplify the beneficial effects, we feel the need to take action against our supply chain as well. Our mission is to establish a fair relationship with all our partners and suppliers to ensure that they promote with us the respect for the environment, the community and consumers.

With these principles as a benchmark, Vigel aspires to improve the impact profile of its supply chain in compliance with the highest international sustainability standards, through pathways of co-evolution and mutual learning as well as transparent reporting.

We therefore expect all of us to understand and adhere to the principles and requirements contained in this document in any situation that may involve the Company and its suppliers in the course of business.

CODE OF CONDUCT SUPPLIERS

⇨ The Code of Conduct: Areas of applicability

- Freely chosen work and modern slavery
- Human rights and children labor
- Equal opportunities and equal treatment
- Wages, salary and benefits
- Working hours
- Occupational safety and health protection
- Workers' representation / Freedom association
- Protection of assets

- Environmental protection / performance
- Product conformity and safety

- Representation of political interests
- Donations, sponsorship and charity

- Conflict of interest
- Gifts, hospitality and invitations
- Free and fair competition
- Prohibition of corruption
- Relationship with officials/elected office holders
- Prohibition of money laundering
- Financial accounting and reporting

- Privacy
- Insider Trading
- Security and protection of information, knowledge and intellectual property
- Information security

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Freely chosen work and modern slavery

Forced, bonded (including debt bondage), involuntary, slavery or trafficking of persons shall not be used and our expectation is that this behavior has to be reflected throughout all the supplier chain. This includes recruiting, transferring or receiving persons by means of threat, force, coercion for labor or services. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment.

- Human rights and children labor

Our company observes, promotes and protects throughout the world the legal regulations in force concerning protection of the rights of adults and children as universal guidelines. We reject any kind of exploitation of child, forced and/or compulsory labor as well as any form of modern slavery. The term "child" refers to any person under the age for completing compulsory education or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. The above applies not only within our company but obviously also in relation to the conduct to be adopted in relations with all the business partners – suppliers included.

- Equal opportunities and equal treatment

Our company offers to everyone the same opportunities. This is what we also require of any of our business partners. Every worker should be committed to a workforce free of harassment and unlawful discrimination. No one will be never discriminated because we do not tolerate any kind of discrimination on the basis of ethnicity or nationality, gender, religion, age, disability, sexual orientation, skin color or other aspects protected by law. We experience diversity, actively strive for inclusion and create an environment that promotes everyone's individuality in the interest of the company. For the selection, recruitment and promotion of our employees is fundamentally based on their qualifications, individual skills and abilities/competences.

- Wages, salary and benefits

Wages and benefits compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits and according with each competence, skills, experience and role within each organization (internal and/or external) in which they work. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

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- Working hours

Working hours – including overtime - are not to exceed the maximum set by local law in all the countries in which we are involved in our operations as well as we expect the same care for all our suppliers. In any case, we observe local labor law in terms of days of rest with the respect as priority to the health and the safety of each employee.

- Occupational safety and health protection

We promote and encourage a culture of accident prevention, health protection and full responsibility for possible risks in the workplace. We require our workforce to strictly observe safety regulations and exercise constant vigilance to identify potential risks. We also ask our business partners to observe the same rules when they are in our facilities as well as they work in their facilities. Vigel has always strived to provide its workforce with programs designed to promote and support individual safety, well-being and a healthy lifestyle.

- Workers' representation / Freedom of association

We recognise the fundamental right of all workers to form representations and we are committed to work with trust and transparency with workers, to have a constructive and collaborative dialogue seeking to achieve a fair balance of interests. To have professional relations with the representatives without applying preferences or penalties is an integral part of our corporate culture. Workers shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment. The future of Vigel, of its employees and of its suppliers depends on the spirit of collaborative conflict resolution with the objective of economic and technological competitiveness. The profitability and safeguarding employment are common goals of equal importance.

- Protection of asset

Members of the workforce – at all the level of our organization - are responsible for the protection and proper use of the Company's assets and must endeavour to safeguard them from damage, theft or unauthorised use. We also expect our suppliers and business partners to act in the same manner. This principle applies to all types of assets - tangible, intangible and financial - and the intellectual property rights represented by patents trademarks, copyrights and trade secrets.

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- Environmental protection / performance

Vigel is committed to a proactive environmental protection policy and focuses on this principle within its operations. As a business operator, we are responsible for the environmental protection and sustainability of our products, our locations and the services we offer by continuously monitoring any new environmental risks, identifying them and taking the necessary measures to prevent or reduce their effects. The same attention we take internally to environmental policies related to our manufacturing operations we also demand from our suppliers with a focus on:

- Sustainable resources management
- Air quality
- Water quality and consumption
- GHG emissions, energy efficiency and renewable energy
- Waste reduction and use of renewable resources
- Responsible management of chemical products

Environmental protection – as defined in our 'Sustainability Report' - is a process that we apply to the development and production phases, where as Vigel we always seek to adopt a constant behavioural policy that leads to the reduction of environmental impact in compliance with environmental regulations (at the national, European and international levels).

- Product conformity and safety

This is not only a legal obligation, but also our aim to be complied with legal regulations or authorities' guidelines as well as internal standards applicable to our manufacturer. All our products are developed in compliance with legal requirements as well as we expect that the same is follows on all our supply chain. This is monitored constantly and systematically in the day-to-day business. We ensure that, in the event of any discrepancies, we can take appropriate measures can be taken in good and reasonable time.

- Representation of political interests

Neutrality in dealing with political parties and interest groups is an indispensable principle for us. Not unlawful influence on politics and legislation is not permitted. No funds or corporate assets may be used to financially support political parties or candidates in political elections. The members of our workforce - as well as our suppliers - are free to conduct party political activities in a personal way and outside working hours. On such occasions, however, they may not represent the Company or give the impression of act on behalf of the Company.

- Donations, sponsorships and charities

Vigel is aware that it plays a fundamental role in supporting the communities in which it operates. We make donations in cash and/or in other way to support charitable purposes and ecclesiastical institutions. The donations and sponsorships are only permitted following a transparent authorization procedure just as we expect the same to be done at our supply chain.

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- Conflicts of interest

We respect and prioritise all personal interests and the private lives of our employees and colleagues (internal/external). However, consider it important to avoid any possible conflict between private/personal and professional interests. In this sense, every decision that is made is based exclusively on objective criteria and we do not let ourselves be influenced by personal relationships or interests of any kind/purpose.

- Gifts, hospitality and invitations

All members of the workforce as well as our commercial partner must ensure that any gifts or invitations offered are appropriate and reasonable, so as not to inappropriately influence the judgement or conduct of any outside and external party. Transparency is an important and fundamental rule to ensure the integrity of our work and reputation.

- Free and fair competition

Our activities are conducted exclusively on the basis of the principle of a *free-market economy* as well as in accordance with fair competition; we expect it to be a behavior adopted by each of our business partners. We do not enter into anti-competitive agreements with competitors, suppliers or customers. If our company is in a dominant position in the market, we do not abuse that an advantage. In relations with our authorized sales partners, we comply with the antitrust framework conditions specific.

- Prohibition of corruption

The quality of our products and services is the key driver to our success. We do not tolerate corruption. We offer benefits to business partners, customers or other external parties only within the limits of the framework conditions permitted by law and existing guidelines and always and only after careful evaluation; we expect the same care to be followed by all our suppliers.

- Relations with officials and office holders

Any contact with officials or elected office holders is strictly based on the law and the to avoid conflicts of interest and corruption that we repudiate at any level of our production chain. We do not make any payments to officials to expedite routine administrative procedures. Offering / promising / giving gifts is strictly forbidden, payments or anything else of value to public officials - directly or through intermediaries - with the purpose of inducing such officials to act in violation of their duties in order to secure an illicit benefit or advantage for the Company or one of our suppliers.

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- Prohibition of money laundering

We carefully verify the identity of customers, business partners and other third parties with whom we intend to enter into a business relationship and we expect this control also on all our supply chain. Our stated aim is to enter into relationships only with serious partners whose activities comply with the law and whose means are of lawful origin. Incoming payments are immediately recorded and allocated to the services to which they relate. We ensure that all incoming and outgoing payment flows take place in a transparent manner.

- Financial accounting and reporting

Vigel Administration Office strictly adheres to the legal requirements for regular financial reporting and regular accounting procedures. Transparency and fairness are imperatives for our Group and we expect the same transparency to all our suppliers. To this end, we regularly inform our credit institutions and/or any person who reasonably requests about the current financial situation and business development. We make available regular annual reports, which are prepared in accordance with national and international reporting standards.

- Privacy

We safeguard the personal data of employees, former employees, customers, suppliers and other stakeholders. We collect / process / use and store personal data only in accordance with current legal laws and we ask that the same strictness to all of our business partners.

- Insider trading

We handle relevant insider information and we do not tolerate insider trading or insider use. Information on transactions and projects relevant to these purposes must only be used internally and in accordance with applicable company rules; they should never be disclosed to outside parties, including family members, business partners without prior authorization.

- Security and protection of information, knowledge and intellectual proper

We are aware of the importance of corporate know-how and protect it very scrupulously. As we respect the intellectual property of our competitors, business partners and other third parties in the same way we demand the same behaviour to all of our suppliers.

- Information security

We pay attention to security in information systems and electronic data processing and comply with applicable regulations to protect the confidentiality and integrity of data and to manage access to our business systems. We demand the same attention from our business partners.

⇨ The Code of Conduct: Help and contact

In case of need and assistance relating to the Supplier Code of Conduct, dott.ssa Francesca Pesce (e-mail: francesca.pesce@vigel.com) and Mr. Antonio Depperu (e-mail: antonio.depperu@vigel.com) are available to each of you.

We remind you again that the fulfillment and observance of the rules contained in the Code of Conduct must be considered an essential part of the contractual duties and obligations towards Vigel. It follows that the violation of these provisions may constitute a disciplinary misconduct by the provider of work/services of its contractual obligations.

THANK YOU ALL FOR YOUR COOPERATION

CODE OF CONDUCT SUPPLIERS

For Acceptance

Date:

Company:

Signature: