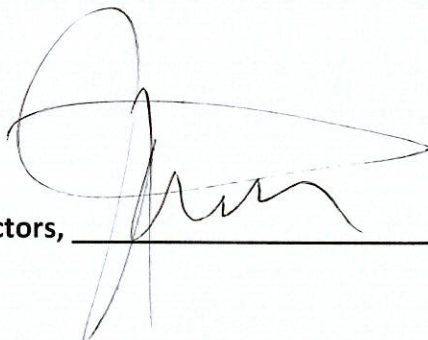


SUPPLIER CODE OF ETHICS

The Code of Ethics is based on the Organisation, Management & Control Model, pursuant Ex D.lgs. 8 June 2001 n. 231, approved on December 1, 2022, as subsequently amended

30 October 2023

The Chairman of the board of directors, _____



- **Law**

The supplier complies to all applied laws and regulations connected to their firm industry including the administrative authority provisions referred to the supplier's business.

- **Social responsibility**

Human rights

The supplier abides, defends, and promotes international recognized human rights, defending them throughout the whole supply chain. The supplier complies to the United Nations Guiding Principles on Business and Human Rights.

Child labour

The supplier defends and complies with the dignity and rights of children. Only men and women at the legal working age shall be recruited in accordance with the national law where the firm is located, ensuring a "zero" tolerance on child labour. The supplier must respect the ILO conventions n. 138 regarding the minimum age for employment and the n. 182 for the suppression of the worst forms of child labour.

Forced labour

The supplier will not force employees or other parties to work under either direct or indirect threat of a penalty regardless of the purpose it is meant for. Fair deals must be agreed with the worker at the start of the employment who can freely accept the conditions or refuse them. The supplier will not shred, hide, seize or hold from the employee his I.D. cards or immigration papers. The supplier will never ask newly hired immigrant workers, excluding professional workers, to pay for taxes and expenses to be recruited, for the journey and for emigration clearance from his origin country.

Treatment of employees

Suppliers will strive to avoid that workers have to endure harsh or brutal treatments at work, protecting them from any form of sexual abuse and harassments, torture and physical punishments, verbal abuse, or physical and mental persuasion. The supplier will avoid at all costs to threaten the use of such treatments.

Workplace health and safety

The supplier must strive to constantly improve health care in order to reach a high standard of health protection, a safe workplace and preventing any further potential risks. Such policy has the purpose to ensure healthy and safe accommodation for workers and contractors if necessary.

Freedom of assembly

The supplier ensures and avoids interfering with workers and contractors who freely gather and associate with trade unions.

Discrimination

The supplier commits to a "zero" tolerance towards who discriminates others by the colour of their skin, the ethnicity, gender, age, nationality, social background, disability, sexual preferences, religious beliefs, moral and philosophical beliefs, political and trade union views. Workers with equal tasks must be subject to the principles of equal pay. The supplier must avoid wage discrimination based on the gender of the worker (Equal Remuneration Convention, No. 100) or based on any of the personal condition listed above.

Salary, working hours and resignation

For overtime and normal working hours, the supplier must be grant the minimum wage required by law. The employer must comply to the rules and provisions regarding working hours, breaks and holidays. Suppliers are required to avoid wrongful termination of employment contracts or dismissions due to unclear insufficient work standards without a valid reason.

Eviction and land deprivation

The supplier strives to avoid illegal evictions including the deprivation of land, forest and waters that stand for living sources for the evicted.

Dealing with raw materials coming from Conflict-affected areas

The supplier must comply to the laws of the country they're located in for import of raw materials coming from conflict-affected areas. The supplier must pay extreme attention to the origin of the materials used to produce goods and avoid at all costs using materials that the supplier is aware or suspects of it being produced illegally. If the supplier either suspects or is aware that any of the materials used to produce goods has been manufactured illegally, it will cut off the relationship with the provider from that moment onwards.

• Environmental responsibility

Protecting the environment

The supplier commits to reduce and prevent environmental health risks in compliance to current regulations on environmental health by also considering developing internal research. An environmental managing system aligned with the principles of ISO14001 must be established and applied to the company.

Protecting the climate, earth, water and air

The supplier commits to protect the natural fundamentals of life by avoiding to damage the soil with alterations, limiting air and water pollution, excessive noise, and over-consumption of water. The supplier is required to use resources in a responsible manner by maximizing efficiency throughout the production cycle. The supplier will prefer purchasing renewable sources and operate by using renewable energy. The supplier commits to reduce or eradicate the environmental negative impact in the company by making changes in the production cycle and in maintenance, as well as by replacing, storing, recycling, and re-using materials if possible.

Limiting the use of pollutants and how to deal with them

The supplier must follow restriction and prohibitions and file the requested returns according to the national law, the European law and the international standards for chemical products use and labelling all those materials which take part of the manufacturing cycle that might be referred to as pollutants. In compliance with bans and restrictions the supplier shall not produce goods with mercury in it, will avoid using mercury in the production process and will treat mercury waste according to Minamata Convention. Moreover, in line with the Stockholm Convention on persistent organic pollutants, the supplier bans the production and use of specific chemicals (POPs Convention)

Waste management

The supplier is required to supervise the negative environmental impact in the area surrounding the company. The supplier will adjust to the laws on waste management committing to possibly recycling, restoring, or re-using goods and disposing of the remaining in the proper waste disposal sites.

- **Ethics in business conduct**

Corruption and bribery

The supplier must comply to the laws and international conventions regarding the measures to prevent and counter corruption inside the business and firmly avoids corruption when connected to offering or promising or requesting or receiving payments.

The supplier will apply to the company's conduct the principles of loyalty and transparency also when relating to public institutions and to administrative apparatus.

The supplier stands against trading goods that have been claimed illegal by public officers.

The supplier will refuse offering and accepting gifts in the forms of goods, money, benefits, or services in from and to either a public officer, a close relative or a representative from a business related to a public officer in compliance to the law.

Should there be a case that allows to offer or accept such gifts, benefits, or other services, the supplier will nevertheless refrain from the offer, as such gifts could be seen as an attempt to influence a decision that could have an impact on the supplier.

Money laundering

The supplier complies with the application of the laws against money laundering and attends to all the duties of reporting suspicious transactions as established by the national law. The supplier who carries out commercial operations with external parties shall refuse payments or loans that could have even supposedly been originated from illegal activities, as for example a loan or a payment taking place in unusual situations or methods; and shall also avoid processing invoices in the absence of a proof that the purchased goods or services have been delivered. The supplier shall commit to structure the business to avoid that the same employee is responsible for purchasing goods and services, supervising that the service has been carried out and paying the invoice.

The supplier rejects payments from anonymous or encrypted bank accounts or receive payment from individuals other than whom the payment was due from and will not use anonymous or encrypted bank accounts to make payments or will not make payments if the recipient is not connected or related to whom the payment is due. Cash payment must be limited to only small amounts.

The supplier's books of account must be kept thoroughly updated ensuring transparency and auditability for the accounting entries. The supplier shall favour mediators in bank and financial operations that comply with the laws and provisions of the European Union on the prevention against money laundering and financing terrorism.

In the selection of the providers, the supplier shall consider as well as the convenience and affordability of the former, also the parameters of reputation and reliability based on the market where the provider operates.

Fair competition

The company must have a fair and righteous conduct in accordance with the competition law rules on the same matter.

Custom rules and export control

The supplier must comply with the international custom laws and to the rules on export control applied to the country where it's located; and shall provide relevant information for international commercial operations aiming for a safe supply chain.

Data protection and security

The supplier is required to ensure the right to informative self-determination, the protection of personal data and the protection of all commercial information and personal data in all the company's operations, in compliance to the laws on the General Data Protection Regulation.

No unauthorized use or abuse shall be made of intellectual ownership of third parties such as copyright, patents, image rights and so on. The right to ownership must always be respected.

- **Supervision and supply chains**

Supply chain

With the goal to fully comply with the principles of this code of conduct through the supply chain, the supplier commits to require from its own providers of goods and services to comply at best with the principles of this code of conduct and to request from the provider the same further along the supply chain and beyond.

Supervision

Vamp-tech can rightfully verify that the supplier complies with the principles and obligations listed in this code of conduct. The supplier will duly and promptly support Vamp-tech in enquiries or requests on this matter.

Remedies and consequences of infringements

The supplier who lacks to abide to this code of ethics shall develop a new internal process aimed to reduce the violations to the minimum or to end the violations entirely.

If the rules get breached the supplier must inform Vamp-tech without delaying.

Shall the supplier regardlessly persist failing to comply to the principles of this code, the collaboration with Vamp-tech may end consequently.

- **Reporting for violations**

All suppliers and their employees are required to report to Vamp-Tech any violation to the provisions of this Code of conduct. Reporting must made through Vamp-Tech's whistleblowing system (<https://vamp-tech.parrotwb.app/>) allowing the name of the informant to be left confidential. The supplier is required to let the employees know about the possibility to report a violation.

DECLARATION OF COMMITMENT

I hereby declare:

- 1) To have received the “Suppliers Code of Ethics” from Vamp-Tech – (hereinafter referred to as “Code of conduct”) and to commit to comply to the principles in it;
- 2) To share the content of the code of conduct to our own suppliers with the aim to persuade them into comply to the code as well;
- 3) That this declaration is part of the trading agreement with Vamp-Tech;

Signature of legal representative:

Date: