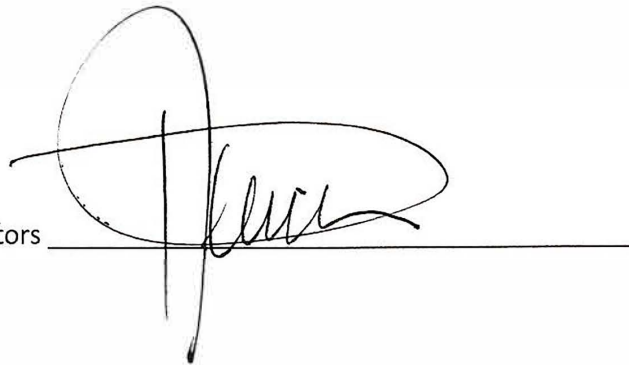


# CODE OF CONDUCT

The following code is inspired by the principles of the management and control organizational Model, Italian ex D.lgs 8 June 2001 n. 231, approved on December 1st, 2022 and all further amendments.

Date: 19/04/2023

Signature of the President of the Board Directors

A handwritten signature in black ink, consisting of a large, stylized initial 'P' followed by several cursive letters, written over a horizontal line.



## **Preamble, the mission and the addressees**

Vamp Tech's Code of Conduct is an official document approved by the CEO and it identifies the Company's fundamental principles and ethical values.

The aim is to declare and share the ethical values and the rules of conduct equal to the ones that the Company constantly refers to in the practise of its business.

The Code is binding, and it must be observed by all employees and any individual who works on behalf of the Company, wherever they operate, either in Italy or abroad, including those who perform representative, administrative or managemental functions as collaborators or consultants acting on behalf of Vamp Tech.

## **PRINCIPLES OF CONDUCT**

- **Professional commitment**

An adequate strong professional commitment is essential for achieving corporate objectives in terms of business, health and safety in the workplace, but also connected to preventing pollution and respecting the external environment in general.

- **Respect for people**

The work environment in Vamp Tech fosters healthy relationships among employees regardless of placement and responsibilities. Hindering and abusive behaviours towards colleagues and collaborators are not accepted.

- **Integrity, Loyalty, Involvement**

Moral integrity, ethics and loyalty are key factors when carrying out the daily work.

These principles ought to be manifested with righteousness, correctness and transparency in each interpersonal relationship and must never strive towards personal or third party's interests.

All throughout the daily work there must be a relationship of seriousness and trust towards both internal and external collaborators.

An active participation to corporate programs and a sense of belonging are valued and deeply appreciated.

## **PRINCIPALS OF ACTION**

The Company has defined principles of action that its directors, managers and employees must comply to when carrying out their activity.

The aim is to be more competitive by offering:

- Tailor-made quality products
- An adequate sales and after-sales service.

and working with economic awareness in full compliance with legality, well-being and safety for both the environment and the workplace. We plan out activities and fully control our payoff in compliance with principles of transparency in the accounting, administrative and corporate responsibility.



- **Law**

The Company, through its employees, is committed to respect all rules, laws, directives, regulations, both national and international, as well as all generally recognized practices.

- **Health and safety?**

The policy defined by the Company ensures the highest standard of health and safety at work and ensures the prevention of all potential forms of risk. The Company tends to constantly improve these policies.

The policy is to be applied with no difference between both employees and staff from external companies that are providing labour in any of the Company's sites.

The Company uses an implemented system, based on shared and updated Risk Assessment Document, to develop and control compliance with health and safety management.

All staff, internal or external, are required to strictly follow all Vamp-Tech measurements and regulations in terms of health and safety at work. All regulations and measurement are processed and updated in accordance with current legislation. Furthermore, everyone is required to report to their line manager any malfunctions or possible improvements.

- **Environment**

While carrying out the development in scientific research, Vamp-tech takes into account the protection of the environment in full compliance with the current legislation.

Vamp Tech conducts its investments and developments in an environmentally sustainable way in compliance with the authorizations issued and respecting the neighbourhood.

The Company strives to consume responsibly raw materials, water and electricity. At the same time it tries to temper pollution emissions and the impact that the production has on the environment.

- **Suppliers**

Clarity is fundamental when stipulating a contract with a supplier. An evaluation on competitiveness, quality, technical and professional requirements, inexpensiveness, price, integrity, reliability of the supplier are necessary when selecting between suppliers, goods and services. Contractors must be selected carefully as to ensure all the requirements regarding health and safety in the workplace are followed, with a view over pollution preventions, referred in particular to all coordination activities. Furthermore, Vamp Tech only collaborates with companies who accept the principles of this ethical code.

- **Business information protection**

Vamp Tech allows the employees to know and carry out what is provided by corporate strategies and directives on data security, considering they may also be digital, as to ensure their integrity, confidentiality and availability. All of Vamp Tech's knowledge related shared by the employees and connected to the activity is owned by Vamp Tech. All data then must be stored and managed exclusively on either physical or digital supports owned by Vamp Tech.



- **Company assets protection**

For the protection of the Company assets, whether physical or intangible, employees are required to operate them with in due care. Thus, each staff member is requested to:

- Use assets meticulously and thriftly
- Avoid using assets for improper or personal purposes that might damage or make the assets less efficient or are simply being used in contrast with the company interest

For the usage of software applications, staff members are required to:

- scrupulously adopt what is expected by the corporate security policies and to avoid compromising IT systems functionality and protection.

- **Corporate social responsibility**

Vamp Tech is committed to maintain fair and transparent relationships with its stakeholders such as employees, customers, suppliers, institutions and local communities.

Vamp Tech protects and promotes human right in the development of its international business, as foundation for building societies based on principles of equality, solidarity, refusal for war and protection of civil and political, social, economic and cultural rights.

Based on its social responsibility the Company promotes a work/life balance understanding that employees have their own personal engagements outside the work commitment.

- **Protection of trade union rights**

**Vamp Tech** ensures freedom of association to trade unions without exception to all staff.

- **Regular Employment, wages and working hours**

All workers must be hired with a regular contract in compliance with the national regulation forms of contract.

The use of illegal or undeclared forms of employment is prohibited.

While recognizing the value of collective bargaining, Vamp Tech guarantees and applies to its employees and collaborators a remuneration in accordance with the national collective contract in force.

Regarding working hours, the company ensures to be in compliance with the regulatory limits and the current collective contract.

- **Child labour**

In all national or international establishments, the Company repudiates child labour and avoids employing children under the legal age to work

Furthermore, it avoids employing under-age workers where permitted. Should the Company hire minors who are of legal age to work in full compliance with both national legislation and the international legislation of the ILO convention on child labour, it will ensure special conditions for the protection of their health and safety, a dedicated path for professional growth and training and overall will avoid giving them night shifts.



- **Discrimination**

The Company prohibits discrimination in individuals' relationships based on age, sex, race, religion, language, political opinion, disability, trade union membership.

Workers are employed, trained, promoted and paid fairly based on their work performance.

Particular attention is given to protect the principle of non-discrimination of women as no difference in treatment can be applied on the basis of the sex of the person, guaranteeing equal conditions for women to access top positions.

- **Principles of transparency of accounting, administrative and corporate responsibilities**

The Company adopts adequate standards of financial planning, control and accounting systems and operates with the highest accounting transparency, which is based on the truth, accuracy and completeness of basic information in the accounting records.

- **Compliance to rules for free competition and anti-corruption**

Vamp Tech means to protect the values of fair competition avoiding any unlawful conduct, abuse or dominant positions.

The Company undertakes actions based on principles of loyalty and integrity to prevent and avoid any kind of illegal conduct.

Thus, it's forbidden to all workers and collaborators to bribe or take bribes in any form, cash or gifts, for their own or the company's benefit, that have higher value compared to normal commercial gifts of courtesy. The relationships with both customers and suppliers must be guided by the general principles of commercial ethics.

- **Conflicts of interest**

All workers must avoid any action made in conflict of interest, especially if it's for a personal gain.

Any secondary occupation must not interfere with the effort and diligence spent for working in Vamp Tech.

A second occupation that occupies a fair amount of time may need a prior approval and must be reported to the HR department.

All workers who witness cases that involve, or might involve, conflict of interest must promptly report them to their superior.

- **Sanctions and Obligations**

The recipients are obliged to respect and follow all the principals set out above as well as to comply to the rules of conduct set by this Code of Conduct.

Knowledge and adaptation to the provisions of this Code are a fundamental requirement to establish and maintain collaborative relationships with third parties, to whom the Company undertakes sharing all information connected to it.



The disputes, the charges and the imposition of disciplinary sanctions are responsibility of the governing bodies of the Company, by the powers to them conferred and within the limits of delegations and competences applied.

The applicable sanctions comply to both employees and managers with the procedures established by the combination between statute of the workers, special regulations and national workers' contracts.

Violations of the Code are to be seen as serious breach if not respected by the suppliers, the external collaborators and the consultants.

- **Information and communications**

Vamp Tech adopts solutions to share the knowledge of the Code among all its managers, employees, collaborators, suppliers and stakeholders, also through specific training initiatives.

- **Communication Channels**

Vamp Tech ensures using adequate Communication channels with all stakeholders, including managers, employees, collaborators and suppliers, and to receive reports of violations or observations on the application of the principles within this code.