



CODE OF ETHICS

This Code of Ethics was approved by the Board of Directors on 09/04/2024

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1. PREAMBLE

Vici Company ("the Company") welcomes you. We are confident that you will find this a dynamic place to work and collaborate in. We value people, and we are committed to fulfilling our Vision and Mission through the adoption of our Core Values.

Wanting to share the ethical vision of the Company with you is the reason behind this Code of Ethics, which is part and parcel of a company policy mindful of the quality of its processes and products, of safety, respect for the environment and social ethics, with the primary aim of obtaining satisfaction and ensuring added value for Customers, Employees, Collaborators and, in general, for the Community.

With the adoption of this Code of Ethics, the values and ethical principles already rooted in the corporate culture are clearly shared, summarizing the code of conduct which the company has developed and adopted throughout the years.

We therefore ask all those who work for and on behalf of the Company ("Recipients") to comply with this Code of Ethics in conducting business and managing relationships, to promote its circulation and to be an example in its actual application.



1.1. Company Mission and Vision

MISSION E VISION

WE PROVIDE TECHNOLOGICAL SOLUTIONS FOR PIONEERING COMPANIES

WE BOOST THE COMPETITIVE EDGE OF BUSINESSES ALL AROUND THE WORLD

The Company, which has always been oriented towards continuous improvement, encourages all those involved to engage in any possible improvement in the value chain which they have identified, with a proactive approach, free of judgment. Make suggestions in order to improve, not to criticize. Be part of the solution and not just a presenter of the problem. Work and feel part of a team that encompasses branch offices, partners and suppliers. Keep your eye on distant and cutting-edge horizons.

1.2 Our Values

CUSTOMER ORIENTATION

EVERY DAY WE TAKE CARE OF OUR CUSTOMERS, PARTNERS AND COLLABORATORS.

THEY INSPIRE US TO WORK TO TRANSFORM THEIR NEEDS INTO NEW OPPORTUNITIES.

TRUST

WE BELIEVE IN LISTENING TO THE POINTS OF VIEW OF OTHERS SO AS TO ESTABLISH TRANSPARENT, JUDGMENT-FREE DIALOGUE.

WE HELP EVERY EMPLOYEE TO BE THE BEST THEY CAN BE.



PASSION

A DESIRE TO BE THE BEST DRIVES US TO CONSTANTLY IMPROVE BOTH OUR SOLUTIONS AND PROCESSES, LEADING US TOWARDS NEW HORIZONS.

WE BELIEVE IN WHAT WE DO AND THE RESULTS REFLECT OUR PASSION FOR INGENUITY.

UNIQUENESS

THE VALUE THAT WE PLACE ON PEOPLE DISTINGUISHES OUR STYLE AND BROADENS THE SENSE OF BELONGING.

WE ACT WITH HUMILITY, RESPECT AND AMBITION.

2. STRUCTURE AND FIELD OF APPLICATION

This Code represents:

- the founding document of company ethics, which all Recipients sign when they begin collaborating with the Company;
- an instrument of fundamental importance for the ethical and sustainable growth of business;

and includes:

- Ethical Principles;
- Code of Conduct;
- Implementing Rules.

The Code of Ethics is addressed to all persons who work, even occasionally, for and on behalf of the Company: directors, managerial staff, office workers, factory workers, as well as all external collaborators, such as, but not limited to, consultants, contractors, suppliers, agents and dealers (hereinafter "Recipients").

In no way may the conviction of acting for the benefit, or in the interest of the Company, justify behavior that conflicts with this Code of Ethics.



Within the limits of the applicable laws and regulations, the Code of Ethics is therefore an integral part of any working relationship and/or form of collaboration.

The Code shall be widely circulated within the company and externally, as well as being posted on the company website (www.vici.it).

3. Ethical Principles

The Ethical Principles on which the Company is based embrace the following main areas:

- Ethics in conducting business and company activities;
- Work ethics;
- Protection and appreciation of the Recipients;
- Sustainable development and Corporate Social Responsibility.

The conduct of the Recipients, in line with company values, is based on the principles of **legality, honesty, transparency, non-discrimination, confidentiality, diligence and loyalty**.

The work ethic and the consequent protection and appreciation of the Recipients are pursued through a **constant move towards improvement, compliance with current regulations and regulations, inhibiting friction, conflicts of interest and encouraging the continuous growth of knowledge, learning and motivation**.

The essential requirement of the Company's development plan is **economic, social and environmental sustainability**. The company promotes projects for the development of the community and the socio-economic and cultural fabric in which it operates.



4. Code of Conduct

In the light of the afore-mentioned ethical principles, the following is the code of conduct that the Recipients must adhere to when carrying out their activities.

4.1. The People

- The Company identifies the guiding principles within its "Company Policy", as well as the fundamental ethical behavior guidelines that all workers and/or collaborators must obligatorily respect and promote within their respective roles.
- Every new member of staff or collaborator is unique and brings important added value to the company.
- The Company protects and appreciates its human resources, committing itself to maintaining constant the conditions necessary for professional growth, supporting the achievement of the best results achievable through the enhancement of knowledge, skills and competences, and carrying out appropriate refresher training to reach set goals.

4.2. Code of Conduct within the Company

- Every person within the Company is required to behave in a manner appropriate to the place and to the people with whom it has professional and interpersonal relationships.
- All company activities must be carried out with passion, diligence, honesty, collaboration, loyalty, mutual respect, in compliance with company procedures and regulations, as well as with current regulations.
- Humility, respect and ambition must be values common to every collaboration relationship for the utmost satisfaction of the parties involved.

4.3. Equal Opportunities and Human Rights

- The company undertakes to ensure compliance with the conditions necessary for a positive work environment.



- The Company condemns any form of discrimination based on race, sex, nationality, religion, language, trade union, salary, or other nature, and shall:
 - not engage in the use of or support child labor;
 - not resort to, nor support the use of forced labor
 - not resort to, nor support undeclared or illegal work;
 - not use or support unlawful disciplinary practices such as corporal punishment, mental or physical coercion, verbal abuse or other forms of intimidation;
 - not discriminate, during employee selection processes, or in the case of access to information/training activities, career advancement, dismissal or retirement, or any other activity.
 - allow freedom of association and the right to collective bargaining.
 - remunerate personnel respecting the national collective labor agreement, communicating with transparency the remuneration schemes applied.
 - regulate and implement overtime in a responsible manner, following the provisions of legislation or collective bargaining.
 - provide its employees with clear and correct information about the roles, responsibilities, tasks, rights and duties of the parties.

4.4. Internal and External Communication

- The role of communication is fundamental for transmitting the values that distinguish the company. Integration between the development of technologically advanced products and the growth of our reputation are one of the main cornerstones of our professional success.
- Communication to the external environment shall be made in full transparency and loyalty. All Recipients must therefore undertake to support and enhance the corporate image and its values.
- The assistance and support service is one of the cornerstones of customer orientation and continuous improvement. The Company, therefore, implements appropriate communication tools through which it is possible to interact with the Company itself, to forward requests, request clarifications, make complaints or propose improvements.



- Information disseminated inside and/or outside must always be complete and accurate, so that the Recipients can make correct and informed decisions.
- Advertising promotion shall respect the Ethical Principles and reflect the shared Corporate Values.
- Internal and external communication shall respect the principles of Confidentiality, Loyalty and Trust.

4.5. Confidentiality, Loyalty and Trust

- The Company undertakes to ensure the protection and confidentiality of data, in compliance with current legislation.
- Recipients are required not to use confidential information, learned by reason of their work, for purposes unrelated to the exercise of such activity, and in any case to always act in compliance with the loyalty and confidentiality of data agreement into with the Company.
- In particular, the Recipients are bound by the strict confidentiality of documents that disclose proprietary know-how, corporate transactions, commercial, technical or other information.
- The Company and the Recipients undertake to engage in fair competition, knowing that honest competition is a healthy incentive for both internal development and protection processes, and for the interests of customers and the community.
- The relationship between the Company and its Recipients is based on mutual trust: the Recipients are therefore obliged to work to promote the interests of the company, in compliance with the values set forth in this Code.
- Recipients must refrain from any activity that could constitute a conflict with the interests of the Company, forgoing the pursuit of any personal interests in conflict with the legitimate interests of the Company.
- In cases where the possibility of a conflict of interest may emerge, the Recipients are required to contact their immediate superior so that the Company can evaluate and manage the potentially conflicting activity.

4.6. Respecting Laws

- The Company operates in full compliance with laws, regulations and agreements applicable to business, and in particular in the field of labor law, product, environment and occupational safety.
- All Recipients are therefore required to observe the same upright behavior.

4.7. Health and Safety in the Workplace and Safeguarding the Environment

- The Company is committed to offering its staff a healthy, safe and respectful working environment.
- Safety in the workplace is ensured both by strictly implementing the provisions of the law in force and by actively promoting the culture of safety through specific education, information, training, involvement and participation programs. Staff training and involvement are a central element of the adopted Management System.
- The Company protects the health of its workers, also ensuring compliance with hygiene and health prevention regulations.
- Striving for continuous improvement in this area focuses on the analysis and management of "near misses" and direct and indirect warnings (including observations during internal and external audits).
- The responsibility linked to compliance with the law runs throughout the entire organizational chain, making occupational safety a given standard in the work processes.
- Within the analysis of business processes there is constant focus on Environmental Sustainability, the reduction of energy consumption and climate-altering gas emissions, industrializing processes to obtain less waste, optimizing packaging and transport, in line with the applied System Management.
- The Company implements both separate waste collection and a timely and correct management of the waste produced.
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4.8. Observing Procedures and Instructions

- The Company has a clear and shared organizational structure, which analyzes and defines both the company roles and the duties and responsibilities assigned to each function.
- The Company believes that management efficiency and the culture of continuous improvement are indispensable elements, and constantly monitors the KPIs assigned to each function.
- The Company has mapped its processes, subdividing the activities among the various company functions and preparing suitable management and control tools.
- The Recipients must therefore act on the basis of their respective profiles, observing the procedures and instructions given, being proactive, suggesting solutions and actions for continuous improvement to achieve their objectives.

4.9. Interaction with Authorities and Public Administrations

- Relations with Authorities and Public Administrations must be carried out with utmost clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.
- The Recipients, unless expressly authorized, cannot interact with the Authorities and with the Public Administrations for and on behalf of the Company.
- Authorized Recipients will abstain from exerting any form of pressure, explicit or veiled, aimed at obtaining any undue advantage for themselves or for the Company.
- In this regard, the Authorized Recipients will be required to strictly comply with the provisions of this Code, as well as, more generally, with the directives given by the Company Management.

4.10. Interaction with Political Organizations and Unions

- In relations with representatives of political parties and associations that bear collective interests, no Recipient must neither promise or pay sums of money, nor promise or grant



goods of any kind on a personal basis in order to promote or directly or indirectly favor the Company's interests.

- No Recipient may circumvent the above provisions by resorting to different forms of aid or contributions which, in the form of sponsorships, appointments, consultancy or advertising, have the same purposes as described above.

4.11. Relationships with clients and suppliers

- "Every day we take care of customers, partners and collaborators", "they inspire us to put them in a position to turn needs into new opportunities". These concepts are the basis for customer orientation.
- The Recipients therefore shall relate to third parties with courtesy, competence and professionalism, in the belief that the protection of the image and reputation of the Company, and consequently the achievement of the Company Mission.
- In particular, Recipients must refrain from any form of unfair or deceptive behavior that could induce customers or suppliers to rely on unfounded facts or circumstances.
- Recipients are obliged to commit themselves constantly to provide timely and high-quality services, seeking to limit any form of disruption or delay, in order to maximize customer satisfaction.
- Relations with suppliers are based on collaboration, loyalty, honesty and transparency.
- The choice of suppliers is carried out on the basis of objective criteria of economy, opportunities, quality of service and efficiency.
- The choice of suppliers is precluded by virtue of interests conflicting with those of the Company.



4.12. Use of company property and information systems

- All corporate property and IT resources made available to the Recipients are fundamental tools for achieving the results of the Company. Under no circumstances may they be used for purposes contrary to current laws and regulations, or contrary to Company values.
- The Recipients are responsible for the safekeeping and conservation of the property and resources entrusted to them.
- In reference to the information systems and tools received, the Recipients must monitor their functionality and correct use, protect the information contained in them, keep the passwords and identification codes confidential and use only software programs authorized by the Company.

4.13. Accepting gifts and other business courtesies

- The exchange of benefits that are not consistent with normal business relationships and business courtesies may create conditioning situations.
- It is therefore forbidden to grant or accept gifts, courtesies or benefits that may be interpreted as a means of favorable treatment or unfair advantage for any activity connected to the Company, or such as to generate even the impression of illegality or immorality.
- Recipients who grant or receive gifts, or other forms of benefit, not directly attributable to normal courtesy relations, are obliged to immediately refuse and inform their direct manager.

4.14 PROTECTING REPORTERS

- The Company is committed to promoting a culture of good communication and corporate social responsibility, encouraging the use of internal reporting channels first and foremost so that relevant information quickly reaches those closest to the source of the problem who are capable of dealing with it effectively and possibly rectifying it.



- The Company, therefore, shall comply with every provision of the relevant law, aimed at preventing and prohibiting retaliation against whistleblowers, who should be considered figures that significantly contribute to self-correction and excellence.

5. IMPLEMENTING RULES

Anyone operating and/or maintaining relations with the Company is required to know the Code of Ethics. Any revision of the Code shall be approved by the Board of Directors and disclosed according to the procedures provided for by the Code itself. The review may also be requested based on the reports received from the Recipients.

5.1. Training and Communication

The HR office is responsible for preparing and implementing appropriate communication and training plans for the dissemination and knowledge of the Code of Ethics. Particularly, in the case of new workers, it will be its prerogative to communicate the Code.

5.2. Code Enforcers

Compliance with the provisions of this Code is entrusted to the existing Internal Control System and to the prudent, reasonable and careful supervision of each of the Recipients, within their respective roles and functions.

All the Functional and Service Managers have a primary responsibility in relation to the Code of Ethics, in so far as they must:

- Behave in line with the provisions of the present Code such as to constitute an example for its Recipients;
- Orient the Recipients towards compliance with the Code of Ethics, requesting External Recipients to familiarize themselves with this Code;



- Report promptly any facts and circumstances potentially in conflict with the principles and provisions of this Code, and adopt subsequent corrective measures shared with the Management.

In relation to reports pursuant to Legislative Decree 24/23, a Whistleblowing Office has been specifically created to handle the following activities:

- receiving and examining all reports received through the internal reporting channel;
- managing reports in compliance with the protection principles and confidentiality obligations pursuant to Legislative Decree. 24/2023.

5.3. Value of the Code

Compliance with the Code of Ethics must be considered an essential part of the contractual obligations with the Recipients.

The violation of the principles and contents of the Code of Ethics may constitute a breach of the of the employment or collaboration relationship obligations.