

CODE OF CONDUCT / 2025



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INTRODUCTION

Vimi Fasteners S.p.A. is proud of its identity and values.

We are a cutting-edge company, committed to succeeding correctly, participating in the growth of the global market with innovative products and advanced technology.

We value our people by developing new talents to be excellent and leaders in the global market.

We contribute to building a better world with our commitment to the environment and sustainable development, also by voluntarily publishing our Sustainability Report.

The principles expressed in this Group Code of Ethics are mandatory and binding for all Group Companies.

They identify the behaviours to be adopted to disseminate the main values in the workplace, to promote and protect the good name of the company and to operate in compliance with current laws and regulations.

In particular, this Code of Conduct¹ must be interpreted as "a Group Code of Conduct" through which the Vimi Group states and clarifies its ethical/social responsibilities and commitments towards the various internal and external stakeholders, also in light of the provisions of Legislative Decree 231/2001.

All Vimi Group employees must ensure that their decisions comply with the requirements of the Code of Ethics.

Our partners are also asked to operate in compliance with the Code of Ethics when interacting with our company or when operating on behalf of Vimi.

Methods of Implementation

All Vimi Group employees and partners must adhere to the following documentation:

- This Code of Conduct
- All corresponding internal procedures, in particular the anti-corruption policy
- Any other local rule that relates to ethical issues.

The Code of Conduct is brought to the attention of all internal and external employees and partners. Periodically, each employee will be informed and trained on the requirements of the Code of Ethics and will be required to declare their compliance with the Code of Ethics.

An autonomous oversight body (Organismo di Vigilanza or OdV) has been established at Vimi Fasteners S.p.A. with the following functions:

- Monitoring, updating and periodic revision of the Code

¹ Hereafter, the terms "Group," "Vimi Group," or "Vimi" shall refer to all companies subject to the direction and control of Vimi Fasteners S.p.A.

- Verification of the correct application of the Code
- Reception, analysis and decision on reports of Code violations
- Management of the development of communication and training activities on the Code.

Any violation of the Code is managed rigorously, through specific investigations and the subsequent adoption of disciplinary measures, including dismissal and the initiation of legal actions, as better specified in the Company Disciplinary Code.

We all have a duty to report possible violations.

In case of doubts, violations, and to report information relating to situations not in line with the Code, reports can be made in the following ways:

- By contacting your manager
- By sending an email to the following address: organodivigilanza@vimifasteners.com
- By postal service (To the attention of the Supervisory Body, c/o VIMI FASTENERS SPA, with registered office in Novellara (RE) Via Labriola n. 19); in this case, to ensure confidentiality, the report must be placed in a sealed envelope marked as “confidential/personal” on the outside.

RESPECT FOR PEOPLE

Vimi Group employees are an indispensable factor for success. For this reason, we want employees to feel in a safe environment, where their rights are guaranteed and their talent is valued.

1. Personnel Selection

The evaluation of personnel to be hired is carried out exclusively on the basis of the professional and psycho-aptitudinal profile of the candidates. The information requested is strictly related to the verification of the aspects provided for by the professional and psycho-aptitudinal profile, respecting the candidate's privacy and opinions.

The Human Resources Department, within the limits of available information, adopts appropriate measures to avoid favouritism, nepotism, or forms of cronyism during the selection and hiring phases (for example, by ensuring that the recruiter is not related to the candidate), as well as conflicts of interest.

The Group Companies offer all workers the same employment opportunities, ensuring that everyone can enjoy fair treatment, based on merit criteria, without any discrimination. The Group Companies are committed to creating a work environment that discourages discriminatory conduct, injurious or defamatory interpersonal attitudes.

The Group Companies also undertake not to favour in any way candidates reported by third parties, and in particular those belonging to Public Administrations, or clients of the Company. In the event of reports of candidates to function managers, or to employees by members of Public Administrations, immediate communication will be given to the Supervisory Body, which will proceed with the investigations it deems appropriate.

2. Establishment of the employment relationship and privacy protection

We hire personnel solely and exclusively with a regular employment contract in compliance with all regulatory and remuneration elements provided by law and the National Collective Bargaining Agreement (CCNL).

No form of irregular work is permitted neither in the VIMI group companies, nor by suppliers and collaborators. Furthermore, the company does not use child or forced labour, nor has it stipulated or does it stipulate contracts with suppliers or subcontractors who use it.

The privacy of employees and collaborators is guaranteed by compliance with relevant legislation and by the prohibition of exercising any form of control over employees not permitted by law. In particular, any investigation into the ideas, preferences, personal tastes and, in general, the private life of collaborators is excluded. These standards also provide for the prohibition, except in cases provided for by law, of communicating/disseminating personal data without prior consent of the interested party and establish rules for the control, by each collaborator, of the norms and laws protecting privacy and data processing pursuant to current privacy legislation.

Upon establishment of the employment relationship, each collaborator receives adequate training and information regarding the following aspects:

- Code of Conduct;
- characteristics of the function and tasks to be performed;
- regulatory and remuneration elements, as regulated by the national collective labour agreement;
- rules and procedures to be adopted in order to avoid possible health risks associated with work activity.

This information is presented to the collaborator in such a way that the acceptance of the assignment is based on an effective understanding.

3. Personnel Management

Managers and heads of company functions have the task of ensuring compliance with equal opportunities also in the management of the employment relationship, in maintaining workplaces free of discrimination, ensuring fair treatment based on merit criteria and promptly identifying and resolving any related problems.

Each manager is required to value the working time of collaborators by requesting performance consistent with the exercise of their duties and with work organisation plans.

It constitutes an abuse of authority to request, as an act owed to a hierarchical superior, personal services or favours or any behaviour that constitutes a violation of this Code.

Furthermore, it is the Company's policy to promote an internal climate in which each Employee interacts with other colleagues, honestly, with dignity and mutual respect.

A climate of work groups in which human resources communicate openly facilitates the achievement of the Company's goals and objectives and promotes personal growth.

4. Health and Safety

Vimi's objective is to ensure working conditions that comply with all health and safety standards. Furthermore, we are committed to spreading a culture of safety, developing awareness of risks and promoting responsible behaviour by all employees; moreover, we work to preserve, especially with preventive actions, the health and safety of workers, as well as the interest of other stakeholders.

Vimi's objective is to protect the human, tangible and financial resources of the Company, constantly seeking the necessary synergies, not only within the Company, but also with suppliers, companies and customers involved. To this end, Vimi carries out technical and organisational interventions through:

- a continuous analysis of the risk and criticality of the processes and resources to be protected;

- continuous improvement of prevention activity;
- the timely preparation/updating of necessary measures and means;
- the adoption of the best technologies;
- the control and updating of working methodologies;
- the contribution of training and communication interventions.

In compliance with the applicable safety regulations, for the purposes mentioned above, Vimi bases its conduct on the following principles:

- elimination of risks and, where this is not possible, their reduction to a minimum;
- assessment of risks that cannot be avoided;
- reduction of risks at source;
- replacement of what is dangerous with what is not dangerous or is less dangerous;
- respect for ergonomic principles in the design of workplaces and the choice of work equipment and working and production methods, in particular to mitigate monotonous work and repetitive work and to reduce the effects of this work on health;
- consideration of the degree of technical evolution;
- prevention planning, aiming at a coherent complex that integrates technique, work organisation, working conditions, social relations and the influence of environmental factors;
- priority to collective protection measures over individual protection measures;
- adequate instructions to workers.

These principles are used by the company to take the necessary measures for the protection of workers' safety and health, including professional risk prevention activities, information and training, as well as the provision of an organisation and necessary means.

The entire company, both at top and operational levels, particularly when decisions or choices must be made and, subsequently, when they must be implemented, adheres to these principles.

5. Use/Abuse of Alcohol, Narcotic, Psychotropic and Toxic Substances

Referring to Italian legislation (Legislative Decree 81/08 of the new Consolidated Law and subsequent amendments), rules governing the use of alcoholic substances by company employees have been introduced. The provision affects individuals holding B, C, D and E licences, with particular emphasis on those who regularly use company vehicles. Pursuant to the Decree, the blood alcohol level tolerance is 0 mg; for this reason, the aforementioned individuals are required to abstain from consuming alcoholic beverages.

We remind you that, according to the law, any checks carried out by the Competent Doctor must be carried out upon notification by the employer, the worker themselves, or any other person who has contact with the alleged individual, in the event that anomalous situations occur.

Furthermore, Provision 18 September 2008, published in Official Gazette no. 236 of 8 October 2008, contains the application procedures for carrying out checks on workers to ascertain the absence of drug addiction and the consumption of narcotic or psychotropic substances. Each employee undertakes to abstain from the consumption of the aforementioned substances.

6. Freedom of Association

At Vimi, employees are free to create and affiliate with organisations that promote and protect the interests of employed workers. Freedom of affiliation applies to all employees, including those with fixed-term and temporary contracts. No discrimination of any kind against those who decide to affiliate with a trade union is tolerated.

7. Discrimination and Harassment

It is our commitment to ensure appropriate working conditions, guarantee equal opportunities and maintain workplaces free from discrimination. We want to create an environment where all employees are treated equally and enjoy the same opportunities for growth, characterized by a spirit of mutual help and cultural enrichment. The company does not consider any form of discrimination acceptable or tolerable.

The company also requires that in internal and external work relationships there is no harassment, meaning:

- The creation of an intimidating, hostile or isolating work environment towards individuals or groups of workers;
- Obstruction of others' job prospects for reasons of personal competitiveness;
- The situation in which significant company determinations, initiatives and decisions relevant in any way to the recipient's working life are conditional on the acceptance of sexual favours;
- Proposals for private interpersonal relationships, conducted despite an express or reasonably obvious lack of liking, which have the ability, in relation to the specificity of the situation, to disturb the recipient's serenity with objective implications for their work position;
- Any conduct that – due to modalities, circumstances, time and place – may entail, both with reference to colleagues of equal level and to people in a hierarchical relationship, a violation of personal dignity and honour.

The company will not tolerate any form of retaliation against Employees who have complained about discrimination or harassment, nor against workers who have provided information about it.

8. Prohibition of Possession of Child Pornographic Material

It is absolutely forbidden to distribute, divulge, disseminate or publicise, possess on computer or paper supports, at Vimi's premises, warehouses, appurtenances thereof, or any other place that can in any case be traced back to it, child pornographic material or virtual images created using images of minors.

9. Compliance with legislation on combating forms and expressions of xenophobia and racism

Vimi considers compliance with legislation on combating certain forms and expressions of racism and xenophobia as an essential value. It therefore repudiates any activity that may involve the promotion of ideas based on racial or ethnic superiority or hatred, the incitement to commit or the commission of acts of discrimination on racial, ethnic, national or religious grounds, the incitement to commit or the commission of violence or acts of provocation to violence on racial, ethnic, national or religious grounds, even when such behaviours are manifested by the denial, serious minimisation or apology of the Shoah or crimes of genocide, crimes against humanity and war crimes.

Any employee who, in the course of their work, becomes aware of the commission of acts or behaviours of racism and xenophobia, as identified above, must, without prejudice to legal obligations, immediately notify their superiors and the Supervisory Body.

COMBATING CORRUPTION

1. Conflict of Interest

All activities conducted by and on behalf of Vimi must not imply a conflict of interest and all collaborators are required to avoid personally benefiting from business opportunities of which they have become aware in the performance of their duties.

In the event that even the appearance of a conflict of interest arises, the collaborator is required to immediately communicate this in writing, including by email, to their manager and to the Supervisory Body (through the appropriate communication channels) as well as to refrain from conducting the specific business and/or company process.

Furthermore, before accepting an appointment as an officer, director, auditor in another company or public office in State Bodies, which may even appear to be a conflict of interest, it is necessary to obtain approval from the Chairman of the Board of Directors. The collaborator is also required to provide information about activities carried out outside of working hours, if these may appear to be in conflict of interest with Vimi.

Situations of conflict of interest include:

- Entering into a contract with a company owned by a family member without it being subjected to evaluation by the purchasing department.
- Holding a senior or control position in a company (director, auditor, general manager, head of function) and having economic interests with suppliers, customers, or competitors (ownership of shares, professional assignments, etc.) even through family members and/or relatives;
- Being employed by a client or competitor in addition to the duties performed at Vimi.
- Accepting money or favours from individuals or companies that are or intend to enter into business relationships with Vimi.
- Deciding on the hiring, promotion, or financial recognition of a relative and/or cohabitant.
- Participating in the performance evaluation process concerning spouses, relatives, or people with romantic ties.

2. Directors' Interests

If a director has an interest on his own behalf or on behalf of third parties in a specific Company transaction, he must inform the Board of Directors and the Board of Statutory Auditors, specifying its nature, terms, origin and scope. If it is a managing director, he must also refrain from carrying out the operation. If it is a sole director, he must notify the first useful shareholders' meeting.

In the above cases, the resolution of the Board of Directors must adequately explain the reasons and the convenience for the Company of the transaction, also promptly informing the Supervisory Body.

3. Bribes

Vimi adopts a "zero tolerance" approach to any form of bribery and is committed to maintaining a professional environment where corruption cannot occur. All employees in business relations with third parties are required to behave ethically and in compliance with laws, based on the utmost fairness and integrity.

4. Gifts, Tributes and Benefits

With the exception of gifts, tributes and benefits of modest value (max. €100.00) not aimed at improperly acquiring advantages, no form of gift that could even be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring favourable treatment in the conduct of any activity linked to Vimi, is permitted, both towards customers and in relations with suppliers, agents, distributors and/or employees and collaborators.

In particular, any form of gift to Italian and foreign public officials, auditors, directors, statutory auditors or their family members is prohibited if it could influence the independence of judgment or induce them to secure any advantage. This rule, which allows no exceptions even in those countries where offering valuable gifts to business partners is customary, concerns both promised or offered gifts and received ones; it is specified that a gift means any type of benefit (in a broad sense also free participation in conferences, promise of a job offer, etc.).

Gifts offered (except those of modest value) must be adequately documented to allow for verification and authorized by the head of the function. Vimi Group collaborators who receive or provide gifts or benefits not provided for by the permitted types (i.e., exceeding the concept of modest value mentioned above) are required, according to established procedures, to communicate this to the Supervisory Body and to communicate Vimi's policy on the matter to the sender.

5. Contributions and Sponsorships

Sponsorship activities can be carried out after defining specific agreements and verifying the honourability of the beneficiary and the promoted event/initiative, avoiding giving sponsorships to counterparties of which membership of criminal organisations or the commission of money laundering crimes is even suspected.

6. Budget & Reporting

To preserve the Vimi Group's reputation, it is necessary to be transparent about its financial status. Our commitment is therefore aimed at ensuring that all financial documentation is compiled in compliance with the highest standards of integrity and accuracy. Vimi, in fact, aims to guarantee the integrity of the share capital, committing itself in all its operations to create value in the medium to long term in compliance with current regulations and internal company procedures.

7. Accounting Transparency

The Company's accounting system complies with generally accepted principles of truth, accuracy, completeness and transparency of recorded data. The recipients of this Code undertake to refrain from any conduct, active or omitted, that directly or indirectly violates the regulatory principles and internal procedures relating to the preparation of accounting documents and their external representation.

In particular, the Recipients of the Code undertake to collaborate so that every operation and transaction is promptly and correctly recorded in the company accounting system according to the criteria indicated by law and applicable accounting principles, and, where appropriate, duly authorized and verified.

The recipients of this code are required to keep and make available, for every operation and transaction carried out, adequate supporting documentation in order to allow:

- accurate accounting registration
- immediate identification of underlying characteristics and motivations
- easy formal and chronological reconstruction
- verification of the decision, authorization and implementation process in terms of legitimacy, consistency and appropriateness, as well as the identification of responsibilities.

The recipients of the aforementioned Code who become aware of cases of omission, falsification, or negligence in accounting records or supporting documentation are required to promptly report this to their superior and to the Supervisory Body.

The company promotes the initiation of updating and training programs and courses in order to educate its employees on current rules and regulations in the accounting sector.

8. Use of Company Assets

Every employee is required to operate diligently to protect company assets, through responsible behaviour in line with established operating procedures.

Every employee is responsible for the resources entrusted to them and has a duty to report any threats or harmful events.

PROTECTION OF INFORMATION

1. Confidential Information and Inside Information

Information is a vital part of our success. Information, if misused, can cause serious damage to our activities.

Certain information concerning Vimi is classified as confidential because it is highly sensitive, including financial results, strategic plans or technical/production aspects related to our products. Once made public, such information is no longer considered confidential.

In relation to Vimi's status as a listed company, within the scope of Confidential Information, all precise information concerning financial instruments or issuers of financial instruments that is not public domain and is capable, if made public, of significantly influencing the price of such financial instruments is defined as "Price Sensitive Information" or "Inside Information".

Inside Information may not under any circumstances be disclosed externally except by the Investor Relations Officer and/or by the individuals provided for in the "Inside Information Procedure".

By way of example but not limited to, Inside Information includes:

- acquisition, merger, demerger projects, etc.;
- strategic plans, budgets, business plans, investment planning and any act affecting business strategies;
- any information on new products and technologically advanced materials;
- information on entering or exiting a business sector;
- changes in the company's strategic personnel;
- transactions on the company's capital;
- significant developments in legal or trade union disputes.

Each employee is prohibited from buying and selling Vimi financial instruments or carrying out any other financial and commercial transaction, even through an intermediary, for the purpose of personal gain, when this is encouraged by the possession of Inside Information or Confidential Information of which employees have become aware by reason of their function within Vimi.

Natural or legal persons who have access, on a regular or occasional basis, to Inside Information concerning the company are defined as "Insiders" and, as such, are entered in the Register of persons who have access to Inside Information and are informed of this condition as required by market abuse legislation.

2. Internal Dealing

The Code of Conduct includes the current regulatory provisions aimed at making transactions carried out on the company's shares by Relevant Persons (i.e., those who perform management and control functions of the company) or by persons closely related to them more transparent.

3. Principles for Market Information

The Investor Relations Officer (appointed by Vimi's Board of Directors) is the sole person responsible for market information activities.

The Manager responsible for preparing the company's accounting documents is required to certify, under their own responsibility, the correspondence of all economic and financial information transmitted to the market with the results of the accounting books, in application of Article 31 of the AIM Italia Issuers' Regulation (Alternative Capital Market) and applicable provisions.

4. Competition Information

Running a business honestly is a two-way street. In fact, we are required to respect others' information as much as we want our competitors to respect ours. The company does not engage in unlawful or unfair conduct in order to gain possession of trade secrets, does not hire employees from competing companies in order to obtain confidential information, nor does it induce personnel or customers to disclose information they cannot disclose.

5. Mass Media

Relations with the mass media are based on respect for the right to information. The communication of data and information must be truthful, accurate, clear and transparent, and must be carried out by the company functions delegated to this responsibility. Information concerning Vimi directed to the mass media may only be disclosed by the company functions delegated to do so or with their authorization.

6. IT Systems

IT systems are vitally important for the company's operations. Improper use of IT systems can expose our entire network to serious risks due to hacking, viruses and other threats. IT systems include all devices owned or licensed by Vimi, including laptops, desktops, phones, mobile phones, tablets, networks, software and hardware.

7. Transactions with Related Parties

Vimi, as a listed company, adopts rules that ensure transparency and substantial and procedural fairness in transactions with potential conflicts of interest (so-called "related party transactions"), in compliance with applicable regulations and related procedures.

8. Anti-Money Laundering and Self-Laundering

The Vimi Group's policy requires the application of effective anti-money laundering programmes both to comply with current laws and to protect the Company from being used as a tool to carry out this type of illicit practice.

Therefore, all Vimi employees, in any capacity, must never carry out or be involved in activities that imply receiving stolen goods, money laundering (i.e., the acceptance or processing) of proceeds from criminal activities in any form or manner, or in operations involving the use of money, goods or utilities of illicit origin.

In particular, the recipients of the Code of Ethics are required to comply with all national and international provisions on money laundering and are expressly forbidden from carrying out, or allowing others to carry out, criminal or otherwise illicit activities.

In relation to the crime of self-laundering, Vimi prohibits all its employees, in any capacity, from transferring, replacing, or investing in economic, financial, entrepreneurial or speculative activities, sums of money deriving from the commission of a non-culpable crime or from illicit activities such as, for example, tax evasion, corruption and the appropriation of corporate assets, in such a way as to concretely hinder the identification of their criminal origin.

HONESTY IN EXTERNAL RELATIONS

We aspire to maintain and develop a relationship of trust with our stakeholders. The way we act is judged by people, therefore we are required to maintain the same ethical standards we adopt towards our colleagues also in relations with external parties.

1. Relations with Suppliers

Purchasing processes are based on seeking the maximum competitive advantage for Vimi, granting equal opportunities for each supplier, loyalty and impartiality, fairness and transparency.

To obtain the cooperation of suppliers in constantly ensuring the satisfaction of Vimi's customers' needs in terms of quality, cost and delivery times, even exceeding their expectations.

It is good practice, particularly with regard to purchases of non-recurring products and/or services or those of significant value, or goods not evaluated in the budget (extra-budget), to obtain and keep in its archives at least 3 offers received from different suppliers not linked by control, connection, and/or the same management and coordination relationships, and to evaluate them based on:

- quality;
- reliability;
- service;
- price;
- other relevant factors.

In the selection of suppliers, undue practices aimed at favouring or disfavouring one supplier over another are not permitted or accepted. We also want the companies we collaborate with to adhere to the same ethical standards that we ourselves are committed to maintaining and which are contained in the attached Supplier Code of Conduct.

2. Relations with bodies, institutions and trade unions.

Our professional relationships may involve contacts with other entities including: bodies, institutions and trade unions. Relations with these entities are reserved exclusively for the company functions delegated to this and must be based on maximum transparency, clarity, impartiality and independence, such as not to lead to distorted, ambiguous or misleading interpretations by the institutional, private and public entities with whom relations are maintained for various reasons.

3. Intra-group Relations

Vimi requires Group companies to conform to the values expressed in the Code of Ethics and to collaborate in pursuing objectives, in absolute compliance with current laws and regulations.

Vimi's direction and coordination activity is expressed through official communications directed to the appointed corporate bodies of the other Group companies. It is required to:

- refrain from behaviour that is detrimental to the integrity, autonomy or image of the other Group companies;
- promote the circulation of information within the Group, particularly for the purposes of preparing the consolidated financial statements and other communications, in accordance with the principles of truthfulness, correctness, completeness, clarity, transparency and respecting the scope of activity of each company;
- define the existing contractual relationships between the Group companies in line with market prices and value and in compliance with the principles of correctness, effectiveness and traceability of underlying economic relationships and related financial flows;
- favour communication between Group companies.

4. Respect for the Environment

Vimi is committed to safeguarding the environment as a primary asset. Vimi, considering the need for environmental protection, for the benefit of the community and future generations, to be essential, adopts the most appropriate measures to preserve the environment itself by promoting and planning the development of activities in coherence with this objective.

To this end, Vimi is committed to minimizing the environmental and landscape impact of its activities in compliance with both current legislation and the progress of scientific research and best practices in the field.

5. Grants and Funding

Contributions, grants or funding obtained from the European Union, the State or another Public Body must be used for the purposes for which they were requested and granted.

Similarly, in the case of participation in public tender procedures, the recipients of this Code are required to operate in compliance with the law and correct commercial practice, avoiding in particular inducing Public Administrations to act unduly in favour of the Company.

6. Relations with Public Supervisory Authorities

All Recipients of this Code undertake to scrupulously observe the provisions issued by the competent Institutions or Public Supervisory Authorities for compliance with the current legislation on the sector related to company activity. The Recipients also undertake to collaborate with these Authorities and comply with every request within the scope and limits of their functions, avoiding obstructionist behaviour.

7. External Effectiveness of the Code of Ethics

Anyone, acting in the name and on behalf of the Company, who comes into contact with third parties with whom the company intends to undertake commercial relations or is required to have institutional, social, political or any other type of relationship with them, has the obligation to: a)

inform these parties of the commitments and obligations of the Code; b) demand compliance with the obligations of the Code in the performance of their activities; c) adopt the internal provisions provided for in case of refusal by third parties to comply with the Code.

8. Sanctions

Compliance with the Code must also be considered an essential part of the contractual obligations assumed by employees, managers, collaborators, directors and parties having business relations with the company.

Compliance with the Code of Ethics and Conduct by employees and managers adds to the obligation to fulfil the general duties of loyalty, fairness, and execution of the employment contract in good faith, as also contemplated by the national laws in force in the various countries where Vimi operates (e.g., in Italy it is also required pursuant to and for the purposes of Articles 2104 and 2105 of the Civil Code).

Violation of the rules of the Code of Ethics and Conduct constitutes a breach of the obligations arising from the employment relationship, in compliance with the procedures provided for by the regulations and laws in force in the various countries where Vimi operates (for Italy, by Article 7 of Law 30 May 1970 no. 300, known as the Workers' Statute).

Towards collaborators, directors and third parties, the violation of the rules of the Code of Ethics and Conduct constitutes a serious breach of contractual obligations pursuant to Article 1453 of the Civil Code, with all legal consequences, including termination of the contract and/or assignment and may entail compensation for damages arising therefrom

SUPPLIER CODE OF CONDUCT

Introduction

Vimi Fasteners is committed to complying with laws and stakeholder expectations, promoting integrity and sustainability in its relationships with its Suppliers and Business Partners. This Code of Conduct sets minimum standards regarding human rights, occupational health and safety, the environment and anti-corruption.

Objectives and Cooperation

The objective is to maintain a competitive advantage through sustainable products and long-lasting business relationships. Vimi Fasteners therefore requires its Suppliers and Business Partners to share its commitment to sustainability.

With this Code of Conduct, Vimi Fasteners intends to promote virtuous and lasting relationships with its suppliers and business partners with the aim of fostering and maintaining a fair, sustainable and reliable supply chain.

Scope of Application

This Code of Conduct applies to all Vimi Fasteners suppliers and business partners to promote the understanding and application of sustainable practices.

These practices are to be disseminated throughout the entire value chain.

Requirements

- 1. Environmental Protection:** Suppliers and Business Partners are required to comply with environmental regulations and, to this end, are encouraged to implement environmental management systems (e.g. ISO 14001). They are required to minimise the environmental impact of their activities and promote efficiency in the use of resources. Upon delivery, all products and services must meet the quality and safety criteria agreed upon in the contract or specified in the order and must be safe for their intended use, avoiding substances and materials with negative impacts on health and the environment.
Vimi Fasteners expects its Suppliers to improve the environmental performance of products and services by setting targets and monitoring key environmental performance indicators.
Vimi Fasteners' Suppliers and/or Business Partners are required, in particular, to commit to minimising emissions into the air that pose a risk to the environment and health, including greenhouse gas emissions.
- 2. Human Rights and Labour:** It is essential to respect workers' rights, ensuring their health and safety at work, and preventing child labour, forced labour and discrimination.
Vimi Fasteners' suppliers must guarantee decent working conditions and respect the rights of local communities.
In particular, Vimi Fasteners' suppliers and business partners reject all forms of discrimination and harassment and establish a process that allows for the continuous reduction of risks and, consequently, the improvement of health and safety at work.
- 3. Transparent Business Conduct:** Corruption is prohibited, and Suppliers must act with integrity, avoiding conflicts of interest and anti-competitive practices.
Vimi Fasteners' Suppliers and Business Partners make decisions based solely on objective criteria and are not influenced by personal interests.
Suppliers and business partners strictly comply with all applicable laws for the import and export of goods, services and information.

Suppliers and business partners ensure compliance with applicable laws against money laundering and self-laundering.

4. **Sustainability of Raw Materials:** Suppliers and business partners must ensure that raw materials do not come from sources that violate human rights or finance conflicts.

Vimi Fasteners' Suppliers and Business Partners are required to comply with their due diligence obligations with regard to relevant raw materials, in particular tin, tantalum, tungsten, gold, cobalt and mica.

In order to protect ecosystems and biodiversity, the extraction of raw materials in protected natural areas is prohibited.

5. **Integration of Sustainability:** Vimi Fasteners expects its Suppliers and Business Partners to integrate sustainability into their operations and employee training.

Vimi Fasteners' Suppliers and Business Partners are encouraged to develop training programmes to improve the definition of guidelines, the implementation of processes and the communication of expectations to their employees. These training initiatives are aimed at qualifying their employees and encouraging them to act in accordance with rules and regulations.

Verification of Compliance

Vimi Fasteners reserves the right to verify compliance with this Code of Conduct; if the Supplier identifies any non-compliance with this Code in its conduct, it is required to promptly notify Vimi Fasteners and implement the necessary corrective actions to bring its activities and operations into compliance, requesting, if deemed appropriate, support from Vimi Fasteners to identify and agree on the most appropriate timing and actions.

Violation Reporting and Whistleblowing System

Vimi Fasteners has a Whistleblowing tool to collect any reports, including those from third parties: the reporting system is accessible in the Governance section of the Vimi Fasteners website (www.vimifasteners.com).

Consequences of Violations and Non-compliance with the Code of Conduct

If Vimi Fasteners becomes aware of violations and/or conduct that does not comply with this Code of Conduct on the part of the Supplier or a company belonging to the Group, it shall have the right to request that appropriate corrective actions be taken within a reasonable period of time. The Supplier shall remedy the non-compliance found at no cost to Vimi Fasteners.

Vimi Fasteners reserves the right to terminate any relationship and/or contractual agreement with a Supplier who refuses to identify and/or implement the above corrective measures, without prejudice to the right to claim compensation for any damage suffered.

For any requests for information regarding this Code of Conduct, including its interpretation and application, please contact the Vimi Fasteners representatives directly involved in the management of the existing commercial relationship.

Novellara, 14 December 2024

Vimi Fasteners S.p.A.