



**Special Precision Parts**

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## **ETHICAL CODE**

***VI-DA s.r.l.***



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### The Ethical Code of VI-DA s.r.l.

This Code expresses the commitments and ethical responsibilities in the conduct of business and corporate activities undertaken by the collaborators of VI-DA s.r.l. (hereinafter also the "Company"), whether they are directors or employees in any sense of these companies.

It is the Company's conviction that ethics in conducting its business is an indispensable condition for its success, an instrument for promoting its image and representing an essential asset of the Company.

To this end VI-DA s.r.l. has decided to adopt its own Code of Ethics which, in line with the principles of correctness, loyalty, honesty already shared by the company, is aimed at regulating the company's activity through behavioral rules.

This Code must be considered binding for the Company and for the behavior of all its employees and collaborators. VI-DA s.r.l. it also requires that all the main stakeholders of the Company (meaning the main suppliers, customers, etc.), conduct themselves in line with the general principles of the Code, without prejudice to respect for religious, cultural and social specificities.

This Ethical Code consists of:

- i The general principles on relations with stakeholders, which abstractly define the reference values in the activities of VI-DA s.r.l.;
- ii The criteria of conduct towards each class of stakeholders, which specifically provide the guidelines and the standards to which the VI-DA collaborators are required to comply with the general principles and to prevent the risk of unethical behavior;
- iii The implementation mechanisms, which describe the control system for compliance with the Code of Ethics and for its continuous improvement.

For the efficacy and mandatory nature, the Code of Ethics is published on the Company's website (<http://www.vi-da.com>). It is delivered to all new employees and collaborators of the Company and circulated to all those who have relations with VI-DA s.r.l.



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## I. PRELIMINARY PROVISIONS

### 1.1 Introduction

VI-DA s.r.l. carries out its activity in the field of mechanical processing based on the customer's design. The products find application in particular in sectors such as *automotive, food, racing and aerospace*.

The Company recognizes the importance of stating the guiding principles of its business

### 1.2 Definitions

In this Code, the following expressions will have the meaning indicated below:

"Code"	It means this Code and any attachments, as supplemented or modified from time to time.
"Collaborators"	It means the subjects who have economic-financial relations with the Company or other coordinated and continuous or project-based collaborative relationships, mainly personal and without subordination constraints (such as, by way of example and not exhaustive, project work; temporary work; insertion; internship summer orientation program) or any other relationship contemplated by art. 409 of the code of civil procedure.
"Recipients"	It means the subjects to whom the provisions of this Code apply and, in particular, Employees, Managers, Collaborators and Company Representatives.
"Employees"	It means the subjects who have an employment relationship with the Company, including temporary or part-time workers.
"Company Representatives"	It means, as from time to time, the Chairman, the Chief Executive Officer, the members of the Board of Directors, the Board of Statutory Auditors, the General Managers as well as the members of the other corporate bodies of VI-DA s.r.l. eventually set up pursuant to art. 2380 civil code (as modified by the legislative decree of January 17th 2003 n. 6) or of the special laws, as well as any other person in apical position, for this meaning any person who has functions of representation, administration or direction of VI-DA s.r.l.
"Control Body"	It means the Control Body (hereinafter also the "Guarantor") appointed to observe the code of ethics and the provision of sanctions appointed by the Company.
"Responsible"	It means each employee in charge of one or more sectors of VI-DA s.r.l., in accordance with the organization chart of the Company as in force from time to time.



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### 1.3 Scope of applications and effectiveness of the Code

The provisions of this Code apply to Recipients except as otherwise provided by the Code and in any case without prejudice to the application of the mandatory provisions of law and contract (including national, territorial and corporate collective bargaining) from time to time applicable to their relations with VI-DA srl.

This Code also applies to third parties with whom VI-DA s.r.l. maintains relationships, in compliance with the law or with the agreements entered into with them and within the limits established by this Code.

### 1.4 Effectiveness of this Code towards Employees, Collaborators, Managers and Company Representatives

Compliance with this Code is an integral part of the contractual obligations of Employees, also pursuant to and for the purposes of art. 2104 cod. civ.

Violation of this Code may constitute contractual non-fulfillment and / or disciplinary offense and, if applicable, may lead to compensation for any damage caused to the Company by such violation, in accordance with current legislation and collective agreements as applicable from time to time.

Recipients are required to comply with the provisions of this Code both in their relations with each other and in their relations with third parties. In particular:

- i. The Company Representatives, within their administrative and control functions, are inspired by the principles of this Code.
- ii. Managers conform their conduct to the principles set forth in this Code and require compliance by Employees and Collaborators. To this end, the conduct of the Managers constitutes an exemplary model. For the purposes of this Code, each Manager is personally responsible for the coordination and / or control of Collaborators under his direction and supervises to prevent violations of this Code. In particular, each Manager is obliged to:
  1. Communicate to its collaborators, in a clear, precise and complete manner, the obligations to be fulfilled and specifically the obligation to comply with the law and this Code;
  2. Communicate to its Collaborators in an unequivocal manner that, in addition to disapproving any violations of this Code, the latter may constitute contractual non-fulfillment and / or disciplinary offense, in accordance with current legislation, and therefore be punishable;
  3. Promptly report to their line manager or the Guarantor their findings as well as any information reported to them by their Collaborators regarding potential or actual violations of this Code by any Employee or Collaborator;
  4. As part of the functions attributed to him, to implement or promote the adoption of suitable measures to avoid the protraction of violations and prevent



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retaliation to the detriment of one's own Collaborators or of any other Employee or Collaborator;

- iii. Employees and Collaborators adapt their conduct to the principles set forth in this Code and to the communications of their Managers.

Without prejudice to the functions attributed to the Guarantor with respect to Employees, Collaborators and Company Representatives, the fulfillment by each Manager of his functions and the obligations related to them is performed in compliance with the provisions of this Code, as well as the consequent recommendations or instructions of the Guarantor, and the implementation and control procedures adopted from time to time by the Company.

To the extent necessary, the Company promotes the application of this Code to the Recipients also by recalling, in the respective contracts, specific clauses that establish the obligation to comply with the provisions of this Code.

The Guarantor monitors the implementation of the foregoing.

The Guarantor also supervises, so that the selection of candidates for Employees, Collaborators and Corporate Officers is also carried out in order to assess the adequacy of the personal and professional qualities of the candidates selected with the provisions of this Code.

## 1.5 Effectiveness of this Code towards third parties

The Recipient who, in the performance of his duties, comes into contact with third parties, must:

- i. To inform, as necessary, the third of the obligations established by the Code;
- ii. Require compliance with the obligations deriving from this Code which directly concern the activity of the same;
- iii. In the case of the Employee or of the Collaborator, report to their Manager, and, in the case of the Manager or Company Representative, report to the Guarantor any conduct by third parties contrary to this Code or in any case likely to induce the Recipients to commit violations of this Code.

VI-DA s.r.l. promotes the application of the fundamental principles referred to in this Code, taking into account the legal, social, economic and cultural reference framework, of the provisions of this Code by third parties with whom the Company has relations, including through insertion, in the respective models and contractual arrangements between them and the Company, of specific clauses that establish the obligation of these third parties to observe, in the context of their activities and their organization, the provisions of this Code.

The Guarantor monitors the implementation of the foregoing.



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## II. GENERAL PRINCIPLES

### 2.1 Legality

Respect for the law, as well as the provisions of its own Statute, is a fundamental principle for VI-DA s.r.l.

As part of their duties, the Recipients are required to comply with the rules of the legal system (national, supranational or foreign) in which they operate and must in any case refrain from committing violations of the laws, whether or not they are subject to custodial sentences, fines or administrative or other sanctions.

To this end, each Recipient undertakes to diligently acquire the necessary knowledge of the laws applicable to the performance of his duties, as in force from time to time.

Each Recipient observes, in addition to the general principles of diligence and fidelity pursuant to art. 2104 of the Civil Code, including the behavioral provisions contained in the collective agreements applicable to it.

### 2.2 Morality

The quality and efficiency of the company organization as well as the reputation of the Company constitute an invaluable asset and are substantially determined by the conduct of each Recipient. Each Recipient is therefore required, with his own conduct, to contribute to the safeguarding of this heritage and, in particular, of the reputation of the Company, both in the workplace and outside of them.

In particular, in the performance of their duties each Recipient maintains a conduct inspired by moral integrity, taking into account the various social, economic, political and cultural contexts of reference and, in particular, the following values:

- i. Honesty, fairness and good faith, assuming the responsibilities that it is responsible for according to its duties;
- ii Transparency, treating the information in its possession in a timely manner and implementing communication and information processes inspired by clarity, completeness, precision and sharing.

### 2.3 Dignity and equality

Each Recipient recognizes and respects the personal dignity, privacy and personality rights of any individual.

Discrimination, harassment or sexual, personal or other offenses are not tolerated.

### 2.4 Professionality

Each Recipient carries out his activity with the professionalism required by the nature of the duties and functions exercised, using the utmost commitment to achieve the objectives assigned to him and diligently carrying out the necessary in-depth and updating activities.



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### 2.5 Anti-corruption policy

VI-DA s.r.l. has a position of absolute intransigence against any form of corruption.

The Company and the recipients undertake to ensure that all laws and regulations that aim to combat corruption are respected.

Recipients must not:

- directly or indirectly offering money or other benefits to directors, general managers, managers in charge of preparing corporate accounting documents, statutory auditors or liquidators or subject to the management or supervision of the aforementioned subjects, of client or supplier companies, or of another entity, for the purpose of to obtain an interest or advantage of any kind, including obtaining or retaining business / business benefits for or on behalf of the company;
- directly or indirectly requesting or accepting money or other benefits from customers, suppliers, or other subjects or seeking an advantage of any kind.

## III. EXTERNAL RELATIONS

### 3.1 Donations, benefits or other benefits

As part of their duties, Recipients are prohibited from offering or granting third parties as well as accepting or receiving from third parties, directly or indirectly, even on the occasion of holidays, gifts, benefits or other benefits (including in the form of cash sums, various types of goods or services) that could influence or give the impression of influencing corporate decisions in favor of any person with whom the company has commercial relations.

The Recipient who receives donations, or offers of gifts, which do not comply with the foregoing must immediately inform in writing, in the case of Employee or Collaborator, their Manager, in the case of Manager or Corporate Officer, the Guarantor, for the adoption of appropriate measures.

### 3.2 Relations with customers

Customers are an integral part of the company assets of VI-DA s.r.l.

The Company has relations with customers who respect the fundamental principles and, taking into account their legal, social, economic and cultural reference, the provisions of this Code.

To consolidate the esteem and, consequently, customer loyalty, the relationships with them must be set by each Recipient according to legality and morality criteria, in compliance with the principles of professionalism and integrity.

To this end, the Recipients are required to carry out their activities towards customers with competence, precision, prudence, wisdom, dedication and efficiency, as well as with honesty, loyalty, availability and transparency.

In particular, the Recipients are required to:



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- i Observe the procedures set by VI-DA s.r.l. regarding customer relationships;
- ii Provide accurate, accurate and comprehensive information to customers regarding the goods and services provided by VI-DA s.r.l.;
- iii Do not use false or misleading statements in the sale or marketing of your products and services.

Promotions for the Company's products and services must be fair, accurate and consistent with the laws in force. Objective statements must be based on facts. The information that is disclosed must be accurate and truthful in advertising and statements.

### 3.3 Relations with suppliers

VI-DA has relationships with suppliers that respect the fundamental principles and, taking into account their legal, social, economic and cultural reference, the rules of this Code.

The Company pursues the fair and impartial selection of its suppliers.

The Recipients adhere to the selection and award procedures of suppliers established by the company directives, as well as to the public evidence procedures applicable pursuant to the current legislation.

In tenders for the supply, supply, supply or supply of goods or services to VI-DA s.r.l. Recipients, in the context of their functions, must observe the following rules:

- i Each Employee or Collaborator must communicate to their Manager, and each Manager or Company Representative must communicate to the Guarantor, any personal interest in the performance of their duties, which may lead to the onset of a conflict of interest;
- ii In the case of competing offers, suppliers must not be favored or hindered and must in any case be compared correctly and fairly, adopting objective evaluation criteria and selection with transparent methods. Consequently, the Recipient must not preclude from the candidate suppliers, in possession of the qualification requirements from time to time requested the possibility of winning the supply in question.

In the case where VI-DA s.r.l. purchases from semi-finished third parties and / or finished products, in order to use them in their own production process or to sell them on the final market, it is subject to the prohibition to falsify the origin of the material used or to modify the third party trademark possibly present on the materials / products used.

### 3.4 Relations with governments and public institutions

Relations with public institutions are held by the Company Representatives authorized to do so or by the persons delegated by them, in compliance with the provisions of this Code, as well as the Statute of the Company and special laws, having particular regard to the principles of transparency and efficiency.

In the relations that the Addressees of the Code, also through third parties, maintain with the Public Administration, the following principles must be respected:



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i It is always necessary to operate in compliance with the law and correct commercial practice, with the express prohibition of engaging in behaviors which, in order to benefit the Company or pursue an interest of the same, are such as to integrate offenses;

ii When any business negotiation, request or relationship with the Public Administration is in progress, Employees, Collaborators and those who work on behalf of the Company must not try to improperly influence decisions or induce the performance of acts contrary to the duties of office, even if implemented for the benefit or in the interest of the Company, the managers, officers (including the officials who deal with or make decisions on behalf of the Public Administration) or the employees of the Public Administration or their relatives or cohabitants.

### 3.5 Relations with political and trade union organizations

Relations with political and trade union organizations are held by the Company Representatives authorized to do so or by the persons delegated by them, in compliance with the provisions of this Code, as well as the Statute of the Company and special laws, having particular regard to the principles of impartiality and independence, nationally and internationally.

### 3.6 Relations with information bodies

Relations with the press, television and in general with mass media, both national and foreign, are held exclusively by the Company Representatives authorized to do so or by the persons delegated by them.

All external communication interventions must be previously authorized in compliance with the company procedures in force from time to time.

### 3.7 Competition

Each Recipient is required to comply with the regulations on fair competition and antitrust.

Article 81 of the EC Treaty states that "all agreements between companies, all the decisions of associations of companies and all concerted practices that may affect trade between Member States and which have as their object and by the effect of preventing, restricting or distorting competition within the common market [...]".

Furthermore, in the event that the abuse or the concerted practice undermines free competition within the Italian State, this agreement is also punishable under the Italian Antitrust law and, in particular, by article 2.

In order not to violate the law protecting competition, VI-DA s.r.l. operates exclusively on the basis of its strategic and commercial choices, defining its own policy independently and independently of that of its competitors.

The sale of the Company's products and services must take place solely on the basis of the merits and advantages that the Company offers. This Code does not allow you to falsely denigrate the competition or its products and services.

VI-DA s.r.l. recognizes that competition is a fundamental element for the development and economic and social progress of the country. To this end, the Company, in the performance of its activities, ensures that the general conditions for freedom of enterprise are respected,



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allowing economic operators to access the market and compete with equal opportunities, and protect its customers, favoring containment of prices and improvements in the quality of services resulting from free competition.

The Company does not deny, hide or delay any information requested by the antitrust authority and the regulatory bodies in their inspection functions and actively cooperates during the preliminary investigation procedures.

## IV. HUMAN RESOURCES

### 4.1 Selection, development and professional training

Human resources are the central element on which the Company bases the pursuit of its objectives.

In selecting and managing personnel, the Company adopts criteria of merit, competence and assessment of individual abilities and potential.

VI-DA s.r.l. enhances and tends to the development of the skills and abilities of each Recipient, also through the organization of training and professional updating activities. Each Recipient diligently carries out the aforementioned activities and reports any needs for additional or specific activities in order to allow the adoption of the necessary initiatives by the Company.

### 4.2 Respect for people and diversity

Respect for diversity is guaranteed, no form of discrimination based on race, color, gender, language, religion, nationality, political opinion, sexual orientation or social status is tolerated. Maximum effort is made to prevent any physical, verbal, sexual or psychological harassment, abuse or threat and intimidation in the workplace.

### 4.3 Equal opportunities

It is the Company's objective to consolidate a work environment characterized by the absence of racial, cultural, ideological, sexual, physical, moral, religious or other kinds of discrimination and to offer Recipients equal opportunities on equal terms, including the rights of minorities and indigenous peoples.

All Recipients are required to work together to achieve this goal.

### 4.4 Work environment

The Recipients collaborate with each other to achieve common results and are committed to creating a peaceful, stimulating and rewarding work environment, based on a just culture. Within the work environment the Recipients maintain a conduct based on seriousness, order and decorum.



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The Company requires that in internal work relations there are no episodes of harassment or intolerance.

### 4.5 Wages, benefits and working hours

Employee salaries are paid in compliance with or better than the metalworkers' collective bargaining agreement in terms of both economics and benefits and are based on objective criteria.

The number of weekly working hours required by current legislation is respected and any overtime work is ensured to be appropriately remunerated. Employees are guaranteed adequate rest.

### 4.6 Freedom of association and collective bargaining

The right of workers to have adequate representation and the freedom to form and/or join workers' organizations or trade union representatives, without fear of retaliation or intimidation, is respected. Management undertakes to establish a constructive dialogue with workers' representatives elected by employees, placing mutual respect at the basis of the discussion.

### 4.7 Child labor and young workers

The use of child labor is not permitted; no child under the age of 15 may be employed in work activities. It is ensured that young workers under the age of 18 work in roles appropriate to their age.

### 4.8 Modern Slavery

The use of any type of forced or compulsory labor and any form of human trafficking is prohibited. Staff must perform their work voluntarily.

### 4.9 Collateral activities

The performance of collateral activities by the Recipients is permitted to the extent that they do not prejudice their performance of work activities in favor of the Company.

Recipients must, in any case, refrain from carrying out collateral activities (including unpaid ones) that are in contrast with specific obligations they have assumed towards VI-DA s.r.l.

### 4.10 Use of company equipment and facilities

The company assets of the Company, in particular, the plants, the equipment located in the workplace are used for service reasons, in accordance with current legislation.

In no case is it permitted to use company assets and, in particular, IT and network resources for purposes contrary to mandatory legal regulations, public order or morality, as well as to



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commit or induce the commission of crimes or otherwise to racial hatred, the exaltation of violence or the violation of human rights.

No Recipient is allowed to make audio-visual, electronic, paper or photographic recordings or reproductions of company documents, except in cases where such activities fall within the normal performance of the functions entrusted to him.

### **4.11 Alcoholic and narcotic substances. Smoke**

The use of drugs and the consumption of alcohol in the workplace is prohibited.

Without prejudice to the regulatory provisions on smoking in the workplace, the Company will take into particular consideration the needs of those who ask to be protected from contact with "passive smoking" in their workplace.

## **V. CONFLICT OF INTEREST**

Recipients, in the performance of their duties, avoid situations of conflict of interest.

By way of example, conflicts of interest can be determined by the following situations:

- i. Taking on corporate offices or carrying out work activities of any kind with customers or suppliers;
- ii. Taking economic and financial interests of the Recipient or his family in the activities of suppliers or customers (such as, by way of example, assumption of direct or indirect shareholdings in the share capital of these subjects).

Any situation potentially capable of generating a conflict of interest, or in any case prejudicing the Recipient's ability to make decisions in the best interest of the Company, must be immediately communicated by the Employee or the Collaborator to his / her Manager, or by the Manager or by the Company Representative to Guarantor and determines, for the Recipient in question, the obligation to refrain from performing acts connected or related to this situation.

## **VI. EXPORT CONTROLS AND ECONOMIC SANCTIONS**

The Company is aware of its social responsibility to comply with export control and international sanctions obligations and is committed to complying with relevant regulations.

## **VII. ACCOUNTING AND INFORMATION REPORTS**

### **7.1 Accounting records**

Accounting transparency as well as keeping accounting records in accordance with the principles of truth, completeness, clarity, precision, accuracy and compliance with current legislation is the fundamental prerequisite for efficient control.



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For each operation adequate supporting documentation must be kept in records, such as to allow an easy accounting entry, the reconstruction of the transaction and the identification of any responsibilities.

Each Recipient is required to collaborate in the correct and timely registration in the accounts of each management activity.

The presentation of adequate supporting documentation is also requested from the Recipients in the compilation of expense reports, for which reimbursement is requested.

### 7.2 Information reports

The circulation of information must be managed according to criteria of truth, accuracy and timeliness. To this end, the information reports, intended for both internal (colleagues, collaborators) and external relations (customers, suppliers, institutional interlocutors) must be drawn up scrupulously and in compliance with these principles.

VI-DA srl, moreover, fulfills the legal obligations, including those concerning communications, towards the competent authorities, with particular reference to the supervisory and control authorities, and collaborates with these authorities in the performance of their functions in accordance with the current legislation.

## VIII. BUSINESS POLICIES

### 8.1 Environmental protection

Environmental protection and the preservation of natural resources are the Company's primary objectives.

The Company and all employees act in accordance with applicable laws and regulations to protect the environment and reduce pollution. Specifically, they:

- are committed to ensuring sustainable water use within the company;
- choose environmentally friendly, advanced, and efficient technologies;
- use natural resources, land, and forests carefully.

Each Recipient, in carrying out their duties and activities, must contribute to the pursuit of exemplary results in this area.

### 8.2 Protection of health and safety in the workplace

The responsibility of each Recipient towards its Collaborators and colleagues makes the maximum care for risk prevention mandatory. To this end, the technical planning of workplaces, equipment and processes must be based on the highest level of compliance with current regulations on safety and hygiene at work. Each Recipient must pay the utmost



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attention in carrying out his activity, strictly observing all established safety and prevention measures, to avoid any possible risk for himself and for his own Collaborators and colleagues.

### **8.3 Intellectual property and new product development**

The protection of the Company's intellectual property, including patents, industrial secrets, brands, distinctive signs, technical and scientific knowledge, know-how and skills acquired in the course of business activities, is essential to preserve the company's competitive advantage.

Employees are required to define, protect, maintain and defend the rights of the Company in all areas of intellectual and commercial property and to exercise these rights responsibly.

In addition to protecting the Company's intellectual property rights, the intellectual property rights of other parties must also be respected.

### **8.4 Counterfeit Parts**

The Company implements a system to manage the prevention of counterfeit parts through appropriate training for personnel, supply chain management, traceability, and incoming checks.

### **8.5 Copyright Rights**

Many materials used during the work are protected by copyright legislation. The reproduction, distribution or modification of copyrighted materials without the consent of the copyright holder is illegal and prohibited under this Code, except for legal exemptions such as those concerning the so-called "fair use". Unauthorized duplication of copyrighted materials may result in violations punishable by civil and / or criminal penalties. Although copyright infringement usually involves the unauthorized duplication of publications or other printed materials, it may also include the unauthorized use of photographs and graphic displays or designs. As a rule, computer software programs are protected by copyright and are sold subject to license agreements that may limit their use.

No director, officer, employee or representative may copy software or use it on different computers, except where the license agreements provide for it or in the presence of an applicable legal exemption

### **8.6 Social responsibility**

The social responsibility of companies operating both in Italy and abroad is a value recognized and shared within VI-DA s.r.l.

The Company conducts its activities in compliance with social and moral obligations and aims to contribute, with the same, to the enrichment of the economic, intellectual and social heritage of each country and community in which it carries out its activity.



## Special Precision Parts

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### 8.7 IT Resources

VI-DA s.r.l. recognizes the importance of the correct use of IT resources in order to continuously improve the management of all social activities.

The Recipients of this Code undertake to use the IT resources made available by the Company in accordance with the provisions of the law in force.

In particular, in no case shall the Employee, the Collaborator or the Company Representative:

- i. Falsify a public or private IT document with evidential value;
- ii. Unauthorized access to an IT or telematic system inside or outside the Company, hold and distribute the access codes to this system without authorization or work to damage it in any way;
- iii. Perform acts aimed at intercepting, preventing or interrupting computer or electronic communications in an illicit manner;
- iv. Damage in any way private information, data, programs and computer or electronic systems owned or not owned by the Company;
- v. Damage in any way information, data, programs and computer or telematic systems used by the State or by another Public Body or in any case of public utility.

Furthermore, in order to prevent the violations listed above, Employees and Collaborators are obliged to report to their Manager, and the Managers and Company Representatives are obliged to report to the competent Guarantor those behaviors that conflict with the provisions of the points previous.

## IX. INFORMATION AND CONFIDENTIALITY

### 9.1 Information on VI-DA s.r.l.

No confidential information relating to VI-DA s.r.l. acquired or processed by the Recipient in the performance or in the course of his activity in relations with the Company, it may be used, communicated to third parties or disseminated for purposes other than institutional ones. The notion of confidential information includes all the data, knowledge, deeds, documents, reports, notes, studies, drawings, photographs and any other material pertaining to the organization and company assets, to the production methods, to commercial and financial transactions, to research and development activities, as well as to judicial and administrative proceedings relating to the Company.

The obligation of confidentiality remains in force even after the termination of the relationship with the Company, in compliance with current legislation.

Any confidential information must be kept in places inaccessible to unauthorized persons.



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## 9.2 Protection of personal data

In carrying out its activities, the Company processes personal data of Recipients and third parties. The Company requires that the Recipients undertake, in the context of their functions, so that the data subject to processing are treated in compliance with the legislation in force from time to time.

To this end, the processing of personal data is allowed only to authorized personnel and in compliance with the rules and internal procedures of VI-DA s.r.l. which are established in accordance with current legislation.

## X. IMPLEMENTING PROVISIONS

### 10.1 In general

In order to pursue compliance with the principles set out in this Code, VI-DA s.r.l. ensures:

- i. The maximum dissemination and knowability of this Code;
- ii. The uniform interpretation and implementation of this Code;
- iii. The carrying out of verifications regarding news of violation of the present Code and the application of sanctions in case of violation of the same in compliance with the legislation in force;
- iv. Prevention and repression of any form of retaliation against those who contribute to the implementation of this Code;
- v. The periodic updating of this Code, based on needs that from time to time become manifest also in light of the activities indicated above.

All Employees are required to implement and collaborate in the implementation of the Code, within the limits of their duties and functions.

### 10.2 The Supervisory Body (ODC)

All Company *stakeholders* can report, in writing and in a non-anonymous form through specific confidential information channels (mail [odc@vi-da.com](mailto:odc@vi-da.com), internal company boxes) , any violation or suspected violation of the Code of Ethics to the Company's Control Body, which provides an analysis of the report, possibly listening the author and the person responsible for the alleged violation.

The Control Body has, in fact, the task of:

- i. Periodically check the application and compliance with the Code;



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- ii. Check the content of the Code, in order to signal the need for adjustments to the evolution of laws;
- iii. Undertake activities for the dissemination of the Code;
- iv. Receive reports of violations of the Code and carry out investigations into the matter;
- v. Assure and assist those who report behavior that does not comply with the Code, protecting them from pressure, interference, intimidation and retaliation.

The OCD is identified in the figure of General Manager.

The revision of the Code is approved by the Board of Directors.

### 10.3 Clarifications, complaints and reports

All Employees and Collaborators of the Company are required to cooperate with the Control Body, possibly providing the company documentation necessary for carrying out the activities for which it is responsible.

In the event of doubt as to the lawfulness of a particular behavior, its ethical negative value or its opposition to the Code, the addressee may contact his superior and / or the Control Body.

The reporting of any offenses by the recipients must be in writing and may be forwarded, in addition to the hierarchical line, to the Control Body.

The strictest confidentiality will be kept on the received reports.

Approved by the CEO of VI-DA s.r.l.

(Below is the signature of the CEO in scanned image format)

Beltrami Massimiliano

Beltrami Nicola