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### **General Principles**

We as a Branch we make reference to the ethical code of EUROVAST S.p.A. group. More specifically on what concerns our personnel and stakeholders we issued this document meant to be a part of the company Handbook.

The company and its employees will at all times demonstrate the highest levels of integrity, truthfulness, and honesty in order to uphold both personal and corporate reputations and to inspire confidence and trust in their respective actions. The company will conduct its business in a competent, fair, impartial, and efficient manner.

### **Purpose**

The purpose is to maintain a culture of openness, trust and integrity in the company's business practices. EuroVast S.p.A. NL Branch is committed to protecting employees, business partners and suppliers from illegal or damaging actions by individuals, either knowingly, or unknowingly. This also aims to create a good environment to work in.

### **Health and Safety**

The company is committed to providing a safe and healthy working environment for all of its employees. A safety and hygiene policy as well as a dedicated handbook are part of the quality system (Appendix 20 Vers. 0, date: 6 October 2023 Health & Safety Handbook).

### **Environment**

The company respects the environment and the need to protect it and minimise the impact its operations have on it. It is engaged in a continuous programme of improvement on environmental issues constantly open to third party verification, inspection, and certification. We only use wind power for our electrical connection, emissions are monitored to reduction trend. Our R & D is focusing on sustainability as a must.

### **Equality, diversity, and Inclusion**

EuroVast S.p.A. NL Branch understands that everyone is different and have unique qualities to offer, well aware that we are working in a multicultural frame. We seek to respect and understand these differences, so we can make the most of everyone's talents, to the benefit of individuals and the business as a whole. We are committed to equal opportunities throughout the business.

### **Employees**

All employees are therefore treated with dignity and respect with equal employment opportunities given to all irrespective of their race, religion, gender, sexual orientation, maternity, marital status, family status, disability, age, or national origin.

### **Suppliers**

Suppliers will be chosen on the basis of factors such as price, quality, delivery, service, and integrity. A purchasing protocol including supplier validation and evaluation is part of the quality system (MOD 10 11 Approved suppliers list). The company's choice of suppliers will be made objectively. Honesty and openness will be paramount in the company's dealings with its suppliers.

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### **Competitors**

The company will build its reputation on the basis of its performance alone. It will compete vigorously and lawfully and will not compete unfairly with others. It will not seek to damage the reputation of its competitors either directly or by implication.

### **BCM**

Breakages of ethical rules are separately treated in the BCM system, to better analyse root causes, prevention and recovery policy.

### **Compliance with laws and regulations**

Our commitment to integrity begins with complying with laws, rules and regulations. We understand and comply with the legal requirements and commercial practices of lawful business.

We are committed to adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights.

- Nederlandse Arbeidsinspectie
- NEN-EN-ISO 22301 (BCM)
- BRC Global Standard for Consumer Products General Merchandise Issue 4
- Directive EP and Council 95 of 2001 (general product safety)
- Directive EP and Council 62 of 1994 (packaging and packaging waste)
- Regulation EC 1907 of 2006 (Reach)
- Regulation EU 1021 of 2019 (persistent organic pollutants)
- Dir EU 2019/904 (reduction of the impact of certain plastic products on the environment)

Our staff must follow applicable laws and regulations and must ensure compliant operation.

### **Anti-corruption**

We firmly condemn and do not tolerate all forms of corruption. It is prohibited directly or indirectly offering, promising, giving, asking, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business. An unfair advantage or benefit may include cash, any cash equivalent (e.g. voucher), gift, credit, discount, travel, personal advantage, accommodation or services. We do not permit facilitation (or “grease”) payments to government officials or private business in order to secure or speed up routine actions. Corruption also covers the misuse of function or position as well, when someone makes that false appearance that s/he improperly influences a decision maker.

Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business is considered gross misconduct. Similarly accepting or allowing another person to accept a bribe is considered gross misconduct. Our staff’s has to account for all benefits received in the course of doing business and must to not give or receive bribes or otherwise act corruptly.

### **Gifts and Hospitality**

We shall avoid any actions that create a perception that favourable treatment was sought, received or given in exchange for personal benefits.

Business courtesies or benefits include gifts, gratuities, meals, refreshments, entertainment or other advantage from persons or companies with whom we do or may do business. We will neither give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business

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inducements that would violate law, regulation or polices, or would cause embarrassment. Our staff may never use personal funds or resources to do something that cannot be done with our resources.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, provided that they are not inappropriately excessive, not frequent and do not reflect a pattern of frequent acceptance, does not create the appearance of an attempt to influence business decisions. Only trivial gifts with low value can be accepted. All other gifts must be politely refused or, if received through post, returned to the donor. If return is not possible it shall be offered for charity or community purposes. It is the responsibility of the person offering, providing, receiving or accepting the gift to decide whether the gift is appropriate.

**Confidentiality, information security, proprietary information and intellectual property**

We are committed to business information confidentiality, integrity and accessibility, we implement proper technical security measures this and it is our staff’s obligation to uphold this. Proprietary information includes all non-public information that might be harmful to the company or its customers, business partners if disclosed to unauthorised parties. All staff must handle any such information as secret. It also covers that, no one is entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities. Every rule ensuring information security must be followed all times.

We respect the property rights of others. We will not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We will not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.

**Privacy, personal data protection**

We respect people’s privacy, and we acknowledge customers, employees and other natural persons’ need to feel confident that their personal data is processed appropriately and for a legitimate business purpose. We are committed to comply with all personal data protection laws. We only acquire and keep personal information that is necessary, and we give proper information on these activities to data owners. We implement proper security measures to assure confidentiality, integrity and availability of personal information.

Our staff must observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.

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