

## SOCIAL RESPONSIBILITY POLICY AND CODE OF ETHICS

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**Corporate Social Responsibility (CSR)** is the area, within the company's strategy, concerning the effective management of issues and implications that have social and ethical impact both externally and internally, in relation to the entire scope of business activities.

**Ethics** is a set of rules of public and private conduct that a person or a group choose and follow in life and work. Val Giovanni & Figli s.r.l. believes that, since in a company all workers, regardless of their role, spend a considerable part of their life and form a group that interacts, collaborates and grows, constituting a small community that has a "social" impact on people and also on the public good, it is necessary to have moral rules and shared values. Val Giovanni and figli s.r.l is committed to observing the highest ethical standards in relationships with employees, customers, suppliers, institutions, authorities, the community and towards the surrounding environment, also in accordance with the provisions of the Universal Declaration of Human Rights of the UN, ILO conventions, and current legislation.

### **PRINCIPLES**

#### 1) Respect, conscience, integrity

Respect should be understood as consideration for others, tolerance, transparency, sincerity, and understanding towards the people who work with us. Moments of criticism and warnings should always be constructive and lead to improvement: you criticize an action or behavior, never the person. The respect we have for people must also be shown towards the workplace, the environment, and company assets, which must always be kept efficient, clean, and orderly, as they are the tools of our commitment and our results. Conscientious behavior and moral integrity are fundamental assets of work.

#### 2) Engagement and awareness

Engaging and being engaged means welcoming and listening to people without prejudice, understanding their expectations and needs, asking for and providing help, participating and showing interest, informing, including, contributing with one's ideas and commitment, and growing. Initiative and concreteness accompany engagement. We want to promote awareness among all staff about the importance of their actions, the quality and results of their work and the products produced, and the impact they have on the well-being and safety of consumers and the community, on environmental sustainability, on the lives of future generations, elements that also contribute to their motivation at work. Management and employees commit to informing everyone about their goals and achievements and always try to convey a strong motivation to the people they work with.

### 3) Responsibility and delegation

We are aware that we must be held accountable for our actions, committing ourselves to the tasks assigned, and solving problems without shifting the burden to others. We pay attention to practical aspects, base our decisions on facts, try to plan as much as possible to avoid any problems and time losses. We try never to make excuses for not doing work, setting an example for others. For certain activities, it is necessary to delegate responsibilities and encourage other individuals to take on their own responsibilities and initiatives. This requires trust, flexibility, tolerance, and the ability to change what we initially had in mind. Let people make mistakes if we want them to grow.

### 4) Teamwork

The team is a group where roles are well defined and there is a director/coach who organizes. It is important to feel part of a team and not individual "players". It is the team that wins, not the individual. We must never forget that our work always conditions that of our colleagues. We can expect rigor and efficiency from others if we are the first to exercise them diligently and persistently. In the eyes of the customer, it is always the company that works well or poorly, not the individual.

## ETHICAL RULES

### 1) Workplace environment, equal opportunities, and absence of discrimination

Our company is committed to preserving a workplace free of discrimination, abuse, and offenses, including harassment, based on gender, sexual orientation, race, age, religious belief, disability, union membership, or political affiliation, ensuring that the criteria used in hiring, access to training, progression of engagement and career, and pay level are linked solely to job performance and merits. The company is committed to providing equal opportunities to all taking into account the capabilities relative to the positions to be covered. The company condemns any behavior of verbal, physical, or psychological violence towards any individual inside or outside the company. R.A.S. and R.S.P.P. have the task of monitoring behaviors and any discrimination/harassment in the workplace and listening to any reports in this regard. The company has identified the toll-free numbers for racial discrimination (800 90 10 10) and gender violence (1522) on the website [www.pariopportunita.gov](http://www.pariopportunita.gov) to ensure an independent and confidential channel for those who experience discrimination and harassment (e.g., mobbing, stalking).

### 2) Surrounding environment and climate change

Our company is committed to ensuring safe and healthy working environments and minimizing environmental impacts, respecting all laws and regulations related to the environment, safety, health, and worker protection. Everyone must contribute to this with their behaviors. We must commit to constantly reduce energy and water consumption, use less paper, less plastic, and less fuel, reduce noise in all its forms, contain waste production as much as possible, prevent pollution, and manage any contaminating products in the most appropriate and safe way. These efforts are also directed towards our production processes. We are also preparing to be more resilient to extreme climate events. Natural resources are a heritage of all and must be preserved.

### 3) Protection of labor

Our company is committed to ensuring that no one works against their will or is not free to leave the employment relationship; it absolutely does not employ child labor (children under 16 years of age). Any young workers (under 18) hired as apprentices must have fulfilled all school obligations and not be engaged in work that jeopardizes their human rights, health, and safety. Hours and wages are based on fairness, respect for the law, and respect for people.

### 4) Supply chain

All suppliers of Val Giovanni and figli s.r.l must adhere to an ethical code that prohibits any form of corruption and illicit payments, promotes honesty and moral integrity in all work and contractual aspects, safety and health in the workplace, safeguarding the surrounding environment, compliance with mandatory laws, diligence in carrying out assigned activities, protection of people and work, knowledge, and pursuit of any safety requirements related to the product manufactured.

### 5) Personal and others' freedoms and dignity

Our company does not support any entity, company, association with a political or religious background. There is full freedom of association and assembly according to one's own dictates and beliefs. Everyone must respect personal opinions and beliefs and the customs and religious beliefs of others. Smoking is prohibited in the workplace. The use of drugs and alcohol abuse is not tolerated. Our company is committed to respecting the right to privacy and confidentiality of data of all "stakeholders and operates according to the dictates of the legislation in force. It is the responsibility of each individual to respect the privacy of customers and colleagues. Computer and electronic communication resources must be used in a respectful, ethical, and legal manner, in accordance with the Information Security System policies.

### 6) Theft, fraud, corruption, gifts, and conflicts of interest

Our work activities must reflect values of honesty, loyalty, reliability, correctness, legality, solidarity towards others, and a sense of responsibility. Any act, at all levels, involving theft, fraud, misappropriation of any property, corruption, extortion, money laundering is prohibited. All employees must refrain from any action or relationship that may conflict or appear to conflict with the interests of our company and our clients. No employee may use their position for personal gain or to obtain illicit benefits for the company. It is also necessary to reject gifts and goods that could be seen as actual or potential "favours".

## 7) Reporting Violations (Whistleblowing)

The company has an active confidential and protected channel against retaliation (with methods indicated in an appropriate company information notice) to report any commission or omission by anyone in their dealings with Val Giovanni & Figli that constitutes or may constitute a violation or inducement to violate laws and regulations, principles stated in this ethical code, company policies and procedures, and which may directly or indirectly cause economic, financial, or image/reputation damage, to the company, customers, the public, and employees.

## 8) Minority rights

A minority is a national, ethnic, religious, or linguistic group smaller than the rest of the population/community, whose members share a common identity and/or common ideas. Minorities are often among the most marginalized communities in many societies: they are often excluded from participating in socio-economic life, rarely have access to political power, and frequently face obstacles in expressing their identity and rights. Discriminatory behaviors may affect some members of the community more than others, especially women, children, people with disabilities, elderly people, and lesbian, gay, bisexual, transgender, and intersex (LGBTI) people. Similarly, often, indigenous populations of a certain territory do not enjoy rights, such as the practice and protection of traditions and customs, the protection of intellectual property and cultural heritage. In many parts of the world, these groups may be victims of serious human rights violations, violence, conflicts, ethnic or religious persecution, and, in extreme cases, genocide. Consequently, they often have no choice but to flee and become migrants. Displaced populations belonging to a majority in their country of origin may end up in a discriminatory situation similar to that of a minority in a country that provides them asylum. Val Giovanni & Figli is committed to protecting individuals belonging to national, ethnic, religious, gender, and linguistic minorities. Where possible, we strive to support their efforts to maintain their cultural and identity heritage and ensure they have access to information and services, as well as opportunities to participate in decisions that concern them.

## 9) Rights to land and water

Every year, millions of people around the world are evicted from their homes and expropriated from their lands and forests, often leaving them in conditions of extreme poverty and misery, with extremely traumatic consequences, increasing their marginalization and vulnerability within society. Forced expropriations and evictions also violate a wide range of human rights recognized internationally, including the right to adequate housing, food, water, health, land, education, work, personal safety, freedom from cruel, inhuman and degrading treatment, and freedom of movement. These practices are not part of the culture and behaviors of Val Giovanni & Figli, which instead support the right to freedom, water, and land.

#### 10) Use of private or public security forces

Security forces are often necessary to protect people and property in countries affected by conflicts or lacking governance. However, the inappropriate use of security forces can lead to human rights abuses or even pose a risk to the rights to life, freedom, and security of individuals and communities, especially when the local community is not informed about the possible operations and objectives of public or private security. Val Giovanni & figli does not use private security and supports the proportionate use of force to resolve conflicts.

#### 11) Financial responsibility

We follow a financial policy based on the following elements: -specific assignment of authority for necessary and regular financial actions and decisions, which may include partial delegations to board members (Val family) -no "toxic" titles or funding of organizations linked to wars and uncontrolled exploitation of resources -crosschecks by board members on the operations carried out -adherence and declaration of absence of conflicts of interest and insider trading -clear authority to spend and approve funds, including payroll accounting -specific assignment of authority to enter into contracts -clear responsibility for maintaining accurate financial records

#### 12) Counterfeit parts

Val Giovanni & figli only uses verified suppliers for the purchase of raw materials and components with checks on origin documentation and compliance with current legislation, as well as with a second-party auditing system. Materials and products are checked upon arrival and stored in secure warehouses. The company maintains a certified quality system according to the IATF 14949 specification and the ISO 9001 standard.

#### 13) Intellectual property

Intellectual property discipline is regulated by specific confidentiality commitment agreements signed between parties, functionally to the creation and maintenance of value for Val shareholders, customers, and all stakeholders.

#### 14) Export controls

Due to current provisions on export control and international economic sanctions, banks and economic operators now operate within a framework that is constantly increasing in complexity. In Val Giovanni & figli exports, we avoid working with countries and companies that violate international agreements and legislation or that are part of blacklists identified.