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ITALVACUUM S.R.L.
REGISTERED OFFICE IN
BORGARO TORINESE, VIA STROPPIANA 3

TAX CODE AND
REGISTRATION NUMBER AT THE
TURIN BUSINESS REGISTER
04917380018

CODE OF ETHICS

FOREWORD

ITALVACUUM S.R.L. (hereinafter the "**Company**") deals with mechanical constructions, equipment and related accessories and is one of the leading manufacturers of vacuum pumps and vacuum dryers. The Company also deals with all economic, movable and real estate transactions functionally related to the achievement of the corporate purpose.

The Company has deemed it appropriate to adopt, both internally and in relations with third parties, a set of rules of conduct that it recognizes, accepts and shares, aimed at disseminating, at all levels of the company, a solid ethical integrity and a deep-rooted sensitivity to control.

In this context, the Company promotes the principles of legality, honesty and fairness, as well as the fundamental values of respect for the dignity of the human person and diversity. It is also aware that the adoption of a code of conduct, which clearly and transparently sets out the ethical values that inspire it, is an effective tool for contributing, together with the other organisational measures adopted, to the prevention of unlawful conduct and unlawful conduct, including those referred to in Legislative Decree no. 231





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of 8 June 2001 (hereinafter also the "**Legislative Decree**"), thereby ensuring the reliability and integrity of its reputation.

That said, this document (hereinafter the "**Code of Ethics**"), approved by the Board of Directors of the Company on 2 December 2025, sets out the ethical principles to which the Company adheres in carrying out its corporate activities, and which it requires the strictest observance by corporate representatives (directors, general managers and executives), employees, collaborators and, in any case, all those who cooperate with it in the pursuit of their business objectives. To this end, the Company, within the scope of its competence, undertakes both to ensure the maximum dissemination of this Code of Ethics, organizing, if necessary, training and awareness-raising programs regarding its contents, and to ensure, through an internal body (i.e. "**Supervisory Body**") established pursuant to the Decree, the verification of its compliance.

CHAPTER I – GENERAL PROVISIONS

1. SCOPE AND RECIPIENTS

- 1.1 All the Company's activities are based on the strictest compliance with the principles of compliance with the law, impartiality, fairness, transparency, confidentiality, diligence, loyalty and good faith.
- 1.2 The principles set out above, which inform the provisions of this Code of Ethics, are binding for all persons who hold representation, administration or management functions in the Company, or who exercise, even de facto, the management and control of the Company, who cooperate and collaborate with it – in any capacity – in the performance of their related activities, for all employees without exception, for





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collaborators (by way of example, consultants, representatives, intermediaries, agents, etc.) and for anyone who has business relationships with the Company (hereinafter the "**Recipients**").

- 1.3 The Recipients must be aware of the precepts of this Code of Ethics, and the Company's employees are also called upon to contribute to its compliance.
- 1.4 To this end, the Code of Ethics will be brought to the attention of all Recipients, including third parties who receive assignments from the Company or who have stable or temporary relationships with it.

2. OBLIGATIONS OF EMPLOYEES AND COLLABORATORS

- 2.1 The Company's employees perform the functions assigned to them according to the principles of honesty, fairness, commitment and professional rigour, as well as in accordance with the provisions of the law in force.
- 2.2 Every action, operation, negotiation and, more generally, any activity carried out by the Company's employees, must comply with the rules of managerial correctness, transparency, completeness and truthfulness of information, as well as with the company procedures adopted.
- 2.3 The criteria of collaboration, loyalty and mutual respect must characterize the relationships between employees at any level, and between them and third parties, with whom they come into contact due to the work activities carried out.
- 2.4 In particular, employees are required to:
 - i) observe the Code of Ethics, refraining from conduct contrary to it;





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- ii) report to the Supervisory Body, established by the Company pursuant to the Decree, any news relating to alleged violations of this Code of Ethics that have occurred within the company;
- iii) offer maximum cooperation in ascertaining possible and/or alleged violations of this Code of Ethics;
- iv) inform third parties in relationships with the Company about the principles of the Code of Ethics, requesting compliance with them.

2.5 The Company's collaborators are also required to comply with the principles contained in this Code of Ethics.

2.6 The Company undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the violations that may occur, and, in any case, in compliance with the provisions in force on the regulation of employment relationships.

CHAPTER II – ETHICAL PRINCIPLES

PRINCIPLES

In order to achieve its objectives and in carrying out its related business activities, the Company and the Recipients are guided by the following principles (hereinafter, the "**Principles**"):

- compliance with the law;
- impartiality;
- transparency and fairness;
- confidentiality;





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- respect for the dignity of people and enhancement of human resources, also through the protection of safety and health in the workplace, and protection of the environment;
- professionalism, loyalty and good faith;
- compliance with the strictest rules of conduct, in particular in relations with the Public Administration and the Supervisory Authorities.

The Principles, which inspire the Company's activity and inform the conduct of the Recipients, are specified in greater detail below, it being understood that the Company will not initiate or continue any professional and/or business relationship with those who do not intend to align themselves with these Principles.

3. COMPLIANCE WITH LAWS

3.1 The conduct of the Recipients, in the work and professional activities carried out for the Company, is inspired by honesty and legitimacy, in accordance with current regulations.

4. IMPARTIALITY

4.1 In the management of the various corporate activities (including, by way of example, the choice of customers, relations with shareholders, personnel management or work organization, the selection and management of suppliers, relations with the community and the institutions that represent it, etc.), the Recipients operate with impartiality in the best interest of the Company, taking decisions with professional rigor and objectivity, according to objective and neutral evaluation criteria.





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5. TRANSPARENCY AND FAIRNESS

- 5.1 In carrying out work and professional activities, the actions, operations and, more generally, the conduct of the Recipients are inspired by the utmost transparency and fairness.
- 5.2 In the management of social activities, the Recipients are required to provide transparent, truthful, complete and accurate information.
- 5.3 All the Company's actions and transactions must be legitimate, duly authorized and correctly recorded, verifiable, adequate and adequately documented, in order to allow, at all times, the verification and control of the related characteristics and motivations, of the decision-making, authorization and execution process, as well as the identification of the persons who have authorized, carried out and recorded them.
- 5.4 Each purchase of goods and/or services, including external consultants, is carried out in compliance with the principles of transparency, quality, cost-effectiveness and is supported by the necessary documentation.
- 5.5 The efficiency of relationships requires the transmission of transparent, truthful, complete and accurate information, both in internal relations within the company (with colleagues, collaborators or partners) and in those external to it, of a commercial nature (with customers, suppliers or third parties) and/or institutional.
- 5.6 The Company also requires correct, transparent and collaborative behaviour, in compliance with the provisions of the law, in all activities aimed at preparing the





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financial statements and other corporate communications required by law and directed to shareholders or the public.

- 5.7 All accounting records and information reports must be true and accurate. In particular, the collection, processing, recording, presentation and dissemination of accounting and management transactions and data must be timely and adequate to the Company's information needs, as well as in compliance with the accounting principles prescribed by current legislation.
- 5.8 In the context of the aforementioned conduct, it is forbidden to: i) represent and/or transmit for the preparation and representation in the financial statements or in the other corporate communications required by law, false data on the economic, equity or financial conditions of the Company; ii) omit data and/or information required by law on the same economic, equity or financial situation of the Company, in such a way as to mislead the recipients of the corporate communications required by law.

6. INTERNAL CONTROL

- 6.1 The Company promotes and disseminates, at all company levels, the culture of control, raising awareness among its employees of compliance with the regulations in force, both internal and external to the Company, in the performance of work activities.
- 6.2 An effective internal control system requires the commitment of the entire company organizational structure; consequently, all the subjects belonging to it are responsible, within the scope of their functions and responsibilities, for the correct and effective functioning of the internal control system.





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6.3 The Company conforms its conduct to the provisions of this Code of Ethics, actively collaborating in its compliance with the bodies responsible for control, including the Supervisory Body established pursuant to the Decree.

7. CONFIDENTIALITY

7.1 Due to the nature of the professional activities carried out, the Company considers confidentiality to be a fundamental rule of all conduct. The Company therefore ensures the confidentiality of the information in its possession, for any reason acquired, and refrains from using or processing confidential data, except in the case of express and informed authorization and, in any case, always in strict compliance with current legislation on Privacy.

7.2 In particular, it is forbidden for the Company's employees and collaborators to derive advantages of any kind, direct or indirect, personal or patrimonial, from the use of confidential information and to communicate such information to others or to recommend and/or induce others to use it.

7.3 The communication of this information to third parties must take place exclusively by the company's subjects authorized to do so and, in any case, in accordance with the laws in force.

8. VALUE OF PEOPLE AND HUMAN RESOURCES

8.1 The Company recognizes the value of the human person, who must not be discriminated against based on age, sex, sexual orientation, race, language, nationality, political and trade union opinions, religious beliefs.





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8.2 Human resources represent an indispensable and valuable asset for the Company for its very existence and future development; consequently, the Company promotes the professional skills and competencies of its employees, adopting merit criteria and guaranteeing everyone equal opportunities for professional growth and fulfilment.

9. PROFESSIONALISM

9.1 All the Company's activities must be conducted with the utmost commitment, diligence and professional seriousness, in a spirit of mutual respect and collaboration.

9.2 The Recipients are required to carry out the activities for which they are responsible with a commitment appropriate to the responsibility entrusted to them, protecting the image and reputation of the Company.

10. CONFLICT OF INTEREST

10.1 In conducting their activities, the Recipients must avoid situations where the parties involved are, or may even appear, to be in conflict of interest with the Company. Conflict of interest means any situation in which the Recipient pursues an interest other than the Company's mission or is not compatible with the duties of his office, or carries out activities that may, in any case, interfere with his ability to make decisions in the exclusive interest of the Company, or personally benefits from the Company's business opportunities.

10.2 The Recipients, in the context of the most diverse relationships established with the Company, refrain from carrying out activities contrary to the interest of the





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Company, aware that the pursuit of such interest cannot, however, authorize conduct contrary to the Principles of this Code of Ethics or unlawful conduct.

10.3 In the event of a conflict of interest, the Recipients will inform their company contact person without delay, complying with the decisions that will be taken by the latter in this regard.

11. ANTI-MONEY LAUNDERING

11.1 The Company and its employees must not, in any case and in any way, be involved in the laundering of money deriving from criminal activities, always acting in compliance with current legislation also on anti-money laundering.

12. PROTECTION OF COMPETITION

12.1 The Company, aware that healthy and fair competition responds to its own interest, to that of its customers and, more generally, of all market operators, promotes compliance with the rules in force on competition and refrains from engaging in and/or encouraging conduct that may constitute forms of unfair competition.

CHAPTER III – RELATIONS WITH THIRD PARTIES

13. BUSINESS RELATIONS

13.1 In all business relationships (including those with customers, suppliers, institutions, supervisory authorities, business partners), the Company requires honest, correct and legally compliant behaviour from the Recipients, not tolerating corrupt and/or collusive conduct, nor undue favouritism.





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13.2 It is forbidden for the Company's personnel to receive or accept promises of money, gifts or other benefits on their own behalf, on behalf of third parties or the Company, from anyone who has derived, or may derive, benefits from decisions taken in their favor, except in the case of gifts of modest and reasonable value.

14. RELATIONS WITH THE PUBLIC ADMINISTRATION

14.1 The Company's relations with Public Institutions, State Administrations, Public Bodies, Local Administrations or any other public entity, including, by way of example, concessionaires of public services and/or persons in charge of public functions (hereinafter the "**Public Administration**"), and any other relationship of a public nature must be inspired by the strictest compliance with the applicable legal provisions. to the principles of transparency, honesty, fairness and collaboration.

14.2 Relations with the Public Administration are reserved for the Company's representatives in charge and authorised to do so.

14.3 In its relations with the Public Administration, the Company does not improperly influence the decisions of the Administration itself, in particular, of the officials who deal or decide on its behalf.

14.4 In its relations with the Public Administration, in Italy or in other countries, the Company refrains from conduct contrary to the principles set out above, including but not limited to: i) offering or granting job opportunities and/or commercial advantages to the personnel of the Public Administration, involved in the negotiation or relationship, or to their family members, also as a result of unlawful pressure; ii) offer, promise or make gifts, payments, compensation or other benefits,





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except in the case of acts of commercial courtesy of modest and reasonable value;
iii) provide untrue information or submit false documents or attest to untrue facts or omit to communicate relevant facts or information, where requested by the Public Administration.

14.5 In relations with the Public Administration, in Italy or abroad, it is not permitted for the Company's representatives and/or employees to correspond, nor offer or promise, directly or through third parties, sums of money or other benefits of any kind and entity, whether they are public officials, government representatives, public employees or private individuals, to obtain, facilitate or remunerate a decision, to compensate or repay them for an act of their office, or to obtain or delay the performance of an act contrary to the duties of their office.

15. RELATIONS WITH SUPERVISORY AUTHORITIES AND OTHER INDEPENDENT ADMINISTRATIVE AUTHORITIES

15.1 The Company undertakes to scrupulously implement the provisions, instructions and/or requests from the Supervisory Authorities (including the UIC) or other Independent Administrative Authorities in the sectors related to its activities (including, by way of example, the Italian Data Protection Authority).

16. RELATIONS WITH POLITICAL PARTIES AND TRADE UNIONS

16.1 The Company does not promote political parties and trade unions, nor does it pay them contributions of any kind, directly or indirectly, in Italy or abroad, with the exception of any contributions due on the basis of specific regulations.





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16.2 The Company does not promote or maintain any kind of relationship with organizations, associations or movements that pursue, directly or indirectly, purposes that are criminally illicit or, in any case, prohibited by law.

17. DONATIONS

17.1 Being actively engaged in the advancement of civil society, the Society may provide money and donations in kind for educational, scientific and cultural, as well as social or humanitarian purposes. Requests for donations can, therefore, come from the Society from the most varied organizations, institutions or associations.

17.2 The Company's donations are regulated as follows: i) in general, requests for donations from natural persons are refused; ii) payments into current accounts in the name of natural persons or profit-making entities are not permitted; iii) donations may not be made to persons or organizations whose purposes conflict with the Principles of this Code of Ethics; iv) the transparency of any donation made must always be guaranteed.

CHAPTER IV – SANCTIONING PROVISIONS

18. EFFECTIVENESS OF THE CODE OF ETHICS AND SANCTIONING CONSEQUENCES

18.1 Compliance with the provisions of this Code of Ethics must be considered an essential part of the contractual obligations of the Company's employees pursuant to and for art. 2104 of the Civil Code.

18.2 Any violation of the provisions of the Code of Ethics may constitute a breach of the obligations of the employment relationship and/or a disciplinary offence, in





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accordance with the procedures provided for by art. 7 of the Workers' Statute, with all legal consequences, also about the preservation of the employment relationship, and may entail compensation for damages deriving from the same.

- 18.3 Compliance with the principles of this Code of Ethics is an essential part of the contractual obligations assumed by collaborators and other parties in business relations with the Company. Consequently, any violation of the provisions contained therein may constitute a breach of the contractual obligations undertaken, with all legal consequences with regard to the termination of the contract or assignment conferred, and compensation for damages derived.

CHAPTER V – FINAL PROVISIONS

19. APPROVAL OF THE CODE OF ETHICS AND RELATED AMENDMENTS

- 19.1 The Code of Ethics is approved by the Company's Board of Directors. Any amendments and/or updates will be approved by the same corporate body.

BORGARO TORINESE, 24/03/2026

