

ETHICAL CODE
2023



EuroVast Ltd
T I S S U E U K



OUR VALUES

Our History. Our Path

Euro Vast UK Limited was established in 2017. Euro Vast UK seeks to innovatively respond to consumer needs, by developing products, which are increasingly focused on health, safety, convenience and eco-sustainability.

The special relationship that binds the company to its customers enables this philosophy to be spread respecting the ETHICAL VALUES that guide the strategies of our Group.

This path enables us to manufacture products with the best technology respecting nature, developing new markets in the certainty of being able to offer consumers the excellence of a rapidly transforming field.

Euro Vast UK is convinced that business ethics is a condition for success and a tool for promoting its image, a factor that represents a primary and essential value for our Group.

The aim of the rules set out in this document is compliance with a proper and fair conduct by all Euro Vast UK representatives and all those who, for whatever reasons, work for our company, even occasionally.

Our Code of Ethics, in conclusion, is proposed as a model for all those involved in Euro Vast UK, adapting their conduct to the principles of loyalty and honesty already shared by the whole group to which Euro Vast UK belongs.

The Euro Vast UK Ethical Code is intended to perform the following functions:

- Identify the guiding principles for the resources working in and for the company;
- Define the key commitments that the company assumes with regard to employees and vice versa;
- Express the company's position in relation to stakeholders with whom we dialogue.

Fidelity and Loyalty

Each Euro Vast UK Collaborator, in the performance of their duties, must respect the principles of fairness, integrity, transparency, fidelity and loyalty, with regard to both colleagues and third parties with which they entertain relations.

It is forbidden for any Company Collaborator to offer money, goods, services or benefits of any kind, either in name or on behalf of Euro Vast UK, or personally, to employees of persons, companies or entities, or to people used by the latter, for the purpose of inducing, rewarding, preventing or otherwise influencing any act or fact in the interest of Euro Vast UK.

In execution of the duties of fidelity and loyalty mentioned above, each Euro Vast UK Collaborator must

refrain from carrying out any activity or pursuing any interest in conflict with those of the Group.

Confidentiality

Each Euro Vast UK Collaborator must refrain from disclosing or using for the benefit of their own or third parties, any confidential news and information pertaining to business activities; this in particular considering the fact that privacy is a key corporate asset with regard to all customers and suppliers.

In the course of business, Euro Vast UK Collaborators should avoid any conflict of interest or in other words any activity in which an interest is pursued other than that of the company, or through which the Collaborator takes personal advantage, either on their own behalf or for third parties, of the business opportunities of the Company. Each Collaborator who deems themselves to be in a situation of conflict between their personal interest, on their behalf or on behalf of third parties, and the interests of Euro Vast UK, must inform the senior managers of the Group in which they exercise their business, as quickly as possible.

Euro Vast UK collaborators, and other persons or entities with objective ability to influence company decisions, must absolutely avoid using, even implicitly, their position to influence decisions in their favour and or to the benefit of relatives, friends and acquaintances for aims which are purely personal of any nature whatsoever.

Presents, Gifts and Benefits

Presents and Gifts, whose value exceeds reasonable limits or are not consistent with normal working relationships, create interference in the conduct of the employment relationship itself, which must be free from obligations of gratitude.

For this reason, Euro Vast UK prohibits all employees (and members of their families) from accepting or asking for themselves or for others, gifts, benefits or favours from people with whom employment relationships are entertained.

The following are considered as benefits: money, tangible assets such as watches, jewellery, travel, cars, hi-tech material, clothing, mobile phones, tablets etc.

Normal business courtesies on the other hand can include, for example, small gifts such as flowers, gadgets, sweets etc.

Alcohol and drugs

It is forbidden for Euro Vast UK collaborators to:

Hold, consume, offer or give for whatever reason, drugs, alcohol or substances of similar effect, in workplaces and during working hours.

Smoke inside or outside the facilities, except in the areas indicated.

Human Resources

Our Collaborators are our most important resource.

Euro Vast UK undertakes to spread and consolidate a culture of risk awareness and safety, requiring responsible conduct on the part of all collaborators; the company also operates daily to preserve, mainly through preventive action, the health and safety of every employee by raising reference standards.

To this end, our ongoing technical and organizational efforts include:

- Introducing an integrated risk and safety management system;
- Constant analysis of the risk and critical aspects of processes and human resources to be protected;
- Adopting the most advanced technology;
- Monitoring and updating work methodology;
- Training courses with the active involvement of all collaborators.

All employees are constantly reminded to respect the standards and procedures for the protection of their safety and that of their colleagues, to use the safety devices provided, and of the need to promptly report, any malfunction to their direct superiors.

Discrimination and harassment

In Euro Vast UK we guarantee equal opportunities for all Collaborators, at all levels. Our Company combats all forms of discrimination, harassment and forced labor and modern slavery. Euro Vast UK employees are promoted and rewarded considering only their personal work performance. Euro Vast guarantees its employees full freedom of association, trade union freedom and collective bargaining rights.

The following is absolutely forbidden:

- Creating behaviour that might escalate into an intimidating or offensive environment for colleagues;
- Adopting ambiguous behaviour, which can harm the sensibilities of others, including sexual attitudes.

In particular, the hiring practices and employment activity, except for legal restrictions, must not present discriminatory elements against workers because of race, nationality, religion, gender or sexual orientation, marital or maternal status, political affiliation, physical ability.

All workers, including self-employed workers and subcontractors, can report problems or express complaints about discrimination and harassment, by drawing up a report (in paper or electronic form) and sending it to the Human Resource Manager or to the Official Government Institute for the protection of the worker.

THE ENVIRONMENT

Our environmental policy

Euro Vast UK is daily committed to improving the energy and environmental performance of its activities and work sites, placing at which time due attention to the needs of safety and competitiveness of its products.

The attention to the issues mentioned above is confirmed by the constant awareness campaigns for collaborators to run their production processes under the maximum energy efficiency, as well as on the specific design of our systems, constantly marked by the achievement of the highest standards of energy efficiency.

The commitment of Euro Vast UK is expressed through the implementation of the following actions:

- Reducing energy consumption, just as the rational and more efficient use of energy;
- Reducing fuel consumption and thus greenhouse gas emissions.

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- Reducing energy consumption, just as the rational and more efficient use of energy.
- Reducing fuel consumption and thus greenhouse gas emissions;
- Identifying indicators and ensuring monitoring and control of the progress of corporate actions in terms of environmental impact;
- Adopting a system of periodic monitoring of environmental data, which ensures the monitoring of performance of the various industrial activities;
- Carrying out awareness raising and environmental training for collaborators, aimed at disclosing in-house initiatives and increasing skills and professionalism.

UNDERAGE/CHILD LABOUR

Definitions

Definition of child: any person younger than 15 years of age except in cases where local laws on minimum age establish an older age to work or to attend compulsory schooling in which case the age of reference is that applied in the locality.

Definition of forced labour: Any work or service exacted from a person under threat of punishment and for which said person has not volunteered.

Definition of remedial action for children: any form of support and actions required to guarantee the safety, health, education and development of children who have been submitted to child labour as

defined above and who have subsequently been removed from such work.

Definition of child labour: any work carried out by a child younger than the age specified in the definition of child set out above, with the exception of what is provided for by Recommendation ILO 146.

Child labour

Euro Vast UK rejects any form of forced labour. Euro Vast UK undertakes not to internally employ workers whose age falls within that of the definition “child”. Where possible, it will assess the placement of young workers removing them from any kind of employment or work which, by its very nature or due to the circumstances in which it is carried out, can compromise their health, safety or morale.

This procedure is applied in the case where children have been found working in the company or chain of suppliers in violation of the regulation or the national law, or minors or children are exposed to situations at the place of work, which are risky, hazardous and harmful to their health.

When a new employee is hired, the work consultant gathers all the necessary information to verify the age of the worker and stores evidence of this requirement (e.g. identity card, driving licence, tax code, birth certificate, family status, etc.).

Remedial actions for minors

If a situation of child labour should be found, following an internal audit at the company or at the suppliers and/or sub-suppliers, this is communicated immediately to the Head of the Personnel Office.

The latter will start a non-conformity investigation following the procedure to control non-conformities and corrective and preventive actions (PRO 05) and give immediate communication of this to Management.

The remedial actions envisaged in the hypothesis in which child labour is used can be the following:

- ensure that the minor receives an education, paying for the school fees, books and school transport; for minors who have already fulfilled their school obligations the company will make a professional training path available compatible with the aptitudes of the young worker;
- Immediate termination of the employment of child labour providing the minor who has been laid off with an alternative income to reduce the financial impact on the family;
- provide the minor with light and safe work for a few hours a day, ensuring that the total hours dedicated to school, work and travelling from and to these places, does not exceed 10 hours overall;
- when possible, and if a particularly difficult situation of the family requires it, the company will try to place a family member of the minor within its staff, or alternatively support it in its search for employment, to ensure financial support to the family and reduce the responsibility on the minor himself.

The head of the personnel office will draw up a recovery plan for the minor, establishing:

- his critical situation;
- the recovery actions to undertake, identifying the most suitable for the specific situation being dealt with.

Management will take part in the decision of the resolutions to adopt, aware of the difficulties of managing the situation; the head of the personnel office can avail of the support of associations working in the sector (social workers, child protection associations, Child Line, etc.), which can give advice on the most suitable ways of maintaining relations with the minor and his family.

Communication and dissemination of the Code of Ethics

Euro Vast UK is committed to encouraging and ensuring adequate knowledge of the Code of Ethics and disseminating it among the relevant stakeholders, by all means deemed most appropriate, using targeted and effective communication activities.

So that anyone can standardize their conduct to that described in the Code of Ethics, Euro Vast UK ensures an adequate training programme and continuous awareness raising of ethical values and standards.

06/02/2023

Director

