



BONTEMPI VIBO S.P.A



CODE OF ETHICS

Approved by the Board of Directors on 30 September
2025



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1. BONTEMPI VIBO S.p.A.

Bontempi VIBO S.p.A. (hereinafter referred to as "the Company" or "the Firm") has been manufacturing standard and special screws and bolts for wholesalers and specialised distributors since 1961.

Its wide range of products, direct contact with customers and fast, transparent management of all orders have enabled Bontempi VIBO S.p.A. to become an international benchmark for *Italian-made* screws and bolts.

The **Rodengo Saiano (Brescia)** plant is equipped for the entire production cycle of screws of various shapes, in diameters from 12 to 36 with cold forming and up to a diameter of 64 with hot forming, while the **Calabritto** production centre specialises in the cold forming of hexagonal and hollow cylindrical head screws in carbon and stainless steel, in diameters from 5 to 12.

2. Introduction

This Code of Ethics (hereinafter referred to as the "Code") was approved by the Company's Board of Directors (hereinafter also referred to as the "Governing Body") on 30 September 2025 in the belief that business activities cannot be separated from ethics in the conduct of business and compliance with the law.

The value and importance of this Code are reinforced by the provision of specific liability for entities as a consequence of the commission of criminal offences and administrative offences provided for by Legislative Decree No. 231 of 8 June 2001, containing the "*Regulation of the administrative liability of legal persons, companies and associations, including those without legal personality, pursuant to Article 11 of Law No. 300 of 29 September 2000*" (hereinafter also referred to as the "Decree" or "Legislative Decree 231/2001").

The Company has also adopted its own Organisation, Management and Control Model in accordance with the aforementioned legislation.

3. Recipients of the Company's Code of Ethics

The Company has adopted this Code to formalise the fundamental ethical values that inspire it and to which the Management Body, Employees, Executives, as well as Collaborators, Consultants, Suppliers, Customers (also involved de facto in the Company's activities considered at risk for the purposes of the aforementioned legislation and who do not have their own code of ethics or conduct) and, in general, all those who work with the Company on the basis of a contractual relationship, even temporary, must comply with in the performance of the tasks and functions entrusted to them.

Compliance with the provisions of the Code of Ethics is an integral part of the contractual obligations of Employees, pursuant to and for the purposes of Articles 2104 and 2105 of the Italian Civil Code¹, and their violation by the Recipients constitutes, depending on the case, a disciplinary offence (punishable in accordance with applicable legislation and the provisions of the Organisational Model adopted pursuant to the Decree) and/or a

¹ "Art. 2104 of the Civil Code. *Diligence of the employee.* – The employee must exercise the diligence required by the nature of the service provided, the interests of the company and the higher interests of national production. He must also comply with the provisions for the performance and discipline of work given by the employer and by the colleagues to whom he reports hierarchically". "Art. 2105 of the Italian Civil Code. *Obligation of loyalty.* – The employee must not conduct business, on his own behalf or on behalf of third parties, in competition with the employer, nor disclose information relating to the organisation and production methods of the company, or use such information in a manner that could be prejudicial to the company."



Breach of contract may result in compensation for any damage caused to the Company.

The Company requires its Collaborators, Consultants and Suppliers to comply with the fundamental principles on which this Code is based, including by virtue of specific clauses included in the respective contractual instruments.

4. The fundamental principles

4.1 Compliance with the law

The Company complies with EU, national and regional laws, as well as with current regulations.

Recipients are required to observe and comply with the rules of the legal system in which they operate and must refrain from committing violations.

4.2 Dignity, equality and integrity

The Recipients of this Code must recognise and respect the personal dignity, privacy and personal rights of every individual.

In carrying out their duties, Recipients shall conduct themselves with transparency and moral integrity, taking into account the various social, economic, political and cultural contexts of reference and, in particular, the values of honesty, fairness and good faith.

Recipients work with colleagues of all nationalities, cultures, religions and social classes. Discrimination of any kind is not tolerated.

4.3 Effectiveness, efficiency and cost-effectiveness

The Company carries out its activities according to criteria of effectiveness, efficiency and cost-effectiveness, through the optimal use of available resources and the elimination of waste.

Each Recipient must diligently acquire the necessary knowledge of the laws and regulations applicable to the performance of their duties, as in force at the time: conduct contrary to the aforementioned precepts is not tolerated, nor can ignorance of them be justified in any way.

In addition to the general principles of diligence and loyalty referred to in Articles 2104 and 2105 of the Italian Civil Code, each Employee shall also comply with the behavioural requirements contained in the collective agreements applicable to them.

4.4 Professional diligence and spirit of collaboration

The conduct of each Recipient significantly determines the quality, efficiency and reputation of the Company.

Each Recipient shall carry out their activities with the professionalism required by the nature of the tasks and functions performed, making every effort and diligently carrying out the necessary in-depth study and updating activities.



4.5 Traceability

Each Recipient must keep adequate documentation of every transaction carried out, in order to allow for verification of the reasons underlying each decision and the characteristics of the transaction itself, both at the authorisation stage and at the execution, recording and verification stages.

4.6 Confidentiality of sensitive data

The Company collects data that is useful for the performance of its activities.

The use of confidential data for purposes other than those for which it was communicated is strictly prohibited, except in cases of express authorisation and, in any case, always in strict compliance with current legislation on the matter.

The protection of information and data contained or stored on computer media must be ensured by the adoption of security measures appropriate to the purpose.

The data and information acquired are processed using automated tools for the time strictly necessary to achieve the purposes for which they were collected.

4.7 Conflicts of interest

Recipients shall avoid conflicts of interest in the performance of their duties.

The following situations, among others, are to be considered conflicts:

- open or hidden involvement in the activities of competitors;
- exploitation of one's position to pursue interests that conflict with those of the Company or to pursue interests of a personal nature;
- use of information acquired in the course of work activities for personal gain or for the benefit of third parties and in any case contrary to the interests of the Company;
- taking on corporate positions or carrying out work activities of any kind with suppliers, competitors and third parties in general that conflict with the interests of the Company.

Any situation that could potentially generate a conflict of interest or otherwise prejudice the Recipient's ability to make decisions in the best interests of the Company must be immediately reported by the Recipient to the Management Body and also requires the Recipient to refrain from performing any acts connected with or related to that situation.

5. Internal relations

5.1 Selection and management of personnel (Employees, Executives and Collaborators)

All Company personnel are hired under regular employment contracts and the relationship is conducted in full compliance with the collective bargaining agreements of the relevant sector, tax, social security and insurance regulations, as well as immigration provisions.

No form of irregular work is tolerated, and any form of illegal intermediation or exploitation of labour is prohibited.



The loyalty, ability, professionalism, seriousness, preparation and dedication of the staff are values and conditions that are crucial to achieving the Company's objectives.

Recipients must also expressly and constantly take into consideration respect for the individual, their dignity and values, avoiding any discrimination based on gender, racial and ethnic origin, nationality, age, political opinions, religious beliefs, health status, sexual orientation and economic and social conditions.

In the context of recruitment - conducted in accordance with the principles set out in this Code of Ethics, equal opportunities and without discrimination - the Company works to ensure that the resources acquired correspond to the profiles actually necessary for the work requirements, avoiding favouritism or concessions of any kind.

Any act of retaliation against Recipients who refuse to engage in unlawful conduct or who complain about or report such conduct is prohibited.

In the context of human resources development, the Company is committed to creating and maintaining the conditions necessary for the skills, competences and knowledge of each Employee to be further expanded, in order to ensure the effective achievement of the Company's objectives. For this reason, the Company pursues a policy aimed at recognising merit, in accordance with equal opportunities.

In this context, Employees are required to cultivate and seek to acquire new skills, abilities and knowledge, as well as to operate, in the performance of their duties, in full compliance with the organisational structures, also in order to allow for the correct and orderly activation of the internal control chain and the formation of a precise and articulated framework of responsibilities.

Employees may not carry out work activities, even if occasional or unpaid, that prevent or reduce the fulfilment of their office duties or that conflict with them or that prejudice the Company's reputation.

6. External relations

6.1 Relations with the Public Administration and Supervisory Authorities

Relations with the Public Administration and with the Authorities that perform supervisory functions are based on the principles of fairness, truthfulness, transparency, efficiency and collaboration.

These relations are conducted in compliance with the rules of this Code, with particular regard to the principles mentioned above.

In particular, by way of example, the following behaviours are prohibited:

- promising, offering or in any way paying or providing sums of money, goods in kind or other benefits (except for gifts or benefits of modest value and in any case in line with normal commercial practice), even as a result of unlawful pressure, on a personal basis to public officials or private interlocutors with the aim of promoting or favouring the interests of the Company. The above requirements cannot be circumvented by resorting to different forms of aid or contributions, such as assignments, consultancy, advertising, sponsorship, employment opportunities, commercial opportunities or any other kind, etc.;
- engaging in such conduct and actions towards spouses, relatives or relatives-in-law of the persons described above;
- behaving in any way intended to improperly influence the decisions of officials who deal with or make decisions on behalf of the Public Administration;



- providing or promising to provide, soliciting or obtaining confidential information and/or documents or information and/or documents that could compromise the integrity or reputation of one or both parties in violation of the principles of transparency and professional fairness;
- have the Company represented by a consultant or a 'third party' when conflicts of interest may arise; in any case, these persons and their staff are subject to the same requirements as the Recipients.

The conduct described above is prohibited both during the relationship with the Public Administration or with the private counterparty and once these relationships have ended. The provisions of this Code cannot be circumvented by resorting to personal funds.

6.2 Relations with political parties and trade unions

Relations with political parties, trade unions and other interest groups shall be conducted in compliance with the provisions of this Code, with particular regard to the principles of impartiality and independence.

In relations with these categories, the conduct and actions described in the previous and following paragraphs are prohibited.

Strictly institutional forms of collaboration aimed at contributing to the organisation of events or activities, such as conferences, seminars, studies, research, etc., are permitted, provided that they are not intended to obtain undue favours.

6.3 Gifts, benefits or other advantages

Recipients are prohibited from offering, providing, promising or granting to third parties, as well as accepting or receiving from third parties, directly or indirectly, even on festive occasions, gifts, benefits or other advantages in the form of sums of money, goods or services.

In particular, only gifts of modest value directly attributable to normal courtesy relations are permitted.

However, such gifts must not give rise to the impression - on the part of the other party, i.e. an unrelated and impartial third party - that they are intended to acquire or grant undue advantages, or give rise to the impression of illegality or immorality. In any case, such gifts must always be adequately documented. It is, however, forbidden for the Recipient to solicit the offer or granting, or the acceptance or receipt, of gifts of any kind, even if of modest value.

Any Recipient who, in the course of their duties, enters into contracts with third parties must ensure that such contracts do not provide for or imply gifts in violation of this Code.

6.4 Relationships with Suppliers of Goods and Services

The selection of suppliers of goods or services and, in any case, the purchase of goods and services of any kind are carried out on the basis of objective and documentable criteria, based on the search for the best balance between economic advantage and quality of service. In its relations with suppliers, the Company is guided by principles of transparency, equality, fairness and free competition.

In particular, within the scope of these relationships, Recipients are required to:



- establish efficient, transparent and collaborative relationships, maintaining open and frank dialogue in line with best commercial practices;
- obtain the cooperation of Suppliers in constantly ensuring the most favourable relationship between quality, cost and delivery times;
- demand the application of the conditions set out in the contract;
- require Suppliers to comply with the principles of this Code of Ethics and include a specific provision to this effect in contracts;
- operate within the framework of current legislation and require strict compliance with it.

6.5 Management of Customer Relations

The Company has always placed the quality of its processes and products among its primary objectives.

In particular, the Company has implemented a quality management system in accordance with the international standard UNI EN ISO 9001, which has been specifically certified by an independent third party, in order to guarantee quality control at all stages of the company's processes, also with a view to continuous improvement.

The Company has also obtained product certifications and is able to guarantee the complete traceability of its products and their compliance with production controls, chemical analysis of raw materials and testing laboratory certification.

Accurate quality controls and staff training guarantee product quality in accordance with the specifications agreed with the customer during the contractual phase.

6.6 Prevention of organised crime and compliance with economic and commercial sanctions programmes

The Company refrains from entering into relationships with individuals or legal entities that are part of criminal organisations of any kind, including mafia-type organisations, those involved in human trafficking or the exploitation of child labour, as well as individuals or groups operating for the purposes of terrorism or subversion of the democratic order.

The Company also undertakes, to the extent permitted by applicable laws and regulations, to comply with programmes and restrictive measures relating to economic, financial and trade sanctions based on foreign policy and national security objectives adopted by the European Union and/or individual Member States, the United States of America, the United Nations Security Council, as well as other organisations identified from time to time.

7. External circulation of information

External information must be truthful, clear and transparent. Relations with the press and the media in general are reserved exclusively for the Management Body.

Recipients who are called upon to provide external information regarding objectives, activities and results through participation in public events, seminars or the drafting of articles and publications in general are required to obtain authorisation from the top management of their organisational structure regarding the texts, reports prepared and communication guidelines, agreeing and verifying the content with the competent department.



It is therefore expressly forbidden for anyone else to disclose confidential information relating to projects, negotiations, initiatives, agreements, commitments, even if future and uncertain, relating to the Company that are not in the public domain.

Recipients must also refrain from disseminating false or misleading information that could mislead the external community.

8. Accounting data

8.1 Compliance with principles

Accounting records are kept in accordance with the principles of transparency, truthfulness, completeness, clarity, precision, accuracy and compliance with current legislation.

The Company requires compliance with all applicable regulations and, in particular, regulations relating to the preparation of financial statements and all types of mandatory administrative and accounting documentation.

The accounting system is based on generally accepted accounting principles and systematically records all events arising from the Company's operations.

8.2 Traceability

Adequate documentation must be kept to support each transaction, allowing for easy accounting recording, reconstruction of the transaction and identification of any responsibilities.

This documentation must make it possible to identify the reason for the transaction that generated the entry and the relevant authorisation. Supporting documentation must be easily accessible and archived according to appropriate criteria that allow for easy consultation by both internal and external bodies authorised to carry out checks.

Recipients are required to cooperate in the correct and timely recording of all management activities in the accounts and to ensure that management events are represented correctly and promptly, so that the administrative-accounting system can achieve its objectives.

8.3 Prevention of crimes of receiving stolen goods, money laundering and use of money, goods or benefits of illegal origin and self-laundering

The Company carries out its activities in full compliance with current anti-money laundering legislation and the provisions issued by the competent Authorities, undertaking to this end not to engage in any transactions that are suspicious in terms of fairness and transparency.

9. Health, safety in the workplace and the environment

9.1 Health and safety in the workplace

The Company pays particular attention to the prevention of accidents and the protection of the health and safety of workers in the workplace.

Specifically, it carries out its activities under technical, organisational and economic conditions that ensure adequate prevention and a healthy and safe working environment and



guarantees a working environment that complies with current health and safety regulations (Legislative Decree 81/2008), through the monitoring, management and prevention of risks associated with the performance of work activities.

The fundamental principles and criteria of prevention, on the basis of which decisions of all kinds and at all levels are taken in the field of health and safety at work, are as follows:

- to comply with the legislation on health and safety in the workplace as applicable from time to time;
- prevent accidents, occupational diseases, incidents and dangerous behaviour in general;
- monitor and, where necessary, improve health and safety conditions in the workplace over time;
- combating risks at source;
- avoid risks;
- assess risks that cannot be avoided;
- minimise risks in relation to knowledge acquired on the basis of technical progress;
- take into account the degree of technical development in the adaptation of machinery, equipment and any other device in use;
 - comply with ergonomic principles in the organisation of work and adapt work to people, particularly with regard to the design of workplaces and the choice of equipment;
- define working and production methods to reduce monotonous and repetitive work and mitigate their effects on health;
- replace what is dangerous with what is not dangerous or less dangerous;
- provide workers with personal protective equipment appropriate to the risks to be prevented, working conditions and the needs and requirements of the worker;
- planning prevention, aiming for a coherent whole that integrates technology, work organisation, working conditions, social relations and the influence of workplace factors;
- give priority to collective protection measures over individual prevention measures;
- provide adequate instructions to workers;
- ensure health checks for workers;
- participate in consultations and periodic meetings on health and safety at work;
- provide adequate and sufficient information, education and training to workers and managers;
- plan the measures deemed appropriate to ensure the improvement of safety levels over time , including through the adoption of good practices;
- provide for emergency measures to be implemented in the event of first aid, firefighting, evacuation of workers and serious and immediate danger;
- use warning and safety signs;
- regulate the maintenance of environments, equipment and systems, with particular regard to safety devices, in accordance with the manufacturers' instructions;
- ensure the signing of the works and service contract and the related Single Document for the Assessment of Interference Risks in all cases provided for by law, as well as verify the technical and professional requirements of contractors prior to signing the contract.

All activities, both at senior level (when making decisions) and at operational level (when implementing them), must be geared towards compliance with these principles.

In addition, workers are required to:

- use machinery and equipment, personal protective equipment and



safety devices;

- report any work situation that involves a serious and immediate danger, as well as any defect in the protection systems;
- participate in the fulfilment of health protection requirements to enable the employer to ensure that the working environment and conditions are safe and risk-free;
- contribute, together with the employer, managers and supervisors, to the fulfilment of the obligations for the protection of health and safety in the workplace.

The Company has implemented the Occupational Health and Safety Management System in accordance with the international standard ISO 45001, which will be certified in 2025 by an accredited and independent third party.

9.2 Environmental protection

The Company monitors all applicable legal requirements in the environmental field, striving to ensure strict compliance with them, including by involving and raising awareness among personnel directly involved in managing the impacts generated, as well as individuals who, although not part of the company structure, are linked to the Company by contractual relationships for the management of activities with an environmental impact.

In particular, the Company:

- takes measures to limit and, where possible, eliminate the negative impact of economic activity on the environment;
- gives priority to the adoption of measures to prevent any damage to the environment;
- promotes the values of sharing the principles of the Code among all Recipients.

The drafting of any type of environmental documentation required by law (both paper and electronic), as well as the accounting recording of documents relating to transactions with third parties that have a connection, even indirect and potential, with environmental management, is based on criteria of clarity, truthfulness and correctness.

The Company has implemented the Environmental Management System in accordance with the international standard UNI EN ISO 14001, which will be certified in 2025 by an accredited and independent third party.

10. Implementation rules

10.1 Adoption and dissemination of the Company's Code of Ethics

The Code and any future updates thereto are defined and approved by the Company's Board of Directors.

The Code is disseminated, including in electronic format, to all resources through a specific communication from the Chief Executive Officer.

A copy of the Code is posted on the notice board inside the Company's premises. New employees are given this Code together with the Company's Organisational Model, in order to ensure that they have the knowledge considered to be of primary importance.

The Company carefully monitors compliance with the Code by providing adequate tools for information, prevention and control tools and taking corrective action where necessary.



10.2 Amendment and entry into force of the Company's Code of Ethics

The Code is subject to review by the Company's Board of Directors.

The revision process takes into account contributions received from Employees and third parties, as well as regulatory developments and established international practices, and the experience gained in applying the Code itself.

Any amendments to the Code introduced as a result of this review are published and made available in the same manner as described above.

This Code shall enter into force on the date of its approval by the Board of Directors.

11. The Company's Supervisory Body

The task of supervising the functioning and observance of this Code is entrusted to the Supervisory Body (also referred to as the "SB"), which has autonomous powers of initiative and control and is appointed by the Company's Board of Directors in accordance with Legislative Decree 231/2001.

Without prejudice to compliance with any protection provided for by current regulations or collective agreements and without prejudice to legal obligations, the SB is entitled to receive requests for clarification, as well as reports of potential or actual violations of this Code.

The SB is bound to the utmost confidentiality and operates with impartiality, authority, continuity, professionalism and autonomy. The Supervisory Body also operates with broad discretion and with the full support of the Company's top management, with whom it collaborates in complete independence.

12. Violations of the Company's Code of Ethics

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations of the Company's Employees, pursuant to Articles 2104 and 2105 of the Italian Civil Code, as well as for Consultants, Collaborators, Suppliers and anyone who becomes a Recipient of this Code, with reference to the existing contractual relationship.

12.1 Management of reports - Whistleblowing

In order to ensure the effectiveness of this Code, the Company has set up an internal reporting channel through which anyone who becomes aware of any unlawful conduct within the Company can report it freely, directly and in complete confidence to the Supervisory Body.

It is the duty of everyone to report to the Body, without delay, any conduct by any Recipient that does not comply with the principles of the Code of Ethics.

12.2 The internal reporting channel

Reporting through the internal channel (hereinafter also referred to as "Internal Reporting") ensures that information about violations reaches the people closest to the cause of the violation, who can resolve it and take corrective action.



For internal reporting, the Company provides the following communication channels:

1. a platform accessible from the company website ([GlobeLeaks](#));
2. request for a face-to-face meeting with the Reporting Manager, scheduled within a reasonable time of the request.

The management of the reporting channel has been formally entrusted to an external party called the Reporting Manager.

12.3 The 'Whistleblowing Regulations'

The Company has drawn up specific Whistleblowing Regulations, adopted on 12 December 2023, which provide clear information on the channel, the subject of the report, the procedures and the conditions for making internal reports.

The Company undertakes to disseminate the content of the aforementioned procedure to all interested parties, both inside and outside the Company, through specific information and periodic training activities. The instructions are published on the company notice board. The Company ensures that the contents of the procedure are disclosed to all employees by organising specific training.

The Regulations are also available in a dedicated section of the company website.