

**SUBJECT:** Integrated management system policy.

The Vector S.p.A. Management has formally committed itself to pursuing the satisfaction of the company's stakeholders (the owners, customers, staff, suppliers, communities, etc.), the protection of the environment, and the protection of its workers' health and safety.

By establishing itself as a benefit company, the Management has expanded its commitment, setting goals that will have a positive impact on society and the environment, in addition to the usual general guidelines:

- the complete fulfilment of the stakeholders' expectations;
- the continuous improvement of the quality, environment, health and safety management system;
- the efficiency and effectiveness in the management of processes;
- the identification and monitoring of all environmental, quality, and health and safety related impacts;
- the commitment to protect the health and safety of its workers, in order to prevent accidents and occupational diseases, and to ensure safe and hygienic work environments, while at the same time taking into account the prevailing knowledge of the sector and all the relative hazards;
- the investigation and elimination of the causes of non-compliances at all levels;
- the continuous improvement of the practices and operating procedures in order to reduce the water, soil, and atmospheric impacts;
- the establishment of a proper and well-organised waste management system;
- the optimisation of the use of non-renewable resources;
- systematic compliance with the legislative requirements, with particular regard to environmental and worker health and safety issues;
- the evaluation of measures that will reduce the environmental impacts associated with the shipping sector;
- The monitoring, reduction and offsetting of the environmental impacts of our activities, avoiding waste and damage to the surrounding environment;
- the consolidation of collaborative relationships with the control bodies in order to ensure environmental protection and worker health and safety;
- the continuous improvement of the company's integrated management system in order to ensure compliance with the applicable requirements.

Vector S.p.A. it is also aware that economic, environmental and social sustainability must be an integral part of its business strategy.

Vector S.p.A. believes that business growth must also take the management of environmental impacts, worker health and safety and staff valuation measures, contributions to society, and ethical responsibility into consideration.

This sustainable vision of the company's future will not only guarantee significant reputational, commercial, and economic advantages for Vector S.p.A. itself, but also for all of its major stakeholders, thus contributing to the creation of a widespread sustainable economic model.

The company aims to achieve these objectives by systematically:

- monitoring the quality of the service provided;
- training the personnel who have an impact on the service and the processes;
- ensuring the continuous adaptation of the human resources involved;
- improving the environmental compatibility of the vehicle fleet and the operational facility;
- saving energy and non-renewable resources;
- reducing the impacts associated with waste production;
- reducing the pollution associated with the use and the emission of hazardous and non-hazardous substances;
- planning prevention and protection activities against health and safety risks;
- making use of safe, efficient and eco-friendly technologies;
- monitoring the supply chain in every area, even monitoring the ESG approach, and raising awareness of sustainability and ethics issues.

We also believe that maintaining a good reputation with respect to the highest legal, moral and ethical standards is fundamental for Vector S.p.A.'s present and future success, and have therefore adopted a code of ethics, whose guidelines are summarised below:

### **Honesty and integrity**

- It is prohibited to engage in conduct aimed at pursuing personal or corporate interests in violation of the principles of honesty and integrity as established by the current laws and regulations.

### **Transparency and fairness**

- Actions and conduct that could give rise to conflicts of interest are prohibited.
- The company encourages transparent conduct based on the principles of the truthfulness, accuracy, comprehensibility, completeness and timeliness of the documentation and information transmitted between the parties concerned.

### **Bribery and corruption**

- All forms of conduct that could induce or produce acts of corruption, extortion and/or falsification of documents are prohibited.

### **Service innovation and sustainability**

- Development of increasingly sustainable services
- Development of ideas and projects guided by sustainability principles
- Introduction of practices and models of sustainable innovation for the transformation of consumption paradigms that tend to safeguard social and natural systems
- Research and innovation activities

### **Training, dissemination, and positive contamination**

- Creation of sustainable educational and informational materials
- Organisation of events, fairs, conferences, and workshops related to sustainability issues
- Training linked to sustainability principles
- Creation of an environment based on support and understanding, where everyone can fully develop their potential
- Encouragement of coaching and training
- Promotion of diversity & inclusion projects and programmes
- Creation of the best possible conditions to attract, grow, and retain talented people

### **Partnerships, affiliations, and collaborations**

- Collaboration and synergies with non-profit organisations
- Partnerships and affiliations with organisations and companies that pursue the same objectives

### **Labour Law**

- Employment is a free choice, and labour must never be compulsory
- Forms of forced or involuntary labour are not permissible
- It is not permissible for workers to be required to submit security deposits or identity documents to their employer, thus preventing them from being free to leave their jobs after providing reasonable notice
- Only workers with valid residence permits are hired
- The original documentation certifying the candidate's right to work is always checked, even for candidates referred by staff recruitment agencies

### **Freedom of association and right to collective bargaining**

- The workers, without distinction, have the right to join or form trade unions of their choice, and have the right to collective bargaining
- The employer maintains an open attitude towards the activities of trade unions, where applicable, and their organisational activities
- The workers' representatives are not discriminated against and have access to the work areas to perform their representation functions
- If the right to freedom of association and collective bargaining is limited by law, the employer facilitates, and does not hinder, the development of parallel means for free and independent association and for bargaining

### **Child labour**

- Our company complies with the national legislation on child labour by applying the provisions of the National Collective Labour Agreement for the sector

### **Wages**

- The wages and contributions paid comply, at a minimum, with the national legal regulations and with the regulations set out in the national collective labour agreement for the sector
- Information on the working conditions applied and the relative wages are available to all the workers in a written and easily understandable format
- Any disciplinary measures are taken in accordance with the provisions of the collective labour agreement

### **Working hours**

- The working hours are compliant with the current laws and the collective labour agreement
- Overtime work is not excessive, and the resulting economic consideration is always at the premium rate

### **Discrimination**

- Any discrimination based on age, sex, sexual orientation, gender identity, physical appearance, health status, disability, economic conditions, ethnicity, nationality, political opinions, trade union affiliation, religious beliefs and/or any other personal characteristics are not permitted, without exception

### **Regular employment**

- To the extent possible, the activity carried out is based on a stable employment relationship, in compliance with national laws and practices
- The company's obligations to its workers arising from the law, the social security regulations, and the regular employment relationship are not circumvented through the use of contractual devices or through the excessive use of fixed-term employment contracts

### **Cruel or inhumane treatment**

- Disciplinary abuse, physical mistreatment, the threat of physical, sexual or other harassment and verbal abuse, or any other forms of intimidation are prohibited



### Subcontracting

- Adequate processes have been implemented to properly manage subcontracting in order to avoid any abuse, exploitation, or unsafe working conditions for the workers

### Privacy

- Our company has always worked to protect data subjects and ensure the confidentiality, integrity and availability of the data processed through the implementation and maintenance of adequate organisational, technological, and documentary measures

The Management is committed to implementing, supporting, and periodically verifying the above Policy, and to disseminating it among all those who work for the company or on its behalf.

All the professional figures must work to achieve the objectives set each year: the application of the integrated management system therefore requires the complete participation and commitment of and effective interaction among all the organisation's staff.

This document, which summarises the Management's thoughts on the matter, is intended for public disclosure and is available for consultation by all concerned parties.

Castellanza (VA) Italy, 19 July 2022

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