



CODE OF ETHICS

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Approved by the Board of Directors of Laboratori Fabrici S.r.l. il 17/04/2025

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1 Introduction

Laboratori Fabrici S.r.l. (*hereinafter also referred to as “Laboratori Fabrici” or “**Laboratori Fabrici S.r.l.**” or “**Vitesy**” or “**Company**”*) has developed its Code of Ethics (*hereinafter the “**Code of Ethics**” or simply the “**Code**”*). This document establishes the fundamental principles and values that guide the company in its relations with all stakeholders, including employees, customers, suppliers, communities, and the environment.

This Code outlines the rights, duties, and responsibilities that Laboratori Fabrici S.r.l. is committed to upholding daily, with particular attention to minimizing the environmental and social impacts of its activities and maximizing the benefits for society and the ecosystem. The document is also available online at <https://vitesy.com/it/download>.

Laboratori Fabrici S.r.l. adopts a strategic approach based on sustainability and social responsibility principles, with a strong focus on eco-design, resource circularity, and commitment to environmental sustainability.

Our corporate philosophy is based on the principle of creating shared value for all stakeholders

involved in our activities, from employees to the supply chain, through a continuous improvement process.

In this regard, Laboratori Fabrici S.r.l. has implemented an Integrated Quality and Environmental Management System, certifying its commitment to high standards.

As a Benefit Corporation, Laboratori Fabrici S.r.l. pursues goals of common benefit, operating responsibly, transparently, and sustainably to contribute to the well-being of people, communities, territories, and the environment, and supporting cultural and social activities. Laboratori Fabrici S.r.l. recognizes the importance of an extended responsibility process, a concept it considers essential, whereby every actor is called to account for the impact of their actions.

1.1 Mission and Vision

Vitesy's mission is to build an ecosystem of sustainable products and services that promote responsible behaviors and improve the quality of the environments in which people live. The company is committed to creating economic value ethically and sustainably, developing solutions that facilitate the adoption of environmentally and health-conscious practices, meeting current needs, and anticipating future societal demands.

We firmly believe in human potential and are convinced that our company's growth is closely linked to the personal and professional growth of our collaborators. Therefore, Vitesy is committed to creating an inclusive and stimulating work environment, where each individual can fully express their abilities, develop skills, and feel valued.

We operate in compliance with ethical, economic, and social principles to ensure that our growth path generates a positive, concrete, and lasting impact on the community and the planet.

Furthermore, Vitesy is dedicated to developing solutions that generate positive impact, aiming not only to meet current consumer needs but also to anticipate future needs of society and the planet. With the goal of making the world a better and more sustainable place, we aim to engage all our stakeholders, encouraging responsible behaviors that can have tangible and lasting effects on the quality of life and the global environment.

Laboratori Fabrici aspires to create a world where people, businesses, and communities collaborate for sustainable and shared development, promoting a healthy and environmentally respectful lifestyle. Our vision is to build relationships based on trust and mutual value with all our stakeholders: employees, customers, suppliers, and the community in which we operate. We believe that commitment to a sustainable future involves the active involvement of every individual, both inside and outside the company.

1.2 Recipients of the Code of Ethics

The recipients of the Code of Ethics, who are required to adhere to its principles, include all those within Laboratori Fabrici who hold positions of representation, administration, or management, as well as those who exercise control over the company. This obligation extends to all employees, without exception, collaborators, and anyone conducting business relations with the company, either directly or indirectly, on a stable or temporary basis, or who collaborates in achieving its corporate mission. They are required to observe and, within their remit, ensure compliance with the principles contained in the Code of Ethics.

Violation of the Code of Ethics damages the relationship of trust established with the Company and may result in disciplinary or legal actions, as provided by law and collective agreements.

2 Guiding Values

In carrying out its activities and guiding its strategic choices, Laboratori Fabrici S.r.l. has defined a set of guiding values listed below.

2.1 Social: work and human rights

2.1.1 Human rights

Vitesy is committed to respecting human rights, including those of workers, inspired by the International Bill of Human Rights¹ and the fundamental conventions of the International Labour Organization (ILO)². It treats its workers with dignity and respect, protecting them from any degrading working conditions.

2.1.2 Child labour

Vitesy fully complies with all applicable laws and regulations regarding child labor and the protection of young workers. The employment of workers under 18 years of age, where permitted by applicable laws and regulations, must not interfere with their mandatory education

¹L'International Bill of Human Rights si compone dei testi della Universal Declaration of Human Rights, dell'International Covenant on Economic Social and Cultural Rights (ICESCR), e dall'International Covenant on Civil and Political Rights (ICCPR). L'ICESCR e l'ICCPR individuano diritti civili, politici, economici, sociali e culturali di cui chiunque deve poter beneficiare. Affinchè le due Convenzioni siano vincolanti devono essere ratificate dai Governi. *"International Bill of Human Rights. A brief history, and the two International Covenants"* <https://www.ohchr.org/en/what-are-human-rights/international-bill-human-rights> Di seguito la Dashboard interattiva che monitora lo status di ratifica delle Convenzioni su scala globale <https://indicators.ohchr.org/>

²"Norme internazionali del lavoro e documenti in italiano" <https://www.ilo.org/rome/norme-del-lavoro-e-documenti/lang--it/index.htm>

and must not expose them to hazardous activities or harm their health, safety, or physical and mental development.

2.1.3 Forced labour

Vitesy refrains from any practice of forced labor and modern slavery as indicated by applicable regulations and ILO conventions. No individual may be forced or threatened by Laboratori Fabrici S.r.l. personnel or collaborators to perform any service or work, either directly or indirectly. Any work must be freely chosen and agreed upon.

Laboratori Fabrici refrains from any practice that may interfere with workers' regular access to their identification documents or restrict their freedom of movement.

2.1.4 Discriminatory practices

Vitesy opposes any discriminatory practice based on age, gender, ethnic or racial origin, nationality, sexual orientation, gender identity, political or religious beliefs, disabilities, and any other personal characteristic not relevant to the workplace, ensuring fair treatment of all employees and collaborators.

Vitesy promotes and adopts work practices inspired by the principles of equal opportunity for all its employees and collaborators. The Company respects and adheres to applicable regulations in this regard, drawing on ILO conventions in its practices³.

2.1.5 Freedom of Association

Laboratori Fabrici S.r.l. ensures respect for workers' rights to association and collective bargaining as established by applicable laws and regulations, drawing on ILO conventions in its practices⁴.

Suppliers must also refrain from any threats, discrimination, retaliation, and/or harassment related to the exercise of this right.

2.1.6 Working Conditions

Employees and collaborators of Laboratori Fabrici S.r.l. are compensated in accordance with applicable laws and regulations and adopted collective agreements. Salaries are assigned in a way that ensures the fulfillment of employees' and collaborators' primary needs, as well as the respect for decent living standards.

³ "Norme internazionali del lavoro e documenti in italiano" <https://www.ilo.org/rome/norme-del-lavoro-e-documenti/lang--it/index.htm>

⁴ "Norme internazionali del lavoro e documenti in italiano" <https://www.ilo.org/rome/norme-del-lavoro-e-documenti/lang--it/index.htm>

Laboratori Fabrici S.r.l. complies with legal requirements regarding rest periods, breaks, vacations, leaves, drafting of contracts, and other labor conditions provided by law.

2.1.7 Harassment

Vitesy guarantees a work environment where any form of harassment is not tolerated and ensures the protection of those who need to report such incidents, acting in full compliance with applicable laws and regulations.

2.1.8 Workplace Health and Safety

Vitesy promotes working conditions and environments that protect the physical and psychological integrity of individuals, fostering a safety culture within the company. It raises awareness among the recipients of this Code of Ethics regarding risks and promotes responsible behavior among all. Vitesy constantly works to prevent potential accidents, injuries, and risks related to activities and the operating context.

Each employee is responsible for their colleagues and collaborators and must be attentive in preventing risks of injury, taking care of their own health and safety and that of others present in the workplace. It is mandatory to follow the instructions and directives given by those to whom the Company has delegated safety obligations.

2.2 Governance: Ethics and Integrity

2.2.1 Integrity

Vitesy makes every effort to conduct its business in compliance with generally recognized ethical principles and integrity and to adopt organizational systems consistent with the principles outlined in this Code. The goal is to maintain lasting, honest, and transparent relationships with all stakeholders.

2.2.2 Corruption

Vitesy opposes and prohibits any form of corruption and embezzlement, whether active or passive, acting in full compliance with all applicable laws and regulations. Laboratori Fabrici S.r.l. refrains from and prohibits promising, offering, or accepting improper advantages and/or benefits of any kind for corrupt purposes.

Vitesy employs procedures to prevent and combat corruption in all its forms and in no way facilitates or supports third parties in money laundering, terrorism financing, or other financial crimes.

2.2.3 Unfair competition

Vitesy complies with current competition laws to conduct its business activities while respecting the rules of fair competition. The Company rejects any form of unfair competition practices, including but not limited to defamation of competitors, misappropriation of trade secrets, infringement of intellectual property rights, and unethical acquisition of confidential information.

Each employee is required to respect these principles and report any behavior that violates competition law.

2.2.4 Privacy and Sensitive Data

Laboratori Fabrici S.r.l. respects all obligations, laws, and regulations regarding privacy and proper management of confidential, personal, and sensitive information, adopting appropriate security measures to protect personal data in its possession and preserving the confidentiality of information obtained through its business activities. All stakeholders must also safeguard, protect, and make appropriate use of information shared by Vitesy.

Such use must not deviate from assigned tasks and agreed purposes. Any sharing of confidential information related to Laboratori Fabrici S.r.l. must be done with prior written consent from the Company.

2.2.5 Ethics in the use of Digital Resources

Laboratori Fabrici S.r.l. personnel may use company-provided IT equipment for work purposes only, in compliance with applicable regulations and company procedures. It is prohibited to store exclusively personal documents on Vitesy-owned computers.

The use of IT and network resources provided by Laboratori Fabrici S.r.l. for purposes contrary to mandatory legal rules, public order, or morality is strictly prohibited.

Under no circumstances should these resources be used to promote racial intolerance, glorify violence, or violate human rights, nor to commit or incite criminal acts, damage or alter third-party information systems, whether private or public, or unlawfully obtain confidential information. The Company condemns all illegal conduct related to IT systems, including the use of unauthorized or unlicensed software, falsification of public or private IT documents, unauthorized access to IT or telecommunication systems, unlawful possession or dissemination of access codes to IT systems, and illegal interception, blocking, or interruption of IT or telecommunication communications.

2.2.6 Conflict of Interest management

Vitesy strives to avoid real or potential conflicts of interest, inappropriate influences that could create illegitimacy or collusion practices of any kind, acting with fairness and impartiality.

Stakeholders, employees, or collaborators involved must inform Laboratori Fabrici S.r.l. of any situation that may be considered a conflict of interest (even if merely potential) and must refrain from any actions that may harm the company or its image.

2.2.7 Industrial and Intellectual Property

Vitesy operates in full compliance with applicable laws, regulations, and conventions regarding industrial and intellectual property rights.

Laboratori Fabrici S.r.l. takes all necessary measures to protect, as required by law, the know-how and trade secrets of both its own and all stakeholders, assuming responsibility for any improper management and/or dissemination.

Vitesy also complies with applicable competition and antitrust laws and regulations.

To this end, and in compliance with the aforementioned regulations, all recipients must avoid any behavior that may be considered an infringement of industrial property rights, alteration or counterfeiting of distinctive marks, industrial products, patents, designs, or industrial models. It is also forbidden to unlawfully and/or improperly use copyrighted works or parts thereof protected by copyright law.

2.2.8 Product Quality and Safety

Laboratori Fabrici S.r.l. pays particular attention to the quality, safety, and reliability of its products, aiming to ensure maximum customer satisfaction and maintain high operating standards. To this end, all stakeholders must strictly comply with the procedures outlined in the quality management system, actively contributing to the continuous improvement of company processes.

2.3 Environment: Climate Risk Mitigation

Vitesy promotes respect for the environment with a focus on sustainable development, adopting various practices outlined below.

2.3.1 Waste Management

Laboratori Fabrici S.r.l. complies with applicable laws and regulations regarding the management of hazardous and non-hazardous waste, ensuring their proper handling,

treatment, and disposal. Laboratori Fabrici S.r.l. is committed to progressively reducing the waste generated and improving waste management through reuse and recycling, ultimately aiming to reduce its negative environmental impact.

2.3.2 Energy Consumption Management and Emission Reduction

Laboratori Fabrici S.r.l. is committed to measuring, monitoring, and reducing its energy consumption where possible and adopting reasonable measures to reduce greenhouse gas emissions and other toxic and/or hazardous pollutants associated with its product manufacturing process. It optimizes operations and acts in full compliance with applicable laws and regulations. Vitesy also commits to mapping its carbon footprint at both the corporate level (scope 1, 2, and 3) and product level (through LCA studies) following internationally recognized standards. In line with international goals (such as the Paris Agreement), Vitesy establishes plans for emission reduction and possible compensation. In this regard, Laboratori Fabrici S.r.l. encourages employees, collaborators, and suppliers to use environmentally friendly transportation whenever possible.

The Company encourages its suppliers to responsibly and efficiently use all resources involved in its product lifecycle, rely on sustainable sources of supply, and, where possible, use energy from renewable sources.

2.3.3 Environmental Respect

To ensure greater environmental protection, Vitesy has implemented an environmental management system aimed at reducing its impact and promoting positive coexistence with natural ecosystems. This commitment is realized through a system of monitoring, managing, and reducing environmental impacts, compliant with ISO 14001 standards or, alternatively, through the adoption of internal policies pursuing the same goals.

2.3.4 Resource Use and Circular Economy

Laboratori Fabrici S.r.l. promotes the adoption of circular economy models in its activities and operations, increasingly adopting "Life Cycle Thinking" approaches to optimize resource use in line with applicable laws, regulations, standards, and international objectives⁵. Vitesy pays attention to the entire lifecycle of its products and services, encouraging resource and material reuse and recycling practices.

2.3.5 Traceability and Responsible Product Development

Laboratori Fabrici S.r.l. places great emphasis on the responsible development of its products. Therefore, it ensures maximum traceability of materials, components, and products throughout the entire value chain, complying with all applicable laws and regulations, including those

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Per

maggiori

informazioni

<https://www.europarl.europa.eu/news/it/headlines/economy/20151201STO05603/economia-circolare-definizione-importanza-e-vantaggi>

related to the sourcing of raw materials, processing, sales, and distribution. Laboratori Fabrici S.r.l. assesses potential environmental and social risks associated with the services it receives from its suppliers.

3 Implementation Methods

3.1 Code Application and Dissemination

The Company aims to maximize the dissemination of this Code of Ethics among all recipients and third parties, ensuring that its principles and values are shared. To this end, the Code is published on the company website.

All recipients of the Code must be familiar with its provisions, the reference regulations, and the procedures governing it, and they are required to comply with them.

3.2 Supervision and Reporting

The Company promotes a culture of integrity and transparency, inviting all recipients of the Code of Ethics to monitor compliance with its provisions. It is essential that any potential or suspected violations are promptly reported.

Reports can be made directly and confidentially to the Human Resources Manager or, if the HR Manager is directly involved in the reported situation, to the General Management. The HR Manager is responsible for receiving and handling reports with the utmost discretion and impartiality. To ensure confidentiality and protect whistleblowers, several communication channels are provided:

- Through a dedicated email box, accessible only by the HR Manager: vigilanza@labfabrici.com
- Via a physical suggestion box (Piazzetta Ado Furlan 04, Pordenone) allowing anonymous reporting if the whistleblower wishes to remain anonymous.
- Orally through a direct meeting with the HR Manager (Martina Rigon)

The Company ensures that all reports will be taken seriously, with no retaliation against those who report in good faith, in compliance with current data protection and whistleblower protection laws. Reports must be made clearly and in detail to enable proper and timely evaluation.

3.3 Violations and Sanctions

The Company sanctions violations of this Code of Ethics, in compliance with labor relations regulations.

Compliance with the Code of Ethics is an integral part of employees' contractual obligations under Article 2104 of the Italian Civil Code. Violation of the provisions of this Code of Ethics may result in disciplinary measures being imposed, in accordance with the procedures set out in Article 7 of the Workers' Statute and applicable collective agreements, with all legal consequences, including regarding the continuation of the employment relationship, and may result in an obligation to compensate for any damages caused by the violation.

Violations of this Code of Ethics by those holding positions of representation, administration, or management of the Company, or by those who exercise management and control, even de facto, may result in sanctions in accordance with applicable national laws, up to temporary suspension or removal from office in severe cases. Other sanctions related to different types of liability may also apply.

The application of disciplinary sanctions is independent of the outcome of any criminal or civil proceedings, as the conduct rules imposed by the Code of Ethics are effective regardless of the offenses that improper conduct may entail.

Failure to comply with this Code of Ethics is also relevant with regard to job assignments, employee placement, and performance evaluation, including the granting of bonuses or economic incentives.

Compliance with the values of the Code of Ethics, formalized in the related contractual agreements, is a fundamental obligation for all those conducting business with the Company. Therefore, any violation of the Code by suppliers, collaborators, or partners may constitute a breach of contract, with the consequent application of the sanctions provided by applicable regulations.

The supervision of compliance with this Code of Ethics is entrusted to the Human Resources Manager, who carries out this task with impartiality and independence.

The Recipients of the Code must promptly report to the Manager any violation or suspected violation of the Code of Ethics they become aware of, ensuring adherence to the principles of transparency and integrity.

3.4 Amendments and Updates to the Code

This Code of Ethics is subject to periodic updates to ensure it remains aligned with current regulations, international best practices, and changes in the corporate environment.

Any amendments will be approved by the Board of Directors and promptly communicated to all recipients of the Code, including employees, collaborators, suppliers, and other relevant parties.

The updates will be shared through official channels, such as publication on the company website and internal communications, to ensure maximum transparency and clarity. It is the responsibility of each recipient of the Code to stay informed about any changes and to adopt behaviors in line with the new provisions.

3.5 Approval and Dissemination of the Code

Laboratori Fabrici approves this Code of Ethics through a resolution of the Board of Directors and promotes its adoption.