



# V-ADVICES, INTEGRITY WITHOUT COMPROMISE

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# OUR STANDARDS OF BUSINESS CONDUCT

**V-Advices** encompasses various global cultural perspectives, knowledge, and individual experiences. Our values constantly unite us across borders, corporate groups, and personal roles, particularly our unwavering commitment to Integrity and fairness. These principles are immutable.

Our values are the foundation of our relationships with customers, suppliers, and competitors. Ethics, information security, and strict Compliance with laws are our mantra. At **V-Advices**, these values are non-negotiable, and there is no room for compromise.

Solutions are only sometimes straightforward in today's intricate business landscape. V-Advices' standards of business conduct serve as a practical manual, clarifying our principles for everyday scenarios. These Standards apply to all **V-Advices employees**, and we are responsible for understanding and complying with them.

While business expansion is essential, it can't come at the expense of meeting our standards or breaking the law, even unintentionally.

**V-Advices** has earned a reputation for honesty, trust, helpfulness, and Integrity. We consistently convey information truthfully to all stakeholders. We owe it to our employees and customers to consistently maintain our commitment to Integrity.

All managers must review these standards with their team and make them an integral part of our work culture to ensure understanding and Compliance.

As we work with our clients to address their challenges, **V-Advices'** values must form the basis of every decision and action we take. We must always prioritize honesty, Integrity, Compliance with global laws, and **V-Advices'** standards of business conduct in all our business relationships.

## VALUE

**V-Advices values the diverse cultural and individual perspectives of our employees. Our constant values guide every decision and action, no matter where we are. These values form the basis of our business conduct standards, shaping how we approach work in a complex environment. All employees are required to comply with V-Advices' values.**

## INNOVATION AND CONTRIBUTION

We strive to stand out in our customers' eyes by constantly innovating and finding new solutions to meet their needs. Our dedication to helping our clients succeed fuels our passion for researching new ideas.

## VELOCITY

We are always ready and eager to meet the needs of our customers and business partners. If we encounter obstacles, we take swift and decisive action to correct our course.

## OBJECTIVES

We love to achieve challenging goals. This is how we prioritize and simplify understanding what is essential. Our goal is always to anticipate and meet customer needs.

## TRUST, RESPECT AND TEAMWORK



Trust, respect, and teamwork are the cornerstones of our culture. Every individual is treated with the utmost respect, and we strive to create an inclusive environment that fosters respect for everyone's ideas and contributions. We firmly believe in the power of a global and diverse workforce.

## RESPONSIBILITY

We keep our commitments, and we always respect them. Our dedication to unwavering Integrity remains steadfast.

## INTEGRITY WITHOUT COMPROMISE

We are committed to maintaining Integrity in all our interactions with customers, competitors, suppliers, and employees. We proudly uphold the highest standards of business ethics and refuse to settle for anything less.

## REGULATORY REQUIREMENTS

We want to help our customers comply with regulatory requirements, following them step by step to implement them and help them improve.

# OVERVIEW

Over our exciting journey, we have witnessed incredible technological advancements and dynamic changes in the economic landscape. However, one thing that has remained unwavering is our dedication to core values. Our Standards of Business Conduct (SBC) continue to guide us, providing us with knowledge, direction, and tools to uphold the highest standards of honesty, Integrity, and Compliance with laws and regulations in every corner of our business operations.

## WHO IS REQUIRED TO COMPLY WITH THE SBC?

V-Advices' **Standards of Business Conduct (SBC)** apply to everyone, from employees and executives to officers, directors, managers, and even third parties who work with or for **V-Advices**. It is essential that each of us:

- Familiarize yourself with all SBC policies and guidelines.
- Know and follow all the laws and regulations of the countries in which we work.
- a) If you are unsure, do not hesitate to ask questions before proceeding. Also, be sure to share any observations or information about behavior that seems inaccurate, illegal, or out of line with the SBC.
- b) Cooperate in any internal investigation of misconduct.

## MANAGERS HAVE ADDITIONAL RESPONSIBILITIES

We have the incredible opportunity to shape an ethical work environment and guide our team members toward conducting business with honesty, Integrity, and full Compliance with SBC. If you're a manager, it's crucial to:

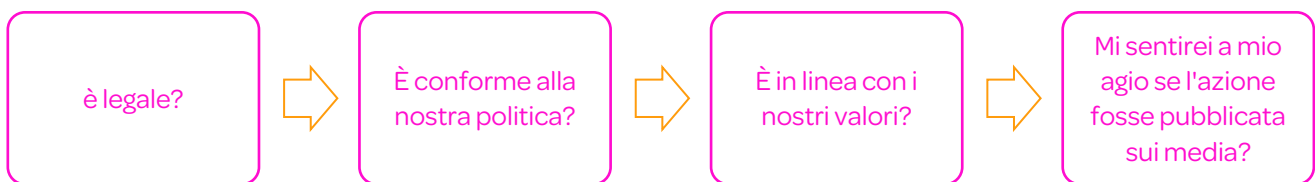
- Lead by example, showing no gap between what you expect and what you do.
- I would foster a supportive work environment where employees feel empowered to raise questions and concerns.
- Support employees who speak up, treating their contribution as confidential and working to address issues.
- Cultivate an environment free from fear of retaliation for raising concerns in good faith.

## LOOK BEYOND THE LOCAL LAW OR CULTURE

**V-Advices thrive** in a dynamic global market. We understand that SBC may not cover all possible scenarios in our work environment. Nonetheless, it sets the expectation that the highest standards of Integrity will be maintained.

Use common sense, regardless of the situation or location. If local customs or practices clash with the SBC, Compliance with the SBC is essential.

When faced with an ethical dilemma, let these questions guide your decision-making. If you can answer "yes" to all four questions, it's probably safe to proceed. However, a "no" or "I'm not sure" to a question should prompt you to stop and reconsider your actions.



## VIOLATION OF THE SBC

**V-Advices** takes ethical conduct seriously and believes in fostering a work environment based on trust and Integrity. Our open-door policy ensures that every employee, customer, and supplier can voice their concerns at any level. Your direct manager is typically the first person to turn to, but if you feel uncomfortable or your concerns need to be appropriately addressed, feel free to contact management via the whistleblower channel.

Let's continue to work together to build a reliable and ethical work environment at **V-Advices!**

## WHISTLEBLOWING

We have a platform specifically designed to report any actual or suspected violations. We are committed to ensuring that individuals can come forward without fear of retaliation and are fully compliant with the assurances provided to the whistleblower.

This initiative underlines our ongoing commitment to:

- Cultivate a company culture firmly rooted in transparency, accountability, and Integrity.
- Establish and promote the internal reporting channel.
- c) Clearly define responsibilities related to the whistleblowing process and the operations of the Internal Whistleblower Committee.
- Outline the guarantees and the system of protection available to whistleblowers by the legislation.
- d) Explain the system of penalties the law provides against **V-Advices** and its directors.

**V-Advices** has implemented a procedure Whistleblowing Regulation Rev.01 <sup>1</sup>

## THE COMPLIANCE HOTLINE

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<sup>1</sup> SOP009

At the Compliance Hotline, you have the incredible power to report your concerns anonymously and confidentially 24/7! Whether it's a quick phone call or online, we've got you covered! For more details on the Compliance Hotline, please get in touch with [Compliance@V-Advices.com](mailto:Compliance@V-Advices.com). In countries where anonymous reporting is not allowed, don't worry; you can still share your concerns using our Open Door Policy. Your voice matters!

## AFTER REPORTING

We take every report of misconduct seriously and handle it promptly and fairly. Rest assured that your reports will be treated with the utmost sensitivity and shared only with those involved in the investigation. Our internal processes ensure that all investigations are conducted in a legal, professional, and confidential manner. We may also involve relevant authorities when necessary or appropriate.

## OUR NON-RETALIATION POLICY

We support and encourage the reporting of any misconduct, including violations of the SBC. **V-Advices** is proud to uphold a strict policy against retaliation against individuals who make good faith reports on known or suspected violations of the SBC or those who cooperate with investigations into such matters. You must feel completely comfortable when you step forward, knowing you are taking the right and noble path, even if the reported problem cannot be immediately proven. While it may seem tempting to ignore or disregard potential issues, choosing to do nothing is an action that can have detrimental consequences for **V-Advices** and the individual involved. We urge everyone to express any concerns to be adequately addressed promptly. Please be assured that all information provided will be treated with the strictest confidentiality and only shared with those responsible for investigating and resolving the issue.

# CONFLICTS OF INTEREST

As employees, we do what is suitable for **V-Advices**, avoiding situations that could create or appear to create a conflict between your interests or the interests of friends and family and the interests of **V-Advices**. We avoid situations that can give rise to conflicts of interest, recognizing that they can cloud our judgment and impair our ability to make objective business decisions.

A conflict of interest occurs when, in the course of the work carried out by **V-Advices** staff, their interests or, in any case, related parties threaten their judgment and objectivity.

V-Advices **staff** must avoid overlapping business tasks and roles with economic activities and personal and family interests.

In the event of a situation of conflict of interest, even if only potential, the parties involved are required to refrain from acting and promptly notify their hierarchical superior or the Supervisory Body, which assesses their actual presence and relevance on a case-by-case basis.

## CONFLICT IDENTIFICATION AND DISCLOSURE

A conflict of interest may exist whenever your personal investments, activities, interests, associations <sup>2</sup> compromise your loyalty to **V-Advices**. When making decisions relating to the work of **V-Advices**, the person must act in the best interests of our **V-Advices** and avoid the appearance of conflict.

While it is not feasible to outline every possible conflict situation, some scenarios commonly lead to conflict. You should do your best to avoid these situations and communicate them if they occur. If you have questions about the appropriate course of action

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<sup>2</sup>, or those of your family members or other people with whom you have a personal relationship

in a particular situation, please get in touch with your direct manager or any manager within your management chain for guidance before taking any action. Most conflicts can be easily avoided or addressed if promptly disclosed and managed adequately. If you find yourself in a situation with an actual or perceived conflict, you should promptly notify your manager in writing. In situations that require approval, the manager responsible will review the matter and notify you in writing, advising you that there are no objections to the business or relationship or that there are specific steps you need to take to resolve the potential conflict.

You are obliged to notify us as soon as you become aware of any change in circumstances that may affect your situation. In the meantime, V-Advices will retain copies of your policy and **V-Advices'** responses.

Communicate in writing any actual or perceived conflicts of interest.

## FINANCIAL INTERESTS

A conflict of interest may arise if you or a family member has a financial interest in or exercises control or influence over a supplier, customer, reseller, or competitor of **V-Advices**. The potential for conflict depends on the investment size, the work performed, and the business relationship between **V-Advices** and the one in which you have invested (or intend to invest).

Communicate the investment and seek advice whenever an investment you are considering or have made in the past could represent a potential conflict of interest.

## EXTERNAL WORK AND CONSULTANCY

Work outside of **V-Advices** may represent a potential conflict of interest if it competes with the work you do for **V-Advices** or interferes with the time, talent, and energy you bring to the work.

The following activities are expressly prohibited:

- Working for a competitor in any capacity
- Support or promote a competitor's products and services.
- Support or promote **V-Advices products or services** (or products or services similar to ours) on behalf of another.
- Hold more than one job within **V-Advices**: For example, you cannot be an employee of one division of **V-Advices** and an independent contractor for another company.

Other activities may be permitted if disclosure is made in advance and written approval is obtained.

Even when a second job is permitted or approved, there is an expectation that any work performed outside of **V-Advices** will not adversely affect fulfilling one's job responsibilities or the responsibilities of others at **V-Advices**.

Can working in a restaurant during the weekend and some evenings represent a conflict of interest?

No, however, you must inform your manager of this provision and take special care not to allow your work outside of **V-Advices** to affect your fulfillment of job responsibilities at **V-Advices**.

## ADMINISTRATOR AND CONSULTING POSITIONS

At **V-Advices**, our employees have the exciting opportunity to take on management and consulting roles in various companies, universities, and organizations. Before accepting such positions, you must write the details to your manager. This allows us to review potential opportunities and determine if they may conflict with or hinder your responsibilities at **V-Advices**.

When considering director positions on external Boards of Directors, it is essential to adhere to the **V-Advice policy**:

- Competitors: You are not allowed to take a position on the Board of Directors of any competitor of **V-Advices**.
- Companies or organizations that support or promote competitor products/services: Approval from a member of the executive staff and general counsel of **V-Advice is required**.
- For-profit product providers/service providers, customers, or resellers: Approval from a member of the **V-Advices executive staff is required**.
- e) Nonprofit product providers/service providers, customers, or resellers: Approval from a director or higher is required.

Suppose you are a director or advisor for an outside entity and find yourself in a situation that may conflict with your interests. In that case, it is crucial that you withdraw from the situation or resign immediately. Adhering to these guidelines is essential to aligning with our mission and values at **V-Advices**.

## VOLUNTEER ACTIVITIES

We are excited to fully support your volunteer service with charitable, professional, and community organizations. Remember that your volunteer activities should occur during your time and be self-funded and provided with self-sufficient resources. It's crucial to ensure that your volunteer work is consistent with your responsibilities at **V-Advices** or gives the impression of conflict.

The associations for which you do business should only use the **V-Advice** name or resources if you obtain explicit written approval from your manager. Also, refrain from seeking out other **V-Advices** persons during working hours on behalf of an outside organization unless this is part of a charity initiative authorized by **V-Advices**.

Sometimes, your volunteer service may present similar problems to paid work. Therefore, it is essential that you disclose any volunteer activities that may conflict with your work at **V-Advices** or the work in which **V-Advices** is involved.

We truly appreciate your dedication to volunteering and its positive impact on our community. I appreciate your commitment to making a difference.

## PERSONAL RELATIONSHIPS

Business decisions can be a real challenge when dealing with friends or family. It is important to adhere to **V-Advices'** policy and be open about any situation where you or your **V-Advices corporate group** are considering doing business with close personal ties, such as family, friends, or others.

My sister-in-law works for a company that does business with **V-Advices**. Is this a problem?

**V-Advices** does not prohibit conducting business with companies that employ friends and family of our employees. Still, it is essential that you disclose the report so that all necessary actions can be taken to prevent potential conflicts from influencing or appearing to affect the decisions you make on behalf of **V-Advices**.

## PERSONAL BENEFITS

We must keep our business interactions in professional social settings and approach them with common sense. Remember, we should not gain any profit or personal benefit from transactions involving **V-Advices** beyond our average compensation. It's perfectly fine to participate in frequent flyer programs, but let's avoid those that offer cash refunds or any other type of free travel. We must also avoid obtaining personal benefits from travel service providers when planning group activities or trips for ourselves or others.

Gifting and receiving can be tricky, so let's ensure you understand and follow **V-Advices'** policy on gifts and entertainment to avoid conflicts of interest.



We are not just looking after ourselves: we must avoid any action that may promote our interests over others or harm fair judgment. In addition, you are not allowed to pay or accept any money, gifts, or favors for the benefit of **V-Advices**.

Always remember that if we receive gifts or benefits during our work that are not part of everyday business practices, we must communicate this to top management. Let's ensure our conduct always aligns with current regulations and best business practices.

Finally, when interacting with business partners, customers, and suppliers, we always uphold the values of transparency, fairness, and loyalty to strengthen our corporate image.

**In making arrangements with a local hotel, my colleague applied for the hotel reward points she earned by booking a corporate meeting with her personal account. Can it do it?**

No, she should not receive any personal benefit by doing what is expected of her as part of her work. Accepting points represents a conflict of interest as your decision for this meeting and future meetings may be based on the points you earn rather than the best value for **V-Advices**.

**Take responsibility.**

We remain aware of any situations that could potentially lead to conflict. We must ask ourselves: are we involved in a situation that could create a conflict between our interests and those of **V-Advices**? If so, we should inform management of any actual or potential conflicts of interest and obtain approval before proceeding. It is essential to step back from making any decisions in situations with a conflict, or there may be one. Thank you for ensuring we're all on the same page!

## INFORMATION PROTECTION

At **V-Advices**, we treasure information as one of our most valuable assets. As team members, we are responsible for protecting information related to our V-Advices, colleagues, and business associates. We need to be aware of what information is considered sensitive, refrain from using it for personal gain, and refrain from sharing it with others, including friends and family, who do not need to know.

The conduct of our **V-Advices** is based on the pillars of transparency, reliability, and clarity. We define the roles and responsibilities of each process and expect everyone to be as transparent as possible in providing accurate information for our stakeholders, customers, and third parties.

We hold consultants, suppliers, and customers to the same standard as part of our commitment. It is of the utmost importance to us that correct information is provided to shareholders, governing bodies, and the teams responsible for managing and overseeing **V-Advices**. We strongly condemn any action by our employees or contractors that hinders or impedes the supervision of relevant organizations.

### DEFINING CONFIDENTIAL INFORMATION

As part of your job, it's essential that you handle sensitive information with care. This includes non-public information about our business, financial details, employee information, and information about third parties we protect.

Be sure to label sensitive information according to **V-Advices** guidelines to indicate how carefully it should be handled and how widely it can be shared. Unless you have a good reason to believe otherwise, treat information not labeled as sensitive.

Before sharing sensitive information, whether inside or outside **V-Advices**, make sure that there is a valid business reason for sharing it, that you are authorized to disclose it, and that the recipient is also authorized to receive it. Share as much information

as necessary to achieve your intended business purpose. When sharing, ensure the recipient understands the sensitive nature of the information and restrictions on its use.

Sensitive information should only be disclosed to third parties with the protection of a proper written agreement, such as a confidential disclosure agreement or privacy agreement. If you are unsure which agreement to use or if a third party wishes to use its own form of agreement, please contact the Director for assistance.

Regarding receiving sensitive information from a third party, it is essential to do so only after **V-Advices** has determined that it is necessary and a written agreement has been entered into that identifies the information and outlines our obligations in handling it. The agreement must be our Standard Confidential Disclosure Agreement or another written agreement that the Legal Department has reviewed. You must keep your information in line with this agreement and use it only for your purposes. Keeping a written record of disclosure and use, both in terms of receiving and disclosing sensitive information, is best practice. It is important to note that the responsibility to protect sensitive information also extends to any work you did before joining **V-Advices** and any work you undertook for **V-Advices** if you leave **V-Advices** for another position.

### Why is protecting sensitive information so important?

Information such as commercial and technical data determines our competitive advantage in the market and can be of great value to competitors. Violation of our policy regarding the disclosure of sensitive information may weaken our competitive position, as well as the investments we have made and the resources we have developed.

## DATAPRIVACY

At **V-Advices**, we place the highest priority on protecting any personally identifiable information (PII). This includes data such as names, addresses, photos, dates of birth, and phone numbers that could be used to identify people. We are fully committed to practices responsible for collecting, storing, using, transferring, and deleting personal information belonging to our employees, customers, and other business partners. Relevant local laws must process personal data. In some countries, the term "sensitive personal data" has specific implications and requires additional safeguards for its collection and use.

We apply comprehensive organizational and technical measures to safeguard personal data from unauthorized disclosure and respond quickly and decisively to correct any data breaches. Employees who have access to employees' personal data or sensitive customer information have a crucial responsibility to ensure that they are protected. They must only use the information for their intended purpose and may not share it with unauthorized persons inside or outside **V-Advices**.

Improper handling of private data related to employees and customers could result in severe penalties for **V-Advices** and potential criminal charges for individuals. We urge everyone to consider how they would like their personal information to be treated and to act accordingly. For more guidance, please visit the Privacy Program Office website.

In addition, the management of personal data, defined as any information linked to an identified or identifiable natural person, is governed by Italian law on protecting personal data and by the provisions issued by the authority in charge of protecting personal data. Employees should adhere to the guidelines outlined below to avoid actions that could potentially harm colleagues or third parties.

Processing only the personal data necessary for performing your duties is essential. Any processing not explicitly required by an individual's duties should be reported to the controller for feature updates.

The unauthorized dissemination of personal data, including sensitive information, is strictly prohibited without specific authorization. This restriction applies to the personal data of dependents, business directors, customers, and suppliers unless otherwise specified in the data processing information provided by **V-Advices** to individual categories of data subjects. The **V-Advices** policy outlines the categories of subjects to whom the data may be communicated. In addition, any information relating to V-Advices may only be transferred internally if it is already intended for dissemination through the **V-Advices** website,

presentations, or normal corporate communication channels. Under EU Regulation 679/2016, all personal data will be processed in Compliance with the law.

## INSIDE INFORMATION

It is important to note that trading **V-Advices** securities or sharing insider information that has not been made public is prohibited.

### What types of information could be considered inside information?

#### Takeresponsibility.

When handling sensitive information, it is crucial to treat it carefully and safeguard it as diligently as you would with your data. Before disclosing such information to anyone, inside or outside **V-Advices**, always take the necessary precautions. Only share sensitive information if you have the appropriate permission to do so, and make sure that it is only disclosed to those who have both the right and the need to access the information.

Compliance with data privacy laws and **V-Advices** policies is essential. Please familiarize yourself with the types of information classified as inside information and play your role in safeguarding them. Under no circumstances should inside information be shared with anyone, including family members, brokers, or other individuals inside or outside **V-Advices**.

It is strictly forbidden to trade **V-Advices** shares or any other **V-Advices** if you have inside information. In managing the report, the personal data of the whistleblower and the other parties involved will be processed in full Compliance with data protection legislation, including EU Reg. 679/2016 ("GDPR") and Legislative Decree 196/2003. To this end, **V-Advices** will implement a Data Protection Impact Assessment (DPIA).

## ASSET PROTECTION

At **V-Advices**, protecting our assets is paramount, but we are also responsible for safeguarding our physical, financial, and technological resources.

All computer equipment provided to business users, including PCs, codes, and software, are essential work tools and must be stored and used appropriately. Misuse or unlawful use, including unauthorized purposes, discriminatory actions, or copyright infringements, is strictly prohibited.

Each user is responsible for the security and proper use of the systems and must comply with V-Advices regulations and license agreements. Any misuse of **V-Advices'** assets, including network connections, violates civil and criminal laws and goes against the employment relationship.

### PHYSICAL AND ELECTRONIC GOODS

Our offices supply goods such as office furniture, equipment, supplies, computer hardware, software, and information systems for business use. **V-Advices** own them and can use them inside or outside the workplace. You are permitted to use these goods incidentally and infrequently within reason if the use is appropriate and by **V-Advices' policies and laws**.

It is crucial to protect our systems from viruses and downtime. Using unauthorized software, applications, hardware, or storage devices on the computer provided by **V-Advices** or accessing our network through unauthorized applications or devices may involve risks. Adherence to best practice policies and procedures is essential to maintaining the Integrity of our systems.

Common sense must be exercised in online and electronic communications, ensuring you never violate laws, harass others, disclose confidential information, or interfere with users, services, or network equipment. You must always respect the copyrights



for any installed software, and you must not duplicate, install, or use the software in a manner that violates any applicable copyright or license terms. If you have doubts about your rights and responsibilities, please seek advice from your direct manager or the Legal Department.

Please remember that any information you create, submit, receive, download, or store on our systems is considered the property of **V-Advices**. We reserve the right to monitor, review, and disclose data as necessary unless prohibited or restricted by applicable laws and regulations.

## Our intellectual property results from much effort over many years and represents a substantial investment.

As the recipient of **V-Advices'** tangible and intangible assets, it is my responsibility to safeguard and maintain them by using them in accordance with **V-Advices' objectives** and applicable regulations.

All personal data, whether stored in physical or digital form, must be processed solely to conduct the business of **V-Advices**. It is imperative for recipients to maintain the confidentiality of this data and ensure Compliance with the relevant privacy legislation (EU Reg. 2016/679 and Legislative Decree 196/2003 and subsequent amendments).

### INTELLECTUAL PROPERTY

V-Advices' **intellectual property (IP)** consists of patents, trademarks, copyrights, trade secrets, technical data, and software we have developed over many years. Safeguarding our IP is crucial as it represents a significant investment. This protection is in line with **V-Advices'** policies and relevant laws and regulations. Even if you no longer work for **V-Advices**, the responsibility to preserve our IP persists, and it is important to recognize that **V-Advices** will enforce its IP rights legally.

At **V-Advices**, we deeply respect others' intellectual property rights. It is your responsibility to comply with copyright laws relating to various forms of expression, including books, articles, images, videos, and music, whether physically or electronically. Refrain from copying these materials for personal use or **V-Advices** without proper permission.

If you have any doubts about **V-Advices'** right to use a current or planned product or service due to the intellectual property of others, please complete a right of use request form.

Unauthorized disclosure of technical product information or details of business strategy may cause damage to **V-Advices**. As a result, employees must adhere to the specific rules outlined below.

It is essential to ensure that technical and commercial information about our products is kept from **V-Advices** unless it has already been shared through official channels or is necessary for a customer to use our products properly. In addition, sharing details about strategies, projects, campaigns, or initiatives that have yet to be officially disclosed is strictly forbidden.

All knowledge developed within the **V-Advices** work environment belongs to **V-Advices**, and **V-Advices** has the right to use by applicable laws. We are committed to preventing counterfeiting and piracy of our brands and products according to the laws of the countries in which we operate.

Every employee is expected to actively contribute to protecting and managing our intellectual property within the scope of their roles and responsibilities. In doing so, employees must refrain from using V-Advices' intellectual property **for personal purposes and take steps to prevent activities that could damage** V-Advices' industrial property or trade secrets.

It is essential not to modify or falsify patents, designs, or industrial designs and not to use modified or infringing patents, designs, or industrial designs. If you become aware of any infringement of **V-Advices'** intellectual property rights or the rights of third parties, please notify management immediately. I appreciate your cooperation in upholding these essential standards.



## THE V-ADVICES BRAND<sup>3</sup>

For **V-Advices**, the **V-Advices** brand is more than just a name – it's a vital part of our identity and intellectual property. This encapsulates our name, the spark of intuition, our corporate signature, and our products' unique look and feel. Each of us is responsible for safeguarding the brand by adhering to the relevant standards and policies regarding its visual representation and use, as well as reporting any instances of internal and external misuse. It is crucial to maintain consistent representation to strengthen the brand value of our **V-Advices** and protect it from potential infringement.

Any use of V-Advices' **name or trademarks** by another entity in a manner that implies an affiliation with or endorsement by **V-Advices** requires a formal written license from **V-Advices** and the Director's written approval. Suppliers are rarely allowed to use our logo, and this should only be taken for granted after using **V-Advices' third-party** branding.

## THEFT AND FRAUD

Integrity is a core value at **V-Advices**, and we oppose misrepresentation, cheating, theft, and deception. While theft of physical goods is theft, it is essential to remember that misrepresentation of expenses in reports or falsifying receipts is also considered theft. If you suspect any theft, loss, or misuse of **V-Advices** assets, please report it promptly. We take these issues seriously and will thoroughly investigate all reported incidents. If fraud or theft is confirmed, we will take appropriate action, including prosecution or a request for reimbursement from those involved.

As a team member, it is crucial to take care of **V-Advices'** assets and protect them from damage, loss, misuse, or theft. Please note that these assets belong to **V-Advices** and should be used exclusively for commercial purposes. We all need to act responsibly when we use electronic communications and systems. Reporting any cases of theft or fraudulent activity is essential. We work together to ensure that we protect and respect **V-Advices' assets**.

# COMMUNICATION ON V-ADVICES

Every time we communicate, whether by speaking, writing, or electronically, we impact the reputation, brand, and people at **V-Advices**. It is our responsibility to protect **V-Advices** and related information by ensuring that all communications relating to **V-Advices** are consistent, accurate, and complete. We must also ensure that sensitive data is safeguarded from unauthorized disclosure.

## SPEAKING ON BEHALF OF V-ADVICES

To ensure accurate and complete information is disclosed to the public, regulators, and other parties, we have appointed specific individuals as our official **V-Advice spokespersons**. Please refrain from making statements on behalf of **V-Advices** unless you have been explicitly authorized

Please direct all media and public inquiries for information, including those related to financial performance, to **V-Advices'** public relations contacts. If you have any questions about the permissibility of the use or public disclosure of certain information, please get in touch with the Director for clarification.

## AUDIT, INVESTIGATIONS AND LITIGATION

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<sup>3</sup> Including all business units

By legal requirements, we will respond to requests for information from government and regulatory agencies and cooperate fully with investigations. If a government official or agency contacts you, please contact the legal or Compliance departments for guidance before disclosing any information. Cooperating and providing truthful and complete information is essential if you are questioned during an investigation. Additionally, it is critical to refrain from preventing, hindering, or influencing any audit or investigation and never providing false or misleading information.

## INVESTIGATION AND ENFORCEMENT OF SANCTIONS

During the initial phase, information, documents, and data from the various departments within **V-Advices** can be requested. At the end of the investigation phase, the relevant persons will assess whether the breach has actually occurred, the underlying causes, and the need for any corrective measures or interventions.

## SOCIAL MEDIA

At **V-Advices**, we value your social media involvement in sharing thoughts and making connections. We trust that you will use common sense in your online interactions and comply with all relevant laws governing copyright, trademarks, fair use, and financial disclosure.

If you represent **V-Advices** on social media, please do so honestly and by **V-Advices'** guidelines. Always check the facts: do not spread false or unsupported statements on **V-Advices**, and always respect the rules and policies of each platform, social network, or community. If you are not authorized to speak on our behalf and post about our business, please make it clear that you are an employee and emphasize that your perspectives are yours, not those of **V-Advices**.

Remember that you are responsible for the content you post on the internet.

You are responsible for the content you post. Be careful not to:

- Sharing anything that might violate another employee's privacy rights.
- Do not disclose confidential information about **V-Advices**, our clients, or third parties who do business with us or on our behalf.
- You are making unsupported claims about our products.
- Approve **V-Advices'** **products or services** without proper authorization.

### Takeresponsibility.

- Please refrain from speaking on behalf of **V-Advices** unless you have explicit permission. All questions and requests for information should be directed to the designated office responsible for **representing V-Advices**.
- We are committed to fully cooperating with government requirements, audits, or investigations.
- Be careful when communicating online about **V-Advices**, and ensure that your use of online tools is in line with our policies.

## MARKET

At **V-Advices**, we are committed to fostering an environment of healthy competition and fairness. We aim to interact with our customers, suppliers, dealers, and competitors ethically and transparently. We strive to offer our products and services based on their quality and value. Our responsibility is to cultivate positive and respectful business relationships in all our operations and avoid taking unfair advantage of others through misleading or deceptive practices.

## COMPETITION AND ANTITRUST LAW

It is important to comply with competition and antitrust laws to ensure fair trade and competition within the market. We must be aware of these laws and ensure Compliance with them in all areas of our business operations. You must avoid engaging in activities that could be perceived as a violation of these laws. This includes refraining from entering into formal or informal agreements with competitors, customers, or suppliers to fix prices, divide territories or customers, hinder market entry, participate in collusion for bid prices, refuse to negotiate, limit production or sales, or force buyers to purchase unwanted products. Additionally, when working with resellers or other channel partners, we must refrain from interfering with their ability to price our products and services independently.

## INTERACTIONS WITH RESELLERS AND OTHER CHANNEL PARTNERS

Our resellers and channel partners are critical in delivering our products, services, and brands. While they are invaluable partners, they operate as independent companies. Therefore, any agreement restricting their activity must be carefully considered to avoid potential infringements of competition law in relation to the control of resale prices.

It is crucial to note that what is permitted by the laws of one country may be prohibited by the laws of another. Therefore, before imposing any restrictions limiting retailers' pricing decisions, it is imperative to consult with the Legal Department.

We exercise our selectivity in choosing our dealers. It is essential to understand that we are not obligated to explain our decision if we decide not to conduct business with someone, and it is good practice not to do so.

Our options may be more limited in other countries, particularly in Europe. You should plan a selective distribution program or impose restrictions on resale networks with proper legal guidance.

## ETHICAL SALES AND MARKETING PRACTICES

We are committed to conducting fair, accurate, and thorough marketing, sales, and promotional activities. You must always disclose all relevant features, costs, terms, and limitations of our products and services. We should never prevent our customers or suppliers from doing business with our competitors as a condition of obtaining products and services from **V-Advices**. In addition, we must avoid tying agreements where customers must purchase a second separate product as a condition of purchasing another product.

While we are generally free to offer bundled products or services at a bundled price, sometimes it is essential to make them available separately, especially if selling them only as a bundled package would eliminate market opportunities for smaller competitors. Current and factual data must support comparisons with competitors' products or services before publication. They must comply with the European Comparative Advertising Directive for comparisons made in the European Union. It's important to note that some countries have stricter rules or may consider comparative claims illegal. Before including comparisons of products or services in promotional materials intended for use outside the United States, consult the Legal Department.

It is crucial only to use up-to-date promotional materials that have undergone regulatory and legal approval. We should also only promote products or applications that have received all the necessary regulatory approvals in our market.

## INTERACTIONS WITH SUPPLIERS

Our supplier relationships are critical to our operations. We strictly adhere to our contractual obligations and expect our suppliers to comply with V-Advices' Supplier Code of Conduct. This Code includes strict environmental, health, and safety standards and incorporates eight International Labor Organization (ILO) conventions that protect workers' rights. We actively monitor our suppliers' adherence to this Code.

For those involved in supplier management, it's essential to approach interactions with common sense and unwavering Integrity. As **V-Advices**, we must ensure that third parties working with or for us understand and comply with their contractual obligations, operating ethically and by all relevant laws and regulations, including those relating to anti-corruption, conflict minerals, and human trafficking.

We emphasize that there is no obligation to engage with all potential suppliers, nor should the deal be awarded solely based on the lowest price or personal affiliations. Decisions should be based on the supplier's technology, quality, responsiveness, delivery capabilities, cost, financial stability, environmental performance, and track records. In addition, we actively seek out small, qualified, minority-owned, and women-owned suppliers as part of **V-Advices'** supplier diversity program.

In our formal bidding processes, we are committed to treating all suppliers fairly and evaluating their bids objectively compared to other qualified bidders.

Complying with the procedures described in **V-Advices'** procurement processes and constantly communicating with bidders is not only necessary but mandatory.

In less formal purchasing situations, we emphasize the importance of maintaining accountability, adhering to the defined procurement process, and handling negotiations with unwavering Integrity.

While we are not contractually obligated to keep supplier prices confidential, we are ethically obligated to do so unless otherwise agreed. Sharing pricing information with **V-Advices' subcontractors** or third parties without the written approval of the supplier is strictly prohibited.

## SUPPLIER RELATIONS

When asking suppliers for prices for materials and services, our employees must ensure they comply with local laws, especially when purchasing products for resale without adding significant value. In these cases, seeking advice from the Legal Department is mandatory, especially if a non-standard price is offered.

## INTERACTIONS WITH MEDICAL PROFESSIONALS <sup>4</sup>

The highest levels of Integrity and ethics must always guide our interactions with medical companies. Practitioners include individuals or entities involved in the provision of health care services or products to patients or anyone who recommends purchases, uses, prescribes, or arranges for the purchase or use of our products. The primary responsibility of healthcare professionals is to act in the best interests of the patient.

Interactions with industry players are highly regulated by governments worldwide, and violations can result in severe penalties. While regulations may vary from country to country, some standards apply universally:

- We will never offer operators anything that could be perceived as an attempt to inappropriately influence their decision to purchase, use, or recommend our products. This includes non-compliant expansion of product claims.
- Consult **V-Advices** policies and local laws before providing healthcare professionals with anything of value, including gifts, meals, entertainment, or travel.
- If you hire a healthcare professional, ensure that the remuneration is proportionate to the services provided, consistent with fair market value, and transparent.

If your job requires you to interact with a healthcare company, ensure you understand and follow the specific laws and rules that apply to those interactions and seek advice from the Director when you need clarification on your obligations.

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<sup>4</sup> Laboratories, Medical Devices, In Vitro Diagnostics, Pharmaceuticals



### Takeresponsibility.

- Comply with antitrust laws and promote positive business relationships and fair business practices.
- We treat our customers fairly and strive for a competitive advantage through superior products and services, not unethical or illegal business practices.
- Show your commitment to ethical sales practices and advertising.
- Refrain from discussing with competitors that could imply an agreement that limits full and open competition.
- Conduct business with retailers and suppliers ethically, honestly, and transparent

ly.

- We are supporting the safety of our products and their users.
- To commit to the continuous improvement of our products and processes, following the policies and procedures of our **V-Advices** if you become aware of any customer complaints.
- Conduct research and development with Integrity and Compliance with all applicable laws, regulations, and industry standards.
- Make sure your interactions with healthcare professionals align with our policies.

Governments around the world heavily regulate interactions between healthcare and healthcare companies.

## RELATIONS WITH THE PUBLIC ADMINISTRATION

Please follow these guidelines regarding interactions with public officials, the Public Administration, or public service managers:

All interactions must strictly comply with relevant laws and regulations without compromising the Integrity or reputation of **V-Advices**.

Only **V-Advices representatives** and authorized personnel can make commitments and manage relationships with the parties. This must be done in full Compliance with internal procedures and the principle of transparency.

Conduct that may create ambiguity or mask a lack of transparency is strictly prohibited, including:

- Offering or promising money, gifts, or other benefits to public or public service officials to influence their preferential treatment decisions.
- Implement conduct that may be interpreted as collusive or detrimental to the principles of this Code of Ethics.
- Submission of false declarations to public bodies to obtain public funds, grants, loans, concessions, authorizations, licenses, or other administrative acts.
- Look for sensitive information that could compromise the Integrity or reputation of either party.

# PRODUCT SAFETY AND QUALITY

We prioritize safety above all else and never compromise on product quality or Compliance with regulations and laws.

## SAFETYFIRST

We are committed to providing high-quality, safe, and reliable products that consistently meet or exceed the standards outlined in our quality policy and global quality manufacturing standards. You are responsible for complying with the quality management system (QMS) processes and relevant external quality standards and regulations. You can find more information on our website.

We are unwavering in our dedication to continuously improving our products and processes. Our post-market surveillance and vigilance system ensures analysis, assessment, monitoring, and control of the risk of adverse events and malfunctions related to our products. In addition, we diligently study customer feedback on product performance.

We take responsibility for our customers, product users, and business partners. Suppose a customer complaint or quality, safety, or reliability issue exists. In that case, it is critical to report it immediately by following the applicable QMS process and report the issue to your local quality representative or company quality, even if you are unsure whether it is a complaint. For more information, please refer to our Uncompromising Quality Standard and Product Safety Event Reporting Standard.

**V-Advices** guarantees the freedom of association of workers, rejects all forms of discrimination in the recruitment and management of human resources, and is committed to protecting the psychophysical Integrity of workers. We are dedicated to developing the skills, professionalism, and commitment of all our employees and collaborators to effectively achieve the objectives of **V-Advices**, creating a safe and serene working environment free from any form of upset, conditioning, discomfort, and intimidation related to the activities carried out.

## QUALITY AND REGULATORY STANDARDS

We comply with international standards set by independent third parties and obtain certifications that demonstrate our dedication to quality and safety. These certifications include **V-Advices'** ISO 9001 quality management system, the ISO 27001, ISO27017, and 27018 medical device quality management system, and relevant global product safety and regulatory regulations (including those related to electrical and mechanical safety).

Our relationship with customers is focused on the full and timely fulfillment of contractual obligations. We aim to establish solid relationships guided by fairness, honesty, efficiency, and professional rigor.

**V-Advices** considers its customers key elements of its success and is committed to meeting their needs in terms of quality of products and services tailored to the market's expectations and needs.

**V-Advices** is dedicated to offering ethically correct products and services in Compliance with social rules and the criteria of cost-effectiveness, effectiveness, and efficiency. It adopts best management practices, maximizes **V-Advices'** assets, and controls business risks.

## OTHER INDUSTRY STANDARDS

We operate in a highly regulated industry with broad and complex national and local requirements. Compliance with these standards is critical to maintaining the trust we have built with all our stakeholders. Our internal policies and procedures ensure Compliance with these laws and all applicable regulations. It is essential to be experienced and compliant with the standards that apply to your business to ensure that you meet our legal and ethical obligations.

### Takeresponsibility.

- We proactively promote our products' safety and their users' well-being.
- Promote the continuous improvement of our products and processes and strictly adhere to the policies and procedures of our **V-Advices** as soon as they become aware of any customer complaints.
- Conduct research and development with unwavering Integrity and strict Compliance with all relevant laws, regulations, and industry standards.
- Fully understand and strictly adhere to the policies and procedures specific to your role to ensure that you consistently comply with all legal and regulatory obligations.

# INTERNATIONAL BUSINESS

As **V-Advices** operating in the global marketplace, we are committed to fully complying with the many international laws, regulations, and restrictions that govern our operations. We must thoroughly understand and comply with the legal and contractual requirements for our business activities in various countries. Due to the complex nature of these laws, we will confidently seek guidance whenever necessary to ensure strict Compliance.

## ANTI-CORRUPTION LAWS

We do not tolerate corruption in any form, whether it is government officials or representatives of non-governmental trade organizations. Not to offer, pay, promise to pay, or agree to accept or accept anything of value, directly or indirectly, in exchange for obtaining or continuing the business or an improper advantage. **V-Advices** maintains a comprehensive anti-corruption policy detailing our position and expectations regarding corrupt practices.

A bribe can take many forms, including payment, gift, favor, job, entertainment, or travel offer. Even a charitable or political contribution could be considered a bribe if offered to influence a decision on our behalf. Regardless of the local practice or the practices of other companies, make sure to avoid the appearance of something improper as well.

In addition to our actions, we may be responsible for specific acts of our agents, partners, advisors, and other third parties, and we are responsible for any corrupt payments or other bribes they offer on our behalf. That's why it's crucial to know who we're working with, the business practices they employ, and the reputation they have to operate honestly and ethically.

We are subject to several countries' laws regarding bribery and improper payments, including the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act, and the European Antibribery Act, which have worldwide implications. Therefore, it is critical that you know, understand, and comply with the statutory, regulatory, and contractual provisions that govern the work you do and ensure that your business conduct is beyond reproach.

Violations of these laws can result in lawsuits, substantial fines, and even jail time. If you see or suspect something improper, share your concerns

In pursuit of its mission, V-Advices is committed to complying with legislation on combating money laundering and corruption against public officials or private individuals on the national and international front. **V-Advices bases** its relations with Public Administrations on the two criteria of the maxim.

**V-Advices** bases its relations with public administrations on the criterion of maximum honesty, committing itself not to implement any action that could unduly influence the counterparties.

## INTERNATIONAL TRADE

We understand that conducting business internationally is a privilege, not a right. Violations of import and export laws can significantly impact our operations. Suppose you are involved in moving products, services, information, or technology across international borders. In that case, it is crucial to comply with local and commercial laws and the trade laws and regulations of the countries you do business with. Please note that the laws of more than one country may apply to cross-border transactions.

Please adhere to the following:

- Comply with all applicable customs procedures, regulations, and laws related to the importation of products or technology. It is essential to accurately describe, classify, and declare the value of goods and their country of origin.
- Comply with all export control laws, including regulations regarding shipments of our products and technologies and transfers of information by download or transportation during travel, whether by hand or with baggage.

We do not do business with countries subject to trade embargoes or economic sanctions by the United States or Europe. All trading partners must be screened against **V-Advices'** Restricted Party List (RPL).

**V-Advices** does not show direct or indirect favoritism or discrimination against any political or trade union organization.

Only persons expressly designated by **V-Advices** must maintain relations with the press and the media regarding disseminating information relating to the activities of **V-Advices**.

Communications to any media outlet must be truthful, clear, transparent, unambiguous, and consistent. The information must be accurate and consistent.

## COMPLIANCE WITH THE LAW

**V-Advices** unequivocally obliges its shareholders, directors, employees, and collaborators to comply with the national and supranational laws and regulations in force. Each recipient must have a thorough knowledge of the rules applicable to their tasks to comply with the rules. All staff members are unequivocally obligated to cooperate in rejecting and reporting any illegal or non-compliant conduct.

## RESPONSIBILITIES AND PERFORMANCE OF ACTIVITIES

The following are the guidelines:

- Work with loyalty, Integrity, diligence, honesty, and fairness, and collaborate with others by following internal procedures.
- Strive to improve your skills and professionalism in all your activities.
- Ensure that all your actions align with the objectives of **V-Advices**.
- Avoid any conflict between your interests and those of **V-Advices**, and if there are conflicts, communicate them in advance.
- Do not engage in any activity that may create a conflict of interest or damage the reputation of **V-Advices**.
- Refrain from using V-Advices' information, assets, or equipment for personal purposes.
- Show respect for the environment when performing your duties.

## CONTRABAND

All V-Advices employees and collaborators involved in the import processes, directly or indirectly, must ensure the regular entry into the territory of the State of goods subject to border duties. This includes strict adherence to customs regulations.

**V-Advices** is committed to verifying the freight forwarders it employs in advance and ensuring traceability of customs operations.

# GIFTS AND ENTERTAINMENT

We conduct our business with unwavering Integrity and make sound and unbiased business judgments on behalf of **V-Advices**. Although accepting occasional gifts and entertainment is customary in business, we firmly recognize that it is unacceptable when it leads to a sense of obligation, impairs our professional judgment, or gives the impression that we are doing so.

## WHAT YOU MIGHT ACCEPT

Business meals, entertainment, and other courtesies are indeed part of everyday business interactions and are appropriate if accepted with common business sense. In most parts of the world, employees can accept meals, entertainment, and reasonable-value gifts on a rare or occasional basis.

Employees should always use common sense to avoid situations where their loyalty may be split between their interests and the interests of **V-Advices**. It's also crucial to prevent the appearance of impropriety, so employees must be prepared to refuse meals, entertainment, or gifts if accepting them could unduly influence their decision-making or create an improper appearance, even if the offers are of reasonable value.

Generally, you can confidently accept infrequent offers consistent with ethical standards and business practices intended to promote a business relationship, not be construed as bribes, and comply with the law and the **donor's** V-Advices policy.

It is never appropriate to solicit gifts, meals, or entertainment or make a business decision in exchange for an offer.

If you need to know whether you can accept any business meals or entertainment, communicate the situation to your manager, who will determine its acceptability. In addition, you may only accept payment or reimbursement of travel expenses from one of our suppliers, customers, or resellers with the written approval of an appropriate vice president or local general manager.

### I was invited by a potential V-Advices provider to attend a conference, and they offered to cover my room and board. Can I accept the offer?

As a conference participant, you cannot accept free travel (e.g., flight ticket, train ticket) or accommodation from the provider. The associated costs will be covered if **V-Advices** determines a valid business reason for your attendance. However, you can accept a waiver of your conference attendance fee if it is offered to encourage your participation.

Meals included in the cost of participation and provided to all attendees, such as lunch during a speaker session or a networking cocktail, are allowed to be accepted. In addition, reasonable after-hours recreational activities are offered to all conference attendees. In addition, you may accept meals and entertainment from the current or potential supplier, provided that the value of what is offered is reasonable in the context of the event and your presence does not create an appearance of irregularity.

### WHAT YOU COULD GIVE

Business lunches, entertainment, and other courtesies can be part of everyday business interactions if provided using sound business judgment. Employees may offer meals, entertainment, and reasonable-value gifts on an infrequent or occasional basis within the specific limits set forth in the **V-Advice policies**.

Employees are expected to use common sense and avoid situations where a business meal, entertainment, or gift could be seen as having an inappropriate influence on a customer's decision to purchase **V-Advices** products. The appearance of impropriety must also be avoided. This means refraining from offering meals, entertainment, or gifts if the provision of any of them could unduly influence a customer's decision or create an improper appearance, regardless of adhering to the value limits outlined in **V-Advices'** policies.

Any offer of promotional items, business lunches, or entertainment must be infrequent, in line with ethical standards and business practices, for the purpose of promoting a business relationship, and not be construed as a bribe or comply with the law and the recipient's **V-Advices** policy.

Careful recordkeeping is part of our gift and entertainment policy. All items provided in connection with your work must be transparently and accurately recorded in our **V-Advices books and records**.

### Should you send a postcard and a modest gift to a recently married client?

In general, it is acceptable, but it may not be suitable in some situations. For example, donating cash or cash equivalents like gift cards is never appropriate. Giving a gift is also not okay if it violates your customer's gifting policy. It's always best to review our policy and ask questions beforehand.

### Is providing a catered lunch during a group meeting with one of our clients problematic?

No, it is permitted as long as it adheres to the value limits outlined in our policy and is not extended to individuals prohibited from accepting such a gift, such as healthcare professionals and government officials.

## GOVERNMENT EMPLOYEES

Government employees, including state government employees, may have stricter requirements when it comes to receiving items from companies. For example, in some states, there are very strict rules about what can be offered to state employees, including members of the government and their staff. It is important to know and comply with our Customer-Related Charges Policy and the policies of the customers you interact with.

There are some circumstances in which it may be acceptable to offer low-cost promotional items such as **V-Advices**-branded pens, coffee mugs, or calendars to government officials. However, even this type of activity must be closely monitored to ensure strict Compliance with the law. If you're considering offering something of value, discussing it with Compliance beforehand is essential.

**We will offer all attendees a free dinner on the last night of the industry conference sponsored by V-Advices. Will this create problems for the government officials present?**

Yes, the rules for providing meals to government officials are stringent. Before planning free meals or other forms of hospitality for a government official, it's critical to achieve Compliance.

When dealing with government officials outside of the United States or Europe, it is essential to recognize that gifting laws differ from country to country. Suppose your responsibilities include interacting with non-U.S. government officials, including those of state-owned enterprises. In that case, it is imperative that you understand and comply with antibribery laws in the countries in which you operate. Always remember that offering anything of value to improperly influence an official decision is strictly prohibited. In addition, any action permitted by our policies must be transparent and thoroughly documented in the books and records of our **V-Advices**.

### Takeresponsibility.

- Only give something of value to government officials with prior approval from Compliance.
- Please ensure that your record keeping is accurate and complete and that you comply with all internal controls, policies, and procedures related to the offering and receiving gifts and entertainment.

## ACCURACY IN RECORD KEEPING

The Integrity of our V-Advices books and records is vital to our future success and to maintaining the trust of our shareholders, customers, and business partners. We must adhere to all internal controls when recording and maintaining **V-Advices**' books and records. In every transaction, whether filing an expense report, preparing a financial statement, or completing a timesheet, we must demonstrate unwavering honesty, accuracy, and completeness.

## FINANCIAL INTEGRITY

For **V-Advices**, it is imperative that all of our books and records accurately reflect our transactions, comply with political, procedural, and legal requirements, and adhere to local and global generally accepted accounting principles (GAAP). If you participate in any aspect of our accounting or financial reporting processes, it is critical to adhere to the following rules strictly:

- Ensure that all internal processes, controls, and accounting principles are followed to reflect all transactions accurately and fairly in our records.

- Maintain accuracy, honesty, and completeness in all aspects of recordkeeping, including accounting records, financial statements, expense reports, timesheets, purchase orders, sales invoices, etc.
- Avoid establishing unreported or unrecorded funds, liabilities, or assets for any purpose.
- Do not falsify or misrepresent any book, ledger, account, or transaction related to our business.
- Consistently assign costs to the appropriate project number, contract number, name, or identifier.
- Refrain from making any payment on behalf of **V-Advices** without proper supporting documentation and the necessary approval.
- Correctly apply for customer payments along with all supporting documentation and verify any communications, both written and verbal.
- Avoid lying or making false or misleading statements to anyone.
- Protect, store, and delete information by legal requirements and our internal records management policies.
- Cooperate with all reasonable requests for information from government and regulatory agencies and cooperate fully with government audits or investigations.
- Protect confidential information and disclose it only to authorized persons when necessary.

In addition, all commission or fee agreements should only be made under written contracts with bona fide distributors, sales representatives, agents, or consultants. Any fees or compensation for assistance in obtaining orders must be reasonable and consistent with local laws and standard industry practices. We strictly prohibit certain sales practices, such as concessions, collateral agreements, modified sales documents, or future roadmap commitments, as they violate our commitment to conduct business honestly and ethically. Every operation and transaction within **V-Advices** must be legitimate, consistent, congruous, and adequately recorded so that the related decision-making, authorization, and development process can always be verified. Financial moves can only be made with adequate supporting documentation. **V-Advices** upholds the principle of absolute traceability and transparency in all its economic activities, ensuring that no illegal payments are made and that all lawful and duly authorized payments are made directly to the recipients, except in the case of the small cashier.

I witnessed a colleague approve an inspection report without carrying out the inspection. What should I do?

Report what you witnessed. It is never acceptable to sign an inspection report without conducting the inspection; To do so would be to falsify the records.

## RECYCLING

It is crucial to remain vigilant and proactive in preventing money laundering. Money laundering is an attempt to hide the proceeds of criminal activities through seemingly legitimate business transactions. We must thoroughly understand our customers and partners, monitor financial transactions for signs of illegal activity, and follow strict jurisdictional rules.

We advise you to strictly adhere to the rules of the jurisdiction in which we operate. You must strictly follow our internal procedures for identifying and monitoring trading partners and be vigilant about activities that require greater control. Examples of suspicious transactions include large cash payments, unusual fund transfers to or from abroad, and changes in customer transaction patterns.

**I work in accounting, and I noticed that a colleague generated invoices significantly higher than the amount actually invoiced. I believe it is crucial to point out this discrepancy, as it could potentially be linked to illegal activities. Regardless, this issue needs to be addressed and corrected without delay.**

Yes, this discrepancy could be linked to illegal activities. Even if it is not, it should be immediately addressed and corrected.

## RECORDS MANAGEMENT

It is critical to responsibly create, store, maintain, and delete records to maintain financial Integrity and meet all legal, tax, and regulatory requirements. Strictly adhere to our general policy and retention schedule to keep all **V-Advices** records and keep them only in approved locations. Documents that have completed the retention period and are not subject to a document retention obligation or legal hold must be destroyed appropriately.

If you come across records from a past project, verify that the retention period has expired before deleting them. If you are notified that you have documents relevant to a lawsuit, investigation, or audit, strictly follow the guidelines provided and do not destroy, alter, or conceal any documents under any circumstances until authorized by the Legal Department.

### Takeresponsibility.

It is imperative that all entries in **V-Advices'** books and records are accurate, honest, and complete. Furthermore, under no circumstances should anyone knowingly facilitate money laundering. Preventative measures must be taken to ensure that our resources are not inadvertently used for this purpose.

Any unusual or suspicious transactions or activity should be reported immediately. Our policies regarding the handling, storage, and destruction of documents must be strictly followed. In addition, information subject to legal hold should not be deleted until the Legal Department authorizes it to do so.

**V-Advices** is committed to ensuring transparency and fairness in the management of accounting and tax obligations. We are dedicated to ensuring the veracity of transactions and the completeness and accuracy of tax documents.

In particular, **V-Advices** ensures the meticulous keeping of accounting records, the preparation of financial statements, and Compliance with all applicable laws, principles, and technical standards.

We firmly uphold the values of truthfulness, accuracy, completeness, and clarity in our accounting practices, ensuring a faithful representation of operating facts. The documentation for the facts must be reported in the accounts supporting the registration, complete, clear, truthful, accurate, and valid, and kept in the records for verification as required by law.

Our data and assessments of economic and financial activities are unequivocally based on reasonable and prudential criteria.

Persons who become aware of omissions, falsifications, irregularities in record keeping, or violations of the regulations, the Code of Ethics, or the laws of **V-Advices** are obliged to promptly report them to the Supervisory Body. Violations have a significant disciplinary impact and are sanctioned appropriately, as they undermine the relationship of trust with **V-Advices**.

## EQUAL EMPLOYMENT OPPORTUNITIES

**V-Advices** is fully committed to being an equal employment opportunity employer. These words represent more than just a statement; they are integral to our core values. They emphasize the utmost importance that **V-Advices** places on diversity, inclusion, and each employee's distinctive perspectives and contributions. At **V-Advices**, we depend wholeheartedly on every team member to proactively contribute to creating a workplace where everyone is treated unequivocally with dignity, courtesy, and respect.

**V-Advices** strongly supports the cultivation of an inclusive, collaborative, and supportive work environment rooted in a culture of respect, non-discrimination, and a deep appreciation for diversity.

To this end, **V-Advices** has taken decisive measures to promote greater female participation in the labor market and reduce the gender gap. This includes establishing a system focused on improving working conditions for women, encompassing quality, pay, and roles while supporting transparency in work processes.





**V-Advices** is resolutely dedicated to supporting organizational methodologies that facilitate equal opportunities throughout each employee's career path, starting with the selection process and continuing through Onboarding, training, and professional growth within **V-Advices**.

## ANTI-DISCRIMINATION, ANTI-HARASSMENT

We are committed to preventing unlawful harassment and discrimination based on race, ethnicity, creed, color, religion, ancestry, gender, gender identity or expression, national origin, citizenship, genetic information, sexual orientation, marital status, pregnancy, childbirth, related medical conditions, veteran status, age, disability, or other characteristics protected by law "protected characteristics."

This commitment is evident in our hiring practices, including recruitment, hiring, training, promotions, compensation, and benefits. Recruitment decisions are made without regard to protected characteristics. Instead, they are based on **V-Advices'** legitimate business needs and an individual's qualifications for their job, subject to any applicable collective bargaining agreements.

**V-Advices** is committed to promoting a respectful work environment beyond legal requirements. As employees, we are expected to treat everyone at **V-Advices** with dignity, respect, and courtesy. This means promptly reporting offensive language, humiliating words, aggressive acts, disorderly behavior, and threats and intimidation aimed at you or others.

Our harassment-free workplace policy applies to suppliers, customers, and anyone who does business with us and is relevant to work environments and work-sponsored activities.

If you witness or experience any form of discrimination or harassment, please report it immediately.

## COMPLIANCE WITH LABOR LAWS

At **V-Advices**, our core values and culture demonstrate our unwavering dedication to ethical business practices and responsible business behavior, regardless of our global operations. As **V-Advices**, we firmly uphold and honor the fundamental principles outlined in the Universal Declaration of Human Rights. Our solid policies and practices reflect our unwavering commitment to promoting human rights within our sphere of influence.

The components and assemblies of our products are strictly sourced from suppliers in various countries, each governed by its laws and regulations. Our unwavering commitment is to uphold human rights throughout our global supply chain, unequivocally refraining from doing business with any individual or **V-Advices** involved in child labor, physical punishment, forced labor, or human trafficking.

We require that all people who carry out activities on our behalf adhere to ethical practices in full Compliance with the law and line with our **V-Advice** standards. Our rigorous supplier audits are conducted to ensure that these expectations are consistently met.

### Takeresponsibility.

- Always treat others with the respect and dignity they deserve.
- You have the right to work in an environment free from intimidating, hostile, or offensive behavior protected by law. If something makes you uncomfortable, report it immediately.
- Conduct your business in a way that upholds and respects human rights and refuses to do business with those who do not share these values.

# A SAFE WORKPLACE

At **V-Advices**, the well-being of every employee is our top priority. We care deeply about maintaining a safe and healthy workplace, making sure everyone is free from injury and illness. We understand the importance of healthy working conditions and strict safety practices. As employees, we take an active and empathetic role in ensuring our safety and the safety of others by fully complying with all workplace safety requirements.

## PREVENTION OF ACCIDENTS AND INJURIES

As employees at **V-Advices**, it's crucial to instill a strong safety culture in the workplace. Make it a priority to complete all necessary training to mitigate the risk of occupational hazards. Familiarize yourself with the locations of fire extinguishers, emergency exits, and first aid kits. Understand procedures for evacuating buildings in emergencies and reporting any injuries or illnesses. Stay alert and attentive to your surroundings, strictly adhere to safety protocols, and speak up if you observe any safety hazards, property damage, or personal injury.

Our facility has security measures to maintain a safe environment and regulate access. Adhere to the facility's policies and procedures. If you notice or suspect a breach of our security measures, take immediate action to report it.

At **V-Advices**, we are committed to fostering a strong safety culture in the workplace. Every employee is critical in prioritizing safety and complying with all safety regulations, internal procedures, and obligations. As part of your responsibilities, active participation in the risk prevention process is expected to ensure your safety, that of your colleagues, and that of third parties.

In all our business activities, we uphold the fundamental principles to safeguard the safety and health of our workers to:

- a) Mitigate potential risks that could jeopardize the health and safety of employees.
- b) Address risks at source and tailor work to minimize adverse health and safety impacts.
- c) We are leveraging technology to create a safe and healthy work environment.
- d) Assess the level of risk associated with each piece of equipment and environment to ensure maximum safety.
- e) Strategically planned prevention measures, considering technology, work organization, working conditions, and social dynamics.
- f) Implement collective and individual protection measures.
- g) Provide adequate instructions to workers.
- h) Encourage the reporting of potential risks.

Every employee must take responsibility for their safety and the safety of those affected by their actions. To protect yourself and others, strictly follow your training and the instructions given by your employer, managers, and supervisors.

Foster a culture of safety at **V-Advices**.

## A WORKPLACE FREE FROM VIOLENCE

We maintain a zero-tolerance policy for any action that threatens or has the potential to endanger the safety of our employees, customers, suppliers, or anyone else in our workplace. We expect and rely on you to promptly report any violent or potentially violent act, including behaviors such as:

- Verbal threats or intimidation.
- Property destruction suggestions.
- Threats involving firearms, bombs, or other weapons.



We assure you that we proactively investigate all reported incidents, apply appropriate disciplinary measures, and actively support prosecution in worthy cases.

## ABUSE

Please remember the guidelines regarding the use of substances while working. Maintaining a safe and healthy work environment is essential. The use of drugs or alcohol without permission on **V-Advices** property, during business hours, or at **V-Advices-sponsored** events is prohibited. We encourage you to comply with all V-Advices laws and policies and exercise restraint if you drink alcohol while conducting **V-Advices** activities. It's essential to make sure that performance and judgment aren't compromised. Also, remember never to operate machinery or vehicles if you are under the influence of drugs or alcohol unless prescribed or if your judgment is impaired. If you have any questions or concerns about our substance abuse policy, please get in touch with HR or the EH&S website. Your well-being and safety are our top priority.

### Takeresponsibility.

- Actively promote workplace safety by understanding and adhering to basic safety rules and promptly reporting unsafe conditions.
- Encourage open communication about any security breaches at our facilities.
- If you are unsure about the training requirements for your role, please do not hesitate to contact your manager or EHS representative.
- Speak up and report any incidents of hate-related conduct or threats of violence in the workplace.
- Please familiarize yourself with and comply with our policies regarding guns, drugs, and alcohol in the workplace.

# SOCIAL AND ENVIRONMENTAL RESPONSIBILITIES

**V-Advices** values its position in the global community and is committed to conducting business ethically, socially responsible, and environmentally sustainable. Its goal is to be an economic, intellectual, and social resource for every client or sector in which we operate. As employees, we actively participate in **V-Advices'** efforts to make our world a better, healthier, and more sustainable place to live.

## CHARITABLE AND POLITICAL ACTIVITIES

We fully support and encourage your voluntary involvement in charitable activities and policies. Make sure your participation complies with our policies and the law while being careful to use your time and resources. **V-Advices** allows up to 1 hour of paid time per month for employee volunteering, subject to management approval. Prior approval is required before using any funds or assets of **V-Advices** for charitable or political purposes.

As **V-Advices**, we have chosen not to use company funds or assets for local law contributions. However, we recognize the legally permissible option of establishing an independent entity to collect individual donations from employees to support specific federal campaign candidates. Still, we have decided not to pursue this route.

## ENVIRONMENTAL COMPLIANCE



We work together to conduct our business in an environmentally responsible manner and ensure Compliance with all applicable environmental laws and regulations. Our commitment includes protecting the environment, conserving energy and natural resources, and minimizing the environmental impact of our operations worldwide.

Here are some ways you can make a positive impact every day:

- Reduce water and energy consumption.
- Recycle whenever possible.
- Limit printing to save paper.

Also, remember to report any actual or potential environmental hazards. Together, we can make a difference!

At **V-Advices**, we are committed to protecting the environment and ensuring the safety and health of our customers. Our activities are conducted in full Compliance with the laws and regulations on prevention and protection.

We are dedicated to the following principles:

- a) Implement certified environmental management systems and work to prevent environmental risks.
- b) Definition of specific objectives and programs to minimize significant environmental impacts.
- c) To provide our customers with all the necessary information about the environmental risks associated with our products and services.
- d) Promote environmental awareness and conduct training for our employees and customers to encourage the use of eco-efficient technologies.
- e) We are reporting on the environmental impact of our operations by identifying key performance indicators.

#### Takeresponsibility.

- Do not use **V-Advices** funds, property, time, or resources directly or indirectly for charitable or political contributions.
- Immediately report any hazardous or hazardous environmental conditions of which you become aware.