

**CODE
OF ETHICS**

DVP
TECHNOLOGY FOR YOU

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Introduction

DVP Vacuum Technology, a leading company in the vacuum technology sector since 1973, competes worldwide in the production of vacuum pumps and compressors for various industrial applications.

DVP is based in the province of Bologna but is present all over the world through sales branches; it also boasts a sales and service network on every continent. Constant care and listening to the customer are a real company mission and reach the highest levels in unique and innovative solutions.

In this Code of Ethics, which is an instrument for spreading and sharing the inspiring principles, DVP considers it important to state and clearly define with transparency the set of values and moral rules in which it believes and which it recognises, accepts and promotes. Ethical and social responsibility in the daily activities of the Company is the basis of the vision and essential for the pursuit of the company mission.

The values

● Responsibility

as awareness and willingness to be protagonists of one's own choices and actions.

● Collaboration

as the search for a whole that can be more than just the sum of its parts.

● Transparency

as openness in interpersonal relations and feedback culture.

● Sustainability

as recognition of the principles and pursuit of the objectives of the UN 2030 Agenda and the EU Green New Deal, achieved through an Environmental, Social and Governance (ESG) approach.

DVP believes

In **compliance with the rules** of a free and sustainable market.

In a **fair contest** of skills and minds.

In **collaboration** and **sharing** as drivers of sustainable innovation.

In the **loyalty** and **seriousness** proved through its products and towards its Stakeholders.

In **honesty** and rejection of any fraudulent means.

In **synergies**, more effective than opportunism.

In the importance of **winning**, but also learning from defeat.

In **people**, in the **environment** and in **future prospects** that can not be missed.

DVP believes that all together, we can do it.

Recipients, application and functions

This Code of Ethics (hereinafter also Rules) applies to all those who act as employers, in collaboration, in the name and on behalf of DVP and is considered an essential part of the obligations of such subjects.

Recipients, application and functions

Failure to comply with it may result in measures and sanctions.

The Board of Directors is the last reference body for ethical issues and is responsible for approving the Code of Ethics. It will act as the Ethics Committee and will be referred to as such in this text. Its task is to assess the measures and sanctions referred to in the previous paragraph.

Anyone who notices conduct or situations that do not comply with the principles set out herein is asked to report them as described in the annex.

The internal operational contact for the management of Ethical Affairs is the Human Resources Office, which shall be responsible for the dissemination of these Regulations and the application of any internal measures decided by the Ethics Committee.

Compliance with laws, fair competition, anti-money laundering

DVP believes in the compliance with all laws, directives and regulations as key condition for any action, activity and negotiation and in no way are behaviours in violation of them allowed.

DVP promotes fair competition among the parties operating in the market as per the Antitrust Law (10 October 1990, no. 287).

DVP strictly prohibits any operation that involves the Company in money laundering, use of money, goods and other items of illicit origin.

Relations with shareholders

DVP is committed to creating value for its Shareholders, protecting their interests and those of the Company, without discrimination or favouritism.

DVP promotes and guarantees to its Shareholders transparency and integrity of information flows.

Relations with suppliers

DVP selects its Suppliers according to the criteria of competition, fairness and quality of the good and/or service, in order to guarantee excellence and innovation in its products.

DVP requires the Suppliers to comply with the regulations in force and, in general, with the principles of protection of the person, health, safety of workers and the environment.

DVP carries out periodic audits at their premises to check the implementation of these values and standards, reserving the right to continue the established business relationship.

Relations with customers

DVP wants to be recognised in the world as the interpreter of its customers' dreams and proposes itself as a faithful and competent consultant for its OEM customers, offering innovative and customised solutions with the best "Performance/Price Ratio".

DVP offers reliable products and an extraordinary Customer service to its Resellers with added value.

DVP responds to the needs of the End Users with a capillary, competent and fast commercial network.

DVP reserves the right to evaluate the integrity and compliance of its Customers with what is set forth in these Rules and to continue the established business relationship.

Conflicts of interest, gifts and gratuities

In its activities, DVP pursues the objective of not incurring in situations of real or even only potential conflict of interest.

Those who work in the name and on behalf of DVP must avoid any conflict of interest and act in a fair and transparent manner, without favouritism or collusive practices that may lead to personal advantage for themselves or others.

In relations with third parties, it is forbidden to offer or accept money, gifts or benefits, even on a personal basis, to obtain undue advantages of any kind. Gifts and gratuities, both received and donated, are allowed provided they are of modest value.

Protection of intellectual property rights and privacy

DVP preserves and protects its know-how and intellectual property rights with respect to its brand, products and processes.

DVP complies with Reg. (EU) No. 2016/679 (GDPR - “General Data Protection Regulation”), which provides for the protection of people and other subjects with regard to the processing of personal data. According to the above-mentioned Regulation, such processing is based on the principles of correctness, lawfulness and transparency and protection of confidentiality and rights.

Content dissemination and confidentiality

DVP requests the utmost care in the dissemination of content that is disclosed by any means of communication and prohibits any use in violation of the prevailing laws.

Information considered sensitive may not be disseminated, except after explicit authorisation of the Company's management.

Assets, internal control and risk management

Those acting for and on behalf of DVP must protect the assets that the Company has made available to them and help ensure the proper use and maintenance of the Company's assets in general.

DVP adopts a risk management and control system that includes a set of tools, procedures and structures within the organisation area that allow for the management and control of the main risks and safeguard the company's assets and the efficiency and effectiveness of the processes.

Environment and sustainable development

DVP products are manufactured based on an eco-innovation and eco-design approach according to the logics linked to the concept of circular economy, which foresees disassembly, refurbishment and a long life cycle of the products.

DVP works in its value chain to ensure that strategies are adopted in accordance with the principles of sustainability and environmental protection.

Extended producer responsibility

DVP implements art. 26 of the Italian Legislative Decree 14 March 2014, no. 49 “Implementation of Directive 2012/19/EU on waste from electrical and electronic equipment (WEEE)”, which extends the obligations towards WEEE to all EEE.

As a registered manufacturer of electrical and electronic equipment, DVP participates in financing and organising the recovery and recycling of its products at the end of their life cycle and assumes responsibility for placing them on the market.

DVP is committed to supporting the creation of a circular economy, where products are resources to be reused and fully shares the EU guidance for a correct management of WEEE that reduces its environmental impact.

Collaboration and innovation

DVP believes in collaboration aimed at sustainable innovation because sustainability does not lie in the individual, but in the group.

Support to community

DVP supports Associations, Foundations and local bodies to contribute to the welfare of the community and is committed to give maximum resonance through its channels, its contacts and exchange with the media, on issues of social commitment and sustainability.

Selection and motivation of people

DVP aims at working with a team of determined, consistent and proactive individuals who are examples of excellence and capable of creating lasting value.

DVP motivates people who work in the Company in a transparent manner and rewards accountability and initiative.

Respect for the individual

DVP considers respect for the integrity and dignity of any human being a primary value to be protected with the utmost determination.

DVP opposes any behaviour or attitude that is detrimental to the person, discriminatory for reasons of gender, race, culture, religious affiliation or any other personal characteristic that may offend the sensitivity of the individual.

DVP rejects the exploitation of labour, in particular child labour, and promotes the protection of workers' rights, trade union freedoms and the rights of association and political determination, as well as compliance with the relevant regulations.

Well-being

DVP rejects any behaviour that is violent or detrimental to the dignity of the single person and is committed to protecting people's psychological and physical well-being.

By promoting measures with a positive impact on the lives of its workers, such as services, initiatives towards individuals and the community, DVP expresses its concept of a “Company made of People”.

Promotion, protection and enhancement of diversity

DVP recognises diversity, be it cultural or gender, as a strategic added value.

In the context in which it operates, the Company is open to different cultures and the related different professional and personal approaches. DVP ensures full and effective participation of women and equal leadership opportunities at all levels.

Therefore, DVP rejects all forms of cultural and gender discrimination and promotes values such as inclusiveness and equality.

Health and safety of workers

DVP supports the culture of safety, spreading the awareness of risks and promoting responsible behaviour by its Workers, in order to preserve their health.

For this reason, DVP provides safe working environments in compliance with the prevailing laws.

Whoever works in the name and on behalf of DVP shall comply with the aforementioned laws, as well as with the health and safety measures provided for by internal procedures and regulations.

Implementation and dissemination

The Ethics Committee shall periodically update the text of these Rules, making changes and revisions.

These Rules were adopted by resolution of the Board of Directors on 04/11/2021 in revision 0, with effect from 01/01/2022.

DVP undertakes to disseminate the Code of Ethics among its Stakeholders and to promote awareness and training initiatives.

Annex

Procedure for handling reports and complaints concerning violations of the code of ethics

Anyone who discovers or becomes aware of conduct in violation of these Rules is required to report it by e-mail to hr@dvp.it, or in person at the Human Resources Office, which is committed to safeguarding the anonymity of the Whistleblower and ensuring that he or she is not subjected to any form of retaliation. The position of the Whistleblower is also guaranteed until the Ethics Committee has completed its investigation.

If the request is not taken into account by the office in charge, it is possible to refer the complaint to the Board of Statutory Auditors by e-mail to: segnalazioni@dvp.it.

In order to avoid false or exploitative reporting, it is hereby decided that:

- anonymous reports or complaints will not be accepted, unless they are related to known facts or other complaints, therefore with reinforcing value;
- reports or complaints suspected of deceptive or libellous behaviour will be investigated and may result in significant disciplinary action;
- reports or complaints that lack foundation, sufficient credibility or cannot be substantiated will be evaluated by the Ethics Committee, which reserves the right to reject them or suspend judgement pending clarification and possible investigations.

Annex

Procedure for handling reports and complaints concerning violations of the code of ethics

All complaints received must be:

- recorded and kept by the Human Resources Department;
- evaluated by the Ethics Committee with outcome and explanation of the reasons supporting the decision (preliminary investigation);
- where deemed necessary, audited, with disclosure to involved subjects;
- managed in compliance with the GDPR 679/16 Regulation.

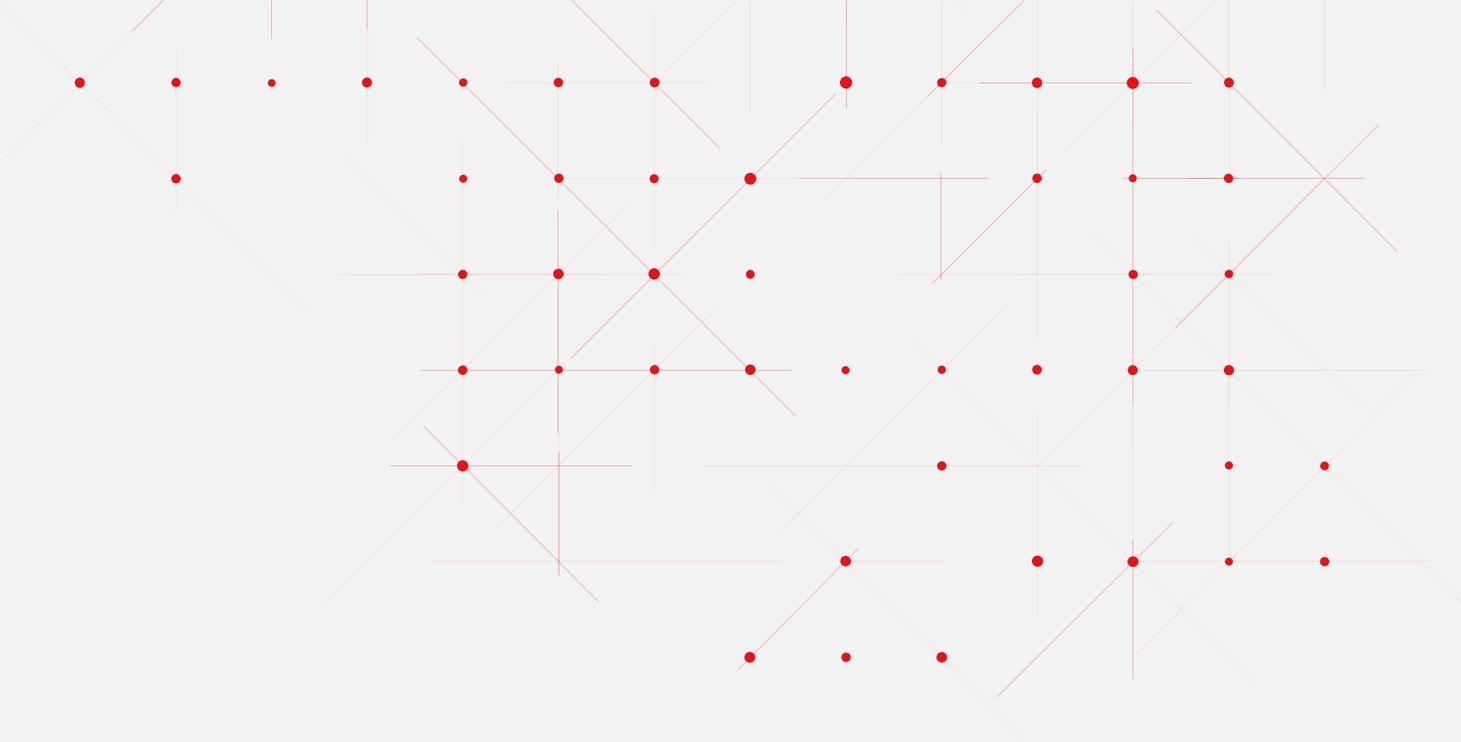
Any department deemed to have the professionalism and knowledge to provide the necessary support may be appointed by the Ethics Committee to carry out checks.

If the complaint is found to be groundless, the investigation shall be discontinued and, if

the Whistleblower is found to be in bad faith, the Ethics Committee reserves the right to propose the initiation of proceedings against him/her.

The results of the checks and any proposed measures are communicated by the Human Resources Office to the appointed Person In Charge.

The Board of Statutory Auditors will be periodically informed about the handling of complaints received and, in case of reports about the financial statements, accounting, internal controls and auditing, it may request further information to the Ethics Committee.



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Cover concept: Valentina Castronuovo,
working in DVP Vacuum Technology for more than two decades



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