



# Code of Conduct

August 2025

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**Dear Employee,**

**VANGEST has a long history of excellence, standing out for its innovation, quality, and the trust it builds with its partners.**

**We believe that our success is not only measured by our technical capabilities but primarily by the ethical and responsible way we manage relationships with our clients, suppliers, shareholders, and the community.**

**Each one of us has a duty to act with the highest standards of ethics. We are all responsible for preserving our reputation and creating a healthy and respectful work environment. This includes, among other things, honesty in our interactions, compliance with safety regulations, the defense of human rights, and respect for diversity.**

**Failing to honor our obligations to act in accordance with laws, regulations, and to ethically manage our business can have serious consequences, including damage to VANGEST's reputation and performance, which is a significant responsibility for all of us.**

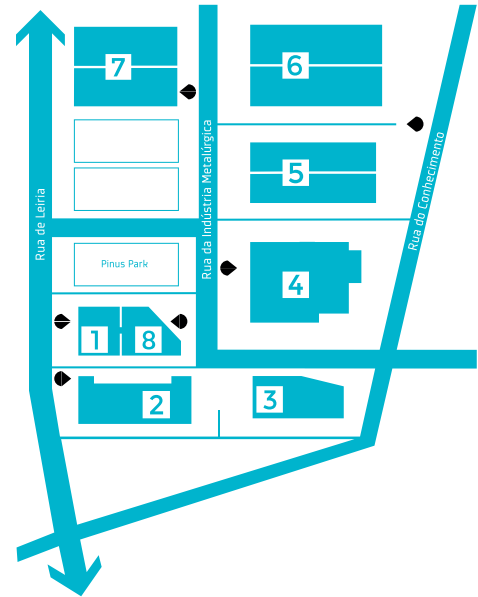
**This Code reflects our values. It should serve as a guide in our daily decisions, helping us face challenges responsibly, fostering trust among all, and ensuring that VANGEST continues to be recognized for its solidity and ethics in the market.**

**We count on your dedication and commitment to keep VANGEST as an example of excellence, respect, and innovation.**

# VANGEST Introduction

VANGEST positions itself as the ideal partner for the development of plastic solutions, from concept to final product. The industrial complex, located in Marinha Grande and spread across 8 buildings, covers a total area of 45,700 square meters and offers services ranging from Design, Prototyping and Rapid Manufacturing, Mould Making, Injection Moulding, HSM to Checking Fixtures.

Virtual tour of the facilities: [www.vangest.pt/virtualtour/](http://www.vangest.pt/virtualtour/)



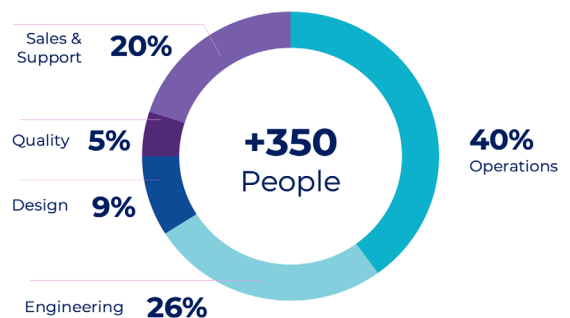
## Specialized teams in different business areas

VANGEST is divided into the sub-brands Vangest Medical, Vangest Industrial, and Vangest Aerospace as a way to focus its offerings on the needs of different markets.



## Our people

Our people are the driving force behind our success. We are committed to maintaining a motivated and dedicated workforce that consistently delivers high-quality results and fosters continuous growth. We firmly believe that the unique perspectives of each team member drive VANGEST's innovation and development.



## Purpose and Scope

The purpose of the Code of Conduct is to promote ethics, transparency, and accountability within organizations, helping to prevent inappropriate behavior and protect the rights of employees and other stakeholders.

The Code of Conduct (hereinafter referred to as the “Code”) is a document that incorporates a set of principles governing the activities of the companies comprising VANGEST - Engineering Solutions, S.A. (hereinafter referred to as “VANGEST”) and all relationships, partnerships, and/or collaborations carried out by it. It embraces and enshrines a set of ethical principles and standards of conduct that must guide the actions of the members of the corporate bodies and employees within the scope of their functions.

This Code of Ethics applies to all VANGEST employees, suppliers, service providers, agents, and other stakeholders, whether permanent or occasional, as well as all other entities acting on behalf of VANGEST.

By “employees” it is understood to mean members of the corporate bodies and all VANGEST staff, whether permanent or temporary.

This Code applies without prejudice to other legal or regulatory provisions to which members of the corporate bodies and other employees are subject by virtue of their functions.

Employees are therefore obligated to know and comply with the Code, as well as to assist in its implementation, including, where applicable, reporting to the Compliance Department any violations of the Code or any facts that may lead to such violations, of which they have direct or indirect knowledge.

## Mission and Values

We are shaped by innovation, expertise, technology, and trust—values that guide all our decisions and relationships. We believe the future is built on knowledge and mutual trust, fostering effective and sustainable solutions. Sustainability is not just a principle but a practice embedded in every action we take, reflecting our commitment to a better world.

VANGEST is committed to conducting its activities as a socially responsible institution, with a strong ethical sense that should be reflected in a policy of sustainable growth and exemplary conduct by all its employees and respective stakeholders.

Our values represent the principles that underpin and form the basis of our actions and the relationships established between employees, partners, and other stakeholders. They are, therefore, our guiding and action principles.

**INNOVATION:** With the future in mind and innovation in our DNA, we foster a culture of expertise. New ideas, approaches, and technologies are embraced to improve our services and offer solutions that meet the challenges of today and tomorrow. We innovate with the awareness of anticipating and managing risks to achieve sustained growth.

**TRUST:** We are committed to creating economic value by establishing lasting relationships based on transparency, integrity, and responsibility. The trust of our Clients and Employees is one of the pillars of our success.

**CONSISTENCY:** We are quality-driven and promote a culture of continuous improvement that motivates all our teams. The integration of various solutions, combined with cutting-edge technologies and the experience of our teams, ensures that our products and services consistently embody rigor and reliability.

**EXPERTISE:** We value technical knowledge and continuous training. Our team is made up of highly qualified professionals who ensure excellent service in every area of operation.

**SUSTAINABILITY:** We act with environmental and social awareness. We implement sustainable practices in all our operations, promoting a positive impact on the society in which we operate.

Ethics, respect, concern for the environment, research, and ongoing investment foster the creation of knowledge, innovation, and sustained growth.

We base our actions on an environment of trust and respect because we believe that only in this way can we contribute and undertake value-added initiatives for VANGEST and our stakeholders.

We believe that continuous improvement depends on everyone's involvement. Each employee plays a key role in identifying opportunities for improvement and in building innovative solutions. That's why we strive to foster an environment open to participation, to value and reward good ideas, and to recognize the effort and creativity of our employees.

## Commitment to Employees

Our People are the driving force behind our success. Their dedication and know-how form the foundation upon which our operations thrive. We are committed to maintaining a motivated and dedicated workforce that consistently delivers high-quality results and fosters continuous growth. We firmly believe that the individual perspectives of each team member drive VANGEST's innovation and development.

VANGEST is committed to maintaining an ethical, safe, inclusive, and socially responsible work environment, in accordance with the following core principles:

### Human Rights

We respect and protect the human rights recognized in the Universal Declaration of Human Rights and major international agreements in this regard, as well as additional local regulations that strengthen these principles.

### Prohibition of Child, Forced, and Compulsory Labor

VANGEST does not employ, engage, directly or indirectly, and repudiates practices of child labour. It

does not accept as partners entities that maintain such practices. The minimum age for recruiting employees by the Group is 18 (eighteen) years. Furthermore, it repudiates practices that resort to forced and compulsory labour, both internally and among its business partners.

### Health and Safety

People are at the core of everything we do. Therefore, we take responsibility for ensuring the necessary conditions for adapting to new work demands driven by business evolution and new technologies. Issues related to Safety, Hygiene and Health at Work are particularly important to us.

VANGEST is committed to ensuring the necessary conditions to provide a healthy and safe work environment for all company employees, preventing harm to the health and safety of employees as well as all individuals present on its premises, including clients, suppliers, community members, or any other entities.

All employees must know, comply with and enforce the Health, Hygiene and Safety at work regulations, whether they are internal rules and/or legal requirements, and must also report any non-conformities identified. Therefore, VANGEST is committed to providing regular training to all employees of the company.

### Freedom and Right to Collective Bargaining

We recognize that effective communication between employees and their supervisors is a competitive advantage. We value peaceful freedom of organization and association, ideological freedom of conscience and religion, as well as freedom of expression and opinion.

VANGEST promotes the right to unionize and collective organization of the workforce, in accordance with applicable law. We do not interfere with employees' rights regarding union freedom and their right to collective bargaining, providing the necessary means for exercising these rights.

### Equality and Non-Discrimination

VANGEST is committed to fostering an inclusive work environment where all employees are treated with dignity, respect, and fairness. We ensure equal opportunities in recruitment, career progression, training, compensation, and working conditions, regardless of gender, age, ethnicity, religion, sexual orientation, disability, or any other personal characteristic. Discrimination, harassment, or any form of exclusion are unacceptable and go against our values.

We value diversity as a driver of growth and innovation, promoting equity in all our organizational practices.

All employees, through their conduct and responsibilities, must ensure that VANGEST complies with all fundamental principles of the ILO (International Labour Organization).

## Employees' Commitment

VANGEST and its Employees must ensure compliance with the legal and regulatory provisions applicable to the Group's activities. Therefore, employees must not perform, on behalf of any of the Group's companies, any actions that may violate the laws and regulations applicable to them.



Employees are expected to demonstrate respect and loyalty toward the company, contributing to its credibility and good reputation, safeguarding its prestige, and using its resources efficiently.

VANGEST and its employees must conduct themselves according to strict principles of honesty, integrity, transparency, and professional diligence, adhering to the following principles:

### Confidentiality and Secrecy

Ensure the confidentiality of data, documents, projects, technical processes, commercial and financial information, and any other sensitive content accessed in the course of their duties.

### Conflict of Interest

VANGEST Employees must ensure their decisions are made in the best interest of VANGEST. They must act with independence, impartiality, loyalty, and without influence from personal or external interests. Employees should refrain from intervening in or influencing decisions that could affect individuals to whom they are or have been connected by kinship, affinity, or entities with which they collaborate or have collaborated. Employees must also refrain from holding positions in companies outside VANGEST when such activities interfere with the fulfillment of their duties or the objectives and activities of the Group's companies.

Any situations of potential or actual conflict of interest, as detailed in the Anti-Corruption Policy available on the website, must be reported to Management, to the immediate supervisor, or through the Whistleblowing Channel available online <https://report.whistleb.com/en/vangest/>.

### Interpersonal Relationships

VANGEST values and promotes a work environment based on mutual respect, cooperation, and open communication among all employees, regardless of role, area, or hierarchy level. Interpersonal relationships should be characterized by courtesy, empathy, professionalism, and team spirit, contributing to a healthy, productive, and inclusive organizational climate.

Behaviors involving disrespect, aggression, intimidation, moral or sexual harassment, discrimination, or any form of verbal, psychological, or physical violence are unacceptable.

Active listening, dialogue, and respectful conflict management are encouraged as essential practices for professional coexistence. Attitudes that harm group harmony, spread rumors, promote exclusion, or create hostile environments are not tolerated and may lead to disciplinary measures.

### Professionalism

Act responsibly and diligently, striving to improve and update knowledge to continuously enhance professional capabilities. Apply the most appropriate knowledge, techniques, and necessary effort to fulfill assigned tasks. Contribute to VANGEST's success consistently, creatively, committedly, and persistently.

### Use of Resources

Ensure the protection and proper maintenance of resources provided for the performance of duties or accessed through such duties. Resources must be used rationally, responsibly, and efficiently, aimed at achieving assigned objectives. Likewise, employees must comply with internal regulations regarding IT resources and refrain from using VANGEST's assets for personal gain or that of third parties.



## Privacy

VANGEST is committed to conducting its business in compliance with EU and national data protection legislation and adhering to the highest standards of ethical conduct.

Our Personal Data Processing Policy establishes principles that employees and third parties must follow regarding the collection, use, retention, transfer, disclosure, and destruction of personal data, as well as the free movement of such data. It outlines data subjects' rights and forms part of a comprehensive Information Security Management System designed to ensure information privacy.

All employees must cooperate in the proper functioning of our Privacy Management System, reporting any data breaches or security incidents, and comply with internal privacy rules.

Employees involved in data collection must ensure that the legal basis for processing is identified and respected—whether consent, contractual compliance, or company interest. In case of doubt, employees should consult their immediate supervisor or the Security and Privacy Team.

## Prevention of Corruption and Related Offenses

Act in accordance with VANGEST's commitment to preventing corruption and related offenses, tolerating no practices or acts of such nature. Follow procedures outlined in the Anti-Corruption Policy and the Corruption and Related Risks Prevention Plan, available on our website [www.vangest.com](http://www.vangest.com) under Policies, and use the specific Whistleblowing Channel for reporting these situations.

Report without undue delay any occurrence of such situations to the Compliance Officer.

# Commitment to Stakeholders

VANGEST is committed to acting with ethics and transparency in its relationships with Stakeholders, respecting their needs and specificities, and ensuring accuracy and transparency in the information reported.

Thus, in line with a strategy based on building relationships that actively engage stakeholders by integrating their concerns into decision-making and management practices, VANGEST, through its Employees, expressly assumes the following commitments:

## Relationship with Clients

We are partners. The Client's purpose is our purpose, and with it, we fully commit to their success. Our goal is to become an integral part of their team, maintaining transparent communication. We believe that, by doing so, we not only enhance the effectiveness of the solutions we provide but also strengthen the trust in the partnership.

- Ensure professional, clear, respectful, and loyal treatment of all Clients and potential Clients;
- Ensure that business is conducted effectively, responsibly, and ethically;
- Support the Client throughout the relationship by providing the necessary information for informed decision-making, ensuring compliance with agreed terms;
- Respect the privacy of information and other data exclusive to our relationship with Clients,

fully respecting the rights related to the work we perform;

- Strive to comply with our Clients' Regulations and Codes of Conduct.

### Relationship with Suppliers

We prioritize relationships with suppliers and service providers, regardless of their size or geographic location, who adopt excellent management practices grounded in respect for human rights, labor laws, environmental legislation, and business practices established in our Code.

- Select suppliers and partners based on clear and objective criteria, promoting product quality and relationship stability.
- Regularly evaluate supplier performance to determine compliance with specific requirements and foster opportunities for the continuous improvement of the system.
- Promote a transparent relationship that enables long-term partnerships and optimizes business for all parties involved.
- Foster with suppliers and partners a climate of professionalism, respect, and loyalty, honoring commitments made and driving the continuous improvement of shared objectives.
- Ensure strict compliance with the agreed conditions.
- Respect the confidentiality of information and intellectual property, particularly with regard to proposals and quotations.
- Encourage suppliers and partners to adopt best environmental and social practices and ensure that the standards set out in this Code are met.
- Ensure that suppliers act responsibly regarding the sourcing of the raw materials they use, in line with the Conflict Minerals Policy in effect and available on the website. We do not tolerate the use of minerals that contribute, directly or indirectly, to armed conflicts, child exploitation, or human rights violations, particularly in regions affected by instability or conflict.
- We encourage our suppliers to implement due diligence procedures in accordance with OECD guidelines for responsible supply chains, ensuring traceability, legality, and respect for human rights throughout their supply chain.

### Relationship with Regulatory Authorities

Provide full cooperation to supervisory and regulatory bodies, responding to their requests and refraining from any behavior that could hinder the exercise of their powers.

### Competition

Respect market rules and criteria by promoting fair and loyal competition, avoiding any practice that could sensibly impede, distort, or restrict competition.

Engage with competitors cordially and promote mutual respect, including respect for each other's intellectual property rights.

### Media Communication

Information provided to the media must be issued by a VANGEST representative or a duly authorized

person, following express authorization from their superior. Information must be truthful, transparent, and clear, respecting the Group's values and the context in which it is produced.

## Commitment to Society and the Environment

VANGEST operates sustainably through monitoring and energy efficiency measures, consumption management — for example, by integrating photovoltaic panels into our buildings — proper treatment of generated waste and the promotion of its recovery and recycling, renewal of the vehicle fleet, which includes electric and hybrid vehicles, and calculation of the carbon footprint, in line with the Sustainability Policy in effect and available on the website.

As part of our activities, we seek to develop initiatives to promote greater environmental responsibility, encourage the development and dissemination of environmentally sustainable technologies, and support a preventive approach to environmental challenges.

VANGEST is committed to strict compliance with legal criteria regarding Air and Water quality, Waste management and disposal, Chemicals, and other applicable legislation, as well as:

- Keeping employees informed about their environmental responsibilities, and providing the necessary training and resources to meet these obligations.
- Encouraging cooperation with our customers and suppliers to foster good environmental practices.

Employees are responsible for complying with internally defined environmental best practices, concerning water and energy saving, waste management, chemicals, lighting management, electronic equipment, and air conditioning.

VANGEST is also committed, through the internally defined Conflict Minerals Policy, available on the website, to complying with the requirements established by Regulation (EU) 2017/821 of 17 May 2017 regarding conflict minerals. The so-called "3TGs" are minerals and metals that contain or consist of tin, tantalum, tungsten (3T) and gold (G).

## Reporting Mechanisms and Anti-Retaliation Measures

The whistleblowing procedure is detailed in our Internal Whistleblowing Policy and Internal Whistleblowing Guidelines, which should be consulted beforehand by any potential whistleblower.

Upon becoming aware of any violation of this Code of Conduct, the whistleblower may make a exclude confidential report through the following channels:

- Contact a hierarchical superior within our organization;
- Send an email to [report@vangest.com](mailto:report@vangest.com);
- Send an anonymous or confidential message through the whistleblowing channel available on our website: <https://report.whistleb.com/en/vangest>;
- Communication to the external channel maintained by the competent authority MENAC (National Anti-Corruption Mechanism).

VANGEST guarantees the confidentiality of reports of misconduct and unlawful behavior made in good faith via the internal whistleblowing channel, committing not to carry out any form of retaliation against the whistleblower. However, reports made in bad faith, with the sole intention of harming third parties or for personal gain, may be subject to disciplinary procedures.

If any employee of a VANGEST company suffers acts that they consider retaliatory due to their report, they should also use the internal whistleblowing channel to alert the company so that the situation can be resolved immediately and definitively.

Retaliation against whistleblowers is punished internally by initiating disciplinary procedures against the retaliator and any accomplices, with the maximum sanction for both cases potentially resulting in dismissal without compensation or indemnity. May also be punished at contravention level and give rise to civil liability proceedings.

If the employee has reasonable grounds to believe that their report cannot be resolved internally or has a founded fear of retaliation, they may resort to an external report or public disclosure, in accordance with Law No. 93/2021, of December 20.

## Non-Compliance

The violation of the principles and rules set forth in this Code constitutes a disciplinary offense, under the applicable disciplinary regime, without prejudice to any civil, administrative, or criminal liability that may arise.

## Approval, Review and Dissemination

This Code of Conduct comes into effect immediately upon its publication and shall be reviewed, upon proposal from the Compliance Department, every 3 years or whenever there is a significant change in the corporate structure or the operational content of VANGEST.

Once approved by the Executive Committee, the Code must be disseminated internally to all Employees and externally published on the VANGEST website in a clear, transparent, and accessible manner.

## Final Provisions

E This Code of Conduct is an integral part of our Compliance Program. Its observance does not exempt

the strict adherence to all policies, regulations, work instructions, and other internal regulations of VANGEST.

All employees, wherever they carry out their activities, and regardless of their hierarchical position or their specific roles and responsibilities, must understand and accept the rules of this Code. Reading and accepting the rules of this Code does not exempt the employee from reading and understanding the policies and other internal documentation referenced herein.

The Human Resources Department shall require each employee to expressly acknowledge this Code by signing the acknowledgment statement, as outlined in Annex I, and shall inform the Compliance Department accordingly.

The signed acknowledgment statements by employees shall be filed in a dedicated folder and managed by the Human Resources Department.

Any questions related to the interpretation or application of this Code must be reported to VANGEST's Compliance Department.

VANGEST will provide awareness actions to its employees at the start of their functions and at least every two (2) years thereafter, focused on the values of VANGEST, the applicable rules of conduct, and the legal and disciplinary consequences that may result from improper conduct, delivered either in-person and/or via e-learning.

## Annex - Acknowledgment Statement (Employees)

### Employee Identification

Name: \_\_\_\_\_

Company: \_\_\_\_\_

Department/Job Title: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

### Declaration

☐

I hereby declare that I have read and understood the VANGEST - Engineering Solutions, S.A. Code of Conduct.

I hereby certify, on my honor, that the information provided above is true and accurate. I further declare that I am committed to conducting myself in accordance with the principles and values set out in the Code of Conduct of VANGEST – Engineering Solutions, S.A.

Date and signature: \_\_\_\_/\_\_\_\_/\_\_\_\_ \_\_\_\_\_



## Code of Conduct

V2/2025

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