

Organizational Model, Management and Control Code of Ethics of Mediberg S.r.l.

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Mission

The experience and technical expertise acquired over the years as an Italian manufacturer of medical devices are the key to our constant drive for innovation and product improvement. Through these, and via technical-scientific dialogue with industrial partners worldwide, we aim to establish ourselves in the market as a serious and reliable partner, essential for maintaining high standards in healthcare performance.

To this end, we design and develop cutting-edge medical devices that meet performance standards without compromising on customization to maximize the skills and abilities of caregivers, ultimately serving the interests of the healthcare system.

Values

At the heart of our work are:

- Passion for the individual and trust in their abilities;
- Awareness of our history as an Italian business, built over the years with inventiveness, courage, and sacrifice;
- The desire to always align patient interests with creating wealth for ourselves and our stakeholders;
- Respect for commitments made to customers and suppliers, which for us represents a lifestyle before a contractual obligation;
- Enhancement of human capital within the company, recognizing it as our enduring competitive advantage;
- Openness to the world and innovation;
- Attention to detail as a reflection of our ideal drive.

Every day, we are committed to pushing our limits, gaining deeper insights into markets, understanding the needs of healthcare professionals, advancements in science and technology, and transforming challenges into opportunities. This fuels our desire to learn and improve continually.

Vision

Healthcare systems and the world of medical devices are constantly evolving, and even those of us who have operated for years as a manufacturing company can only gain new market share by embracing the challenge of flexibility and continuous improvement of products and processes.

Embracing this challenge, over time, we aim to ensure optimal medical devices for both public and private health, excellently designed and manufactured for quality, stability, safety, and suitability for their intended use.

We aspire to be recognized by the market not just as suppliers, but as reference partners in our sector for the quality of our solutions. We aim to be chosen for our differentiated customer service, product care, and ability to promptly respond to the ever-changing demands of the market.

We can and wish to contribute to creating a world where healthcare professionals and patients have access to the best medical devices at affordable and sustainable costs in every care setting.

GLOSSARY

Agent: collaborator of Mediberg S.r.l.; natural or legal person affiliated with the Company under the agency contract pursuant to articles 1742 et seq. of the Civil Code.

Company: Mediberg S.r.l.

CCNL: National Collective Labor Agreements negotiated by the most representative trade unions for the currently employed staff and applied by the Company.

Code of Ethics: adopted by the Company in accordance with Legislative Decree no. 231/01, it is a document in which the Company sets out the rights, duties, and responsibilities towards all parties with whom it interacts to achieve its corporate objectives.

The Code of Ethics aims to establish ethical standards and behavioral norms that the recipients of the Code must adhere to in their relationships with the Company, for the prevention and repression of unlawful conduct.

Collaborator: intern, project-based worker, temporary worker, supplied worker.

Consultant: individual who provides services to the Company under a contractual relationship (including, but not limited to, Lawyer, Accountant, Labor Consultant).

Despite being a service provider, for the purposes of this document, consultants are referred to as a particular and distinct category of supplier.

D. Lgs. 231/01 or Legislative Decree: Legislative Decree no. 231 of June 8, 2001, concerning the "Discipline of administrative liability of legal entities, companies, and associations, even without legal personality," and subsequent amendments and integrations. The provisions of the Decree also apply to transnational crimes regulated by Law no. 146/2006. Therefore, any reference to the offenses under the Decree also includes transnational crimes.

Recipients of the Code of Ethics: Shareholders; Sole Director; members of the Supervisory Body; employees as defined in the applicable CCNL (e.g., worker, employee, middle manager, executive); Collaborators, such as interns, project-based workers, temporary workers, supplied workers; single or multi-mandate agents; Distributors, Consultants, and Suppliers.

Recipients of the Model: Shareholders; Sole Director; members of the Supervisory Body; employees as defined in the applicable CCNL (e.g., worker, employee, middle manager, executive); Collaborators, such as interns, project-based workers, temporary workers, supplied workers; single or multi-mandate agents.

Subordinate or Employee Workers: all employees of the Company (workers, employees, middle managers, executives).

Distributor: Customer of the Company who distributes Mediberg S.r.l. products under a contract with the Company.

Suppliers of goods and services: contractual counterparts of Mediberg S.r.l., both natural and legal persons with whom the Company enters into any form of contractually regulated collaboration aimed at cooperating with the Company in sensitive activities.

Confidential Information: any information related to initiatives, commitments, agreements, projects, negotiations, accounting and statistical data, etc., not known to the public and which, if disclosed, could potentially harm the direct and/or indirect interests of the Company or its clients.

Law no. 146/2006: Law no. 146 of March 16, 2006 (Ratification and implementation of the United Nations Convention and Protocols against transnational organized crime, adopted by the General Assembly on November 15, 2000, and May 31, 2001).

Confindustria Guidelines: Confindustria guidelines for the construction of organization, management, and control models pursuant to Legislative Decree no. 231/2001.

Model: Organization, Management, and Control Model required by Legislative Decree no. 231 of June 8, 2001, and subsequent amendments and integrations.

Supervisory Body (OdV): Supervisory Body required by Legislative Decree no. 231/2001, tasked with overseeing compliance with the model and updating it.

Corporate Bodies: Sole Director, Shareholders' Assembly, Supervisory Body.

Company personnel: employees including executives, internal and external Collaborators, and members of Corporate Bodies.

Public Administration (P.A.) and Regulatory Authorities: Judicial Authorities, National and Foreign Institutions and Public Administrations [purely indicative: Consob, Bank of Italy, Antitrust, Italian Stock Exchange, Privacy Guarantor, and other Italian and foreign supervisory authorities]. Public Administration refers not only to any public entity but also to any independent administrative agency, natural or legal person acting as a public official or serving in a public service capacity, or as a member of European Union bodies or a foreign state official.

Offense, criminal offense, incriminating act, or underlying offense: offenses under Legislative Decree no. 231/01 and any amendments and integrations, as well as transnational crimes indicated in Law no. 146 of March 16, 2006.

Administrative Liability: administrative liability to which the Company may be subject in case of commission of offenses under the Decree or Law no. 146/06, which, if proven, entail the application of sanctions provided by Legislative Decree no. 231/01.

Third Parties: contractual counterparts of the Company, both natural and legal persons, with whom the Company enters into any form of contractually regulated collaboration and who are intended to cooperate with the Company [for example, Collaborators, Suppliers, Consultants (consulting firms, Lawyers...), other Third Parties who have contractual relationships with the Company (e.g., outsourcing companies, supply companies, and supplied employees...)].

Representation Expenses: expenses for breakfasts and refreshments, hospitality and reception, such as business lunches, dinners, or expenses for board, lodging, and transportation, towards one or a group of individuals (e.g., Suppliers, Clients, Public Official, Public Service Delegate, etc.).

Standards: Set of general behaviors to which the Company and its members must conform.

Stakeholders or Interested Parties: refers to those directly or indirectly involved in Mediberg S.r.l.'s activities who have an interest in its decisions, strategic initiatives, and potential actions. Stakeholders include, purely as examples: Employees, Clients, Shareholders, Citizens, Collaborators in any capacity, Suppliers, Business Partners, Municipal, Provincial, and National Institutions, Category Associations, Environmental Associations, and anyone with an interest in the Company's activities, both nationally and internationally.

Statute of Workers: Law no. 300 of May 30, 1970.

1. CODE OF ETHICS

1.1 Preamble

The Code of Ethics – which can be defined as the Constitutional Charter of Mediberg S.r.l. outlining the ethical principles guiding the Company's activities – establishes principles and rules of conduct, in some cases seemingly obvious and taken for granted, to which Mediberg S.r.l. and the recipients of this document must adhere. These rules are considered essential by the Company to ensure a solid corporate ethics.

1.2 Reference Legislation

The Code of Ethics is part of the broader framework set out in our legal system by Legislative Decree no. 231/2001. On June 8, 2001, the Italian legislature enacted Legislative Decree no. 231 concerning the "Discipline of administrative liability of legal entities, companies, and associations, even without legal personality."

The Decree, along with its amendments and variations, introduced a novel form of criminal liability for companies, holding them personally accountable and therefore "in their own right" liable if offenses are committed "in their interest or for their benefit," unless certain conditions are met, including:

- adopting and effectively implementing an adequate Organization, Management, and Control Model;
- appointing internally a control body called the Supervisory Body.

For the adoption of an Organization, Management, and Control Model compliant with the Decree, the law identifies, among the requirements of an adequate and effective Model, the development of specific organizational protocols. These protocols aim to ensure an efficient system for monitoring the legality:

- of the activities managed by the companies;
- of conduct, viewed as actions or omissions carried out by individuals within or outside the companies acting to achieve their business objectives.

Among these protocols, the adoption of a Code of Ethics assumes particular relevance.

1.3 Code of Ethics and Model

The Code of Ethics is the document adopted by Mediberg S.r.l. that expresses the ethical commitments, principles, and responsibilities of the Company in conducting its business and corporate activities, defining the guidelines of behavior that must be adhered to by the recipients of this document.

Consequently, the Code of Ethics:

- identifies the principles that Mediberg S.r.l., in its relations with stakeholders, recognizes as ethical values to guide its activities and those of the recipients towards a path of legality, efficiency, transparency, competence, integrity, and correctness;
- recommends, promotes, or prohibits certain conduct that the recipients must observe towards Mediberg S.r.l., beyond and independently of what is provided at the regulatory level.

The Model of Mediberg S.r.l. is the document through which the Company has built a structured and systematic system of procedures and control activities, including preventive measures (ex ante control), aimed at preventing the commission of various types of offenses contemplated by the Decree. It complies with the provisions contained in the Code of Ethics, which constitutes an integral part as a prevention protocol.

In this regard:

- the Code of Ethics represents a tool adopted autonomously and is capable of general application by the Company to express principles of "corporate ethics" recognized as its own and which it calls for compliance with by all;
- the Model, while inspired by the principles of the Code of Ethics, instead responds to specific prescriptions contained in the Decree, aimed at preventing the commission of particular types of offenses (acts that, apparently carried out to the advantage of the company, may entail administrative liability under the provisions of the Decree itself) and applies to the individuals identified as recipients of the model.

The Code of Ethics conforms to the principles indicated in the "Confindustria Guidelines for the construction of organization, management, and control models under Legislative Decree no. 231/2001."

1.4 Adoption and Update

The Code of Ethics is adopted by resolution of the sole director of the Company. Far from being considered an unchangeable document, this document should be viewed as a tool capable of subsequent modifications and integrations based on internal and external changes to the Company, as well as the experiences gained over time. This is to ensure full consistency between the values assumed as fundamental principles of the Company and the behaviors to be adopted as established in this Code.

1.5 Recipients

Given the aim of ensuring that the Company's activities are conducted according to "ethical" rules, principles, and values, this Code is binding for:

- Shareholders;
- the sole director;
- members of the Supervisory Body;
- the External Auditor;
- employees according to the National Collective Labor Agreement applied by the Company (for example, workers, employees, executives, managers);
- collaborators, including interns, project workers, temporary workers, and supplied workers;
- single or multi-mandate agents;
- Distributors;
- Consultants;
- Suppliers of goods and/or services.

Referred to in this document as Recipients.

1.5.1 Contractual Value of the Rules and Principles of the Code of Ethics

Regarding Employees (workers, employees, executives, managers), compliance with the Code of Ethics is an essential part of the contractual obligations to which the Company's Employee is bound under the provisions of the Civil Code (Articles 2104, 2105 c.c.).

The principles and contents of this Code of Ethics thus constitute specific examples of the obligations of diligence, loyalty, and impartiality imposed by law on Employees, which qualify the correct performance of work and general behaviors towards Mediberg S.r.l..

For the remaining Recipients, compliance with the Code of Ethics is an essential part of the legal relationship established with the Company. In fact, they are subject to compliance with this document through specific contractual clauses that constitute actual contractual obligations, also in accordance with the principle of good faith in contract performance.

In such cases, non-compliance with the Code of Ethics constitutes a breach of contractual obligations with Mediberg S.r.l. and may lead to termination of the contract due to the fault of the Recipient, without prejudice to the Company's right to compensation for any damages suffered as a result of the Recipient's non-compliance.

1.6 Communication, Dissemination, Training

The Company undertakes to ensure timely internal and external dissemination of the Code of Ethics through appropriate communication and dissemination activities, so that the values and principles contained therein are known and applied, and individual initiatives do not generate behaviors inconsistent with the reputational profile pursued by the Company.

In this regard, the Code of Ethics is:

- in electronic format, published on Mediberg S.r.l.'s website and accessible to anyone, both in a dedicated section of the Company's Intranet for internal use, accessible to all except agents and production and warehouse personnel, and to employees;
- in hard copy, provided to the Recipients upon appointment, hiring, or the start of the relationship with the Company;
- in hard copy, posted in the workplaces as provided by Article 7 of the Workers' Statute.

Regarding Members of the Corporate Bodies and company personnel, the Company includes initiatives within the annual training plan aimed at promoting knowledge of the values and behavioral norms referenced in the Code of Ethics.

1.7 Reporting to the Supervisory Body

With Legislative Decree no. 24 of March 10, 2023, the legislator amended the discipline regarding the protection of persons reporting violations of Union law and national legislative provisions, implementing EU Directive 2019/1937.

This legislation has led to the amendment of Article 6 of Legislative Decree no. 231/01, abrogating paragraphs 2-ter and 2-quater, and amending paragraph 2-bis to require that the 231 Models include "internal reporting channels, prohibition of retaliation, and disciplinary system" regarding reporting issues.

Consequently, the Company has implemented a specific procedure by establishing an internal channel for collecting reports that ensures the confidentiality of the reporter, in compliance with the new regulations and the ANAC Guidelines.

Mediberg S.r.l. is a private entity that, in 2022, had an average of more than 50 employees and has adopted an Organizational Model under Legislative Decree no. 231/01.

Under Legislative Decree no. 24/2023, for companies with these characteristics, reported violations must relate to:

- Significant unlawful conduct under Legislative Decree no. 231/2001, violations of organizational and management models provided in Legislative Decree no. 231/2001, and thus of the Code of Ethics, for which only the internal channel set up by the Company can be used;
- Offenses falling within the scope of Union or national acts listed in the annex to Legislative Decree no. 24/2023 (public procurement, prevention of money laundering and terrorism financing, product safety and compliance, consumer protection, protection of privacy and personal data, and security of networks and information systems, etc.);
- Acts or omissions constituting fraud (or other illegal activities) harming the financial interests of the European Union;
- Acts or behaviors undermining the purpose or objectives of Union acts in the aforementioned sectors.

On the subjective side, the adopted procedure applies to subordinate and/or independent workers, freelancers and consultants, volunteers and interns who provide their services to the Company, and shareholders.

The Company has entrusted the management of reports to one of the members of the Company's collegiate Supervisory Body.

Mediberg has identified, among possible forms, two ways to make reports:

(a) Dedicated "Whistleblower Software" platform.

(b) Oral form - meeting request: The reporter can request an in-person meeting with the Supervisory Body through the channel mentioned in point (a).

The procedure specifically addresses:

- Commitments to communicate with the reporter,
- Handling of anonymous reports,
- Cases of conflict of interest,
- Confidentiality management methods,
- Personal data protection methods,
- Conducting the investigation,
- Management of investigation outcomes,
- Possible imposition of sanctions,
- Training,
- Publicity of the procedure,
- Documentation retention.

The Company is committed to ensuring adequate protection for reporters and all involved parties by establishing a prohibition on retaliatory or discriminatory acts, direct or indirect, related to the reports (Reporting Management Procedure).

1.8 Disciplinary System

All Recipients are required to observe and ensure compliance with the principles outlined in the Code of Ethics to the extent of their responsibilities. Under no circumstances does the claim to act in the interest of Mediberg S.r.l. justify adopting behaviors contrary to those set forth in this document.

Types of Sanctions

Sanctions for Workers, Employees, and Middle Management

Employee infractions are sanctioned, depending on the severity of the offense, with disciplinary measures provided for in the sanctioning system under the National Collective Labor Agreement for the Chemical Industry pursuant to Article 50 Disciplinary Measures and subsequent provisions. Specifically, the following measures may be imposed:

- Sanctioning measures:
 - Verbal warning or reprimand;
 - Written warning;
 - Fine not exceeding three hours of pay;
 - Suspension from work and economic benefits for a period not exceeding 3 days;
 - Dismissal for significant breach of contractual obligations (justified reason);
 - Dismissal for a serious offense preventing even provisional continuation of the employment relationship (with cause);
- Precautionary measures:
 - Suspension from work until the disciplinary decision is issued, if the alleged infraction is serious enough to warrant dismissal.

During the suspension period, the employee retains the right to full economic benefits, and the period is considered active service for all other effects under the National Collective Labor Agreement of the relevant category.

Sanctions for Executives

Infractions committed by executives, depending on the seriousness of the offense, may lead not only to expulsion sanctions but also, according to jurisprudential interpretations, to conservative sanctions similar to those applicable to other employees. Specifically, the following measures may be imposed, respecting the procedures provided under Article 7 of the Workers' Statute and any special rules applicable:

- Sanctioning measures:

- Verbal warning or reprimand;
- Written warning;
- Fine not exceeding three hours of pay;
- Suspension from work and economic benefits for a period not exceeding 3 days;
- Dismissal for significant breach of contractual obligations (justified reason);
- Dismissal for a serious offense preventing even provisional continuation of the employment relationship (with cause);
- Precautionary measures:
 - Suspension from work until the disciplinary decision is issued, if the alleged infraction is serious enough to warrant dismissal.

During the suspension period, the executive retains the right to full economic benefits, and the period is considered active service for all other effects under the National Collective Labor Agreement of the relevant category.

Sanctions for the Managing Director

Infractions committed by the Managing Director are sanctioned through liability action and/or revocation action pursued in cases and according to the methods provided in the current Bylaws or, in the absence of specific provisions, under Article 2476 of the Civil Code.

Sanctions for Supervisory Body Members

Infractions committed by a member of the Supervisory Body are sanctioned through revocation action pursued in cases and according to the methods provided in the General Part of the Model.

Additionally, sanctions are applied according to the category of affiliation of the Body member as internal or external to the Company.

Sanctions for Shareholders

Infractions committed by Shareholders result in the sanction of exclusion of the Shareholder pursued in cases and according to the methods provided in the current Bylaws.

Sanctions for Collaborators, Agents, Distributors, Consultants, and Suppliers of Goods and/or Services

Infractions committed by Third Parties may result, depending on the seriousness of the offense and in accordance with the specific contractual relationship, in the termination of the relevant contract. The Company reserves the right to claim

damages resulting from such behaviors, including damages caused by the court's application of measures provided under Legislative Decree no. 231/2001, if the violation causes financial harm to the Company or exposes it to an objectively dangerous situation of such harm.

2 Ethical Principles of Reference of MEDIBERG S.r.l.

2.1 Introduction

In fulfilling its corporate purpose and carrying out its activities, MEDIBERG S.r.l. adheres to the principles of:

- legality, integrity, honesty, fairness, loyalty, fairness, objectivity;
- transparency and confidentiality in information;
- respect for individuals;
- responsibility in the careful use of corporate, environmental, and social resources.

This section aims to illustrate the general principles that MEDIBERG S.r.l. adheres to in its relations with stakeholders, representing the commitments that the Company undertakes in achieving its business objectives as outlined in its corporate bylaws.

2.2 Protection of legality, integrity, honesty, fairness, loyalty, fairness, objectivity

MEDIBERG S.r.l. undertakes to conduct its activities in compliance with international, community, national, regional, provincial, and municipal regulations, rejecting extortion, corruption, fraud, misuse of public resources, false communication of corporate data, and generally any illegal practices. The Company also makes every effort within its competence to implement initiatives aimed at combating crime, money laundering, and terrorism. In this regard, MEDIBERG S.r.l.:

- condemns all forms of criminal organization (in particular, mafia-type associations), whether national or transnational. To this end, the Company does not establish any work, collaboration, or commercial relationship with individuals or legal entities directly or indirectly involved in criminal organizations or otherwise connected by family ties and/or affinity with members of known criminal organizations, nor does it indirectly finance or facilitate any activities related to such organizations;
- ensures maximum transparency in commercial transactions and implements:
 - adequate control measures to combat any form of money laundering, receiving of stolen goods, financing of national and international terrorism, or other criminal activities;
 - pre-checks on potential collaborators, clients, distributors, suppliers, and business partners, including those operating at international levels;

- conducts its relations with Public Institutions, Political Organizations, and Trade Unions in a correct dialogue, without any discrimination or differential treatment, to foster an atmosphere of mutual trust and solid dialogue in the pursuit of a fair system of relationships as consensual as possible;
- does not provide direct or indirect contributions for the financing of political parties, movements, committees, and political and trade union organizations, nor their representatives or candidates, except those required by specific legal provisions;
- does not finance associations or sponsor political propaganda events or congresses.

2.3 Protection of transparency and confidentiality in information

The Company commits to:

- consider confidentiality as a cornerstone of corporate activities, crucial for the Company's reputation and the trust placed in it by its clients. Therefore, it is strictly prohibited to communicate, disclose, or improperly use confidential data, information, or news concerning clients or third parties in general with whom the Company maintains or is about to establish business relationships. Personal data may only be disclosed to those who have a genuine need to know them for the exercise of their specific functions;
- disseminate truthful, complete, transparent, and understandable information, enabling recipients of such communications to make informed decisions regarding their relationships with or involving the Company.

The Company is responsible for the information and promotional actions carried out regarding its services, even if these activities are prepared and/or carried out by third parties. Promotional and marketing activities must be planned at the highest corporate level, excluding any personal initiative not part of a carefully planned strategy. Information provided to third parties must always be non-misleading, documented, and truthful. Exaggerated claims, universal and hyperbolic assertions, and comparisons lacking demonstrable evidence and devoid of clear factual basis are not permitted.

2.4 Prevention of Money Laundering and Self-Laundering of Money or Other Assets

The Company strictly prohibits all Code recipients from purchasing, substituting, or transferring money, goods, or other assets with the knowledge of their criminal origin; or engaging in other transactions related to them in a way that hinders the identification of their criminal origin. The Company prohibits the use of money, goods, or other assets with the knowledge of their criminal origin in economic or financial activities. Furthermore, the Company prohibits:

- cashing sums in cash (except for small payments that must be tracked in accounting);
- receiving payments from encrypted accounts or from unidentifiable entities;
- making cash payments or using untraceable means of payment (except for small amounts which are nevertheless tracked in accounting);
- making payments into encrypted accounts;
- making payments in countries different from those of the supplier's residence or where the service was performed.

The Company commits to complying with all national and international regulations aimed at combating money laundering and self-laundering of money, goods, or other assets.

2.5 Proper Use of Information Systems and Protection of Copyright

In the use of information and telematic resources, recipients are guided by the principles of diligence and correctness and comply with internal security rules. Recipients must refrain from activities aimed at unlawfully damaging the Mediberg's or other companies' computer or telematic systems, state entities, or other public or utility entities. Under no circumstances can the belief of acting in the Company's interest justify the damage to information, data, and computer programs of the Company itself or third parties. The Company commits to not reproduce, use, hold, or disseminate intellectual property works in violation of the intellectual property rights of rightful owners and rejects any modification or update of operating systems or application programs in violation of the usage license conditions contractually defined with suppliers.

2.6 Respect for Quality and Organizational Structure

The commitment to continuously improve service quality and customer satisfaction is essential to the culture and values of our company and constitutes a fundamental aspect of corporate processes and systems. All administrative, commercial, logistical, and production processes, as well as design, are subject to an internal Integrated Management System, in accordance with the standards:

- UNI EN ISO 9001:2015 Quality Management System - Requirements
- UNI CEI EN ISO 13485:2016 Medical devices - Quality management systems - Requirements for regulatory purposes
- UNI EN ISO 14001:2015 Environmental management systems - Requirements and guidelines for use
- UNI ISO 45001:2018 Occupational health and safety management systems - Requirements and guidelines for use

2.7 Transparency in Financial Resource Management

Financial information must be based on the principles of correctness, accuracy, completeness, transparency, and competence of basic information and subsequent records. Recipients must comply with current regulations and any applicable national and international accounting principles. Each operation and transaction must be legitimate, accurate, consistent, appropriate, correctly recorded, authorized, and documentable. For each transaction, adequate supporting documentation must be retained on file to enable:

- easy verification and accounting reconstruction;
- accurate reconstruction of the operation;
- identification of different levels of responsibility.

Therefore, each recipient is required to: a) collaborate to represent management facts correctly, accurately, completely, and faithfully in accounting; b) immediately report to the Oversight Body any omission, inaccuracy, or falsification of accounting records and/or supporting documents that they become aware of.

It is prohibited to conduct simulated accounting transactions, adopt fraudulent behavior, conceal, omit, delete, destroy accounting records or documents, or obstruct the exercise of oversight functions.

2.8 Protection of Individuals

The Company considers the protection of personal safety, freedom, and individual personality as fundamental values. Therefore, it rejects any activity that could endanger individual safety, such as practices involving female genital mutilation, as well as any form of exploitation or subjugation of individuals, and any form of financing that could support or promote the perpetration of such conduct.

Additionally, the Company condemns any behavior aimed at illegally entering a foreigner into Italian territory or another state where the person is not a citizen or does not have permanent residency, with the aim of gaining any indirect profit. The Company also places primary importance on protecting minors and suppressing any exploitation behaviors of any nature directed towards them.

Furthermore, the Company commits to:

- avoiding any form of discrimination, particularly based on race, nationality, gender, sex, age, physical disabilities, sexual orientation, political or union opinions, philosophical beliefs, or religious convictions;
- not tolerating sexual harassment and physical or psychological harassment, in any form or context in which they occur;

- listening to the requests of company personnel, clients, and suppliers without prejudice or behaviors aimed solely at defending one's position;
- promoting the freedom to dissent, overcoming hierarchical and bureaucratic constraints;
- showing sensitivity and respect towards others, refraining from any behavior that could be considered offensive.

2.8.1 Protection of Company Personnel

Recognizing personnel as a fundamental and indispensable factor for company development, the Company finds it important to establish and maintain relationships based on mutual trust with employees and collaborators.

2.8.1.1 Selection of Company Personnel

At the time of hiring or entering into a collaboration, candidates are evaluated based on their suitability for the profiles required by the Company, also assessing professional and attitudinal characteristics that can be beneficially developed within the company.

Personnel are hired exclusively under regular employment contracts, with no tolerance for any form of irregular employment. Candidates are informed of all aspects related to their employment relationship. The HR function, within the limits of available information, takes appropriate measures to avoid favoritism, nepotism, or forms of clientelism in the selection and hiring phases.

2.8.1.2 Development of Company Personnel

The Company is committed to developing the skills and potential of personnel in carrying out their duties, ensuring that the abilities and legitimate aspirations of individuals are fully realized within the framework of achieving company objectives, without distinction of race, nationality, gender, sex, age, physical disabilities, sexual orientation, political or union opinions, philosophical beliefs, or religious convictions.

The Company is committed to offering equal employment and career growth opportunities to all employees and collaborators based on their skills and professional qualifications, without any discrimination, harassment, abuse, nepotism, or favoritism. Therefore, the Company insists that internal and external work relationships do not involve any kind of harassment, such as creating a hostile work environment towards individuals or groups, unjustifiably interfering with others' work, or creating obstacles and impediments to others' professional prospects.

It is the Company's commitment to provide training for all personnel and promote their participation in refresher courses and training programs, ensuring fair and

equal participation in training and development paths, with the presence of both genders, including leadership courses, so that the abilities and legitimate aspirations of individuals are realized alongside achieving company objectives.

2.8.1.3 Health and Safety of Company Personnel

Safeguarding the moral and physical integrity of employees and collaborators is a necessary condition for carrying out work activities. Therefore, the Company works to ensure the health and safety protection of company personnel and endeavors to consolidate and promote a safety culture, developing risk awareness among all personnel.

To this end, responsible and safe behaviors are promoted, and all necessary security measures are adopted to ensure a safe and healthy work environment, in full compliance with current legislation on prevention and protection.

2.8.1.4 Protection of Privacy

Employee privacy is protected by adopting standards that specify the information the company requires from employees and the related processing and storage methods. Any inquiry into the ideas, preferences, personal tastes, and, in general, the private lives of employees is excluded. These standards also include the prohibition, except as provided by law, of disclosing/sharing personal data without the prior consent of the data subject and establish rules for each worker's control to protect privacy.

2.8.2 Protection of Clients' Patients

The Company directs its activities towards satisfying the health needs and care requirements of its clients' patients, ensuring that services provided to clients guarantee the highest possible degree of effectiveness and quality. It is indeed a priority for Mediberg S.r.l. to care for patients by:

- responding professionally, promptly, and appropriately to client needs and ensuring the right to confidentiality of patient information that the Company may become aware of;
- identifying the best methods and tools available to best fulfill the duties of comprehensive and understandable information towards clients.

2.9 Protection of Free Competition, Environment, and Community

The Company conducts its activities by:

- pursuing corporate interests through fair and honest behaviors, recognizing competition as a positive stimulus for continuously improving the quality of

services offered to clients, and guiding its commercial conduct based on principles of fairness and integrity.

In its relationships with Public Clients, Mediberg S.r.l. adheres to principles of maximum transparency and fairness when dealing with individuals who can be classified as Public Officials (hereinafter referred to as PO) or Public Service Delegates (hereinafter referred to as PSD). This is done strictly in accordance with current laws and regulations, the principles set forth in the Code of Ethics and the Model, ensuring the absolute legitimacy of the Company's operations. Interactions with POs or PSDs – managed exclusively by designated Company functions authorized for such purposes – are conducted while maintaining correct boundaries of mutual independence in relations established with them, avoiding any actions or attitudes that could be interpreted as attempts to improperly influence their decisions.

- being inspired by principles of sound and prudent management, aiming to be a solid, reliable, transparent company open to innovation, responsive to ever-evolving client needs, attentive to shareholder interests, committed to enhancing human resources, and achieving more efficient organizational practices.
- ensuring the full compatibility of its activities with the local environment. To this end, the Company commits to conducting its business activities in full respect of the environment in the broadest sense, particularly by:
 - assessing the environmental impact of new activities and production processes;
 - responsibly and consciously using natural resources, implementing specific initiatives to improve the use of limited resources such as energy and water;
 - fostering constructive collaboration, characterized by maximum transparency and trust, both internally and with external communities and institutions in managing environmental issues;
 - maintaining high standards of safety and environmental protection through the implementation of effective management systems.

The Company also pledges to comply with environmental protection regulations. Environmental respect is further ensured through careful evaluation of the impact of its activities, guaranteeing projects that are compatible with the protection of the environment in which they operate.

3. Norms and Standards of Conduct for Company Personnel

3.1 Premise

This section aims to prescribe specific behavioral rules, i.e., actions or omissions concerning obligations to act or refrain (prohibitions) imposed by Mediberg S.r.l.,

which company personnel must adhere to, beyond and independently of regulatory requirements.

The conduct of company personnel in pursuing objectives and in concluding any operation must be inspired by principles of honesty, transparency, loyalty, non-discrimination, integrity, and correctness, in accordance with company policies as well as applicable laws and regulations. The belief that one is acting for the benefit or in the interest of Mediberg S.r.l. cannot justify behaviors contrary to the principles outlined in this Code of Ethics, whose widespread observance is of fundamental importance for the proper functioning and prestige of the Company.

3.2 Information, Assets, and Company IT Tools

Information, data, and knowledge acquired, processed, and managed by company personnel in the course of their duties must remain strictly confidential and appropriately protected. They cannot be used, communicated, or disclosed, either internally or externally, except in compliance with legal requirements and company procedures. Examples of confidential information include, but are not limited to: business plans, strategic, accounting, and commercial information; projects and investments; data related to personnel, clients, suppliers; performance and productivity metrics; corporate agreements, commercial contracts, and company documents; know-how related to the production, development, and marketing of medical devices; and company databases.

Company assets and IT tools must be used exclusively for work-related activities by company personnel. Under no circumstances are company assets, particularly IT resources and networks, to be used for purposes contrary to mandatory legal norms, public order, good morals, or to commit or induce the commission of crimes. Company personnel are required to use these resources responsibly and with due care to protect Mediberg S.r.l.'s assets and IT tools. Accordingly, personnel are responsible for protecting and using the assets and resources entrusted to them for their duties, and must promptly report any threats or harmful events to the relevant company departments.

Specifically, company personnel are required to:

- always operate in compliance with safety regulations stipulated by law and internal company regulations concerning the use of company IT assets, to prevent potential harm to property, individuals, or the environment;
- work to minimize the risk of theft, damage, or other threats to assigned assets and resources, promptly informing company management and/or the Supervisory Body in case of abnormal situations;
- not use company-provided IT tools to access, distribute, or publicize pornographic material, or to distribute or disclose information aimed at sexual enticement or exploitation.

Due to the Company's fundamental principles regarding the protection of intellectual property, company personnel are prohibited from:

- storing protected intellectual works on personal computers or removable devices provided by the Company, or uploading them onto the company network;
- holding unauthorized copies of protected software on removable devices provided by the Company;
- downloading unauthorized copies of protected software using the company network;
- installing unauthorized copies of protected software on devices and the company network;
- using others' works in the design and delivery of training courses or in advertising and marketing.

Additionally, personnel are prohibited from:

- reproducing, transferring to another medium, distributing, communicating, presenting, or demonstrating the content of a database illegitimately, or extracting or reusing data from it without permission;
- unauthorized access to an internal or external computer or telematic system protected by security measures, or remaining within such a system against the will of the rightful owner;
- improperly procuring, reproducing, distributing, communicating, or delivering codes, passwords, or other means for accessing a computer or telematic system protected by security measures, or providing instructions or guidance for such purposes, whether for personal gain or to harm others;
- distributing, communicating, or delivering computer programs designed to damage a computer or telematic system, its data, or programs contained or related to it, or interrupt, wholly or partially, or alter its operation;
- fraudulently intercepting any communication from or within the Company's computer or telematic system, or revealing its content in whole or in part through any means of public information;
- installing equipment designed to intercept, prevent, or interrupt communications related to a computer or telematic system outside cases permitted by law;
- destroying, damaging, deleting, altering, or suppressing others' information, data, or software, or engaging in activities directed at such acts concerning information, data, or software used by the State or other public entities or of public utility, or destroying, damaging, deleting, altering, or suppressing others' information, data, or software by introducing or transmitting data, information, or programs to render wholly or partially inoperable others' computer or telematic systems, or significantly hinder their operation.

3.3 Safety, Health, Environment

Regarding health and safety at work, company personnel are required to:

- follow instructions and guidelines provided by the Employer, Managers, and Supervisors for collective and individual protection purposes;
- use Mediberg S.r.l. assets and IT tools correctly as indicated in section 4.2.1 of this document;
- immediately report to the Employer, Manager, or Supervisor any deficiencies in the above-mentioned means, as well as any dangerous situations of which they become aware, and, in case of urgency and within their competencies, take action to eliminate or reduce serious or imminent hazards, informing the health and safety representative.

In terms of environmental protection, company personnel, with respect to future generations, are encouraged to develop environmental sensitivity. Therefore, based on their roles and collaboration methods within the Company, they are required to:

- comply with and enforce company instructions and guidelines for compliance with current environmental regulations;
- use designated spaces for waste collection and management; follow and respect company directives for the use and maintenance of work equipment;
- report any deficiencies that may compromise compliance with Company directives on environmental matters;
- not undertake operations or behaviors beyond their competency that may compromise environmental safety.

3.4 Conflict of Interest

Company personnel must avoid any situation or personal activity that could lead to conflicts of interest, including potential conflicts, with the company or interfere with their ability to make impartial decisions in the best interest of the Company.

Company personnel must actively communicate any actual or apparent conflicts of interest to their hierarchical supervisor and collaborate with them for a documented and transparent management of these conflicts.

In particular, members of the Corporate Bodies must maintain a position of independence, integrity, and impartiality, ensuring that no decisions are made or non-operational activities undertaken in situations, even potential or apparent ones, involving conflicts of interest. Any activity conflicting with the proper performance of their duties or potentially harming the interests and image of the Company must be avoided.

If a conflict of interest involves the Managing Director, a Partner, or a member of the Supervisory Board, they must abstain from exercising their decision-making role and delegate such responsibilities to other officials designated by the company's organization.

Additionally, members of the Corporate Bodies are required to:

- Act with autonomy, independence, and correctness towards public institutions, private entities, economic associations, political forces, as well as any other national and international entities.
- Ensure diligent and informed participation in meetings and activities of the corporate bodies.
- Maintain confidential use of information they are aware of due to their office, refraining from leveraging their position for personal gain, whether direct or indirect.

3.5 Transparency in Company Management

Company personnel handling documentation produced or received by the Company are prohibited from:

- Falsifying or altering, or colluding with a Public official or a Public Service appointee in falsifying or altering administrative certificates contained in an electronic document, or in falsifying or altering the conditions required for their validity.
- Colluding with a Public official or a Public Service appointee in producing and issuing a legal copy on an electronic document of a non-existent public or private act or a copy different from the original.
- Falsifying or colluding with a Public official or a Public Service appointee in falsifying a certificate.
- Falsely attesting, orally or in writing, to a Public official in a public act, in the form of an electronic document, facts that the document itself is intended to prove the truth of.
- Writing or allowing false entries in records, in the form of electronic documents, subject to inspection by the Public Security Authority, or in notifications, in the form of electronic documents, to the same Authority, concerning industrial or commercial operations.
- Creating wholly or partially false private documents, in the form of electronic documents, or altering true private documents, using them or allowing others to use them.
- Destroying, suppressing, or concealing wholly or partially a true private document or public act, in the form of an electronic document.
- Abusively using the company's digital signature or violating internal regulations governing its use.

Company personnel entrusted with maintaining accounting records must act so that all documents illustrating the Company's management situation are drafted with utmost care and in accordance with current laws and regulations, ensuring their accuracy and truthfulness.

For this purpose:

- Accounting evidence must be based on precise and verifiable information and fully comply with internal procedures issued by Mediberg S.r.l. regarding accounting.
- Each entry must allow for the reconstruction of the related operation and must be accompanied by adequate documentation. All actions concerning business activities must be documented in a way that allows verification and control over the decision-making, authorization, and execution processes.
- Each recording must be accurate, complete, truthful, and transparent.
- Regarding economic and asset elements based on evaluations, the related recording must comply with criteria of reasonableness and appropriateness, clearly explaining in the relevant documentation the criteria guiding the determination of the asset's value.
- It is prohibited to represent or transmit false, incomplete, or otherwise inaccurate data regarding the Company's economic, financial, and asset situation for the preparation of financial statements, reports, or other corporate communications and disclosures.

It is also the specific responsibility of the Managing Director and Partners to safeguard the integrity of the share capital, in accordance with current laws, to avoid impairing the guarantees of creditors and third parties in general. Therefore, they are prohibited, in particular, from:

- Returning contributions to shareholders or releasing them from the obligation to perform them outside cases permitted by law.
- Distributing profits (or advances on profits) not actually earned or legally reserved, and distributing reserves (even those not constituted with profits) that cannot legally be distributed.
- Acquiring or subscribing to shares in Mediberg S.r.l. outside cases provided by law, thereby undermining the integrity of the share capital or reserves not distributable by law.
- Carrying out reductions of share capital, mergers, or splits in violation of legal provisions protecting creditors.
- Carrying out fictitious formations or increases of share capital.
- Distributing corporate assets among shareholders – in liquidation phase – before paying corporate creditors or setting aside the necessary sums to satisfy them.

- Hindering or obstructing, by concealing documents or in any other fraudulent manner, the conduct of social management control or review by the Board of Statutory Auditors or the Auditor.

Regarding Active and Passive Invoicing, it must be carried out according to principles of truthfulness, correctness, and prior information.

Company personnel must ensure that every professional service is correctly recorded for billing purposes according to its actual duration and based on professional fee schedules or specific agreements concluded with the Client.

3.6 Relations with Political and Trade Union Organizations

Company personnel must refrain from any direct or indirect pressure on political representatives. Any relationship with political and trade union organizations and their representatives must be lawful and characterized by maximum transparency, integrity, and impartiality, aimed at establishing a correct dialogue.

3.7 Relations with Public Administration (PA)

In dealings with the PA, company personnel must operate clearly, rigorously, and consistently, avoiding collusive attitudes with the Public Administration. They must also collaborate fully with the PA, avoiding in any case to hinder its institutional activities.

Consequently, they are prohibited from:

- In any way influencing the decisions of Public Administration representatives improperly and/or illegally.

In particular, it is forbidden to:

- Accept, directly or indirectly, money, gifts, goods, services, performances, or favors related to relationships maintained with Public Officials or Public Service appointees.
- Offer or promise, directly or indirectly, money, gifts – except as later in paragraph 3.9 – goods, services, performances, or favors (including employment opportunities or commercial activities directly or indirectly attributable to the PU or PS) related to relationships maintained with Public Officials or Public Service appointees.
- Incur unjustified or contractually unforeseen representation expenses, with purposes other than merely promoting the corporate image, to influence their decisions, seeking more favorable treatment or undue benefits or for any purpose, including the performance of acts of their office.

- Mislead the PU or PS, using tricks or deceit to gain unfair profit for the Company to the detriment of the State, another Public Entity, or the European Union. In particular, compliance with the law and correct business practice is recommended in tendering, negotiations, concessions, licenses, etc., and requests for funding, grants, subsidies, and payments from the State or other Public Administration entities.

In case of explicit or implicit requests or proposals for benefits of any kind from Public Officials or Public Service appointees, it is mandatory for the addressees representing the interests and positions of the Company to:

- Suspend all relationships with them.
- Report the incident to the Oversight Body.

3.8 Commercial Relationships: Corporate Gifts and Gadgets, Donations, Sponsorships, Clinical Trials, Events, Representation Expenses

The company's personnel in managing commercial relationships must adhere to current laws and the company's internal regulations.

Authorized company personnel may offer gifts and acts of courtesy to Public Officials, Public Service Delegates, or any public employees only when these are of modest value, do not compromise the integrity and independence of the parties involved, and cannot be interpreted as a means to gain improper advantages.

In business relationships with Customers and Suppliers, authorized company personnel are prohibited from offering gifts, benefits, performances of any kind, whether direct or indirect, acts of courtesy and hospitality, unless they are of a nature and value that do not compromise the Company's image and cannot be interpreted as seeking preferential treatment not determined by market rules.

In compliance with the principles of traceability and documentability, it is necessary to keep records of the recipients of such gifts. The person who incurred the representation expense must therefore indicate on the expense justification (e.g., fiscal receipt, invoice, shipping document, etc.) the name of the person(s) and the company benefiting from the expense.

Authorized employees may engage in sponsorship activities, provided they are lawful and in the legitimate interests of the Company. Such activities - which, for example, may involve social, environmental, as well as sports and artistic fields - must concern events that offer guarantees of quality and seriousness, and must be adequately documented.

The Company prohibits its personnel from participating in donation proposals where there could be a potential conflict of interest of a personal or corporate nature (e.g., relationships of kinship with PA officials that could favor the Company). Authorized employees may engage in acts of generosity (donations of money or equipment, supplies of other materials) to recognized associations, foundations, as well as public and nonprofit entities, provided they comply with accounting, civil, and tax regulations.

In planning and conducting clinical trials, authorized employees must adhere to the principles contained in the relevant regulations. The start of each clinical trial must be preceded by an analysis of the expected results and the risks associated with the trial.

For authorized employees, it is appropriate to meet with Healthcare Professionals to market and promote Mediberg S.r.l.'s products, to discuss product features, contracts, and sales terms.

Regarding participation in events such as congresses, courses, visits to laboratories/production pavilions by Healthcare Professionals, authorized employees must adhere to all applicable regulatory provisions. In particular, Mediberg S.r.l.'s participation in congresses is subject to verification of the event's scientific nature, the reliability of the organizers, and the presence of a genuine interest for the company. The selection of speakers is based on objective criteria related to the nature of the event.

In dealings with Healthcare Professionals, it is appropriate to occasionally provide hospitality solely in the form of meals and modest receptions for participating Healthcare Professionals, which foster information exchange. It is also appropriate to cover reasonable travel expenses for participating Healthcare Professionals if necessary. However, it is not appropriate to cover meals, hospitality, travel, or accommodation expenses for guests of Healthcare Professionals or any other person who does not have a bona fide professional interest in the information shared at the meeting.

3.9 Relationships with Suppliers of Goods and/or Services

The Company and the Supplier must work towards building a collaborative and mutually trusting relationship. Therefore, company personnel are required to:

- in relation to Supplier selection, comply with current laws and the company's internal regulations; regulations aimed at regulating and tracing the procurement process of goods or services and based on objective

evaluations regarding the competitiveness, quality, utility, and price of the supply.

- regarding pre-contractual management: o to provide correct and timely information to the Supplier regarding the characteristics of the activity, forms, and times of payment in compliance with current rules as well as the expectations of the counterparty, given the circumstances, negotiations, and contract content; o to refrain from abusing their contractual strength and in any case from exerting undue pressure (including promises of gifts and other benefits or advantages in future negotiations) to impose conditions outside the market, with particular reference to prices and payment terms, or to induce a supplier to enter into a contract that is unfavorable to them.
- to refrain from engaging in business relationships: o with subjects who, even indirectly, hinder human development and contribute to violating fundamental human rights (for example, by exploiting child labor or illegal labor); o in general, with subjects known or suspected to be involved in illicit activities, particularly those related to organized crime, money laundering, terrorism, and in any case with individuals lacking the necessary requirements of commercial seriousness and reliability.

Therefore, in commercial transactions, company personnel, also in accordance with specific company procedures, must exercise particular care in receiving and spending coins, banknotes, credit securities, and values in general to avoid the danger of introducing counterfeit or altered values among the public.

Moreover, special attention must be devoted to relationships involving the receipt or transfer of sums of money or other benefits. Company personnel are required to:

- preliminarily verify the available information on business counterparts to ascertain their respectability and the legitimacy of their activity before establishing business relationships with them;
- avoid any involvement in operations that may, even potentially, facilitate the laundering of money derived from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering regulations and internal control procedures.

3.10 Customer Relations

Company personnel are required to manage relationships with Customers with professionalism, competence, correctness, transparency, courtesy, and impartiality. In particular, their behaviors towards Customers are always guided by:

- professional respect for confidentiality regarding information acquired during business activities, as well as compliance with current regulations on personal data protection;
- providing care and attention to every Customer or category of Customers, without any discrimination;
- independence from any improper conditioning, both internal and external.

In formulating contractual agreements with Customers, clauses must be clear and understandable, ensuring the maintenance of balanced conditions between the parties.

Furthermore, when initiating commercial relationships with new customers and managing existing ones, it is necessary, considering the available information, to avoid:

- engaging with individuals known or suspected to be involved in illicit activities, and in any case, with persons lacking the necessary requirements of commercial seriousness and reliability;
- funding illicit activities aimed at the production or marketing of highly polluting or dangerous products for the environment and health;
- engaging in financial relationships with economic activities that, even indirectly, hinder human development and contribute to violating fundamental human rights (e.g., by employing child labor).

Regarding the marketing activities carried out by the Company, all information or communication to Customers - including potential ones - regarding products marketed by the Company must be truthful, complete, correct, and compliant with the Consumer Code.

With that said, Mediberg S.r.l. does not allow or justify any form of misleading advertising or promotionally questionable activities, either legally or ethically.

Company personnel, concerning advertising messages, are required to:

- highlight the quality and excellence aspects of the Company;

- determine the relationship between the product/service offered and the real needs of the Customer;
- inform about the characteristics and costs of the product/service offered by Mediberg S.r.l..

Regarding any complaints filed by Customers, company personnel must ensure a timely response, aiming for a substantive resolution of disputes. Indeed, for the Company, complaints represent an opportunity for improvement to overcome conflicts and regain the trust and satisfaction of the Customer. To this end, the Company, in order to systematically listen to the Customer, conducts periodic Customer Satisfaction surveys as a source of information to identify and verify improvement objectives in the level of service offered by Mediberg S.r.l..

3.11 Relations with Competing Companies

As Mediberg S.r.l. recognizes competition as a positive stimulus for constant improvement in the quality of services offered to Customers and bases its commercial behaviors on principles of fairness and correctness, company personnel are prohibited from:

- counterfeiting, altering, or using trademarks or distinctive signs, models, designs, or patents, whether national or foreign, of products for which, with ordinary and qualified diligence, the existence of others' industrial or intellectual property rights can be known;
- introducing into the territory of the State, holding for sale, selling, or circulating products with protected trademarks or other distinctive signs, whether national or foreign, that are counterfeit or altered;
- illegitimately preventing or hindering the exercise of a business or the carrying out of acts of unfair competition;
- delivering to the customer a product that deviates from the contractual conditions or from what was agreed or promised, or that is misleading to the buyer about the origin, source, technical specifications, or other essential characteristics of the product;
- designing, producing, using, holding for sale, selling, or circulating products or intellectual works by usurping industrial or intellectual property titles or in violation of them, with the possibility of knowing their existence with ordinary and qualified diligence.

3.12 Relations with the Mass Media

Company personnel entrusted with managing relations with the Mass Media are required to handle relationships with the press and media while respecting the right to information and safeguarding the market and stakeholders' interests.

With that said, the dissemination of news related to Mediberg S.r.l. is exclusively the responsibility of designated individuals, in accordance with the procedures adopted by the Company.

Any request for information from the press or media received by Mediberg S.r.l.'s personnel must be communicated to those responsible for external communication before committing to any response.

External communication must adhere to the principles of truth, correctness, transparency, appropriateness, and must aim to promote understanding of the company's policies and programs. Relations with the Mass Media must respect the law, the Code of Ethics, and the principles outlined concerning relations with public institutions and commercial relationships, aiming to protect the Company's image. Additionally, the Company bases its external communication (marketing, advertising) on responsibility, avoiding gender stereotypes in advertising actions, ensuring periodic review of materials and marketing strategies, and committing to promoting a positive image of women and girls, using language respectful of gender differences.

4. RULES AND BEHAVIORAL STANDARDS FOR AGENTS

The Agent is authorized to appoint sub-agents, whose names must be communicated in advance to the Company so that Mediberg S.r.l. can assess their compliance with the requirements set for external collaborators by Legislative Decree 231/01.

Sub-agents must also sign a declaration acknowledging that Mediberg S.r.l. intends to adopt behavior in line with what is expressed in the Organizational, Management, and Control Model adopted under Legislative Decree 231/01. The Agent bears exclusive responsibility for the sub-agents' execution of their assignment and for their compensation.

The sub-agency contract must be in writing, and the Agent must be obliged to promptly transmit to Mediberg S.r.l., upon its signing, a copy of the contract containing only the clauses concerning the relationship between Mediberg S.r.l. and the sub-agent.

The Agent undertakes to ensure that sub-agents comply with the Code of Ethics and the specific procedures established by Mediberg S.r.l. regarding activities at risk of offense, pursuant to Legislative Decree 231/01, through the contract's signature.

Agents are subject to the rules and behavioral standards outlined in the sections: Relations with Public Administration (PA), Business Relations: corporate gifts and gadgets, donations, sponsorships, clinical trials, events, representation expenses, Customer Relations, of this document, according to their respective competencies.

5. RULES AND BEHAVIORAL STANDARDS FOR SUPPLIERS OF GOODS AND/OR SERVICES, DISTRIBUTORS, PARTNERSHIPS, CUSTOMERS

In their dealings with Mediberg S.r.l., Third Parties, in fulfilling their contractual obligations, must adhere, within their respective competencies, to the principles outlined in Chapter 2 of this document and operate in compliance with applicable regulations and the contract entered into with Mediberg S.r.l.. Additionally, these entities are encouraged to conduct their activities following conduct standards consistent with those indicated in the Code of Ethics.