

# Code of Ethics

Pursuant to articles 6 and 7 of Legislative Decree no. 231/01

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## PREMISE

The Code of Ethics, promulgated pursuant to articles 6 and 7 of Legislative Decree no. 231/01 (hereinafter the Decree) and the Guidelines issued by Confindustria, constitutes the fundamental tool in the process of dissemination and sharing of corporate principles, in order to provide a model for anyone, whenever they are called upon to make a decision on behalf of the company.

The issuing of the Code of Ethics is one of the tools implemented by MEDAC Srl in order to guarantee the dissemination and observance of principles, norms and general standards of behavior, aimed at safeguarding the reference ethical values.

The rules of this Code do not replace but rather integrate the fundamental duties of workers and do not exempt them from the mandatory observance of the civil and criminal legislation in force on the matter.

The Code of Ethics is, moreover, one of the indispensable elements of the organizational-managerial and corporate control model (hereinafter for brevity also referred to as just Organizational Model), which MEDAC Srl has decided to adopt.

Therefore, this text, on the one hand, adheres to the complex corporate reality of MEDAC Srl and, on the other hand, also takes into account the inspiring principles and experiences gained since the introduction of the Decree, containing provisions specifically aimed at preventing the commission of the so-called presupposed crimes referred to in the aforementioned Decree.

Directors, auditors, managers, executives and employees at any level of the company must consequently refrain from carrying out, collaborating or causing the implementation of behaviors that could constitute, even potentially, criminal offences included among those referred to in the Decree.

## 1. SCOPE OF APPLICATION AND METHODS OF IMPLEMENTATION

### 1.1. RECIPIENTS

This document, called “Code of Ethics” (hereinafter also referred to as the Code), regulates the set of rights, duties and responsibilities of all employees and collaborators of MEDAC Srl, and of all those who establish relationships or relations with the same.

The directors, auditors, members, employees and collaborators, but also third parties who, in any capacity, carry out activities in the interest or in favor of MEDAC Srl (hereinafter also Recipients) are required to comply with the rules contained in this Code in the exercise of their functions.

### 1.2. DISTRIBUTION AND TRAINING

MEDAC Srl ensures the dissemination of the Code and its updates to recipients, such as:

- Transmission via email and/or hand delivery to members of corporate bodies, employees and collaborators on an ongoing basis and providing, where deemed appropriate, for the signing of a declaration by which the recipient of the Code certifies receipt, reading and acceptance (e.g. upon hiring);

- Publication on the website [www.medac.it](http://www.medac.it) and availability on the company intranet, as well as by posting on the company notice board;
- Information for occasional collaborators and suppliers regarding the existence and contents of the Code;
- Insertion, in the stipulated contracts, of a clause aimed at informing third parties of the existence of the Code and the Model that they will have to declare to have viewed, accepted and will be required to respect. This clause will also be integrated with the provision of remedies (such as, for example, suspension or termination of the contract) aimed at sanctioning violations of the obligations undertaken by third parties.

MEDAC Srl also undertakes to prepare a specific and differentiated training/information plan for company roles, aimed at disseminating the principles and ethical standards on which the entire activity of MEDAC Srl is based.

### 1.3. SUPERVISORY BODY AND REPORTING SYSTEM

MEDAC Srl undertakes to enforce the provisions of the Code of Ethics through the establishment of a Supervisory Body established pursuant to Legislative Decree no. 231 of 8 June 2001, which is also entrusted with the task of ensuring the implementation of the principles contained in this Code.

The tasks of the Supervisory Body will be:

- promote knowledge of the Code among all subjects to whom it is addressed through specific communication activities, including specific information activities for new hires;
- raise awareness among managers, employees and collaborators on ethical issues;
- assist MEDAC Srl in the correct application of the Code's conduct criteria;
- ascertain the degree of application of the principles set out in the Code;
- ascertain cases of violation of the principles and criteria of conduct of the Code and the Organizational Model provided for by Legislative Decree 231/2001 and propose any disciplinary measures to the company;
- periodically report to the Administrative Body on the activities carried out;
- propose appropriate revisions to the Code and the Organizational Model.

Any non-compliance with the Code of Ethics and the Organizational Model must be reported in writing.

Reports may be sent to the Supervisory Body via email: [odv231@medac.it](mailto:odv231@medac.it) or by post, sending them to the address: Via Roberto Wenner, 52 – 84131 Salerno

Reports that are clearly unfounded will result in sanctions being applied to the responsible party.

The Supervisory Body undertakes to protect the authors of the reports against any retaliation they may face, and to keep their identity confidential, except for specific legal obligations.

The Supervisory Body shall hear separately the author of the report and the person responsible for the alleged violation and shall forward its findings to the Administrative Body.

### 1.4. VIOLATION OF THE CODE

Violations of the provisions of the Code of Ethics and the Organizational Model damage the relationship of trust established between the individual who committed the violation and MEDAC Srl, and consequently entail disciplinary action regardless of the possible initiation of a trial, in cases where the behavior constitutes a crime.

Compliance with the provisions of the Code of Ethics and the procedures set forth in the Organizational Model must be considered an essential part of the contractual obligations of MEDAC Srl employees pursuant to art. 2104 of the civil code "diligence of the employee", as well as for MEDAC Srl collaborators.

The above sanctions must be applied in compliance with the provisions of art. 7 of Law 20 May 1970 n. 300 (Workers' Statute) and the provisions contained in collective labor agreements.

The Administrative Body, after receiving the notification of the violation from the Supervisory Body, shall contest the aforementioned violation in writing to the author.

The latter, within 5 days of receiving the complaint, may present written justifications or request to be heard orally.

Once the appropriate checks have been carried out, the Board of Directors will issue any disciplinary measures.

Sanctions must be communicated in writing to the interested parties.

## 2. THE VALUES OF THE COMPANY

### 2.1. HONESTY AND FAIRNESS

Honesty is the ethical principle of reference in every initiative of MEDAC Srl

All employees and collaborators of MEDAC Srl are required to comply with the laws and regulations in force, the Code of Ethics, the Organizational Model and the internal procedures of MEDAC Srl, applying them with honesty and fairness.

In no case can the pursuit of the objectives, including economic ones, of MEDAC Srl justify dishonest conduct.

MEDAC Srl operates in compliance with the law, aware that the principles of legality and transparency are models of conduct that tend to maximize the value of the company in the long term for its members and for the community.

The principle of fairness implies that everyone, in carrying out their duties, respects the rights of each person.

The actions and behaviors of the Recipients of this document must be inspired by correctness and mutual respect.

### 2.2. INTEGRITY AND LOYALTY

In relations with third parties, the recipients of the Code of Ethics undertake to act in a correct and transparent manner, avoiding misleading information and behaviors that take undue advantage of others' positions of weakness or ignorance.

External relations, relations with one's collaborators and those between the latter must be characterised by the utmost loyalty, which consists in faithfulness to the given word, to promises and agreements, in acting with a sense of responsibility, in the valorisation and safeguarding of the company's assets and in the application of an attitude of complete good faith in every activity or decision.

### 2.3. IMPARTIALITY'

In the choice of customers, in the management of personnel, in the organization of work, in the selection and management of suppliers, in relations with the surrounding community and the institutions that represent it, MEDAC Srl avoids any discrimination based on age, sex, sexuality, state of health, race, nationality, political opinions and religious beliefs of its interlocutors.

### 2.4. TRANSPARENCY

The principle of transparency, applicable both in the internal management of the company's activity and in relations with third parties, implies the commitment of all to provide the necessary information in a clear and complete manner by adopting verbal and written communication that is easy and immediately understandable.

This principle applies within the limits of the protection of the company's know-how and assets.

This is so that, both in internal relations and in institutional or business relations, anyone is able to make autonomous and informed decisions.

### 2.5. CONFIDENTIALITY

MEDAC Srl keeps confidential the news and information constituting corporate assets or inherent to the activity of MEDAC Srl. Furthermore, the latter undertakes to treat personal data and confidential information, relating to employees, collaborators or subjects with whom it maintains relationships, in compliance with the laws on confidentiality in force in the countries in which it operates, including the national legislation in force on the protection of personal data pursuant to Legislative Decree no. 196/2003, as well as EU Regulation 2016/679, and the most effective procedures for the protection of privacy.

### 2.6. RESPECT FOR THE PERSON

MEDAC Srl promotes the value of the person through respect for physical, cultural and moral integrity, rejecting any type of discrimination and rejects all forms of forced, compulsory and child labour.

MEDAC Srl recognizes individual merit, work performance and professional potential as determining criteria for salary and career development.

### 2.7. MEMBERS' PROTECTION

The members are the main partners of MEDAC Srl to achieve success.

For this reason, MEDAC Srl directs its research, development and marketing activities towards high quality standards.

MEDAC Srl protects its members regardless of the value of the share capital.

MEDAC Srl favors the participation of the member in the social life, guaranteeing adequate information.

### 2.8. FAIR COMPETITION

MEDAC Srl protects the value of competition, provided it is based on fairness, avoiding the use of illegitimate or otherwise incorrect behavior to achieve its statutory and economic objectives.

## 2.9. PROHIBITION OF CORRUPT PRACTICES

The practice of corruption, whether towards public or private individuals and entities, constitutes a crime and, in addition to being harmful to the entire economic system, constitutes a significant risk for MEDAC Srl, due to the serious legal and image implications that it may entail.

MEDAC Srl therefore condemns and opposes any type of corrupt behavior, whether its own or that of third parties, towards both public officials and/or public service employees, and private individuals or entities, whether Italian or foreign.

MEDAC Srl expressly prohibits the giving or acceptance of money or other benefits (objects, services, performances or favours of value) to any person or from any person (a member, a customer, a supplier, a public body, etc.) for an undue interest or advantage.

In particular, when any business negotiation, request or relationship with a public or private individual or body is underway, it is not permitted:

- offer privileges to the individual involved or to his/her family members, such as employment and/or business opportunities;
- provide, promise to accept or encourage money, gifts, presents or any other benefit to the person involved or to his/her family members;
- offer or receive confidential information that could personally benefit the person involved or that violates equal treatment and the negotiation procedures activated;
- provide donations or accede to any request for contributions/sponsorships that may influence business negotiations;
- induce the subject to successfully complete checks in the event of inspections or checks by the authorities;
- carry out services for third parties that cannot be adequately justified;
- make a payment to a beneficiary other than the contractual counterparty;
- use anonymous instruments to carry out actions or transfer operations involving significant amounts (e.g. cash, bearer financial instruments, anonymous passbooks or current accounts or fictitious names);
- use company funds and resources without formal authorization.

## 2.10. ENVIRONMENTAL PROTECTION

In terms of environmental protection, MEDAC Srl carries out its activities taking into account the need for environmental protection and sustainable use of natural resources, in accordance with the provisions of current environmental legislation.

In particular, in terms of respect and protection of the environment, MEDAC Srl:

- manages, through selected suppliers, the waste produced in compliance with current regulations, verifying that third parties have the authorizations, registrations or communications necessary to carry out the activities, and working towards the traceability of the process and the control of the supply chain;
- makes its development and investment choices taking into account and limiting potential impacts on the territory and the environment.



MEDAC Srl condemns any type of action and behavior potentially harmful to the environment and the territory.

### 3. GENERAL ETHICAL PRINCIPLES

#### 3.1. STAFF RELATIONSHIPS

##### 3.1.1. Personnel Management

MEDAC Srl considers the relationship with each individual collaborator central to its growth policy. MEDAC Srl aims to enhance diversity, offering growth opportunities to all staff, without discrimination based on gender, age, religious faith, origin, political opinion, sexual orientation.

MEDAC Srl prohibits employees from any type of harassment towards colleagues, collaborators and guests. Harassment includes, but is not limited to, behaviors aimed at humiliating, insulting or intimidating on the grounds of gender, ethnicity, sexual orientation, disability, age, religious faith, political opinions.

For any decision relating to an employee or collaborator (e.g. cases of promotion and/or transfer), MEDAC Srl will adopt criteria of merit, competence and correspondence between the professional profiles of the employees and the needs of the company.

In hierarchical relationships, MEDAC Srl is committed to ensuring that authority is exercised with fairness, avoiding any possible abuse and ensuring that the dignity and autonomy of the employee/collaborator are not harmed.

##### 3.1.2. Staff selection and hiring

Staff must be selected based on the match between the quality and skills of the candidates and the company's needs, ensuring equal opportunities for all candidates.

The Personnel Department, within the limits of the information available, adopts all appropriate precautions to avoid favoritism and nepotism or forms of clientelism in the selection and hiring phase of personnel.

The selection staff is required to declare the presence of their relatives among the candidates and to abstain, in this case, from the selection activity.

All staff are hired with a regular employment contract and no form of irregular work is permitted.

Upon hiring, staff are adequately informed about:

- Content and purpose of the assigned task;
- Regulatory and economic elements, as regulated by national and company collective agreements (also through the delivery of a copy of the CCNL);
- Measures to be taken to avoid possible health and safety risks in the workplace.
- Obligation to comply with the provisions for the protection of personal data.

Employees, collaborators, directors and temporary workers are subject to the obligation to respect the principles contained in this Code of Ethics.

##### 3.1.3. Safety and health

MEDAC Srl is committed to spreading and consolidating the culture of safety at work, promoting responsible behavior by all employees, taking action to prevent risks to the health and safety of workers and working towards the continuous improvement of the efficiency of company structures and machinery. To this end, MEDAC Srl carries out continuous monitoring and updating of work methodologies, carries out a periodic analysis of risks connected to work activities, arranges training and updating of employees in safety matters.

MEDAC Srl is also committed to protecting the moral and psychological integrity of workers, guaranteeing them the right to working conditions that respect the dignity of the person and safeguarding workers from

acts of psychological violence and from any form of discrimination.

All employees are required to strictly comply with the rules and obligations arising from the health and safety legislation, as well as to comply with all health and safety measures provided for by internal procedures and regulations.

### 3.2. DUTIES OF ALL EMPLOYEES, COLLABORATORS AND CONSULTANTS

The Recipients must be aware of the Code of Ethics and have the obligation to refrain from conduct contrary to the reference standards and to promptly inform their superiors or the Supervisory Body of possible violations of the Code and the Organizational Model. The obligation of those who receive such information is to maintain confidentiality regarding the identity of the whistleblower.

### 3.3. DUTIES OF MANAGERS

The manager is required to observe, like all employees, the current legislation and this Code, giving concreteness to the values and principles of the same, taking on responsibilities towards the outside and strengthening trust, cohesion and team spirit.

It is the duty of each manager to set an example for his or her employees through his or her behavior.

The manager is also required to monitor compliance with the provisions of the Code by employees, adopting the necessary measures and controls to this end.

### 3.4. INFORMATION MANAGEMENT AND PRIVACY

All employees and collaborators must know and implement the provisions of company regulations and procedures, as well as the current legislation on information security, in order to guarantee their integrity, confidentiality and availability.

In particular, each employee and collaborator must not communicate passwords and access codes of which he or she is in possession for any reason, must not carry out unauthorised access to other people's computer systems and must not engage in behaviour aimed in any way at destroying or damaging computer systems or information.

Each employee is also required to prepare their own documents using clear, objective and exhaustive language, allowing for any checks on truthfulness, completeness and clarity by internal managers or external parties authorised to request them.

The privacy of employees and collaborators is protected in accordance with the relevant legislation.

MEDAC Srl collects and processes personal data, sensitive and otherwise, of its employees and of the natural and/or legal persons with whom it maintains relations or relationships. This processing is carried out in accordance with the methods and limits set forth in Legislative Decree 196/2003 and subsequent amendments, as well as in EU Regulation 2016/679.

It is forbidden to communicate and/or disseminate personal data without the prior consent of the interested party.

### 3.5. USE AND SAFEGUARDING OF COMPANY RESOURCES AND ASSETS

All employees and collaborators of MEDAC Srl are required to operate with due care and diligence to protect the company's resources and assets, both tangible and intangible, through responsible behavior consistent with the operating procedures established to regulate their use.

Each employee is responsible for the resources entrusted to him and has the duty to promptly inform the General Management regarding any threats or damaging events for MEDAC Srl itself or for its assets.

The protection and preservation of such assets is necessary in order to safeguard the interests of MEDAC Srl and their use must be limited to that required by the specific activity assigned to the employee.



Each employee and collaborator is required to act diligently to protect company assets from improper or incorrect use, and to promptly report any use or illicit treatment of such assets by third parties or other collaborators.

Furthermore, each employee is required to act in order to reduce the risks of theft, damage or other threats to assets, promptly informing the relevant management in the event of anomalous situations.

The documents, work tools, systems, equipment and any other tangible and intangible property of MEDAC Srl are used exclusively and instrumentally for the achievement of institutional purposes, with the methods established by the same; they cannot be used by collaborators for personal purposes, nor be transferred or made available to third parties and must be used and kept with the same diligence as one's own property.

In particular, with regard to IT applications, each employee is required to carefully adopt the provisions of company security policies in order not to compromise the functionality and protection of IT systems.

### 3.6. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

MEDAC Srl ensures, in implementation of the principle of compliance with the laws, compliance with internal, community and international regulations for the protection of industrial and intellectual property.

The Recipients promote the correct use, for any purpose and in any form, of trademarks, distinctive signs and all works of the mind of a creative nature, including computer programs and databases, to protect the author's property and moral rights.

To this end, it is forbidden to carry out any conduct aimed, in general, at counterfeiting, alteration, duplication, reproduction or diffusion, in any form and without rights, of the work of others.

### 3.7. ACCOUNTING RECORDS

Each operation or transaction must be correctly recorded in the company accounting system according to the criteria indicated by law and accounting principles. It must also be duly authorised, verifiable, legitimate and appropriate: for each operation, there must be supporting documentation in order to allow, at any time, the carrying out of checks capable of certifying the characteristics and motivations of the accounting operation and the verification of the decision-making, authorisation and implementation process, as well as the identification of the various levels of responsibility.

### 3.8. FORMATION OF THE BALANCE SHEET AND SIMILAR DOCUMENTS

All Employees involved in the preparation of the financial statements or other similar documents must act in compliance with the following principles:

- Maximum collaboration;
- Completeness and clarity of the information provided;
- Accuracy of data and processing;
- Prompt reporting of any conflicts of interest.

### 3.9. CONFLICT OF INTEREST

All employees, collaborators in any capacity, as well as the management of MEDAC Srl are required to avoid situations in which conflicts of interest may arise, which could prejudice the company's interests, or interfere with their ability to make impartial decisions.

Furthermore, such individuals must refrain from taking personal advantage of acts of disposal of company assets or business opportunities of which they have become aware in the course of carrying out their duties.

The following are examples of situations that could lead to a conflict of interest:



- employees or collaborators who act in conflict with the fiduciary duties associated with their position;
- failure to comply with the duty to abstain from maintaining external professional relationships with parties towards whom there is an obligation of neutrality and impartiality;
- individuals, required to comply with this Code, who carry out an activity in conflict with the correct fulfillment of their corporate duties/functions;
- having economic interests with suppliers, customers, or competitors, even through family members (owning shares or holding professional positions, etc.);
- the performance of work activities, even by a family member, at suppliers;
- the acceptance of money or favors from people or companies who have or intend to enter into business relationships with MEDAC Srl or with companies controlled by it.

Any situation in which a conflict of interest occurs, with possible damage to the company, must be promptly communicated by each employee to their superior or contact person. company and to the Control Committee, which evaluates its actual existence on a case-by-case basis and determines the measures to be adopted.

## 4. RULES OF CONDUCT IN RELATIONS WITH SUBJECTS OUTSIDE THE COMPANY

### 4.1. EXTERNAL COMMUNICATIONS

MEDAC Srl's communications to parties external to the company, including through the mass media, are based on respect for the right to information.

Under no circumstances is it permitted to disseminate false or biased news or comments.

All communication activities, including advertising campaigns, publication of articles in the press, on websites or blogs, are carried out with clarity and transparency and must be based on compliance with the communication policy defined by the administrators and previously agreed with the Office responsible for managing communications and external relations.

### 4.2. RELATIONS WITH REPRESENTATIVES OF POLITICAL FORCES

MEDAC Srl maintains relationships with representatives of political forces for the sole purpose of deepening its knowledge of the issues of its interest and of transparently promoting its positions and activities.

MEDAC Srl does not finance or support political parties or their representatives and remains strictly neutral as to political alignments.

Relations with representatives of political forces are handled exclusively by the Administrators or by persons delegated by them.

### 4.3. RELATIONS WITH INTEREST ASSOCIATIONS

MEDAC Srl maintains relations with interest associations (for example: Industrialists' Union, Trade Associations, Chambers of Commerce, etc.), in order to develop its activities, establish forms of cooperation of mutual benefit and present its positions on issues of common interest.

Relations with interest associations are handled exclusively by the Administrators or by persons delegated by them.

#### 4.4. SPONSORSHIPS AND CONTRIBUTIONS

MEDAC Srl can provide contributions and sponsorships to support initiatives proposed by public and private bodies and non-profit associations.

Sponsorships and contributions may concern events and initiatives of a social, cultural, sporting and artistic nature; they may also be aimed at the realization of studies, research, conferences and seminars on topics of interest for MEDAC Srl.

The determination of granting contributions and sponsorships and the indication of the methods of execution are left to the Administrative Body.

In any case, in selecting initiatives, MEDAC Srl operates with extreme care to avoid any possible situation of conflict of interest at a personal and/or corporate level, or cost increases that are not compatible with the economic data.

#### 4.5. PRIVACY AND CONFIDENTIALITY

The information of all subjects external to the company is treated by MEDAC Srl in full compliance with the current legislation on privacy, namely Legislative Decree 196/2003 and subsequent amendments and EU Regulation 2016/679.

Furthermore, the disclosure of "confidential" information by anyone who has knowledge of it is prohibited. Knowledge of the following must be considered "confidential": a project, a proposal, an initiative, a negotiation, an understanding, a commitment, an agreement, a fact or an event, even if future and uncertain, pertaining to the sphere of activity of MEDAC Srl, which is not in the public domain and which, if made public, could cause harm to MEDAC Srl

Furthermore, the company's forecast and final accounting data are considered "confidential" information until they are disclosed to the public in accordance with the provisions of the civil code or by express determination of the Directors.

The corporate bodies, management and employees and collaborators, in any capacity, of MEDAC Srl, who, for reasons of office, become aware of confidential information must not communicate it to third parties.

#### 4.6. GIFTS, FREEBIES AND BENEFITS

It is forbidden to receive and/or offer gifts or gratuities that exceed normal commercial and courtesy practices.

In particular, public officials may not be offered gifts of such value as to influence their independence of judgment or induce them to unduly favor the company.

Employees and collaborators of MEDAC Srl who receive gifts or benefits exceeding normal commercial practices are required to notify the Head of the relevant Office and the Supervisory Body.

#### 4.7. CUSTOMERS AND SUPPLIERS

##### 4.7.1. The selection parameters and principles to be respected in negotiations

The choice of suppliers and customers is based on mutually loyal, transparent and collaborative pre-contractual behaviors, characterized by high professionalism.

To this end, the selection of suppliers or customers and the determination of purchasing conditions is based

on objective parameters such as quality, convenience, price, capacity and efficiency, also making use of lists of trusted suppliers or customers and previous experience.

The criteria on the basis of which MEDAC Srl chooses suppliers and customers are, in particular:

- a. professionalism of the interlocutor;
- b. availability, possibly documented, of means, including financial ones, and of organised structures, project capabilities and resources;
- c. existence of quality, safety and health control systems for providers;
- d. provision of systems for environmental protection;
- e. timeliness of interventions or supplies, or, in the case of customers, of payment of the fee;
- f. reliability resulting from previous experiences.

In order to make the provisions of this code effective, in the pre -contractual phase , the company's collaborators are committed to:

- a. observe internal procedures for the selection and management of relationships with suppliers and customers;
- b. do not discriminate against suppliers or customers;
- c. inform suppliers and customers of the existence of the code of ethics and that its acceptance constitutes an essential condition for any relationship;
- d. always respect the commitments and obligations undertaken;
- e. adopt a style of behavior towards customers and suppliers characterized by efficiency, correctness, collaboration and courtesy;
- f. provide accurate, complete and truthful information;
- g. adhere to the truth in advertising or other communications;
- h. promptly report to the Supervisory Body any behavior by a supplier or customer that appears to be contrary to the ethical principles of the Code of Conduct.

If the supplier or customer, in carrying out negotiations, adopts behaviors that are not in line with the general principles of this code, MEDAC Srl will preclude any other opportunities for collaboration.

Finally, with specific regard to suppliers, MEDAC Srl absolutely prohibits making donations , benefits, gifts or acts of courtesy of any kind to them that could be interpreted as being aimed at obtaining preferential treatment.

#### 4.7.2. Conclusion of the contract and execution of the relationship

In the execution of business relationships with suppliers, the conduct of MEDAC Srl is inspired by mutually loyal, transparent and collaborative contractual behaviors and characterized by high professionalism.

In particular, in carrying out the relationship, the company's collaborators are committed to:

- a. apply internal regulations and procedures in managing the relationship;
- b. always respect the commitments and obligations undertaken;
- c. adopt a style of behavior towards customers and suppliers characterized by efficiency, correctness, collaboration and courtesy;
- d. provide accurate, complete and truthful information;
- e. adhere to the truth in advertising or other communications;
- f. promptly report to the Supervisory Body any behavior by a supplier or customer that appears to be contrary to the principles of the Code of Ethics.

Likewise, the principles set forth in this document constitute criteria of conduct, which suppliers and customers of MEDAC Srl are required to comply with. To this end , the Code of Ethics must be expressly referred to in the agreements stipulated with customers and suppliers, as an integrative act of the contractual determinations.

If the supplier or customer, in carrying out their business for MEDAC Srl, adopts behaviors that are not in line with the general principles of this code, MEDAC Srl will preclude any other opportunities for collaboration.

#### 4.8. RELATIONS WITH THE PUBLIC ADMINISTRATION

Relations with the public administration must be characterised by maximum correctness and transparency in compliance with the principle of impartiality.

Recipients are strictly prohibited from promising or offering payments or other benefits of any kind to public officials, employees or members of the public administration in general, in order to promote or favor the interests of the company.

It is not permitted to submit false declarations to national or community public bodies in order to obtain public grants, contributions or subsidized financing, or, in any case, in order to obtain an economic advantage or to obtain concessions, authorizations, licenses or other administrative acts.

It is prohibited to allocate sums received from national or community public bodies as grants, contributions or financing, for purposes other than those for which they were assigned.

#### 4.9. ENVIRONMENTAL POLICY

MEDAC Srl considers environmental issues to be of high importance.

To this end, in the management of business activities, MEDAC Srl takes into account environmental protection and energy efficiency with the objective of sustainable development.

These values must also be shared by subjects external to MEDAC Srl, and linked to it by contractual relationships, which, by signing specific contractual clauses, undertake to comply with environmental legislation and to implement all preventive measures to avoid or at least minimize environmental impact.

### 5. CODE APPROVAL

This Code of Ethics was approved by the Administrative Body of MEDAC Srl on 10/12/2023.

The Administrative Body may review the Code at any time and make changes or additions to it, including upon reports from the Supervisory Body.