

CODE OF ETHICS

Approved by the Board of Directors of Lifebrain Srl¹ on 30 December 2020 in version No. 5.

MISSION AND VISION

This Code of Ethics represents the elements on which the identity and corporate culture of the companies belonging to Lifebrain and Lifeanalytics (hereinafter "the Group") are based, so that they may become guidelines for future choices as well as the standard of conduct for the performance of the Group's activities.

The Code of Ethics is addressed to the members of the corporate administrative and control bodies and to the employees of all the companies belonging to the group, and to any third party, such as suppliers, commercial and industrial partners, who collaborate or work in the name of or on behalf of or in the interest of the group, wherever they operate and in whatever way they contribute to creating value with a view to environmental sustainability.

The document is published on the websites www.lifebrain.it and www.lifeanalytics.it.

Contents

Foreword.....	4
The company.....	4
1. Structural purpose and scope of the Code.....	5
2. Common ethical values, cooperation and communication	6
2.1 Relations with subsidiaries	6
3. Ethical principles.....	7
3.1 External relations – Communication with the external environment... ..	10
3.2 Relations with users	11
3.3 Relations with customers in the context of chemical environmental and food analysis	12
3.4 Relations with the Public Administration.....	12
3.5 Relations with organisations and associations	14
3.6 Relations with suppliers.....	14
3.7 Conflicts of interest.....	15
3.8 Gifts and acts of kindness	15
4. Adherence to the UN Global Compact	16
5. Management of financial resources and accounting transparency.....	16
6. Internal relations	17
6.1 Employee rights and duties.....	17
6.2 Human resources management.....	19
6.3 Environment and safety	19
7. Misconduct.....	20
7.1 Harassment and discrimination	20
7.2 Alcohol or drug abuse	21
7.3 Smoking	21
7.4 Anti-money laundering.....	21
8. Handling of confidential information and protection of privacy	21
9. Compliance with regulations on individual safety	22
10. Accounting books and company registers.....	23
11. Information flows to the Supervisory Body	23
12. Supervisory Board controls.....	24
13. Violations and disciplinary sanctions	25
14. Diffusion and dissemination of the Code of Ethics.....	25

Foreword

The company

Lifebrain Srl, formerly Laboratorio Analisi Guidonia Srl (hereinafter also referred to as "the Company or Laboratory"), was established in 1976 in the ASL RM/G district as an accredited laboratory (under agreement) with the Italian National Health Authority (SSN).

Since its creation, the company has experienced continuous growth in size, in the number of patients and in the constant search for the technical and scientific quality of the clinical tests carried out. In fact, in addition to serving around 40,000 citizens who directly attend the centre each year, the laboratory carries out tests on behalf of other public and private bodies and companies of national importance. In 2002, with the opening of the Chemistry and Toxicology section for judicial use, the company became the reference laboratory for the Public Prosecutor's Office at the Ordinary Court of Tivoli. It is also a highly qualified research laboratory registered with MIUR (the Italian Ministry of Education, University and Research). In 2010, Lifebrain obtained accreditation with ASL RM/G, RM/E and ASL Rieti for the performance of second level toxicological tests, in compliance with Regional Government Decree 332/2009.

In 2014 the laboratory was acquired by Lifebrain AG, a Viennese private equity operator specialised in the acquisition of medium-sized diagnostic laboratories throughout Europe.

Under Lazio Regional Resolution No. G18631, the laboratory became the Lazio reference hub of the Roman Diagnostic Network as of January 2018. Lifebrain was then acquired by Investindustrial, a leading group in independent investment management.

In 2018 Lifebrain, with the acquisition of Laboratorio di Analisi Chimiche Dr. A. Giusto, also diversified its areas of activity into environmental and food chemical analysis.

From the union of twenty-five Italian companies with more than forty years of experience in analytical services of chemistry, microbiology and biology for the food, environmental, pharmaceutical, hospital and cosmetics, cultural heritage and Industrial Hygiene, Engineering and Geotechnical sectors, **Lifeanalytics** was born. In addition, Lifeanalytics offers sensory analysis, training, auditing, consulting, regulatory and labelling services.

Thanks to the professionalism of its staff and its high level of technical and scientific specialisation, Lifeanalytics supports companies, organisations and health facilities, finding the best solution for every need.

1. Structural purpose and scope of the Code

This Code of Ethics has been drawn up to ensure that the Group's ethical values are clearly defined and form the basic element of the Company's culture as well as the standard of conduct in the performance of its activities and business.

The purpose of the Code is to provide – to addressees – general ethical-behavioural guidelines to follow when carrying out their activities, as well as to help prevent the committing of offences referred to in Italian Legislative Decree No. 231/2001 as amended.

Nevertheless, in the presence or in the absence of specific provisions, it is, in any case, absolutely necessary that in their actions everyone is inspired by the highest standards of conduct, bearing in mind that the correct behaviour to be maintained in every situation always originates not only from good faith, but also from transparency, impartiality and above all from honesty and fairness in one's actions. In no way may the assumption that one is acting in the interest or to the advantage of the Company justify the adoption of conduct in contrast with the principles set out in this Code.

The application of and compliance with the principles set out herein is, moreover, part of the more general obligations of cooperation, fairness, diligence and loyalty required by the nature of the service due and by the interest of the companies of the Group, to which everyone is bound in the performance of any service on behalf of the Company.

The aforementioned obligations, in particular for the employees of the companies of the Group, supplement the provisions of Articles 2104 and 2105 of the Italian Civil Code and of the Italian National Collective Labour Agreement applicable and in force.

The following are required to comply with this Code:

- representatives of the Board of Directors and the Board of Statutory Auditors and managers, who must ensure that all decisions and actions comply with the Code of Ethics and the Codes of Conduct of the relevant bodies, and disseminate knowledge of it and encourage its sharing by employees and third parties working on behalf of the Company; managers must also constitute, through their own behaviour, a reference model for the staff;
- employees, who are required to act in compliance with the Code of Ethics, with the Codes of Conduct of the relevant bodies and to report to the Supervisory Body (hereinafter also "SB") any infringements;
- medical, technical, nursing and auxiliary staff, samplers, geologists and laboratory managers and those who are linked to the Group's companies through independent collaborative relationships, as well as agents and suppliers of goods and services, who must be duly informed of the rules of conduct contained in the Code of Ethics and ensure that their conduct

complies with it for the entire duration of their contractual relationship with the Company, without prejudice to compliance with the Code of Ethics of the relevant bodies.

The persons required to comply with the Code are defined as "Addressees".

2. Common ethical values, cooperation and communication

Lifebrian requires Companies belonging to the group to comply with the following:

- to conform to the values of its Code of Ethics and to collaborate loyally in the pursuit of the company's objectives, in compliance with the law and the regulations in force;
- to avoid behaving in a way that, even if adopted in their own exclusive interest, is detrimental to the integrity or image of one of the companies of the group;
- to cooperate in the interest of common objectives, favouring communication between the companies of the group, soliciting and utilising intragroup synergies;
- that the circulation of information within the group, in particular for the purpose of drawing up the consolidated financial statements and other communications, takes place in accordance with the principles of truthfulness, loyalty, correctness, completeness, clarity, transparency, and prudence, respecting the autonomy of each company and the specific areas of activity;
- to actively contribute to the achievement of the sustainable development objectives defined in the Group's strategy and in general by the United Nations Agenda 2030.

2.1 Relations with subsidiaries

The Company manages its relations with the subsidiaries¹ belonging to the group in full compliance with the principles of fairness, effectiveness and protection of the respective interests. Moreover, the Company pays particular attention to the management of financial resources and transactions between the various subsidiaries.

Information is circulated in accordance with the principles of truthfulness, completeness, clarity and suitability, respecting the autonomy of each company and its specific areas of activity. Under no circumstances is it permitted to behave in a manner that is detrimental to the integrity, autonomy or image of the Company or of the other subsidiaries.

¹ According to Article 2359 of the Italian Civil Code: "The following are considered subsidiary companies: 1) companies in which another company holds the majority of the votes that can be exercised in the ordinary shareholders' meeting; 2) companies in which another company holds sufficient votes to exercise a dominant influence in the ordinary shareholders' meeting; 3) companies that are under the dominant influence of another company by virtue of particular contractual ties with it."

Lifebrain promotes the dissemination of the principles set out in this Code of Ethics to all its subsidiaries, urging the adoption of organisational documents and the relative operational and control measures, as well as the best practices applicable to the specific sectors to which they belong.

3 Ethical principles

The Company, in promoting its own development through the achievement of set objectives:

1. assumes honesty and compliance with the regulations in force in Italy and, in particular, with the regional regulations applicable in the reference sector, as essential principles in its operations. All Addressees are required to know and comply with the laws and Codes of Ethics, where applicable, pertaining to their profession and with reference to their activity;
2. pursues excellence in the provision of its services, in its professional skills and in the commitment of its staff;
3. develops continuous action to improve services and organisational processes, aimed at respecting the user, user satisfaction, worker protection, and the competence, awareness and skills of health, administrative and technical personnel;
4. ensures the best services, in terms of appropriateness, timeliness, effectiveness, thoroughness and continuity required by the user, to whom it guarantees the most exhaustive information on the methods of providing the services adopted;
5. guarantees its employees and partners, in whatever capacity, quality, safe and healthy working environments;
6. does not tolerate or encourage in any way behaviour aimed at inciting people to act against the law;
7. recognises that human resources are a fundamental and irreplaceable asset for its success, and, in managing its working and cooperation relations, is inspired by full respect for workers' rights, promoting their full appreciation and professional development and refraining from any discriminatory behaviour;
8. undertakes to make the management of technological resources more effective and efficient, which are necessary to spread and consolidate a culture of safety, developing risk awareness and demanding responsible behaviour from all Addressees;
9. promotes innovation, scientific research and training;
10. is completely vigilant to ensure that situations in which conflicts of interest may occur are avoided at all times;

11. guarantees the confidentiality of the information in its possession and refrains from searching for and handling confidential data, except in the case of explicit and conscious authorisation and/or compliance with the legal regulations in force;
12. recognises the importance of respecting the environment and requires the assessment, by the Addressees, of the environmental impact of their decisions, in order to minimise any negative effects. To this end, the Company plans its activities by seeking the best possible balance between economic initiatives and environmental needs;
13. considers fair competition as a value and operates in the market in compliance with the principle of fair competition. Competition has an impact on reputation and is functional to the sustainable development of the company and the market in which it operates. In view of this, the Company refrains from any conduct that favours the conclusion of business to its advantage in an unfair manner or in violation of laws or regulations in force, condemning any act carried out in violation of the rules in force to protect it, even more so through the use of threats and/or violence.

In the performance of its various activities, and in particular in the **clinical analysis services**, Lifebrain is committed to respecting the citizen as a subject with an inalienable right to health, applying the fundamental principles and rights of the patient.

In particular, Lifebrain holds the following values as reference points:

- to safeguard equality and the central role of the individual by guaranteeing the right to access the services offered;
- to ensure transparency and impartiality in administrative and technical procedures by guaranteeing the user the right to information and the right to consent; the patient can access all the information regarding his or her state of health and participate in decisions regarding the services to be provided;
- to achieve organisational efficiency and technical effectiveness so as to put into practice the right to respect quality standards and the right to respect patients' time by giving them the possibility to access high quality health services provided in a fast and predetermined period of time;
- to ensure regularity and continuity in the provision of its services;
- to guarantee the patient's right to choose the service by supplying all the necessary information before the service is provided, respecting the right to privacy and confidentiality;
- to guarantee the participation of the user who, at the same time, can exercise the right to complain and, in the case of physical, moral or psychological damage, to ensure the possibility of applying the right to compensation; in order to obtain useful information for improving the service, Lifebrain carries out surveys to detect the level of satisfaction and perception of the quality provided;

- to update equipment and procedures so as to apply the right to innovation to the customer;
- to carry out continuous staff training to guarantee the customer the right to safety and the right to avoid unnecessary suffering and pain.

The objectives that the **LifeAnalytics laboratories** intend to pursue, in synergy with each other, in the service of chemical analysis, are:

- to ensure the required quality of services provided in accordance with established methods appropriate to customer requirements by selecting, qualifying and monitoring suppliers of materials, services or equipment that have an influence on quality;
- to ensure that testing activities under accreditation are carried out in accordance with ISO 17025 and the requirements of the Italian Accreditation Body (ACCREDIA); the laboratories have a UNI EN ISO 9001 compliant Quality Management System;
- to maintain existing certifications and constantly implement them in order to achieve high quality standards to ensure ever greater customer satisfaction;
- to adopt policies and procedures to avoid involvement in activities that may diminish confidence in competence, impartiality, judgement or professional integrity; to comply with legislative requirements relating to the confidentiality and security of data and records;
- to ensure that the laboratory acts impartially and is aware of the importance of impartiality in its work activities;
- to carry out continuous measurement of the services provided and the systematic verification of compliance with the agreements established with customers, with mandatory requirements and with internally defined economic and financial objectives;
- to operate in order to maintain and increase the degree of customer satisfaction and to pay particular attention to the assessment and treatment of complaints and non-conforming services, in order to promptly implement corrective and improvement actions;
- to implement corrective actions and preventive behaviours to avoid the recurrence of problems or prevent their occurrence through a risk-based thinking approach;
- to identify the training and refresher training needs of existing and newly hired staff in relation to present and future tasks and to meet those needs, and to promote the growth of corporate know-how by organising periodic meetings and other initiatives aimed at sharing and disseminating the experience of the Group's laboratories;
- to promote participation in inter-laboratory comparisons in compliance with the customer's existing requirements and as dictated by the methods;

- to continuously improve the effectiveness of the management system, through: assessing the effectiveness of training and periodically checking the competence of personnel; to promote an approach based on interrelated processes;
- to ensure that the integrity of the Quality Management System is maintained when changes are planned and implemented;
- to make choices and pursue objectives in line with the requirements of the ISO 14001 standard, favouring the implementation of a company management system that respects the environment and its protection;
- to use increasingly cutting-edge technical equipment in order also to use raw materials and resources in ever smaller quantities and to minimise risks to the health and safety of workers;
- to reduce potential hazards with a punctual and careful application of Occupational Medicine to minimise risk factors on hygiene, ergonomics and the work environment in accordance with OHSAS 18001 and/or ISO 45001.

3.1 External relations – Communication with the external environment

The Company undertakes to ensure that all information released is based on the utmost **transparency and truthfulness** of the data provided. It is absolutely forbidden to divulge false information.

The Company ensures that information is provided scrupulously, in an orderly manner, and in line with this Code of Ethics and other organisational rules, in compliance with current legislation and transparency.

The members of the Administrative Body and of the Board of Auditors, the managers, the employees and all the medical, technical, nursing and auxiliary staff of the Company must behave with the utmost fairness and integrity in all relations with persons and bodies outside the company.

Professionalism, competence, fairness and courtesy represent the guiding principles that the Addressees of the Code are required to observe in their relations with third parties and/or with the companies of the group;

In order to protect the Company's image and reputation, it is essential that relations with parties external to the Company are characterised by:

- full transparency and correctness;
- compliance with the law, with particular reference to the provisions on offences against the Public Administration and offences of corruption between private individuals and the prevention of corruption in general;
- independence from all forms of conditioning, both internal and external.

In particular, as regards the prevention of corruption, the Company prohibits corruption without exception.

In detail, it is forbidden:

- to offer, promise, solicit to give, pay, authorise someone to give or pay, directly or indirectly, an economic advantage or other benefit to a Public Official or a private individual (Active Corruption);
- to accept a request from, or solicitation by, or to authorise someone to accept or solicit, directly or indirectly, an economic advantage or other benefit from a Public Official or a private individual (Passive Corruption);

This is not limited to cash payments, and includes, in the context of bribery:

- gifts;
- entertainment expenses to third parties, meals and transport;
- contributions in kind, such as sponsorship;
- commercial activities, jobs or investment opportunities;
- confidential information;
- personal discounts or credits;
- commissions;
- Facilitation payments²;
- other advantages or benefits.

3.2 Relations with users

The Addressees must pursue the **maximum satisfaction of users**, in compliance with internal procedures, ensuring the constant support of truthful and exhaustive information on the services provided, enabling them to make informed decisions.

The need to obtain the user's consent to perform a given service is not only a principle regulated by the Constitutional Charter itself, but also constitutes an essential element of the professional contract, as well as a fundamental ethical element.

To this end, the Company undertakes to:

- guarantee the user (or delegate) the most suitable information, as well as information to foreign users, where necessary, by using interpreters with suitable language skills;
- not to use any means of persuasion, of a scientific or other nature, which are misleading or untrue;

² Unofficial payments made to a Public Official for the purpose of expediting, favouring or ensuring the performance of a routine activity or scheduled activity within the scope of one's duties as Public Officials.

- to prohibit the adoption, by the Addressees, of conduct favouring unequal treatment or privileged positions in the provision of services.

In order to establish a better relationship with users, the Company also undertakes to periodically check the proper handling of complaints.

With reference to healthcare services, the Company undertakes to guarantee high quality standards of the services offered both in the case of services provided under contract and in the case of services provided under private agreements.

3.3 Relations with customers in the context of chemical environmental and food analysis

Lifeanalytics pursues its business success in the reference markets through **the offer of services and the provision of quality services.**

Lifeanalytics is committed to respecting the right of consumers to full information on the services and benefits offered.

Lifeanalytics recognises that the appreciation of those who request products or services is of primary importance to its success as a business. Business policies are designed to ensure the quality of services, safety and compliance with the precautionary principle. It is therefore obliged:

- to comply with all applicable legal provisions;
- to comply with internal procedures for managing relations with customers and consumers;
- to provide, with efficiency and courtesy, within the limits of the contractual provisions, services that meet the reasonable expectations and needs of customers and consumers.
- to provide accurate and complete information on the services offered and to be truthful in advertising and other communications so that customers and consumers can make informed decisions.

3.4 Relationships with Public Administration

The Company ensures full **transparency and completeness of information** in the preparation of communications, prospectuses and notices addressed to the Public Administration (hereinafter also referred to as "PA").

The Addressees must strictly refrain from producing false and/or altered documents to the Public Administration, or from withholding and/or failing to

produce, if so required, documents, information or data of any kind, or from behaving in such a way as to mislead the Public Administration, in particular with regard to the management of activities relating to the services provided under agreement.

Every transaction carried out on behalf of the National Health Service and on behalf of entities belonging to the Public Administration must be legitimate, appropriate and adequately documented, in order to be able to carry out, at any time, controls that make it possible to (a) verify the characteristics of and the reasons for the transaction and (b) identify the persons who authorised, carried out, recorded and verified the transaction.

In its relations with the Public Administration,

the Company must always operate in compliance with the law and, in particular:

- the assumption of commitments with the Public Administration, including the Supervisory Bodies, is reserved exclusively to the Chairman or, if necessary, to the appointed and authorised functions;
- the Addressees must provide maximum availability and cooperation to anyone who comes to carry out inspections and controls;
- in anticipation of legal proceedings, an investigation or an inspection by the Public Administration, it is forbidden to destroy or alter records, minutes, accounting entries and any type of document, to lie or make false statements to the competent Authorities.

È It is strictly forbidden to alter the operation of an information or computer system in any way or to use any means to illegally change data, information or programs contained in or relating to an information or computer system to the detriment of the State or a Public Body or the European Union.

Regarding participation in calls for tender, it is necessary:

- to act in accordance with the principles of fairness, transparency and good faith;
- when examining invitations to tender, to assess the suitability and feasibility of the services requested;
- to maintain clear and appropriate relations with the PA officials in charge.

In the event of a tender being awarded, it is also necessary to ensure:

- the clear and proper fulfilment of the provisions of the call for tenders;
- the diligent and punctual fulfilment of the contractual obligations, including with regard to the third parties involved.

Regarding the disbursement of public funds:

- it is not permitted to use or present declarations and/or documents certifying untrue facts and information, or to omit information in order to obtain, to one's own advantage or in the interest of the Company, contributions, financing or other disbursements granted, for any reason, by the State, a Public Body or the European Union;

- it is expressly forbidden to use contributions, loans or other disbursements, however they may be called, granted to the Company by the State, a Public Body or the European Union for purposes other than those for which they were granted.

3.5 Relations with organisations and associations

In choosing proposals to adhere to, the Company is careful to prevent and **avoid any possible conflict of interest** of a personal nature or that of the Company.

The Company:

- does not finance parties, their representatives or candidates and abstains from any improper pressure (direct or indirect) on political representatives;
- may adhere to requests for contributions from non-profit organisations and associations with proper statutes and articles of association that are of high cultural or charitable value and involve a significant number of citizens;
- any sponsorship activities may relate to the fields of medicine and scientific research, social issues, the environment, sport, entertainment and art, and are only intended for events that offer a guarantee of quality.

3.6 Relations with suppliers

Those involved in the process of acquiring goods and/or services:

- are required to respect the principles of **impartiality and independence** in the exercise of the tasks and functions entrusted;
- must remain free from personal obligations towards suppliers and consultants;
- must maintain relationships and conduct negotiations in such a way as to create a solid basis for mutually beneficial and long-lasting relations, in the interest of the Company;
- must immediately report any attempt or case of unjustified alteration of normal commercial relations to the SB;
- must not accept goods or services from external or internal subjects in exchange for obtaining confidential information or initiating actions or behaviour aimed at favouring such subjects, even if there are no direct repercussions on the Company.

The purchasing process must reconcile both the Company's pursuit of maximum competitive advantage as well as fairness and impartiality.

The Company shall ensure that the only criteria for choosing professionals and consultants are linked to quality and technical competence.

For particular types of goods/services, in addition to the normal selection criteria, the concrete existence of adequate quality systems should also be considered.

3.7 Conflicts of interest

Addressees **must avoid any possible situation of conflict of interest** that

may arise from:

- taking part in decisions concerning business activities that could result in a personal interest;
- accepting agreements from which personal advantages may arise;
- performing acts, entering into agreements and, in general, behaving in any way that may, directly or indirectly cause damage to the Company, also in terms of image and/or credibility on the market;
- conflict with the interests of the Company, by influencing the decision-making autonomy of another person in charge of defining business relations with or for it.

Anyone who finds themselves in a situation of conflict of interest, even if only potential, must immediately inform their superior and/or the administrative body as well as the Supervisory Board, which will assess the course of action to be taken. In conducting any activity, the Company shall avoid situations where the persons involved in the transactions are, or may even only appear to be, in conflict of interest.

3.8 Gifts and acts of kindness

Each Addressee of the Model, in connection with the performance of their duties or tasks entrusted to them, **may not accept or solicit gifts, acts of kindness, such as gifts or forms of hospitality, or other benefits** and such as to be considered customary in relation to the occasion and not to be interpreted, by an impartial observer, as aimed at acquiring improper advantages.

Similarly, it is not permitted to offer, promise, give gifts, acts of kindness, such as complimentary items or forms of hospitality, or other benefits if not of modest value. In any case, such expenses must always be authorised and documented.

In the case of receipt of gifts, acts of kindness, such as forms of hospitality and other benefits, of a value exceeding the above-mentioned limit, they must be

returned or not accepted, or if it is impossible to return them, there is an obligation to notify the Administrative Body and the Supervisory Board.

4. Adherence to the UN Global Compact

Lifebrain is committed to supporting the 10 principles at the basis of the international network promoted by the United Nations **on human rights, labour protection, the environment and the fight against corruption.**

By adhering to the principles of the global compact, the Company undertakes:

- to promote and respect universally recognised human rights;
- to ensure that it is not, even indirectly, complicit in human rights abuses;
- to support workers' freedom of association and recognise the right to collective bargaining;
- to eliminate all forms of forced and compulsory labour;
- to eliminate all forms of child labour;
- to eliminate all forms of discrimination in respect of employment and occupation;
- to support a precautionary approach to environmental challenges;
- to promote greater environmental responsibility;
- to encourage the development and diffusion of environmentally friendly technologies;
- to fight corruption in all its forms, including extortion and bribery.

5. Management of financial resources and accounting transparency

The management of financial resources must be carried out in strict compliance with the delegated powers, as well as any specific authorisations for carrying out particular operations.

Accounting transparency is based **on the existence, accuracy and completeness of the basic information for the relevant accounting records.**

All Addressees are required to operate so that management operations are correctly and duly represented in the accounts.

For each operation, adequate supporting documentation of the activity carried out must be kept on file, so as to enable:

- easy recording in the accounts;
- the identification of the different levels of those responsible;
- enable all operations to be accurately reconstructed, to also help reduce the likelihood of misinterpretation.

All persons are required to duly inform their managers of any omissions, falsifications, or negligence in the accounts or in the documentation on which the accounting records are based, by means of appropriate communication channels. The report must also be made to the Supervisory Board.

6. Internal relations

6.1 Employee rights and duties

According to the employment contract applied or the existing contract, as well as the rules laid down in the Italian Civil Code and by law, **the employee is assigned certain rights and certain duties.**

In particular, employees are, inter alia, entitled to:

- the economic and regulatory treatment provided for by law and by collective, company and individual employment contracts;
- the protection of health and safety in the workplace, which must comply with current legislation on safety and hygiene;
- legal assistance in the cases expressly provided for by collective and individual contractual regulations.

The Company's employees are, inter alia, obliged to:

- a) know and comply with the legislation in force, the processes, procedures and guidelines as well as the principles contained in this Code;
- b) comply with the provisions and instructions issued by the Company or its Managers;
- c) comply with all obligations necessary to protect health and safety in the workplace;
- d) provide colleagues or their Managers with adequate cooperation, by communicating all information and behaving in such a way as to enable them to operate with maximum efficiency in the performance of the tasks assigned and in the pursuit of common objectives;
- e) avoid abusing or generating false beliefs in relation to one's position, role or powers within the Company and the role of the Company itself, intervening immediately in order to eliminate any and all misunderstanding;

- f) not perform acts contrary to official duties, nor to omit or delay an official act for the undue achievement or promise of money or other benefits for oneself or for others;
- g) treat everyone in a correct and fair manner and avoid favours or pressures, real or apparent, with a view to obtaining particular advantages from certain suppliers, in order to maintain the trust of the market and in particular that of the suppliers towards the Company;
- h) not use information obtained in the course of the activity carried out for personal purposes or to obtain advantages of a financial or non-financial nature;
- i) promote awareness of the Code among all those with whom they have formal or informal relations in the performance of their activities;
- j) not to denigrate, under any circumstances, the Company and/or those who have or have had relations of any nature and for any reason with it;
- k) avoid joining associations, clubs or other bodies of any nature, if this may give rise to obligations, constraints, or expectations such as to interfere with the exercise of one's activity;
- l) not use for personal needs, except in special cases of urgency, the working tools, including telephone lines, and to take care of the premises, furniture, vehicles or materials placed at his/her disposal;
- m) not derive profits or advantages, direct or indirect, financial or otherwise, with or without detriment to the Company, from the performance of one's work activities;
- n) behave and use language and clothing appropriate to the working environment;
- o) use codes other than the codes corresponding to the service actually provided;
- p) duplicate the invoicing of the this service or fail to issue credit notes if non-existent or non-financial services have been invoiced, even in error;
- q) behave in such a way as to alter the proper management of waiting lists (where they exist);
- r) alter or tamper with the contents of the user's documentation in any of its parts;
- s) make use, for one's own purposes, of projects, systems, procedures, methodologies, reports or any other invention or activity developed by the Company and to which it holds individual property rights.

6.2 Human resources management

The Company is committed to developing the skills and competences of each employee so that the energy and creativity of individuals finds full expression in **realising their potential.**

The Company is committed to providing equal employment opportunities for all, on the basis of professional qualifications and performance capabilities, without any discrimination, by recruiting, hiring and remunerating staff on the basis of merit and competence, without any discrimination on political, trade union, religious, racial, language or gender grounds, in compliance with all applicable laws, regulations and directives.

6.3 Environment and safety

The Company manages its activities by pursuing **excellence in the field of environmental protection and the safety of its staff, users and third parties, aiming to continuously improve its performance in this regard.**

To this end, the Company:

- a) undertakes to comply with the provisions in force in the field of safety and the environment;
- b) draws up and communicates guidelines on environmental protection and safety that must be followed;
- c) promotes employee participation in the process of risk prevention, environmental protection and health and safety towards themselves, their colleagues and third parties;
- d) undertakes to adopt, in the performance of its business activities, techniques and systems compatible with the best protection of the environment;
- e) ensures that the disposal of waste produced during the performance of the company's activities and of personal protective equipment is carried out in compliance with the national and Community regulations in force;
- f) in contracts with third parties from which the Company may incur liability under environmental legislation on waste management and disposal, it shall include clauses requiring such parties to comply with the applicable legislation, providing for contractual penalties in the event of violation.

The company's entire operations are marked by the conviction that no activity is more important than the safety and health of the employees and external parties involved in the performance of the company's activities.

In addition, Lifebrain regularly assesses the hazards and risks associated with its activities through a thorough and up-to-date risk assessment in order to prevent, avoid and reduce the impact of any possible incident.

Lifebrain recognises that the safety of the company's activities depends not only on technical expertise, but also on human skills, strict adherence to procedures, training and an acute HSE culture. It also ensures that all necessary means are in place to ensure the health and safety of employees.

Within the scope of their duties, Lifebrain's staff actively participate in the process of risk prevention, environmental protection and public safety and health and safety protection for themselves, colleagues and third parties.

7. Misconduct

7.1 Harassment and discrimination

The Company:

- a) guarantees a working environment that values the diversity of employees, in compliance with the **principle of equality**, taking care to protect the dignity and freedom of each employee in the workplace;
- b) **does not tolerate any type of discrimination** of a racial, sexual, political, trade union or religious nature;
- c) imposes an obligation to refrain from any intimidation, harassing act or behaviour;
- d) **does not tolerate sexual harassment**, whereby "sexual harassment" means any unwanted act or behaviour, including verbal, of a sexual nature that offends the dignity of the person subjected to it: it also does not tolerate the creation of a climate of intimidation towards the person subjected to such harassment.

Those who believe they are being subjected to harassing or discriminatory behaviour or are aware of intimidation, discrimination or harassing and/or discriminatory behaviour in progress shall inform their superior and/or the administrative body as well as the Supervisory Board, which shall promptly and confidentially take any action deemed appropriate, in order to resolve the unfavourable situation and restore a peaceful working environment.

7.2 Abuse of alcohol or drugs

È It is considered reprehensible behaviour to perform work under the influence of alcohol or drugs, as well as the use of such substances during working hours.

7.3 Smoking

Smoking is forbidden inside all Company premises.

The Company, in any case, shall take into account the discomfort of non-smokers on the one hand, and smokers on the other hand, identifying, where possible, areas intended for smokers, in compliance with the regulations in force.

7.4 Anti-money laundering

No employee or partner of the Company shall be involved in operations, which may involve the laundering of proceeds from criminal or illegal activities.

If an employee or partner becomes aware of such situations, even if not directly involved, he/she shall promptly inform his/her superior and/or the Administrative Body as well as the Supervisory Board and at the same time the competent authorities.

8. Treatment of confidential information and protection of privacy

Any information and other material that the Addressees become aware of or possess, in connection with their working or professional relationship, are strictly confidential and the exclusive property of the Company. Such information may concern present and future activities,

information and news not yet disclosed, even if soon to be released. Of particular importance, among confidential information, is information relating to users and those who, for any reason, deal with the Company.

In carrying out its activities, the Company collects, manages and processes personal data in compliance with current legislation.

In this regard, the Company has put in place the compulsory requirements provided for by the laws and regulations on personal data protection.

In particular, with regard to the processing of data in hard copy and through the use of computer systems, the Company is obliged to comply with special security measures designed to prevent the risk of external intrusion, such as, for example, controls on access to the premises, passwords, personal identification codes, screen savers, etc., unauthorised use, as well as the loss, even accidental, of data.

9. Compliance with regulations on individual safety

The Company considers the protection of personal safety, freedom and individual privacy as an essential value. It therefore repudiates any activity that may entail an injury to individual safety and any possible form of financing that may favour or feed the performance of such practices, as well as any possible exploitation or reduction of the person to a state of subjection.

The Company attaches primary importance to the protection of minors and to the repression of exploitative behaviour of any kind towards them.

To this end, it is therefore forbidden and totally alien to the Company to use its IT tools to initiate or even facilitate any conduct relating to the offence of child pornography, which may even involve virtual images. In addition, in order to ensure full respect for the person, the Company is committed to complying with and ensuring that its employees, suppliers and partners comply with current labour legislation, with particular attention to child labour, through the preparation of specific contract termination clauses that provide for compliance with the Code of Ethics.

Any employee or partner who, in the performance of his or her work, becomes aware of the committing of acts or behaviours that may favour the injury of personal safety as identified above, as well as the establishment of exploitation or reduction to a state of subjection of the person, shall, without prejudice to legal obligations, immediately inform his or her superiors and the SB.

Finally, any behaviour that may constitute or be linked to the offence of female genital mutilation practices is prohibited and entirely alien to the Company.

10. Accounting books and company registers

The Company **accurately and completely records all activities and operations** in order to implement maximum accounting transparency towards shareholders, third parties and the relevant external bodies, and to avoid the appearance of false, misleading or deceptive entries. Administrative and accounting activities are also carried out using up-to-date IT tools and procedures

that optimise efficiency, correctness, completeness and correspondence with accounting principles, as well as favouring the necessary controls and checks on the legitimacy, consistency and congruity of the processes of decision-making, authorisation and performance of the Company's actions and operations. The Company believes that the accuracy and transparency of the financial statements are important values, which it also pursues by means of audits by the Board of Auditors; the Company lends its utmost cooperation at all levels, providing correct and truthful information on activities, assets and operations, as well as on any reasonable request received from the competent bodies.

11. Information flows towards the Supervisory Body

All Addressees of the Code are required to promptly report any behaviour contrary to the provisions of the code itself, the law and internal procedures, to the Supervisory Board.

The Company has set up the appropriate communication channels; in particular, a specific e-mail address³ has been set up to which any reports of non-compliance with the provisions of this Code may be sent.

Reports may be made on unlawful conduct that comes to one's direct knowledge on the occasion of and/or as a result of the performance of one's work duties or as a result of the employment/collaboration relationship.

Reports taken into consideration are only those concerning facts that are directly found by the person making the report, not based on current rumours; furthermore, the report must not concern complaints of a personal nature. The "whistleblower" must not use the institution in question for purely personal purposes or to make claims or retaliation, which fall within the more general discipline of the employment/collaboration relationship or of relations with the hierarchical superior or with colleagues, for which reference should be made to the discipline and procedures of the structures in charge (e.g. Human Resources).

³ The address OdV@Lifebrain.it is also published on the corporate network

The whistleblower is required to indicate all the elements useful to allow the due and appropriate checks and controls to confirm the statements and facts that are included in the subject of the report.

In any case, it is essential that the report submitted by the whistleblower is detailed, that it concerns facts that are verifiable and known directly to the whistleblower and not reported or referred to by other persons, and that it contains all the information and data needed to unequivocally identify the perpetrators of the unlawful conduct.

Whistleblowers shall be guaranteed against any form of retaliation, discrimination or penalisation; the confidentiality of the whistleblower's identity shall also be guaranteed, without prejudice to legal obligations and the protection of the rights of the company or of persons wrongly accused and/or in bad faith.

12. Controls by the Supervisory Body

The correct observance and application of this Code is guaranteed by the Supervisory Body set up for the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001.

The Supervisory Body performs the following functions:

- a) promoting the dissemination and knowledge of the Code among all its Addressees and ensures its correct interpretation;
- b) notifying the Management Body of any need to revise the Code in order to adapt its contents to new internal organisational requirements, to possible changes that may be necessary following changes in the general regulatory framework of reference;
- c) checking, controlling and assessing cases of violation of the Code and proposing, in the case of infringements, the adoption of the appropriate measures in compliance with current legislation;
- d) verifying, controlling and assessing the existence of situations of conflicts of interest and proposing appropriate measures;
- e) receiving reports from addressees relating to conduct that does not comply with the Code and, where necessary, protecting the addressees from any pressure, intimidation and retaliation;
- f) informing the Heads of the competent Departments/Functions about any abnormal behaviour of its staff in order to take the appropriate measures.

13. Violations and disciplinary sanctions

Compliance with the rules contained in this Code must be considered an essential part of the contractual obligations for employees, pursuant to Article 2104 of the Italian Civil Code, as well as for its partners.

Violation of the aforementioned rules will constitute a breach of the obligations arising from the employment relationship and/or a disciplinary offence, with all legal consequences, including with regard to the preservation of the employment relationship.

The Company undertakes to provide for and impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective violations of the Code and in accordance with the provisions in force on the regulation of labour relations.

In particular, in the event of violations of the Code of Ethics by Company employees, the relevant measures shall be adopted and the relevant sanctions imposed in full compliance with Article 7 of Italian Law 300 of 20 May 1970, with the legislation in force and with the provisions of collective bargaining.

The individual punishable infringements and the relevant sanctions will be set out in a specific document to be posted in a location accessible to all, in accordance with the provisions of the applicable CCNL (Italian National Collective Labour Agreement).

With regard to partners, breach of the rules of this Code shall be punished by termination of the contracts in force, without prejudice to the Company's right to claim compensation for the damages incurred as a result of such conduct.

With regard to the Directors, in the event of non-compliance with the rules contained in the Code, the Supervisory Body shall inform the Board of Directors and the Board of Statutory Auditors, so that they may proceed without delay and in accordance with the powers provided for by law and/or the Articles of Association, to convene the Shareholders' Meeting to take appropriate measures against the persons responsible for the violation.

With regard to the members of the Board of Statutory Auditors, breach of the rules of this Code may result in the revocation of their mandate for just cause, to be proposed respectively to the Shareholders' Meeting and to the Board of Directors. In the latter case, the Company is entitled to compensation for any damage suffered as a result of the unlawful conduct.

This Code establishes the mandatory nature of disciplinary action in the event of non-compliance with the rules of conduct it defines.

14. Diffusion and dissemination of the Code of Ethics

The Company undertakes to communicate to all Addressees the values and principles contained in the Code, and to ensure its internal and external dissemination, through:

- distribution to all members of the Administrative Body, the Board of Statutory Auditors, Managers, Employees and Partners in any capacity;
- publication on the Company's website and on the corporate intranet;
- availability to third-party addressees and any other party on the Company's website;
- inclusion of the clause pursuant to Italian Legislative Decree No. 231/01 in contracts with employees, suppliers, partners and third parties in general for compliance with the principles and values contained in the Code of Ethics and the Organisation, Management and Control Model adopted by the Company;
- the directors, the Board of Auditors, the Managers, the Employees and all the medical, technical, nursing and auxiliary personnel the auditors, the consultants and the main suppliers must read the Code and undertake to follow the prescriptions and rules contained therein.

ⁱ Lifebrain Srl exercises management and coordination of the companies – directly and indirectly controlled – belonging to the Group – clinical division and environmental division. The principles and values expressed in this document are adopted by all the companies belonging to the Group.