



CODE OF ETHICS

ASSUT EUROPE S.P.A.

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PREMISE

Assut Europe S.p.A. (hereinafter, "Assut Europe" or the "Company" or "the Company" or "the Entity") is a company operating in the healthcare sector and deals with the production, assembly, sterilization and in general any and any processing of products for medicine, surgery, veterinary medicine, diagnostics in general and the manufacture of surgical sutures. Furthermore, its object is the sterilization treatment of its own and third-party products as well as other production, the sterilization prior to the dismantling of hospital waste and its collection.

The Company, which has always been aware of the relevance of corporate values, together with the professional principles of correctness and loyalty, as well as the transparent competition on the market by all those who operate there, has deemed it appropriate to improve its governance system. In carrying out its business, in fact, the Company intends to observe not only the laws and provisions in force in all the countries in which it operates, but also the high ethical standards and guiding principles which are collected in this code of ethics (hereinafter, the "Code of Ethics 231" or "Code").

This Code constitutes an integral part of the Organization, Management and Control Model originally adopted by the Company in September 2016 (hereinafter, the "Model" or "MOG") pursuant to Legislative Decree 8 June 2001 n. 231 (hereinafter, the "Decree") and updated on 05.12.2017 contains the ethical principles that the Company considers fundamental in carrying out its business and the behavioral rules that all those who act in the name of the Company must respect.

Consequently, anyone who works for the Company or collaborates with it or, in any capacity, maintains relationships with the Company itself, must respect the principles and provisions contained in this Code, as well as in the other policies of a behavioral nature adopted by the Company.

The Company will monitor, also through the Supervisory Body pursuant to Legislative Decree 231/2001 (hereinafter also "OdV"), the effective observance of the Code, preparing adequate information, prevention and control tools and will guarantee the transparency of conduct implemented, intervening, where necessary, to sanction any actions not in line with the principles and behavioral rules of the Code.

MISSION

Assut Europe is a company founded in 1991 in Magliano de' Marsi (AQ) where today the production headquarters and the production plant are located, while the administrative headquarters is located in Rome.

The company aims to "improve the quality of life of patients through the development and marketing of products that guarantee high quality standards, ease of use for operators and sustainability for healthcare institutions".

At Assut Europe there is a continuous commitment to developing innovative products and solutions to improve patients' lives.

The vision is based on the logic of total quality management and lean production, and is oriented towards customer satisfaction through an offer focused on certified and high quality products, deriving from constant research and development activity for innovation at the service of different surgical specialties.

1. PURPOSE

This Code expresses the commitments and ethical responsibilities of the Company in the conduct of business and corporate activities and regulates the set of rights, duties and responsibilities with which the Company intends to comply in the conduct of corporate activity.

The purpose of this Code is therefore to indicate the ethical principles and rules of conduct in which the Company recognizes itself, to which it attributes ethical value, and to which those who work for the Company or collaborate with it or, in any capacity, entertain relations with the Company itself, must comply.

1.1 THE CODE OF ETHICS AND ITS ENTRY INTO FORCE

This Code of Ethics was approved by the Board of Directors (hereinafter also "BoD") on 06/21/2023 as a second update and is immediately effective from the moment of its erga omnes disclosure.

The approval resolution by the Board of Directors prescribes the observance and application by every person who operates on behalf of the Company or who comes into contact with the Company and any update, modification or addition to this Code of Ethics must be approved by the Company's Board of Directors.

In subsequent revisions of the Code, the Board of Directors will take into account the contributions received from the "recipients" of this Code and from the SB, as well as regulatory developments and the most established national and international practices, as well as the experiences acquired in the application of the prevention rules.

The Code is shared within the Company by delivering a copy to the recipients by any means and is given maximum dissemination also through publication on the Company's website.

1.2 RECIPIENTS OF THE CODE OF ETHICS

The recipients of this Code are:

a) the members of the Board of Directors of the Company (hereinafter, the "Board of Directors") or the Sole Director and those who carry out, even de facto, management, administration, direction or control functions in the Company or in one of its autonomous organizational unit;

b) the members of the Board of Statutory Auditors;

c) the subjects in charge of the legal audit of the Company's accounts;

(the subjects referred to in points a), b) and c) hereinafter, collectively, the "Corporate Bodies")

d) managers;

e) other employees of the Company;

(the subjects referred to in points d) and e) hereinafter, collectively, the "Employees")

f) all those who collaborate with the Company by virtue of a para-subordinate employment relationship or who, although external to the Company, operate, directly or indirectly (permanently or temporarily), on its

behalf (such as, by way of example but not limited to, providers temporary workers, temporary workers, collaborators in any capacity, attorneys, agents, consultants, suppliers, commercial partners, etc.)

(hereinafter, collectively, the "Third Party Recipients")

(all the subjects mentioned above, hereinafter, collectively, the "Recipients").

All Recipients are required to observe and, to the extent of their competence, to ensure compliance with the provisions of the Code and the principles contained therein.

Under no circumstances may the Recipients adopt behaviors that conflict with the provisions of this Code, justifying the same with the alleged pursuit of an interest of the Company.

The Code also applies to activities carried out abroad by the Company and also to foreign recipients.

Compliance with the provisions of the Code is an essential part of the contractual obligations of Employees pursuant to and for the purposes of the provisions of the art. 2104 et seq. of the Civil Code.

Violation of the provisions of this Code, considered by the Company with particular rigor, undermines, among other things, the relationship of trust established with the Company and may lead to disciplinary actions and compensation for damages, without prejudice, for employees, to compliance with the procedures referred to in the art. 7 of law no. 300/1970 (Workers' Statute), collective labor agreements and any company regulations adopted by the Company.

1.3 OBLIGATIONS OF RECIPIENTS

This Code binds all Recipients at whatever level of the company organization they operate.

Recipients are required to be aware of the provisions contained in the Code or referred to by it, as well as the applicable laws.

The Recipients also have the obligation to:

- a) refrain from behavior contrary to the provisions of this Code and the applicable laws;
- b) contact their superiors or the Supervisory Body for the necessary clarifications on the application methods of the Code and/or the applicable laws;
- c) report to the SB any violation, even just potential, of the Code;
- d) collaborate with the Supervisory Body and the Internal Managers, as identified in the Special Parts of the MOG, as well as in the event of any investigations carried out by the Company, the Supervisory Body or public authorities in relation to alleged violations of the Code.

1.4 FURTHER OBLIGATIONS FOR THE MANAGERS OF CORPORATE FUNCTIONS

Each company function manager, in addition to what is provided for in the previous article, has the obligation to:

- a) represent an example for their subordinates with their behavior;
- b) ensure compliance with the Code by his subordinates;
- c) ensure that their subordinates understand that the provisions contained in the Code constitute an integral part of their work performance;
- d) select employees and collaborators in general who guarantee compliance with the Code;
- e) prevent any form of retaliation within their functions, to the detriment of the Recipients who have collaborated in order to guarantee compliance with the Code;
- f) promote and ensure compliance with the Code by the Third Party Recipients with whom you operate.

1.5 VALIDITY OF THE CODE TOWARDS THIRD PARTIES

All Company personnel, based on the responsibilities assigned, provide adequate information regarding the commitments and obligations imposed by the Code on Third Party Recipients (suppliers, customers, brokers, third parties in general) and request compliance with the obligations that directly concern their activity.

1.6 RELATIONS WITH STAKEHOLDERS

The term stakeholders refers to all those subjects directly or indirectly involved in the Company's activity, who have some interest and/or are directly or indirectly influenced by Assut's activities, decisions and projects. The Code intends, in particular, to direct the Company's conduct towards cooperation and trust towards stakeholders, establishing a correct and positive climate. The behavior of all the Recipients of this Code must therefore be inspired by the utmost correctness, completeness and transparency as well as legitimacy both from a substantial and formal point of view. The search for a correct and transparent relationship with stakeholders elevates, guarantees and protects the reputation of the Company in the market context in which it operates.

2. REFERENCE ETHICAL PRINCIPLES

The principles listed below represent the fundamental values that the Recipients must adhere to in pursuing the company mission and, in general, in conducting the Company's activities.

2.1. COMPLIANCE WITH LAWS AND REGULATIONS

The Company respects and enforces, internally, the laws in force in the countries in which it carries out its business, as well as the commonly accepted ethical principles according to international standards in the conduct of business. In pursuing this aim, all Company personnel, both on-site and off-site, must be aware of

the ethical value of their actions and must not pursue personal or corporate profit, to the detriment of compliance with current laws and the principles hereof. Code.

Under no circumstances is it permitted to pursue or achieve the interest of the Company in violation of the Law, nor does the Company approve and justify behavior aimed at forcing or soliciting anyone to act in violation of the Law.

The Company will not initiate or continue any relationship with anyone who does not intend to align with this principle.

No fraudulent behavior aimed at corruption or fraudulent violation of internal procedures or the laws of the countries in which Assut operates is tolerated.

2.2. RESPECT FOR HUMAN RIGHTS

Assut is inspired by the protection and promotion of human rights, inalienable and essential prerogatives of human beings and the foundation for the construction of societies based on the principles of equality, solidarity, repudiation of war and for the protection of civil and political rights, social rights, economic and cultural rights and the so-called third generation rights (right to self-determination, peace, development and environmental protection).

The company is inspired by the Universal Declaration of the United Nations Declaration of Human Rights, the Human Rights Principles of the UN Global Compact, the Fundamental Conventions of the ILO, the OECD Guidelines for Multinational Enterprises and the principles enshrined in the United Nations Global Compact.

2.3. INTEGRITY AND CORRECTNESS AND PROTECTION OF THE MARKET AND COMPETITION

The Company undertakes to create and supply products and/or services quality defects and to compete on the market according to principles of fair and free competition and transparency, maintaining correct relationships with public, governmental and administrative institutions, with citizens and third parties. The Recipients are required to operate, in any situation, with integrity, transparency, coherence and fairness, conducting every business relationship with honesty.

In carrying out its business, the Company undertakes to respect the rights of all parties involved.

For the Company it is essential that the market is characterized by correctness and loyalty on the part of all operators, in the spirit of what is established by the art. 41 of the Constitution and the national and European provisions on the matter.

Effective market freedom, which guarantees opportunities for participation and affirmation through merit and quality services or products, can only be ensured with behaviors that comply with the ethical principles of this Code. For this reason it is necessary to observe all laws regulating the market and collaborate with the authorities that regulate it as well as respecting all the provisions useful for preventing forms of market abuse.

2.4. PROTECTION OF INDUSTRIAL PROPERTY

The Company invests in research, in the awareness that new ideas and new patents are fundamental for sustainable industrial development, when committed to implementing new projects that involve new patents or trademarks or in any case subject to protection in favor of third parties, it will comply with the provisions of the legislation to protect industrial property, trademarks and patents.

2.5. HONESTY

Honesty is an essential principle which inspires the activity of the Company which undertakes to reach agreements with the Recipients formulated in a clear and understandable way and which ensure the fair balancing of the interests of the parties. The Recipients must act with awareness of the ethical significance of their actions and must not pursue the Company's profit, nor their own, in violation of the Law.

Assut encourages the reporting of any suspicion of an attempted, certain or presumed corrupt act through the defined channels and methods, guaranteeing both the carrying out of in-depth investigations, in order to evaluate its validity and prepare effective countermeasures, and the protection of the whistleblower from any form of retaliation (see also paragraph 3).

2.6. SUSTAINABILITY

The economic and financial sustainability of the Company is a necessary and essential value to guarantee business continuity, as well as the efficiency and effectiveness of its interventions, with a view to continuous creation of value for stakeholders. In any case, the value of sustainability must in no way induce the Recipients to violate the principles contained in this Code to obtain advantageous economic results.

2.7. CONFLICT OF INTEREST

The Company implements all the measures necessary to prevent and avoid conflicts of interest, meaning both those situations in which the Recipient pursues an interest in conflict with that of the Company and its objectives, and those in which the Recipients may derive undue advantages from carrying out one's business.

Before undertaking any action or initiative, the Recipients must evaluate the existence of conflicts of interest, even if only potential, and, if a situation of conflict of interest arises in an operation, they must communicate it to their hierarchical superior or to the Supervisory Body, refraining from carrying out the operation. The Company itself ensures the implementation of tools to define the principles and rules for managing the risk deriving from situations of conflict of interest that could arise in the exercise of the activities carried out by Assut in order to guarantee impartiality in decision-making processes.

The Recipients must align their activities with the principles of correctness and integrity, refraining from acting in situations of conflict of interest within the scope of the activity they carry out in the Company. The members of the bodies are also required to behave in accordance with this Code of Ethics, the principles of autonomy, independence and respect for the guidelines that the Company provides in the relationships they have with public institutions and with any private entity. The control bodies are required to participate assiduously and informed in the company's activities; they, together with the recipients, are required to make confidential use of the information they become aware of for official reasons and cannot use their position to obtain personal,

direct or indirect advantages. Every communication activity must comply with the laws and practices of conduct and must be aimed at safeguarding price sensitive and industrial secret information.

2.8. GIFTS AND DONATIONS

No form of gift, received or given, is permitted, which could even just be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring preferential treatment in the conduct of any activity connected to the Company. In particular, any form of gift to Italian and foreign public officials, auditors, advisors of Assut and its subsidiaries, auditors or their family members, which may influence their independence of judgment or induce them to secure any advantage, is prohibited.

This rule, which does not allow exceptions even in those countries where offering valuable gifts to business partners is customary, concerns both gifts promised or offered and those received; it should be noted that a gift refers to any type of benefit (free participation in conferences and events, promise of a job offer, etc.). In any case, the Company abstains from practices not permitted by law, commercial usage or the ethical codes - if known - of the companies or entities with which they have relationships.

Gifts and acts of commercial courtesy or hospitality are permitted only if of modest value and in any case such as not to compromise the reputation of one of the parties; in general their value must not exceed 100.00 euros (€ one hundred/00). They must always be duly authorized by the function manager, who provides prior notification to the Company's internal control functions.

Gifts and advantages offered but not accepted, which exceed the modest value, must be reported to allow an adequate evaluation by the function manager, who, according to the established methods, will inform the Supervisory Body.

2.9. REJECTION OF ALL DISCRIMINATION

The Company bases its actions and relationships with its interlocutors on the repudiation of any form of discrimination based on age, gender, race, nationality, state of health, sexual orientation, political opinions or religious beliefs.

2.10. CORRECT USE OF TECHNOLOGIES AND THE COMPUTER SYSTEM

The use of the computer network must always be aimed at the development of Assut. In this sense, any use of IT and communication systems that is not aimed at the interests of the Company and that is not respectful of people and their dignity is prohibited.

Without prejudice to the provisions of the art. 15 of the Constitution, Assut undertakes to provide and install supports for reporting anomalies, alterations and the presence of viruses or access to prohibited or unauthorized sites.

Assut prohibits access to sites whose content may in any case harm the dignity of the person or violate the law and prohibits the use of software that is not properly licensed, as well as the download and duplication of files or programs in violation of the right of 'author.

With regards to IT applications, each employee and collaborator is therefore required to:

☒ scrupulously adopt the provisions of the company security policies, in order not to violate the legislation protecting copyright and not to compromise the functionality and protection of the IT systems;

☒ comply with company policies and standards relating to IT security. In particular, your personal password and your access code to company databases must be kept safe and not disclosed to unauthorized third parties;

☒ not alter the functioning of an IT system for the purpose of falsifying data, information or documents to the detriment of public institutions or private entities;

☒ refrain from using IT tools for threatening or abusive purposes, or from using low-level language, or from expressing inappropriate comments that could cause offense to people and/or damage the company image.

Assut reserves the right to prevent distorted uses of its assets and infrastructures, without prejudice to compliance with the provisions of current laws (in particular privacy law, workers' statute).

The Personal Computer (fixed or mobile) as well as the related programs and/or applications entrusted to the employee or collaborator are work tools and therefore to be used exclusively for carrying out their duties and work activities.

2.11. CONFIDENTIALITY – PRIVACY PROTECTION

The Company ensures the confidentiality of the information in its possession and ensures that the acquisition, processing and storage of the information and personal data of the Recipients and of all the subjects with whom the Company operates take place according to specific procedures that guarantee the compliance with the provisions of the law and, in particular, of Legislative Decree no. 196/2003 and the subsequent Regulation (EU) no. 2016/679 – G.D.P.R.

Recipients are required to use confidential information for lawful purposes connected with the exercise of their business.

2.12. PROTECTION OF INDIVIDUAL PERSONALITY

The Society protects freedom in individual in all its forms and repudiates any act or fact aimed at limiting personal freedom, as well as any phenomenon of prostitution and/or pornography.

Assut demands that in internal and external working relationships there is no rise to harassment, understood as:

- unjustified interference in the performance of other people's work;
- creation of an intimidating and hostile working environment towards an individual or groups of workers;
- obstacle to individual job prospects for reasons of personal competitiveness.

Furthermore, the Company does not allow the carrying out of sexual harassment understood as:

- proposals for interpersonal relationships that the recipient does not like;
- subordination of events relevant to the employee's working life to sexual favours.

2.13. VALUE OF HUMAN RESOURCES AND WORK. JOB SECURITY

The Company recognizes the value of human resources as a fundamental factor for its development. In particular, the Company:

- ☑ promotes the value of human capital with the aim of improving and increasing the assets and value of the skills possessed by each collaborator;
- ☑ guarantees the health, safety and physical and moral integrity of its employees, collaborators and consultants, as well as working conditions that respect individual dignity and safe and healthy working environments, in compliance with applicable legislation;
- ☑ rejects any form of irregular work;
- ☑ in managing relationships that imply hierarchical relationships, the Company undertakes to ensure that authority is exercised with equity and correctness, avoiding any abuse.

The protection of health and safety at work constitutes a primary objective of the Company, also consistently with the regulatory provisions of Legislative Decree 81/2008.

Consistent with this objective, the Recipients, and in particular the Employees, and all the figures involved in tasks relating to health and safety at work (employer, competent doctor, manager of the prevention and protection service, workers' representatives for safety) collaborate, within the scope of their respective functions and responsibilities, to eliminate or progressively reduce risks at source and improve working conditions by adhering to the principles set out below, in particular when decisions must be taken or choices made and later, when they must be implemented.

The fundamental principles and criteria on the basis of which decisions are made, of all types and at all levels, regarding safety at work including activities for the prevention of professional risks, information and training, as well as the preparation of an organization and the necessary means, are the following:

- ☑ avoid risks;
- ☑ evaluate risks that cannot be avoided;
- ☑ combat risks at source;
- ☑ reduce where possible the use of chemical, biological and physical agents;
- ☑ adapt human work, in particular with regard to the design of workplaces, the choice of work equipment and work and production methods, in particular to mitigate monotonous work and repetitive work and to reduce the effects of these works on health, also in light of ergonomic criteria;
- ☑ take into account the maximum degree of evolution on the technique;

- ☒ replace what is dangerous with what is not dangerous or less dangerous;
- ☒ plan prevention, aiming for a coherent complex that integrates technique, work organization, working conditions, social relations and the influence of work environment factors;
- ☒ give priority to collective protection measures over individual protection measures;
- ☒ ensure that collective and individual protection measures are adapted to the best technical standards in consideration of the company activity;
- ☒ take care of information, training, learning and verification of the training levels of Employees;
- ☒ carry out an adequate health check;
- ☒ give adequate instructions to workers.

2.14. AWARDING OF PROFESSIONAL ASSIGNMENTS

In awarding professional assignments, the Company is inspired by the principles of economy, transparency and correctness and evaluates the moral and ethical integrity of its consultants, paying the same fees that are proportionate to the activity carried out and adequately documented.

2.15. TRANSPARENCY AND COMPLETENESS OF INFORMATION

The Company is committed to providing all parties with whom it operates with complete, transparent, understandable and accurate information. In compliance with the principle of transparency, every operation and transaction must be correctly recorded, formally authorised, verifiable, legitimate, coherent and appropriate.

For each operation there must be adequate documentary support in order to be able to proceed, at any time, with checks on the characteristics and reasons for the operation and the authorization process for the operation itself.

To the extent permitted by law, the Company ensures that the shareholders, the parties in charge of the statutory audit of the Company's accounts and the other supervisory bodies, as well as the Supervisory Body, have access to the data, documentation and any information useful for carrying out the own business.

With reference to accounting information, the company requires from all its employees or subjects involved in the accounting processes full and extensive dedication so that the management facts and operations carried out during all its activities are represented in the accounting, correctly and promptly.

Each accounting operation must therefore be supported by suitable documentation certifying the activity carried out so as to allow:

- ☒ easy accounting registration;
- ☒ identification of the origin and/or formation of the documents;

the accounting and mathematical reconstruction of operations.

It is the duty of every employee or person involved in the preparation of the financial statements and explanatory notes to ensure that the accounting documentation complies with the above-mentioned principles and is easily traceable and ordered according to logical criteria. The law requires the application of the principles of transparency, correctness and truthfulness of financial statements and corporate communications and Assut guarantees the adoption of said principles to its employees or collaborators also in order to safeguard the trust that must be able to be placed by anyone is the recipient, in the veracity of all the information contained in said documents. In particular, employees and/or consultants responsible for processing the end-of-year accounting balances are required to formally control or promote the control of all accounting operations leading up to the production of said balances, also with a view to reducing the possibility of errors. interpretative.

2.16. RELATIONS WITH SUPPLIERS

The Company bases its relationships with its suppliers and subcontractors on principles of transparency, correctness, professionalism, efficiency, honesty and reliability.

The Company, in selecting its suppliers and subcontractors, will take into consideration the economic convenience, technical capacity, reliability, quality of materials, the supplier's compliance with the quality procedures adopted or to be adopted by the Company, their credentials, as well as the ability of suppliers and subcontractors to guarantee compliance with the Law and, in particular, with labor regulations, as well as with the Code of Ethics and Model 231. The Company will periodically monitor the permanence of the aforementioned suppliers over time requirements.

Each selection procedure must be carried out by adopting the broadest conditions of competition and any possible derogation from this principle must be authorized and justified, in compliance with current legislation. In procurement, procurement and, in general, supply of goods and/or services and external collaboration relationships (including consultants, agents, etc.), the staff (or external person) who takes care of the supplies and the personnel responsible for managing the contract (or external party), to formally adhere not only to the provisions contained in the Model, but also to the principles and rules of conduct contained in the company procedures and regulations issued or in the process of being issued, as well as in the legislation in force in matter.

Assut undertakes to enhance, in the context of procurement activities, respect for the conditions of protection and safety of workers, attention to the quality of goods, services and performances, respect for the environment and the pursuit of energy saving. In contracts with suppliers from countries at risk, defined as such by recognized organisations, contractual clauses will be introduced which provide for the supplier's adherence to specific social obligations (for example, measures which guarantee workers respect for fundamental rights, the principles of equal treatment and non-discrimination, protection of child labour) and the possibility of making use of control actions at the production units or operational offices of the supplier company, in order to verify the satisfaction of these requirements.

The assessment of compliance with the contractual conditions is carried out by the competent company subjects (or external parties authorized for this purpose) in an objective manner and must be reflected in written documentation.

Suppliers are asked, through a specific contractual declaration, to accept the provisions contained in this Code of Ethics, in the Model and to undertake to respect them. This declaration is signed for acceptance by the owner or legal representative of the company and attached to the documents produced when offering individual assignment procedures.

2.17. RELATIONS WITH CLIENTS YOU AND PRIVATE CLIENTS

For the Company, the full satisfaction of the needs of its customers and the creation of a solid relationship with them inspired by transparency, correctness, honesty, efficiency and professionalism is a priority objective.

Contracts and communications with customers must be:

- clear and simple, formulated with language as close as possible to that normally used by the interlocutors;
- comply with current regulations, without resorting to evasive, aggressive or otherwise incorrect practices;
- complete, so as not to overlook any element relevant to the customer's decision;

Assut undertakes to guarantee the achievement of the expected quality and safety standards and to periodically monitor the quality of the services provided, with a view to continuous improvement.

Assut undertakes to always respond in a clear, timely, precise and detailed manner to observations, requests and complaints from customers for their protection and also undertakes to ensure that the customer can make use of adequate and diversified, and to ensure careful monitoring of the same, in order to facilitate effective and mutual interaction between customer and company.

2.18. ENVIRONMENTAL PROTECTION

The Company recognizes the great importance of protecting the environment and, for this reason, contributes to the sustainable development of the territory and to the identification of industrial solutions with the lowest environmental impact.

All the Company's activities must be carried out in such a way as to comply with the provisions of the applicable environmental rules and regulations.

For Assut, the protection of the environment and biodiversity, also understood as a commitment to combating the effects of climate change, represents a basic value for the satisfaction of one of the primary needs of the individual citizen and the entire community: creating better conditions for future of the new generations.

2.19. REJECTION OF ALL FORMS OF TERRORISM

The Company repudiates all forms of terrorism and adopts, within the scope of its activities, suitable measures to prevent the danger of involvement, even indirect, in any activity that may have a terrorist purpose in any capacity. To this end, the Company will not establish any relationship of a commercial or working nature with individuals, natural or legal persons, involved in acts of terrorism, just as it will not finance or otherwise facilitate any activity of individuals who carry out activities for terrorist purposes in any capacity. .

2.20. RELATIONSHIPS WITH INTERNATIONAL OPERATORS

The Company undertakes to ensure that all relationships, including those of a commercial nature, with entities operating at an international level, take place in full compliance with current laws.

To this end, the Company undertakes to adopt all the precautions necessary to verify the reliability of these operators, as well as the legitimate origin of the capital and means used by the latter in the context of the relationships existing with the same.

The Company undertakes to collaborate, within the limits permitted, with correctness and transparency, with public authorities, including foreign ones, who may request information or carry out investigations regarding the relationships between the Company and these operators.

2.21. RELATIONS WITH THE PUBLIC ADMINISTRATION

The Company undertakes to conduct relations with subjects belonging to the central or peripheral Public Administration, supervisory authorities, independent authorities, public service concessionaires, public officials, public service representatives, with maximum transparency and ethics. the Authorities, members and officials of the European Communities, public officials of other foreign states or international public organizations (hereinafter, the "Public Administration").

The Company adopts particular precautions in relations with the Public Administration, in particular with reference to operations concerning: contracts; supply of goods and services instrumental to the stipulation of contracts; participation in tenders and tenders; requests for authorisations, licenses and concessions; requests, management and use of funding or benefits in general, however named, of public origin, both national and community; checks on the execution of contracts and related plant testing; inspection visits by the Public Administration; regulatory, administrative and corporate obligations; judicial proceedings in which the Public Administration is a party.

Relations with the Public Administration are maintained exclusively through persons appointed for this purpose. It is the duty of the SB to monitor these aspects.

2.22. RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS

All relationships with healthcare professionals must be based on compliance with internal company procedures and current regulatory provisions entities.

The Company prohibits its employees from promising or paying sums of money or other benefits to public employees on a personal basis in order to promote or favor the interests of the Company itself.

2.23. CLINICAL STUDIES

In planning and carrying out the trials, the Company adheres to the principles contained in the relevant regulations. The Company guarantees that clinical studies and all related activities are conducted exclusively for scientific purposes.

The centers to which the experimentation will be entrusted are chosen in compliance with the following criteria:

- structural suitability;
- presence of qualified personnel.

2.24. ORGANIZATION / SPONSORSHIP OF CONFERENCE EVENTS

In the organization / sponsorship of conference events, the Company complies with the Farindustria Code and all current regulatory provisions on the matter.

The Company's participation in conference events is subject to verification of the scientific nature of the event, the reliability of the organizers, and the presence of a concrete interest in the company.

The choice of conference locations is made on the basis of scientific, logical and organizational reasons.

The choice of speakers is made on the basis of objective criteria determined by the Company in relation to the nature of the event.

The Company guarantees "paid" participation in conferences only for those who hold the role of speaker or other prominent role in the conference or seminar. The paid participation of a speaker is regulated by company procedures relating to the assignment of professional and consultancy assignments.

2.25. RELATIONSHIPS WITH POLITICAL AND TRADE UNION ORGANIZATIONS

The Company does not make contributions, direct or indirect and in any form, to parties, movements, committees, associations or other bodies of a political or trade union nature, nor to their representatives or candidates, nor to organizations with which a conflict of interest could arise , except those due and/or permitted according to specific regulations.

Each relationship must be authorized by the relevant structures, paying particular attention to avoid situations in which conflicts may arise between the interests of the Company and those of the collaborator authorized to establish relations with the political or trade union organisation.

2.26. BOARD OF DIRECTORS

The Board of Directors carries out its functions with professionalism, autonomy, independence and responsibility towards the Company, creditors and third parties. In compliance with legal obligations, directors are required to avoid situations in which conflicts of interest may arise and to refrain from taking personal advantage of opportunities connected to the performance of their functions. The director who, in a given transaction, has, on his own behalf or on behalf of third parties, an interest in conflict with that of the Company, must inform the other directors, specifying its nature, terms, origin and scope.

The Board of Directors undertakes to ensure that the values set out in this Code are respected, promoting their sharing and dissemination, also towards third parties.

2.27. RELATIONSHIPS WITH SUPERVISORY AND CONTROL SUBJECTS

The supervisory bodies are invited to carry out their functions with impartiality, autonomy and independence, in order to guarantee effective control.

The Company ensures them access to the data, documentation and information necessary to carry out the assignment

2.28. RELATIONS WITH THE MEDIA

The Company addresses the press and mass communication bodies solely through the statutory bodies and through the internal managers delegated for this purpose.

These operate with an attitude of maximum correctness, availability and transparency, in compliance with the principles contained in this Code in order to guarantee that communication is truthful, non-violent, respectful of the rights and dignity of the person.

All material produced for institutional, project or promotional purposes must comply with the provisions on copyright.

2.29. RELATIONS WITH THE JUDICIAL AUTHORITY

It is forbidden to exercise conditioning of any kind on the person called to make statements before the Judicial Authority in order to induce him not to make statements or to make false statements.

It is forbidden to help anyone who has committed a criminally relevant act, to evade investigations by the authorities, or to escape their searches.

2.30. CONDUCT THAT MAY DAMAGE THE GOOD REPUTATION OF THE COMPANY

Recipients are prohibited from engaging in behavior which, although not criminally sanctionable, may cause reputational damage to the Company. Such behaviors are considered even more serious if exercised in the context of a top management and power position known for the collaborative or dependent relationship it

has with the Company. In the event that behaviors are implemented that contravene the laws of the countries in which the Company operates, these are considered extremely serious.

2.31. USE OF DRUGS AND BAN ON SMOKING AND ALCOHOL ABUSE

Without prejudice to legal prohibitions, the Company prohibits the use, sale, purchase, transfer, possession or presence in the workplace, in any form, of drugs other than prescribed medicines and ensures compliance with the prohibition of smoking in closed spaces and in the workplace.

Chronic dependence states, when they affect the working environment, will be - due to contractual implications - equated to previous cases; the Company undertakes to promote the social actions envisaged in this area by the employment contracts. Finally, the Company also prohibits the abuse of alcohol.

2.32. PROHIBITION OF POSSESSION OF CHILD PORNOGRAPHIC MATERIAL

It is absolutely forbidden to possess, on computer or paper media, at the Company's premises, its warehouses, its appurtenances, or in any other place which in any case can be traced back to the Company, or to disseminate child pornography material via the website, the mailbox of the Company's mail or publications edited or promoted by the Company.

2.33. USE OF COMPANY ASSETS

The documents, work tools, systems, equipment and any other tangible and intangible asset owned by the Company are used exclusively for the realization of institutional purposes, in the manner established by the same; they cannot be used by staff for personal purposes, nor be transferred or made available to third parties without the necessary authorizations, and must be used and looked after with the same diligence as one's own property. The assets also include data relating to personnel, organizational charts, financial and accounting data and any other information relating to the Company's activities and employees.

Each employee and collaborator is responsible for the protection of the resources entrusted to him and has the duty to promptly inform his manager and the Supervisory Body of any events harmful to the Company.

2.34. TAX REQUIREMENTS

The Company undertakes to carry out with completeness and transparency all the tax obligations required by current legislation and to collaborate, where applicable, with the financial administration.

Tax declarations and the payment of taxes represent behaviors that are not only mandatory from a legal point of view but also unavoidable in the context of the Company's social responsibility.

The keeping and conservation of records in compliance with the law is also essential for the correct determination of taxes. The recipients of this Code must not in any way commit or participate with others in committing criminal violations of tax legislation and must promptly report any violations to the Supervisory Body.

2.35. RECYCLING

The Company and all its collaborators undertake not to carry out or be involved in activities that imply the laundering (i.e. acceptance or processing) of proceeds from criminal activities in any form or manner.

All the Company's collaborators must formally verify in advance the available information (including financial information) on counterparties, suppliers and third parties in general, in order to ascertain their respectability and the legitimacy of their activity before establishing strategic and operational relationships with these .

3. METHODS OF IMPLEMENTATION AND MANAGEMENT OF REPORTS (WHISTLEBLOWING)

The implementation of the indications provided for by the Code of Ethics is expressed in the following operating rules:

a) the Code of Ethics has been prepared which, together with the Organizational Model pursuant to Legislative Decree 231, the sanction code and the preventive procedures dedicated to more sensitive aspects, collects all the indications aimed at preventing prejudicial events with negative impact; all recipients are required to rigorously observe the contents of the Code of Ethics, the MOG and the procedures within their sphere of competence.

Compliance with the rules is part of the contractual obligations of employees pursuant to articles 2104 and 2106 of the Civil Code; therefore the violation of these rules constitutes failure to fulfill contractual obligations and may lead to the application of the foreseen sanctions;

b) a Supervisory Body is established, with independence, full autonomy of action and control. The activity of the SB, characterized by professionalism and impartiality, is aimed at:

- supervising the application and effectiveness of the Code of Ethics and the Company's Organizational Model;
- the formulation of decisions regarding violations of the aforementioned documents;
- to the preparation of suggestions regarding the need to update the MOG or the Code of Ethics following regulatory developments or risk profiles that have changed due to a change in the business model and the related organizational structure;
- reporting problems detected in the implementation of the MOG or in the presence of its ineffectiveness;
- field checks and controls;
- to raise the awareness of the Recipients of training and its effectiveness on topics relating to the MOG;

c) Whistleblowing: all Recipients are required to report, verbally or in writing, even anonymously, any non-compliance and violations of this Code or the MOG; reports must be addressed to the Supervisory Body.

The reports must contain information useful to support the investigation and verification activities by the Supervisory Body. If possible, the reports must contain the details of the reporting party, in order to allow the

acquisition of further elements directly from the reporting party. In any case, there must be detailed reports of illicit conduct, relevant in accordance with the law and based on precise and consistent factual elements;

The Supervisory Body undertakes to ensure the confidentiality of the identity of the reporter as per Legislative Decree. 24 of 10 March 2023, without prejudice to legal obligations. In particular, in cases where the reporting person is an employee of the Company or a direct collaborator, he is guaranteed that no retaliation will be implemented against him.

However, if the preliminary investigation reveals that the report is unfounded and/or that it originated from mere informatory intent, the Company reserves the right to evaluate the possibility of initiating disciplinary action against the person responsible.

Reports to the Supervisory Body can alternatively be sent:

- Internet access at the following link: <https://assuteurope.lumosplatform.com/>;
- by post via registered letter with the wording confidential addressed to the Supervisory Body;
- in a closed envelope in the two company offices through the mailbox positioned not in a place of passage and far from surveillance cameras.

The Company undertakes to improve the reporting system, also by implementing a platform, with a link within its website, to send reports in a confidential and optionally anonymous manner.

The methods with which to make the aforementioned reports to the recipients indicated above are indicated on the Company's website and on the company intranet. These channels are able to guarantee the confidentiality of the identity of the reporter in the reporting management activities.

In any case, the Supervisory Body ensures that those who have made the reports are not subject to retaliation, discrimination or, in any case, penalisation, direct or indirect, for reasons connected, directly or indirectly, to the report, thus ensuring adequate confidentiality of such subjects.

The adoption of discriminatory measures against individuals who make the reports can be reported to the National Labor Inspectorate, for the measures within its competence, not only by the reporting party but also by the trade union organization indicated by the same.

The retaliatory or discriminatory dismissal of the reporting party is null and void. Changes in duties pursuant to art. are also null and void. 2103 of the Civil Code, as well as any other retaliatory or discriminatory measure adopted against the whistleblower.

d) the contents of the policies and rules referred to in this Code of Ethics are brought to the attention of the recipients, in particular of the personnel especially those newly hired, through specific communication tools aimed at promoting knowledge of the ethical principles and standards.

ANNEX A

Personal commitment to respect the spirit and letter of the Assut Europe S.p.A. Code of Ethics.

By signing this document, I acknowledge that I have received a copy of this Code of Ethics on and I undertake to respect the rules contained therein.

I also acknowledge that the Company's finding of behavior that breaches one or more ethical rules or an internal procedure entails the imposition of the disciplinary sanctions described in the sanctioning system approved by the company.

Therefore, in case of doubt about the performance of an activity that may lead to said violations, I will immediately contact a manager or a person who has top management and coordination responsibilities within the company structures (directions, functions and areas) or to the function that supervises corporate procedures (function of the company's organizational chart responsible for drafting and verifying internal procedures) or to a lawyer belonging to the relevant fanointing of society.

For receipt there

For viewing there

ANNEX B

Personal commitment to respect the spirit and letter of the Assut Europe S.p.A. Code of Ethics.

(it is aimed at all those who are not employees but represent Assut Europe as consultants, agents, canvassers, interns and other independent collaborators as well as all those who stipulate contracts with Assut Europe such as, for example, procurement contracts, works, services, supplies, etc.).

By signing this document, I acknowledge having received on copy of this Code of Ethics and I undertake to respect the rules contained therein. I also acknowledge that the violation of a provision of the said Code of Ethics entails the ipso iure termination of the contract of stipulated by me with the company on... ..

For receipt there

For viewing there