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Index

1 INTRODUCTION. 2
2 SCOPE AND TARGET AUDIENCE....2
3 GENERAL PRINCIPLES AND CRITERIA FOR CONDUCT....3
4 CRITERIA FOR CONDUCT IN RELATIONS WITH STAFF 4
5 PERSONNEL SELECTION AND ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP. 5
6 HUMAN RESOURCE MANAGEMENT POLICIES 5
7 ENHANCEMENT OF HUMAN RESOURCES 5
8 PRIVACY PROTECTION....6
9 CONFLICT OF INTEREST. 6
10 CULTURE OF SAFETY AND HEALTH PROTECTION. 7
11 CRITERIA FOR CONDUCT IN DEALING WITH THIRD PARTIES....7
12 IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS....10
13 SANCTIONS. 10

1 INTRODI?

Micromed S.r.l. promotes and implements, internally and in the performance of its activities, respect for ethical values in behavior and work activity, considering fairness, transparency and the principle of legality in internal and external relations fundamental criterion to which to standardize every action.

These principles are contained in this Code of Ethics and Conduct (hereinafter referred to as the "Code of Ethics") of which Micromed S.r.l., on the one hand, hopes for its spontaneous sharing, adherence and dissemination and, on the other hand, requires its observance and application by every individual working on its behalf or coming into contact with it, also providing for the application of disciplinary and contractual sanctions for any violations.

The Code of Ethics is therefore a set of principles and guidelines aimed at inspiring the activities of Micromed S.r.l. and guiding the behavior not only of its managers and employees, but also of all those with whom the Company comes into contact in the course of its activities, with the aim of ensuring that efficiency and reliability are also accompanied by ethical behavior.

The Code of Ethics, moreover, with the values and precepts provided, contributes in general to the prevention of the risk of commission of crimes by directors, managers, employees and collaborators of Micromed S.r.l.; this prevention is specifically regulated with the Management Model of Organization and Control, in accordance with the provisions of Legislative Decree no. 231/01, which the Company has adopted and regularly implements, the observance of which is part of the ethical behavior to be respected.

2 AMBIT€: OF A PPLLICATION AND RECIPIENTS

The principles and provisions of this Code of Ethics are binding for the Directors, for all persons linked by subordinate working relationships with Micromed S.r.l. ("employees") and for all those who work for it, whatever the relationship that binds them to it (by way of example but not limited to, consultants, agents, dealers, intermediaries, project workers, trainees, collectively hereinafter also "Collaborators").

The principles and provisions of this Code of Ethics constitute illustrative specifications of the general obligations of diligence, fairness and loyalty that qualify the performance of work services and the behavior that the employee or collaborator is required to observe.

Micromed S.r.l. is committed to requiring all those who act for it (partners, suppliers, etc.) to maintain a conduct in line with the general principles of this Code of Ethics, to this end disseminating its contents to all those who come into contact with the

same.

Micromed S.r.l. considers the observance of the rules and provisions contained in the Code of Ethics an integral and essential part of the contractual obligations arising, for employees, from subordinate lavor relationships also in accordance with Article 2104 Civil Code and, for non-subordinate collaborators, from the respective contractual regulations. Violation of the aforementioned rules will constitute non-fulfillment of the obligations arising from the employment or collaboration relationship, with all consequences of law or contract.

3 PRINCIPLES AND CRITERIA OF CONDUCT GENERAL

Micromed S.r.l., in the performance of its activities, is inspired by the ethical principles set forth below, the observance of which it requires of Recipients:

Legality

All recipients of this document are required to comply with current regulations, the Code of Ethics, and internal company rules; under no circumstances may the pursuit of the entity's interest justify actions that do not comply with them.

Loyalty

All activities, internal and external, must be marked by the utmost loyalty and integrity, operating with a sense of responsibility, in good faith, establishing correct relationships, as well as tending to the enhancement and safeguarding of Micromed S.r.l.'s assets.

Transparency

All actions and reports must be carried out ensuring fairness, completeness, accuracy, uniformity and timeliness of information.

Impartiality

Micromed S.r.l., in both internal and external relations, avoids any form of discrimination based on age, gender, sexual orientation, health status, race, nationality, religious beliefs, political and trade union opinions, or other.

Diligence and professionalism

Directors employees and collaborators diligently perform their professional services, working in the interest of Micromed S.r.l., pursuing objectives of effectiveness and efficiency.

Confidentiality of information

As part of the performance of its activities, Micromed S.r.l. ensures the confidentiality of personal data and confidential information that comes into its possession, committing itself to protect information about its employees and third parties, generated or acquired internally and in external relations, and to avoid any misuse of this information.

Each Recipient is obligated to ensure the confidentiality required by the circumstances or applicable regulations for each piece of information learned by reason of his or her job function.

Information, knowledge and data acquired or processed by employees and collaborators during I Their professional and work activities belong to Micromed S.r.l. and may not be used, communicated or disclosed without specific authorization.

The processing of all data acquired must be in accordance with current regulations.

Protection of the environment, safety

The environment is a primary asset that Micromed S.r.l. is committed to safeguarding. Activities are managed in compliance with current regulations on prevention and protection and environmental protection.

Employees and collaborators, within the scope of their duties, participate in the process of preventing risks, safeguarding the environment and protecting health and safety with respect to themselves, colleagues and third parties.

4 CRITERIA OF CCI1GOT IN RELATIONSHIPS WITH !L FOR SONAL

Micromed S.r.l. recognizes the value of human resources, through the protection of their physical and moral integrity and by fostering continuous growth in technical and professional skills.

Employees shall interact with each other while avoiding any discrimination on the basis of age, health condition, sex, religion, race, political and cultural views, or otherwise, and shall conduct themselves with respect for good manners.

Relations among employees, and between employees and collaborators, are marked by respect for the person as such and the activity he or she performs within the organization.

Micromed S.r.l. does not tolerate requests or threats aimed at inducing people to act against the law or against the Code of Ethics, or to engage in conduct detrimental to one's moral or personal beliefs and preferences.

Micromed S.r.l. ensures its employees safe, healthy working conditions and protects the physical and moral integrity of its employees and collaborators, adopting and maintaining appropriate management systems aimed at identifying, preventing and reacting to possible risk situations, to ensure the health and safety of all personnel, in compliance with current regulations and the Management Model of Organization and Control adopted and implemented.

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The evaluation of personnel to be hired shall be carried out on the basis of the correspondence of the candidates' profiles to those expected and to the specific needs of Micromed S.r.l., in accordance with the principles of impartiality and equal opportunity for all stakeholders.

At the time when the collaboration begins, the employee/collaborator must receive exhaustive information regarding the characteristics of the duties and function, normative and retributive elements, and regulations and behaviors for the management of risks related to personal health. All personnel must be employed under a regular labor contract, in accordance with the provisions of current legislative obligations.

6 HUMAN RESOURCES MANAGEMENT POLICIES

Any form of discrimination against people is prohibited.

All decisions made in the area of human resource management and development, including access to different roles or positions, are based on considerations of merit profiles and/or correspondence between expected profiles and profiles possessed by resources.

In the management of hierarchical relationships, authority is exercised with fairness and correctness, avoiding any abuse. It constitutes abuse of the position of authority to request, as a due act from the hierarchical superior, services, personal favors and any behavior that is not consistent with the professional profile or that otherwise constitutes a violation of this Code of Ethics.

T 'VALUING HUMAN RESOURCES.

Human resources are fully valued through the activation of available levers to foster their development and growth. The relevant functions, and all those responsible with respect to their employees, must therefore:

1. Select, hire, train, compensate and manage employees or collaborators without discrimination of any kind;
2. Create a work environment in which personal characteristics cannot give place to discriminate;
3. adopt merit, competence and otherwise strictly professional criteria for any decision regarding an employee or collaborator.

S PRIVACY PROTECTION

The privacy of employees and contractors is protected in compliance with relevant regulations, including through operational standards that specify the information received and how it is processed and stored.

Any investigation into the ideas, preferences, personal tastes and private life of the people.

Any information however acquired by Micromed S.r.l. about people's ideas, preferences, personal tastes and private lives shall not constitute grounds for personal discrimination.

9 CGNF LI7TO US INT EREST

Every employee/collaborator of Micromed S.r.l. is obliged to avoid all situations and all activities in which a conflict with the interests of the Company may arise or which may interfere with his or her ability to make, in an impartial manner, decisions in the best interests of the Company in line with the technical aspects of the profession performed and in full compliance with the rules of the Code of Ethics.

Each employee/collaborator of Micromed S.r.l., moreover, must refrain from taking personal advantage of acts of disposition of property or business opportunities of which he/she has become aware in the course of performing his/her duties.

Any situation that may constitute or determine a conflict of interest must be promptly communicated by each employee/collaborator to the head of the department and toThe Supervisory Board. In particular, all employees and collaborators of the entity are required to avoid conflicts of interest between personal and family economic activities and the duties they hold within the structure of Micromed S.r.l.

10 CULTURE OELLA .SAFETY AND HEALTH PROTECTION

Micromed S.r.l. is committed to promoting and spreading a culture of safety internally, developing awareness of risk management, promoting responsible behavior and preserving, especially through preventive actions, the health and safety of all employees and collaborators.

All employees and collaborators are required to scrupulously comply with the rules and obligations arising from the relevant health, safety and environmental regulations, as well as to comply with all measures required by the Management Model, procedures and internal regulations.

Each Recipient must take the utmost care in the performance of his or her activities, strictly observing all established safety and preventive measures to avoid any possible risk to himself or herself, his or her co-workers and colleagues as well as third parties however present in the workplace.

Each Recipient's responsibility to his or her co-workers and colleagues imposes the utmost care for the prevention of accident risks to protect his or her own safety and the safety of others. Each Recipient must follow the instructions and directives provided by the Company for compliance and fulfillment of safety obligations.

11 CONDUCT CRITERIA IN DEALING WITH THIRD PARTIES

Relationships with collaborators and consultants

In the context of relations with collaborators and consultants, Recipients must:

1. Carefully consider the use of external collaborators;
2. Select counterparts of appropriate professional qualification and reputation;
3. Establish efficient, transparent and cooperative relationships by maintaining an open and frank dialogue in line with the best business customs;
4. Obtain the cooperation of employees in consistently ensuring the most convenient relationship between quality of performance and cost;
5. Demand the enforcement of contractually agreed conditions;
6. Operate within the framework of current regulations and require timely compliance;

7. Require collaborators to abide by the principles of this Code of Ethics and include appropriate provision in contracts.

Behavior contrary to the principles expressed in the Code of Ethics and the regulations in force may be, by Micromed S.r.l., considered a serious breach of the duties of fairness and good faith in the execution of the contract, grounds for injury to the fiduciary relationship and just cause for termination of contractual relations.

Customer relations

In dealing with businesses and workers, directors, employees and contractors are required to:

1. To develop and maintain favorable and lasting relations with them, marked by maximum efficiency, cooperation and courtesy;

2. Meet commitments and obligations to them;

3. Provide accurate, complete, truthful and timely information;

4. Develop communications inspired by the criteria of simplicity, clarity and completeness;

5. Operate within the framework of current regulations and require timely compliance;

6. require them to abide by the principles of this Code of Ethics and include appropriate provision in contracts.

Relations with suppliers

Relations with suppliers are marked by the search for a fair competitive advantage, the granting of equal opportunities for those involved, loyalty, all impartiality and recognition of the professionalism and competence of the interlocutors.

Micromed S.r.l. is committed to requiring its suppliers to comply with behavioral principles corresponding to its own, considering this aspect of fundamental importance for the establishment or continuation of a business relationship. To this end, suppliers are informed of the existence of the Code of Ethics and related commitments, providing in individual contracts special clauses that refer to it.

The selection of suppliers and the purchase of goods and services are carried out by the appropriate functions based on objective assessments of competence, competitiveness, quality and price.

Providers are required to:

1. Establish efficient, transparent and collaborative relationships, maintaining an open dialogue and

frank in line with the best business customs;

2. Consistently ensure the most convenient relationship between quality, cost and delivery time, comply with contractually agreed conditions;

3. Operate within the framework of existing regulations on contractual, contributory, safety and hygiene of I work and environmental protection;

4. not to use, in the performance of its activities, labor that does not comply with the relevant regulations in force, condemning Micromed S.r.I. any form of labor exploitation, including that of minors, women or foreign nationals;

s. abide by the principles of this Code of Ethics.

Relations with the Public Administration and Supervisory Orqans.

Public Administration is to be understood in the broadest sense to include all public bodies that concur in the exercise and functions of the management, direction and coordination of the state, or a circumscribed territory, in matters within its jurisdiction.

Relations with the Public Administration, public officials or persons in charge of a public service must be inspired by the strictest compliance with the applicable provisions of Law and regulations and may not in any way compromise the integrity or reputation of Micromed S.r.I.

The assumption of commitments and the management of relations with the aforementioned parties are reserved exclusively for the functions assigned to them and authorized personnel, in compliance with internal procedures and the Management Model of Organization and Control, ex D.L. vo 231/01, adopted and implemented by Micromed S.r.I.

In the context of relations with such persons, Recipients shall refrain from offering, even through an intermediary, money or other benefits to the public official involved, his family members or persons in any way connected to him, and from seeking or establishing personal relationships of favor, influence, interference with the aim of influencing or influencing, directly or indirectly, his activities.

Micromed S.r.I. rejects any behavior that could be interpreted as a promise or offer of payments, goods or other utilities of various kinds in order to promote and favor its interests and take advantage of them.

Gifts or gratuities are permitted only if they are of modest value and, in any case, if they cannot be interpreted in any way as a means of receiving illegitimate favors, and always with the explicit authorization of the Directors.

Any employee who directly or indirectly receives proposals for benefits or requests for money or other benefits from public officials, public service appointees or employees in general of the Public Administration or other Public Institutions, must immediately report this to the internal body in charge of supervising the application of the Code of Ethics and the Management Model of Organization and Control adopted, if an employee, or, if a third party, to his or her company contact who, in turn, will report to the supervisory body provided for in the Management Model pursuant to Legislative Decree 231/01 adopted.

12 IMPLEMENTATION AND MONITORING OF THE CODE ETHICS

The application of and compliance with the Code of Ethics are monitored by the above-mentioned Supervisory Board, which also promotes, in collaboration with the Directors of Micromed S.r.l., initiatives for the dissemination of knowledge and understanding of the same.

Any violation of the Code may be reported at any time to the Supervisory Board, which undertakes to ensure the secrecy of the identity of the reporter, without prejudice to legal obligations.

Reports, like any other violation of the Code detected as a result of other investigative activities, are promptly evaluated by the Supervisory Board for the adoption of any sanctioning measures.

13 SANCTIONS

For employees, compliance with the rules of the Code of Ethics constitutes an essential part of their contractual obligations; therefore, their violation constitutes non-fulfillment of the primary obligations of the l lavoro relationship or a disciplinary offence.

Violation of the rules contained in this Code of Ethics, therefore, entails the adoption of disciplinary measures, proportionate to the seriousness, recidivism or degree of misconduct, in compliance with the discipline set forth in Article 7 of the Workers' Statute, with all the consequences of leg, including with regard to the continuation of the labor relationship and compensation for damages.

The provisions of this Code shall also apply to temporary workers who are obliged to comply with its precepts. Violations shall be sanctioned by disciplinary measures adopted by the respective agencies administering the lavor, to which the violation posed has been communicated byll the Supervisory Board of Micromed S.r.l.

With regard to Directors and Executives, violation of the rules of the Code may result in the adoption by the Administration of measures proportionate to the seriousness, recidivism or degree of misconduct, up to and including termination for just cause.

Violation of the Code by suppliers, collaborators, external consultants and by other Recipients other than the aforementioned persons shall be considered as a serious act, such as to determine, in the event that such a relationship is regulated by a contract, the termination of the contract, without prejudice to the right to compensation for damages and the possibility of criminal prosecution in cases where a criminal offence is involved.

Fontenuova, 14/10/2024

A.U. Micromed S.r.l.