

## Organisational Model

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*pursuant to Legislative Decree No 231/01*

## ***Code of ethics***

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## 1. INTRODUCTION

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Aferetica recognizes the importance of ethical and social values in work and business: consequently, it is committed to an upright and responsible management of its own activities and of its social partners, in respect of the community of which it is a part.

This commitment has given rise to this Code of Ethics, which has the following aims:

- Define the fundamental ethical principles of Aferetica;
- Establish the rules of conduct of people who work with it and for it;
- To promote dialogue, involvement and consensus of these subjects;
- To indicate the basis of a voluntary agreement in order to ethically regulate the relations between Aferetica and its interlocutors;
- Represent the basic element for the adoption of the Organizational Model pursuant to Legislative Decree 231/2001 on the administrative liability of entities.

Aferetica considers unethical the behaviours aimed to:

- Appropriate the benefits or collaboration of others through positions of power or strength.
- Failure to comply with the laws, regulations and rules in force.
- Alter the correctness and truthfulness of the data contained in the financial statements.
- Obstruct the functions of control by public authorities in charge.

The rules of conduct, values and principles set out below, as part of Aferetica system of governance, confirm the Company's commitment to limit its freedom to operate in purely opportunistic terms and to ensure all stakeholders forms of participation and dialogue.

Aferetica system of governance guarantees effective management of the Company's activities and a system of internal and external controls to cover operational risks.

In pursuing the company's mission, Aferetica will ensure that the principles of this Code are understood and shared by management, its collaborators (partners and non-partners), its customers and suppliers and civil society.

This Code of Ethics consists of:

- Values and principles of a general nature, which the Code is inspired by and which Aferetica intends to protect and share with its stakeholders;
- Special rules of conduct, which are complied with by the Recipients of the Code;
- Rules for implementing the Code and monitoring its observance.

The document is approved by the Board of Directors, which will circulate it to all interested parties. The Company's commitment is to ensure that the activities of its services are carried out in compliance with the law, with honesty, integrity, fairness and in good faith, respecting the legitimate interests of users, employees, collaborators and contractual partners.

This Code of Ethics expressly refers to the minimum contents expressed in section III of the "Guidelines for the construction of organization, management and control models" pursuant to Legislative Decree no. 231 of 8 June 2001, approved by Confindustria on 7 March 2002 and updated in March 2014 and to the Assobiomedica Code of Ethics updated in February 2018.

## 2. SUBJECTS

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The Code of Ethics is addressed to:

- the members of the corporate bodies;
- employees (managers, middle managers, clerks, workers);
- suppliers and other collaborators of the Company who, directly or indirectly, permanently or temporarily, establish relationships or relations with Aferetica whereby they operate to pursue its objectives.

In view of this, Aferetica undertakes to disseminate this Code to all interested parties, to correctly interpret its contents and to provide tools to facilitate its application.

Aferetica trusts that the subjects of the Code will behave in accordance with the values and principles of the Code, bringing it to the attention of customers, suppliers and civil society.

Aferetica also implements the necessary measures in order to carry out verification and monitoring of the application of the Code itself, providing for penalties in the event of its violation. To this end, a special internal body is identified with the task, among others, of supervising the application of the Code.

## 3. VALUES AND PRINCIPLES

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### 3.1 Values

Aferetica refers to the great values of civilization and democracy ratified by the Constitutions of the Italian Republic and the European Union and in the Universal Declaration of Human Rights of the United Nations, recognizing in dignity, freedom, equality, solidarity and justice, the value bases of civil living.

In particular, it is fully recognized in Article 41 of the Italian Constitution, according to which private economic initiative "may not be carried out in conflict with social utility or in such a way as to cause damage to security, freedom, human dignity".

Aferetica directs its activity to the principles contained in this Code, declaring itself free not to enter into or continue any relationship with those who demonstrate that they do not share its content and spirit and/or violate its principles and rules of conduct.

Its bodies, their members, managers, employees and collaborators are required to comply with this Code.

### 3.2 Directness and completeness of information and communications

Aferetica is committed to inform the relevant social partners in a clear and transparent way about its situation and its progress, without favouring any interest group or individual.

The financial, accounting and management evidence and any other communication comply with the requirements of truthfulness, completeness and accuracy.

Aferetica recognizes the fundamental value of correct information to shareholders, bodies and competent functions, regarding significant events concerning corporate and accounting management. It also recognizes the fundamental value of correct information also to third parties, in the phase of Advisory or investment solicitation, both for itself and for its customers. Aferetica in this case uses Best Practices or possibly third parties, to ensure impartiality and consistency of judgment.

Communication is mainly based on scientific information, which must be accurate, balanced, correct, objective, unambiguous or misleading, documented and documentable. The information must be produced and disseminated in accordance with the provisions governing the matter.

### **3.3 Respect for legality**

Aferetica assumes as a mandatory principle the strict observance of all the regulations in force and of the provisions issued by the Supervisory and Control Authorities. The Company adopts internal procedures and organisational and control models aimed at preventing and combating any conduct contrary to the principle of legality and promotes a "culture of internal control" among all recipients.

Aferetica makes every effort, within its competence, to combat corruption, terrorism, money laundering and any other form of crime, intending to pursue its own interest through honest conduct and in compliance with the law.

The Company undertakes to adopt useful and appropriate measures so that this constraint of respect and ethical conduct is made its own and practiced by all recipients of the Code itself.

Each subject is therefore responsible, to the extent of his or her competence, for the compliance of his or her activity with the principles of the Code and for the adoption of corporate control systems; in particular, each employee, within the scope of his or her role and competences, is responsible for the proper functioning of the internal control system.

### **3.4 Fairness in corporate management and use of resources**

Aferetica pursues its corporate purpose in compliance with the law and the Articles of Association, ensuring the proper functioning of the corporate bodies and the protection of the patrimonial and participatory rights of the shareholders, safeguarding the integrity of the share capital and assets. The use of company resources is based on the utmost transparency with periodic reporting to the competent internal and external control bodies.

### **3.5 Relations with Public Administrations**

All those who work in the name and/or on behalf of Aferetica must not induce the Public Administration to violate its principles of good administration and impartiality.

The persons appointed by the Company to follow negotiations and/or relations with the Public Administration may not, for any reason, behave to illegitimately influence the decisions of the Public Administration in order to obtain an illegal or undue advantage or interest from Aferetica.

Aferetica prohibits and condemns any behaviour carried out by those who act in its name and on its behalf:

- Consisting in promising or offering directly or indirectly money or other benefits to Public Officials and/or Persons in Charge of a Public Service in order to obtain for Aferetica an illicit or undue advantage or interest.
- Aim of obtaining contributions, financing or other income from the Public Administration, by means of false or altered statements and/or documents, or information omitted or more generally as a result of tricks or deceptions aimed at misleading the provider.

- Aimed at allocating, for purposes other than those for which they were granted, grants, subsidies or financing obtained from the Public Administration, even if of modest value.

This requirement extends not only to direct incentives, but also to indirect ones made by the Company, in any form, through agents, distributors, consultants or other third parties. The Company shall pay particular attention to the laws and regulations that prohibit or circumscribe incentives aimed at influencing health professionals or customers.

### **3.6 Protection and regard of people**

Aferetica recognizes the centrality of human resources and the importance of establishing and maintaining relationships with them based on loyalty and mutual trust. In this sense, all those who work for Aferetica, even in contractual forms other than that of subordinate work, are understood primarily as human resources.

All internal and external human resources commit to act loyally in order to respect the obligations deriving from the employment contract, if subordinate, and from the provisions of the Code of Ethics, ensuring the services that are required of them and respecting the commitments undertaken, even in the event that they become aware of the conduct that differs from those defined in it held by other recipients of the Code.

The management of the employment relationship is based on respect for the person, fairness and respect for equal opportunities, without any discrimination depending on sex, race, religious beliefs, political opinions, age or state of health. Any form of discrimination against people is prohibited.

All personnel are hired under a regular employment contract: no form of illegal or, in any case, irregular work is permitted.

The decision to enter into an employment relationship or to entrust a collaboration mandate must be made on the basis of the correspondence of the candidates' profiles and their specific skills with the company's needs, in compliance with the equal opportunities of the candidates. The information requested must be closely linked to the verification of the professional and psycho-attitudinal requirements requested, in compliance with the privacy and political-social opinions of the candidate.

When the collaboration begins, the person receives exhaustive information regarding the characteristics of the duties and function, the regulatory and salary elements and the regulations and behaviours for the management of risks related to personal health.

All decisions taken in the context of the management and development of human resources are based on considerations of merit profiles and/or correspondence between expected profiles and profiles possessed by individuals. The same applies to access to different roles or assignments.

Budget objectives, both general and individual, for employees or collaborators, must be objectively achievable, in relation to the time available for their achievement and the means available.

Aferetica promotes the growth of professionalism through training activities and the sharing of knowledge, in the belief that the individual and collective contribution to work processes is an essential element for its development and for the enhancement of people.

In the management of hierarchical relationships, authority is exercised with fairness and correctness, avoiding any abuse. It is an abuse of the position of authority to request, as an act due to the hierarchical superior, services, personal favours and any conduct that constitutes a violation of the Code of Ethics.

In the case of company and/or production reorganizations, the value of human resources is safeguarded by providing, if necessary, training and/or professional retraining.

Aferetica recognizes and respects the role of trade unions and their full right to exercise their activity of worker representation and promotes the dissemination of a proper system of industrial relations, including through the strengthening of worker and union participation in the development of the company.

### **3.7 Health and safety**

For Aferetica, respect for the physical and cultural integrity of people is an ethical value of reference: Aferetica strives to ensure the protection of health and safety in the workplace, and to exercise the utmost fairness in the management of the employment relationship, in compliance with the contracts and laws in force on the subject.

Aferetica systematically complies with all the provisions of current legislation on health and safety in the workplace.

The Company informs, stimulates and sensitizes all personnel, to avoid that carelessness or neglect frustrate the organizational efforts made. Employees and all company collaborators in various capacities are required to scrupulously follow the instructions given in relation to safety.

Aferetica puts in place methodologies to make systematic and under control all the requirements regarding security and systematically supervises the correct adoption of the security measures provided.

### **3.8 Social and environmental responsibility**

In the belief that it is possible to combine the profitability requirements of the company with respect for ethical values and the protection of the environment, Aferetica pursues the objective of encouraging not only the economic, but also cultural and moral development of the community, invests in energy saving and takes care of the environmental impact of its activities, paying attention to waste disposal, consumption of energy resources and emissions caused.

Aferetica, in fact, has at heart the concept of local community, understood as that set of territory, people, workers, traditions, public and private institutions that represent the social and geographical fabric of which Aferetica is part. The environment is a primary part of this fabric and its protection from potential pollution problems is, and must remain, an important aspect for Aferetica and for anyone working with it.

Aferetica promotes the spread of a culture of solidarity, safety and prevention.

All those who make any purchase of goods and / or services, must act in accordance with the principles of fairness, affordability and quality and operate with the diligence of a good family man, verifying compliance with the principles of the Code of Ethics by suppliers, with particular regard to the protection of workers' rights and respect for the environment.

### **3.9 Preserving the company's image**

Aferetica reputation is an intangible asset of absolute value that allows it to develop relationships of trust with its interlocutors. This reputation depends on the image that the company has built over time and has a very fragmentary nature.

The company's image, in turn, depends on many different factors, the first and most important of which concerns the behavioural ethics held by the people of Aferetica at all times, and in particular in relations with the outside world.

Aferetica trusts that all recipients will represent it with professionalism, honesty, seriousness and fairness and will strive to protect its image.

### ***3.10 Fair competition and proper publicity***

Behaviour in the market and regarding competitors must be based on the utmost correctness; in particular, the Company must not behave in an improper manner that is detrimental to the image of competitors.

Aferetica promotes a culture of fair competition in the markets in which it operates and acts in accordance with current national and EU Antitrust regulations, in its relations with customers, suppliers and competitors. The Company's advertising communications shall be transparent, correct, truthful and suitable to not mislead the persons to whom they are addressed and not to harm a competitor.

Aferetica, through the persons acting on its behalf, does not offer or accept money or goods in any form to promote or facilitate the conclusion of business to its advantage in violation of laws, regulations or free competition. Courtesy gifts are allowed when they are of modest value and are not appreciable as a means of seeking favours or privileges, in violation of current regulations or fair competition.

The Company condemns conduct contrary to the principles of competition and undertakes to observe them by adopting appropriate measures to prevent association meetings from becoming, even involuntarily, an opportunity for anti-competitive behaviour.

In this context, the Company and its collaborators must not be involved, either personally or through third parties, in initiatives or contacts between competitors (by way of example, not exhaustive: discussions on prices or quantities, subdivision of markets, limitations on production or sales, agreements to share customers, exchange of information on prices, etc.), which may appear as a violation of the regulations protecting competition and the market.

### ***3.11 Exports***

The Company respects applicable export control laws and other regulations which restrict trade with certain countries.

### ***3.12 Protection and privacy of personal data and information***

In accordance with current legislation, the processing of personal data relating to customers, employees, collaborators and suppliers is carried out with the utmost respect for the dignity of the person concerned and his or her right to privacy and protection of personal data.

Aferetica undertakes to treat such data in a lawful and correct manner, collecting only those relevant and not exceeding the purposes for which they are collected.

Aferetica has also analysed the possible risks to the processing of data and has adapted its information systems, both paper and electronic, to minimize the possibility of harmful events; Aferetica is committed to maintaining these systems dynamically updated on the basis of legislative, regulatory and technological developments, at the same time, has extended to all its employees, internal and external, the responsibilities in this regard, implementing the monitoring.

### ***3.13 Transparency in relations with the Supervisory and Control Authorities***

The communications of Aferetica to the Supervisory and Control Authorities and to the public are exhaustive, not misleading, clear and timely and are made only by the corporate bodies and the corporate function responsible for this. The protection of information transparency is favoured by compliance with the current provisions and internal procedures adopted on the subject.

### **3.14 Associations and politics**

Aferetica actions are governed solely by the principles of its Articles of Association and Rules, in a context of respect for all opinions.

Aferetica can contribute to the financing of associations and the support of political parties and/or their media, committees, organizations or political candidates, in accordance with the Statute and the rules in force.

Aferetica may entertain normal commercial or legal relations with the same parties in compliance with the laws, regulations in force and this Code of Ethics.

### **3.15 Conflict of interest**

The subjects of the Code shall refrain from carrying out acts in which they have, even indirectly, interests in potential conflict with those of Aferetica or the group in general, such as, for example, personal or family interests of a financial or commercial nature with customers, suppliers, competitors.

A conflict of interest is constituted by the fact that a director, manager, employee or collaborator pursues or attempts to pursue for himself or for third parties an objective other than that pursued by Aferetica, or procures voluntarily or attempts to procure a personal advantage during the performance of activities carried out in the interest of Aferetica, or procures or attempts to procure it for third parties. For this reason, practices of corruption, illegitimate favours, collusive behaviour, solicitations, directly and/or through third parties, for personal and career advantages for oneself or for others and other similar behaviour are prohibited.

The Management of Aferetica, its employees and collaborators refrain from making and/or receiving gifts of any kind and value in the context of employment relationships, except for symbolic value and in accordance with normal business practices, paying particular attention to relations with employees of the Public Administration.

Aferetica customers and suppliers are invited to refrain from making gifts that could induce the subjects of the Code to behave in contrast with the interests, including moral interests, of the Company.

Aferetica recognizes and respects the right of its employees and collaborators to participate in investments, business or other activities outside those carried out in the interest of Aferetica, provided that these are activities permitted by law and by contractual and statutory regulations, as well as compatible with the obligations assumed as partners, employees or collaborators.

Any situation that may constitute or determine a conflict of interest, even if potential, must be promptly communicated to the Supervisory Body and to the hierarchical superior for appropriate measures. In particular, all Aferetica partners, employees and collaborators are required to avoid conflicts of interest between personal and family economic activities and the duties they perform within their structure. By way of example, but not limited to, the following situations give rise to conflicts of interest:

- Carrying out top management functions (managing director, director, function manager) or the essence of significant economic or financial interests at suppliers, customers, competitors or business partners of Aferetica or the group, including through family members;
- Use of one's position in Aferetica or the group or of the information acquired in one's work in such a way as to create a conflict between one's personal interests and the interests of Aferetica or the group;
- Performance of work activities, of any kind, with customers, suppliers, competitors;
- Acceptance or offer of money, favours or benefits from persons or companies that have or intend to enter into business relations with Aferetica or with the group.

### **3.16 Use of computer equipment**

Aferetica prohibits any practice that may violate the privacy of its own computer systems, of third parties, public or private, or cause you any damage, or aimed at falsifying a public or private computer document with evidential effectiveness.

Aferetica requires compliance with current legislation on the processing of personal data and the implementation of company regulations on the subject and related documents in the use of information technology tools owned by the company.

### **3.17 Media**

Relations with media are reserved exclusively for the functions and responsibilities delegated to them. Aferetica communicates true and transparent information to the outside world.

Partners, employees and collaborators do not provide information to the outside world, nor do they undertake to provide it, without the authorisation of the competent functions.

In no way or form do partners, employees and collaborators offer payments, gifts or other advantages aimed at influencing the professional activity of mass-media functions, or that can reasonably be interpreted as such.

## 4. RULES OF BEHAVIOUR

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### 4.1 Common rules

Aferetica recommends to the subjects of the Code responsible behaviour, pursuant to the achievement of company objectives and consistent with the values and principles set out above.

Every operation and/or transaction must be legitimate, documented, recorded and verifiable at any time.

Aferetica condemns any behaviour, by anyone, aimed at altering the correctness and truthfulness of the data and information contained in the financial statements, reports or corporate communications required by law.

The subjects are obliged to behave in a correct and transparent manner in the performance of their functions, in particular with regard to any request made by the Shareholders, the Board of Statutory Auditors, or by the Public Authorities responsible for checks and/or controls, maintaining an attitude of availability and maximum cooperation.

It is forbidden to intentionally spread false information, both internally and externally, concerning Aferetica, its employees and collaborators.

In particular, recipients who, due to the positions held or the duties performed, have access to confidential information or news relating to Group companies:

- do not communicate such news or information to third parties and do not use it for purposes unrelated to their office;
- refrain from carrying out, directly or indirectly, on their own behalf or on behalf of third parties, operations on the financial instruments of the companies concerned by using the same information or news.

From the point of view of commercial practices, any person in Aferetica, or working for the same as an external collaborator, is obliged to avoid any form, even promised, of offering money or other benefits to potential customers or other partners of the company, in order to make them choose Aferetica as a new supplier.

The above must be understood as fully valid also when working through a third party.

### 4.2 Corporate bodies

The authority, professionalism, diligence and independence of judgement of the Chairman, Chief Executive Officer, Directors and Statutory Auditors of Aferetica guarantee the achievement of the company's objectives and the protection of the interests of the company's stakeholders.

The Board of Directors promotes a culture of legality and supervises the full compliance of the company's activities with the laws, regulations and company procedures; it also promotes a culture of internal control and ensures maximum independence and autonomy of action for those in charge of control.

The executive Directors carry out their functions in compliance with the contents and limits of the proxies granted by the Board of Directors, to which they report on their work.

It is forbidden to engage in any conduct on the part of the Directors of the Company aimed at causing damage to the integrity of the company's assets.

Directors must not carry out any type of corporate transaction that could cause damage to creditors.

With regard to conflicts of interest, the activity of the directors complies with the provisions of the law and the relevant internal guidelines: any conflicts of interest are managed with total transparency and in such a way as to safeguard the interests of Aferetica. Any other conduct that violates the relevant legislation on corporate crimes is prohibited.

### **4.3 Employees**

#### *Commitment and sense of responsibility*

Aferetica employees carry out their duties with commitment, sense of responsibility, loyalty, seriousness and decorum in compliance with legal and contractual provisions and company directives. Aferetica also trusts that all those who carry out coordination activities will behave with courtesy and respect towards their collaborators and promote their professional growth. Contractual and regulatory obligations

In particular, each employee is required to know and comply with the obligations arising from the observance of the rules of:

- CCNL applied;
- Company regulations;
- Company procedures deriving from the management systems applied

With regard to the last two points, both managers and employees, each for their part of expertise, are required to:

- ensure that the procedures for carrying out activities in accordance with the issued company procedures are respected;
- report any changes made in order to keep the documentation up to date;
- evaluating and promoting reports of improvement from its collaborators;
- managing the corrective actions and the preventive actions assigned;
- have the reports drawn up/edited and the indices for which they are responsible calculated/calculated;
- manage the assigned projects.

#### *Custody of the company's infrastructures, assets and instruments*

Employees are responsible for the conservation and protection of the infrastructure (including the canteen, toilets, workshop and office spaces) and the goods and tools (including machinery, computers, telephones, vehicles) that Aferetica makes available to them for the proper performance of their work, avoiding improper use of the same for purposes unrelated to the activity.

With regard to the assets owned by Aferetica each employee or collaborator is required in particular to:

- Avoid improper use that may cause undue costs, damage or reduction of efficiency or in any case uses contrary to the interests of Aferetica;
- Strictly adopt the provisions of the procedures, in order not to compromise the functionality, protection and security of information systems, equipment and systems of Aferetica;

- Always operate in compliance with the safety rules provided by law and internal procedures, in order to prevent possible damage to property, people or the environment;
- Use such goods, of any type and value, in compliance with the law and internal regulations;
- Use such goods exclusively for purposes connected with and instrumental to the exercise of work activity;
- Avoid, except when specifically authorized, the use or transfer of the goods by third parties or to third parties, even temporarily;
- Operate in order to reduce the risk of theft, damage, tampering, or other threats to such assets, promptly informing the appropriate functions in case of abnormal situations.

#### *Behavioural obligations of the person in charge of the function*

The manager is required to carry out and have carried out in an effective and efficient manner, the activities for which he is responsible in order to achieve the business objectives. The manager is required to behave with fairness, respect and decency towards both his managers, colleagues and collaborators.

The manager is required to communicate, according to the methods in use, all information relating to products, services associated with the product, production and non-production technologies, materials, customers, competitors and markets, of which he may become aware in the performance of his activities.

In particular, the person in charge must:

- collaborate in defining the profiles of the necessary resources;
- participate in the selection of the necessary resources;
- inform and train/collaborate in the training of new employees by providing all the necessary information (for example in terms of: company rules, use of infrastructure/equipment/company goods, working methods, safety and environment, etc.);
- inform in advance the management and the bodies concerned of all the reasons that prevent the execution of an activity delegated to its department/body;
- to provide collaboration and support to all the company bodies connected to him;
- compiling and pursuing the budget for the cost items under their responsibility in terms of resources (human, financial and technical), with the aim of improving the efficiency and effectiveness of the area under their responsibility.
- Furthermore, the manager, towards his own internal and external collaborators, is obliged to:
- verify compliance with contractual, regulatory and behavioural rules;
- to check and report to Management any non-compliance (e.g. regarding: company rules, use of infrastructure/equipment/company goods, work methods, safety and the environment, etc.);
- organize the resources within its competence;
- guarantee the optimal use of the resources assigned to them (collaborators, goods, equipment, money, etc.) and the correct management, according to the rules specified for each type of apparatus, of the end of life of the equipment;
- verify the correct use of infrastructures (canteen, bathroom, lights, etc.), equipment and company assets (computers, mobile phones, machinery, cars, etc.);
- to ensure that the best conditions are created, in terms of climate and motivation, within the area of its competence;

- notify the Management of its own training needs and those of its collaborators;
- ensure the continuity and correct performance of activities within its area regardless of the presence of its employees;
- never create conditions of dependence within its area on its collaborators;
- respect and ensure respect for the indications that, in compliance with current legislation and in terms of safety at work and waste management, the company has provided;
- supervise compliance with the smoking ban on the company's premises. This task involves the obligation to:
  - formally recall, using the form of reporting non-compliance, those who violate the observance of the smoking ban;
  - report, in the event of non-compliance with the warning, the conduct of the offender(s), to the local administrative police corps (police), agents and officers of the criminal police (police) who are responsible for notifying the violation of the ban and the consequent report of the report of the violation.
  - report any breaches to the Management.

### *Employee behavioural obligations*

The employee is required to:

- carry out the activities for which they are responsible in an effective and efficient manner;
- follow the instructions of your manager;
- maintain a respectful and correct attitude towards both the employee's manager and colleagues;
- collaborate in updating the company database, as far as it is concerned;
- communicating to their manager, in accordance with the procedures in use, information relating to irregularities or work failures, either by them or by others, of which they may become aware in the performance of their activities
- Observe the company's occupational safety and environmental management guidelines scrupulously.
- Maintain due confidentiality of personal data and information processed.

### *Confidentiality obligations*

Employees in charge of data processing store and protect personal data in an appropriate manner, following the relevant company regulations. Everyone is required to strictly respect the confidentiality of the data and information learned as a result of the activities carried out and in particular on the technical / patent solutions adopted by Aferetica.

#### *Duty of truthfulness of information*

Each corporate function is responsible for the truthfulness and originality of the documentation and information provided in the performance of the activity for which it is responsible.

### *Conflict of interest*

Each employee shall comply with the specific company provisions on conflict of interest and shall inform his or her superior in the presence of operations in which he or she has an interest, even indirect, potentially in conflict with those of the company.

#### **4.4 Collaborators**

Aferetica evaluates the importance of the contribution of collaborators and consultants to the daily activities of the Company and asks them to operate with honesty, diligence, seriousness and in compliance with the instructions given in relation to the task.

Aferetica manages its relations with its collaborators in conditions of equality and mutual respect.

Collaborators shall avoid taking personal advantage of the collaboration relationship, acting in the sole interest of Aferetica and shall adequately safeguard and protect the assets owned by Aferetica and the personal data available to them for the activity entrusted to them with the same directives valid for employees in the previous point.

Aferetica requires its external collaborators to respect the ethical principles expressed here, considering this aspect of fundamental importance for the establishment or continuation of a business relationship.

#### **4.5 Suppliers**

Aferetica requires its suppliers to respect the ethical principles expressed here, considering this aspect of fundamental importance for the establishment or continuation of a business relationship. Every supplier, business partner or external collaborator must be informed of the existence of the Code of Ethics and of the commitments that, according to it, are required of him.

The processes of purchasing goods and services are based on the search for competitive advantage, the granting of equal opportunities for those involved, loyalty and impartiality.

The selection of suppliers and the determination of purchase conditions are based on criteria of:

- objective evaluation of the quality and ability to provide and guarantee goods, services and performances of an adequate level;
- availability, suitably documented, of means, including financial means, organised structures, technical knowledge, skills and resources in relation to the intervention to be carried out;
- professionalism of the interlocutor.
- In the relationships of contract, works and works of procurement and, in general, of supply of goods and services, the partners, employees and collaborators of Aferetica di:
- Adopt objective and transparent evaluation criteria when selecting the supplier;
- Do not preclude anyone, in possession of the required requisites, from competing in the acquisition of the contract;
- Observe the contractual conditions;
- Maintain a frank and open dialogue with suppliers, in line with good business practices.

The stipulation of a contract with a supplier and the management of the relationship with the same is based on relations of extreme clarity and reciprocal fairness.

## 5. OBSERVANCE OF THE CODE

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Aferetica is committed to spreading the Code of Ethics to all subjects.

### **5.1 Compliance with the rules contained in the Code of Ethics**

Each subject of this Code of Ethics is required to know the rules contained therein, as well as the reference rules governing the activity carried out within its function, arising from the Law and / or procedures, provisions, internal rules Aferetica.

Each recipient must also explicitly accept their commitments under the Code of Ethics, in particular the recipients have the obligation to:

- refrain from conduct contrary to the rules contained in the Code of Ethics;
- contact their superiors, or the Supervisory Body referred to in paragraph 5.2, in the event of a request for clarification on the methods of application of the same;
- promptly report to their superiors, or to the Supervisory Board referred to in par. 5.2, any information, directly detected or reported by others, about possible violations of them and any request made to them to violate them;
- collaborate with the structures responsible for verifying possible violations;
- adequately inform any third party with whom they come into contact in the course of their work about the existence of the Code and the commitments and obligations imposed by it on external parties;
- demand compliance with the obligations that directly concern their activity;
- adopt appropriate internal and, if within its competence, external initiatives in the event of failure by third parties to comply with the Code's rules.

### **5.2 Supervisory Body**

A Supervisory Body has been set up specifically for this purpose and is responsible for the following tasks:

- monitoring the application of the Code of Ethics by the parties concerned through the application of specific organisational rules and accepting any reports provided by the internal and external social partners;
- periodically report to the Board of Directors on the results of the activities carried out, reporting any significant violations of the Code of Ethics;
- express opinions on the revision of the most important policies and procedures, in order to ensure their consistency with the Code itself;
- provide, where necessary, for the proposal for the periodic revision of the Code of Ethics.

It is possible to contact the Supervisory Board, also from external parties, either by e-mail at the address [odv231@aferetica.com](mailto:odv231@aferetica.com), or by ordinary mail at the address of the Chairman of the Supervisory Board published on the Company's website. In order to guarantee the confidentiality of the identity in the eventual use of the IT channel, the sending of the e-mail message from an account other than the company one is required. The OdV will analyse and evaluate the reports, guaranteeing their confidentiality and monitoring compliance with the prohibition of retaliatory or discriminatory acts, direct or indirect, against the reporter. The person who intentionally or grossly negligently makes reports that prove to be unfounded will be subject to the consequences set out in the following paragraph.

### **Violations and sanctions**

Compliance with the Code of Ethics is an integral part of the recipients' contractual obligations.

Violations committed by Directors, Managers, Employees and Collaborators of Aferetica are subject to the corporate disciplinary system in force, as provided for by the National Collective Labour Agreement applied: conduct contrary to the Code will be punished, in compliance with the right of defence, for the seriousness of the conduct, on the basis of the provisions of the law and the contract, and may constitute a cause for termination of contractual relations with the recipients, if the relationship of trust is terminated or there is a serious breach of the duties of fairness and good faith in the execution of the contract.

For violations of the Code by employees, the company rules on disciplinary sanctions apply, as well as, where applicable, the specific provisions of the Organisation and Management Model adopted pursuant to Legislative Decree no. 231 of 8 June 2001.

## **6. AMENDMENTS AND ADDITIONS**

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The Code of Ethics may be amended and supplemented by approval of the Board of Directors of the Company, on the basis of application experience or on the proposal of the Supervisory Board.