

FIDIM

ETHICAL CODE



DISCLAIMER

The only legally binding version of Fidim's Code of Ethics is the Italian-language version of this document; this English translation is provided for convenience only.

FIDIM S.p.A.¹ (“**FIDIM**” or the “**Company**”), an Italian corporation, is the parent company of an internationally oriented group and is aware that, due to the size and importance of its activities, it plays a significant role with respect to the market, economic development, the well-being of all individuals who work or collaborate with FIDIM, and the communities in which it operates.

FIDIM is multiracial, multicultural and multilingual, reflecting the different industrial and social characteristics of the countries in which it operates.

The complexity of the contexts in which FIDIM operates, the new challenges—such as sustainable development—and the need to protect and enhance the interests of all stakeholders involved in the company’s activities (“**Stakeholders**”) reinforce the importance of clearly defining the values and responsibilities that FIDIM recognizes, accepts, shares, and assumes, thereby contributing to building a better future for all.

FIDIM recognizes that the founding values of an organization, as well as its image, depend largely on the quality of the people who work within it. For the Company to fulfil its mission and achieve its objectives, capable employees are essential—individuals who are not only sensitive to FIDIM’s interests but also able to properly consider the interests of other parties and groups with whom they interact, internally and externally.

FIDIM has chosen to become a Benefit Corporation, pursuing a mission that has a positive and sustainable impact both on people and on the environment, as it feels a strong responsibility towards future generations. Its commitment to creating value for the community and all Stakeholders involved in its business activities is carried out internally, within its core business—namely through investment processes—and through its philanthropic initiatives.

FIDIM’s Objectives Are:

- 1.** to operate with a level of profitability that ensures the Company’s long-term economic solidity, while providing shareholders with an adequate return on investment sufficient to attract the necessary capital and support growth;
- 2.** to create shared value for all stakeholders through the implementation of projects with purposes of common benefit;
- 3.** to maintain an organization composed of capable and committed individuals in the countries where the Company operates and to offer opportunities for their national and international growth and development;
- 4.** to pursue standards of ethical, operational, technical, scientific, cultural, environmental, and marketing excellence that ensure a solid and competitive long-term position in the markets and territories in which the Company operates;

¹ FIDIM shall mean Fidim S.p.A. and its directly and indirectly controlled subsidiaries in Italy and abroad.

5. to pursue a fair balance between the interests of shareholders, employees, customers, and suppliers, as well as public institutions and any public or private third party, while achieving its objectives and considering the various social, economic, environmental, scientific, and cultural interests of the communities in which it operates;
6. to demonstrate high standards of integrity in all phases of the Company's activities.

In pursuing these objectives, FIDIM is guided by the following principles:

- legality,
- honesty,
- fairness,
- integrity,
- transparency,
- non-discrimination,
- respect for human rights and individual freedoms,
- protection of workers' health and safety,
- enhancement of human resources,
- environmental protection,
- protection of cultural heritage,
- support to scientific progress.

Based on these principles, and in compliance with applicable laws, regulations, customs, and practices, FIDIM has adopted the following policies:

Towards all stakeholders

- ❖ adopting and complying with a responsible investment policy integrating purposes of common benefit within business processes, such as:
 - promoting and supporting cultural dissemination;
 - promoting and supporting scientific research in the fields of chemistry, biotechnology, pharmacology, and medicine;
 - nurturing people's talent and passions.

Towards employees

- ❖ promoting the use of all employees' experience, skills, and creativity to improve the Company's operational and commercial performance;
- ❖ respecting the inclinations and opinions of all employees and contributing to the development of the communities in which the Company operates;
- ❖ offering development opportunities and professional growth to all employees who demonstrate the required skills, motivation, and integrity;

- ❖ promoting high standards of workplace health and safety;
- ❖ providing fair and competitive compensation within the national or local context;
- ❖ maintaining relationships with all employees and their representatives based on good faith.

Towards customers

- ❖ pursuing excellence in all aspects of the Company's activities by continuously improving the quality and performance of products and services;
- ❖ understanding customers' needs and providing them with high-quality products and services at competitive costs;
- ❖ ensuring that products meet all required standards regarding consumer health and safety.

Towards Technology

- ❖ maintaining the security of Company-owned information and processed data, ensuring confidentiality, integrity, availability, and authenticity;
- ❖ using technology and know-how while safeguarding intellectual and industrial property rights and ensuring due recognition of such contributions;
- ❖ encouraging and supporting innovation in Company activities;

ensuring that all uses of artificial intelligence comply with principles of legality, transparency, fairness, safety, and respect for fundamental rights. The Company prohibits the use of AI systems that may harm individuals, discriminate, or violate privacy, and adopts all necessary measures to ensure transparency and accountability in adopting such technologies.

About environmental protection

- ❖ seeking compatibility between environmental protection and the Company's processes and products;
- ❖ undertaking all necessary actions to prevent or reduce any negative environmental impact resulting from the Company's activities;
- ❖ complying with local legal standards and promptly implementing any changes required to ensure compliance;
- ❖ minimising waste and pursue the most efficient use of energy and other raw materials.

Regarding financial and commercial practices

- ❖ regularly providing a truthful and accurate consolidated representation of FIDIM's financial position, income statement and financial flows, in compliance with applicable accounting principles and within the deadlines established by law;
- ❖ conducting financial and economic transactions and operations with any private or public party with transparency and fairness, and in compliance with applicable rules and laws;
- ❖ adopting appropriate measures to identify and prevent fraud, misappropriation, and any conduct that may be criminally relevant, whether committed by the Company, its employees, collaborators, or individuals representing FIDIM;
- ❖ refraining from offering or receiving money unduly;
- ❖ ensuring that all financial transactions are properly recorded in the accounting books, that diligent management of accounting records and procedures is maintained, strengthened by a comprehensive internal control system, and that all documentation is available for review by those responsible, supervisory bodies, and authorities;
- ❖ requiring all Recipients holding positions of responsibility to refrain from undertaking commitments or maintaining relationships that may generate a conflict of interest with FIDIM, and, where such situations arise, to immediately notify the Company;
- ❖ refraining from improperly involving their work activities in political activities in the countries where the Company operates;
- ❖ engaging in financial or commercial transactions only within the limits strictly necessary for business operations and the protection of FIDIM's interests, within forecasted needs and in accordance with prudent practices inspired by the principles of transparency and fairness;
- ❖ acting with independence of judgment and in the exclusive interest of FIDIM in all circumstances that may influence conditions of free competition, refraining from practices that restrict competition.

FIDIM believes that only through strict adherence to the principles and rules of conduct set out in the Code of Ethics is it possible to protect the interests and rights of its employees, customers, suppliers, collaborators, shareholders, public institutions, and any other private or public third parties, while at the same time creating shared value for all stakeholders.

No code of conduct—no matter how detailed—can represent all the rules that must be followed in carrying out one's activities. The purpose of this document is therefore to provide guidance on our core values and fundamental principles, without claiming to offer a complete framework of all rules and corporate policies adopted by FIDIM.

FIDIM rejects any business model that conflicts with the principles and rules set forth in this Ethical Code, convinced that their observance is an essential prerequisite for long-term success.



FIDIM S.p.A.

President
Lucio Rovati

CODE OF CONDUCT – INTRODUCTION

1. Purposes of the Ethical Code

The Ethical Code aims to define the general principles, values, and behavioural rules that must be followed by all those who operate—both in Italy and abroad—for the achievement of the Company’s objectives.

FIDIM believes that compliance with ethical rules and transparency in business conduct are not only a necessary condition but also a competitive advantage to pursue and attain its goals.

To this end, FIDIM promotes the creation of an environment characterised by a strong sense of ethical integrity, based on the conviction that such integrity significantly contributes to the effectiveness of corporate policies and control systems, influencing behaviours that might otherwise escape even the most sophisticated oversight mechanisms.

In carrying out its activities, FIDIM draws inspiration from the protection and promotion of human rights—inalienable and essential prerogatives of every individual and the foundation for building societies based on the principles of equality, solidarity, rejection of war, and the safeguarding of civil, political, social, economic, and cultural rights, as well as third-generation rights (such as the rights to self-determination, peace, development, and environmental protection).

Every form of discrimination, corruption, forced labour, or child labour is rejected. Particular attention is dedicated to recognising and protecting dignity, freedom, and equality; safeguarding labour and trade-union freedoms; health and safety; the environment and biodiversity; and upholding values and principles of transparency, energy efficiency, and sustainable development as affirmed by international institutions and conventions.

FIDIM therefore considers it appropriate and necessary to adopt this Ethical Code, which defines the values and principles that must guide the conduct of everyone who contributes—at various levels of responsibility—to the Company’s operations, including consultants and external collaborators of any kind.

These values mainly include:

- ❖ moral integrity, personal honesty, loyalty, mutual respect, fairness and good faith in internal and external relations
- ❖ transparency towards shareholders, stakeholders, and the market
- ❖ respect for employees and commitment to enhancing professional skills
- ❖ social responsibility
- ❖ protection of health, safety, and the environment

and, more generally, the refusal of any conduct which, even when aimed at achieving a result in FIDIM’s interest, is inconsistent with an organisational and managerial model based on strict compliance with the law and with internal behavioural rules and procedures.

FIDIM is committed to overseeing compliance with the Ethical Code by implementing appropriate tools for information, prevention, control, and—when necessary—corrective action.

2. Recipients of the Ethical Code

This Code is binding for all individuals who act, in Italy or abroad, on behalf of FIDIM, and in particular:

- (i) all directors, auditors, members of FIDIM's corporate bodies, and those working for the company responsible for the statutory audit of the accounts (hereinafter collectively referred to as "**Directors**", "**Auditors**", "**Corporate Bodies**", and "**Auditor**");
- (ii) all workers and employees of FIDIM, including "Directors", "Auditors", "Corporate Bodies", and management, without exception (the "**Personnel**");
- (iii) all those who, although external to the Company, act, directly or indirectly, for FIDIM (e.g., attorneys, agents, collaborators in any capacity, consultants, suppliers, business partners, hereinafter referred to as "**Third Recipients**")

All the parties referred to in points (i), (ii), and (iii) above shall hereinafter be collectively referred to as "**Recipients**" or, individually, "**Recipient**".

3. Compliance and Obligation to be Familiar with the Code

Respect for the values, principles, and rules set out in this Code is a fundamental value for the Company. Under no circumstances may the belief that one is acting in FIDIM's interest justify a violation of these values, principles, or rules.

All Recipients must comply, and ensure compliance, with the principles contained in this Ethical Code, which also applies to the Company's activities carried out abroad.

Each employee is required to know the contents of this Code and the procedures governing their role and responsibilities. Each employee is required to:

- (i) refrain from behaviours contrary to the rules and procedures referenced in this Code;
- (ii) carefully select, within their area of responsibility, their collaborators and ensure they fully comply with the Code;
- (iii) require third parties with whom FIDIM interacts to confirm that they have read the Code;
- (iv) report any potential violations through the reporting channels established within the FIDIM Group.

Breaches of the Ethical Code may give rise to disciplinary action and claims for compensation for damages in favour of FIDIM.

4. Dissemination and training on the Ethical Code

The Ethical Code is made available to all Recipients and must be accessible via FIDIM's websites.

The Company undertakes to ensure internal and external dissemination of the Code by distributing it to all personnel, third-party Recipients, and anyone who requests it.

To promote understanding and facilitate implementation, FIDIM ensures the dissemination of the Code's contents through internal communication activities and training programs addressed to all organisational levels—from corporate bodies to employees.

5. Value of the Ethical Code

Compliance with the provisions of the Ethical Code is an essential part of contractual obligations between the Company and all Recipients.

Violation of the principles and rules in this Code may constitute a breach of primary contractual duties or a disciplinary offence, with all associated legal consequences, including the continuation of the employment relationship, and may entail liability for damages.

Contracts and agreements with third-party Recipients must include clauses or declarations confirming their commitment to comply with the Ethical Code and governing remedies in case of violation.

6. Monitoring compliance with the Ethical Code

The Company adopts specific monitoring procedures to ensure the correct implementation of the Ethical Code and compliance by anyone acting on its behalf with applicable regulations and this Code's behavioural rules.

In relation to this Code, the Company undertakes to:

- ❖ monitor compliance to reduce the risk of offences pursuant to Legislative Decree 231/2001;
- ❖ provide guidance on ethical matters arising in business decisions and on any alleged violations of the Code;
- ❖ offer clarification on the legitimacy and proper interpretation of behaviours and provisions;
- ❖ coordinate updates to the Code;
- ❖ promote and oversee communication and training activities;
- ❖ report any violations to the competent corporate bodies.

7. Revision of the Ethical Code

Amendments to the Ethical Code must be approved by FIDIM S.p.A.'s Board of Directors, upon the proposal of the CEO in agreement with the President, and after consultation with the Board of Statutory Auditors.

NORME DI COMPORTAMENTO

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1. LEGALITY

1.1 Company Objectives

FIDIM pursues the goal of sustainable growth and grounds its identity and every action in full compliance with the law. FIDIM considers respect for legality to be an essential prerequisite for long-term growth.

1.2 Definition

Legality refers to compliance with all laws and regulations in force in Italy and in any other country in which the Company operates.

1.3 Principles and Rules of Conduct

Legality must guide the Company's business operations and inform all corporate activities.

All Recipients must comply with the laws in force in Italy and in all other States in which the Company conducts its operations.

Whenever the legislation of a country in which the Company operates—regarding a specific transaction or matter involving the Company—is more stringent than FIDIM's internal principles or rules, all Recipients are required to comply with the local legislation.

Under no circumstances may the pursuit or achievement of the Company's interests justify a violation of applicable laws.

2. FAIRNESS

2.1 Company Objectives

FIDIM recognises the importance of fairness in its relationships with all parties—both inside and outside the Company—and considers compliance with this value to be essential for strengthening, in a medium- to long-term perspective, the Company's assets, managerial, technological, and knowledge-based value, as well as for creating value for all FIDIM stakeholders.

2.2 Definition

The principle of fairness implies respect for the rights of all individuals involved in the activities carried out by the Company.

2.3 Principles and Rules of Conduct

All FIDIM activities must be carried out with fairness, professionalism, commitment, and rigour.

All Recipients must act fairly, avoiding any situation of conflict of interest with the Company and refraining from undertaking commitments or engaging in relationships that could generate a conflict of interest with FIDIM.

In particular, it is strictly forbidden, without exception, to accept money from individuals or companies that maintain or intend to maintain business relations with FIDIM. Anyone who receives offers of gifts, preferential treatment, or any other benefit that cannot be considered of modest value—or any request for such benefits from third parties—must reject them and immediately inform the Company or the relevant corporate body of which they are part.

3. VALUE OF HUMAN RESOURCES

3.1 Company Objectives

Human resources represent a fundamental and indispensable factor for the existence and development of the Company. The dedication, commitment, and professionalism of the Personnel are essential elements for achieving FIDIM’s mission. It is in the interest of the Company—and of all its Stakeholders—to provide a working environment capable of attracting talented individuals and helping them express and develop their skills and professionalism.

3.2 Definition

Human resources refer to all Recipients who carry out their work for the Company.

3.3 Principles and Rules of Conduct

FIDIM promotes the professional development of its Personnel to increase and strengthen existing competencies, ensuring that everyone has full opportunity to express their professional potential within their working role.

FIDIM fosters working conditions that support the personal and professional growth of Personnel and guarantees all workers—pursuant to applicable legal and contractual regulations—equal employment opportunities and fair treatment in terms of labour conditions and remuneration.

FIDIM protects working conditions both by safeguarding the psychophysical integrity of workers and by respecting their dignity, prohibiting any unlawful conditioning or pressure on employees.

In the evolution of the employment relationship, FIDIM supports the development of individual potential and professional growth by providing specific training and upskilling programs tailored to professional profiles and individual potential.

Personnel are required to seek from their supervisors or managers the acquisition of new skills, knowledge, and working methodologies, while managers must devote the utmost attention to the enhancement of their team’s talents and predispositions.

Corporate roles must ensure that decisions regarding salary increases or other incentive systems (including bonuses, benefits, or stock options) and promotion processes are tied not only to legal and contractual requirements, but also to merit and to the ability to demonstrate

behaviours and organisational competencies aligned with the ethical principles set forth in this Ethical Code.

FIDIM ensures that Personnel at every level contribute to maintaining a working environment based on mutual respect for the dignity of every worker.

4. RESPECT FOR HUMAN RIGHTS AND NON-DISCRIMINATION

4.1 Company Objectives

FIDIM pursues the objective of sustainable growth while ensuring respect for human rights, which the Company recognises as inalienable and essential for every individual.

The Company acknowledges the equal dignity of every person and rejects—without any exception—any form of discrimination, whether direct or indirect, based on ethnicity, nationality, gender, sexual orientation, religion, personal or political opinions, age, health condition, or economic status.

4.2 Definition

For the purposes of this Code, human rights refer to the civil and political rights, as well as the social, economic, and cultural rights, established by the Universal Declaration of Human Rights of the United Nations, the ILO fundamental conventions, and the OECD Guidelines for Multinational Enterprises.

Discrimination refers to unequal treatment of individuals based on ethnicity, nationality, gender, sexual orientation, religion, personal or political opinions, age, or health or economic conditions, which results in a disadvantage for a person or a category of persons compared to others.

4.3 Principles and Rules of Conduct

FIDIM promotes the recognition and protection of human dignity, freedom, and equality, as well as the safeguarding of labour rights, trade-union freedoms, health and safety.

All Recipients, without distinction or exception, must conduct their actions and behaviours in accordance with these principles, within the scope of their duties and responsibilities.

All forms of discrimination, corruption, forced labour, or child labour are strictly prohibited.

Any form of discrimination within the Company is prohibited, particularly regarding access to training, promotions, dismissals, or retirement.

5. CONFLICTS OF INTEREST

5.1 Company Objectives

FIDIM believes that preventing situations of conflict-of-interest involving Recipients is essential for the sound management of its business activities and for creating value for shareholders and Stakeholders in general. This is achieved through decisions made exclusively in the interest of the Company, without any personal advantage or utilitarian considerations for individuals.

5.2 Definition

A conflict of interest arises when an individual has a personal interest—or an interest on behalf of third parties—in each Company transaction that conflicts with FIDIM’s interest and may therefore compromise that person’s independence of judgement.

Such situations may occur, by way of example, when an individual obtains (or seeks to obtain) an undue advantage—even potentially—arising from corporate business opportunities or from actions that conflict with fiduciary duties connected to their role.

Examples of conflicts of interest include, but are not limited to:

- (i) having a personal financial interest in the business of a counterpart of FIDIM (e.g., a supplier or customer) or of a competitor;
- (ii) receiving compensation, in any form, from a counterpart of FIDIM (e.g., supplier, client) or a competitor;
- (iii) having a personal interest, even potential, in any Company transaction;
- (iv) hiring an employee or consultant due to family relationships with public officials or government personnel.

5.3 Principles and Rules of Conduct

All Recipients must avoid situations of conflict of interest with the Company and must not undertake commitments or engage in relationships that could generate a conflict of interest with FIDIM.

If Recipients find themselves in a situation of actual or potential conflict of interest, they must promptly report the circumstance to the relevant corporate body of the FIDIM Group company concerned and must refrain from carrying out any related operation or activity.

It is the responsibility of the relevant corporate bodies of the FIDIM Group company involved to assess conflict-of-interest situations or the incompatibility of roles, duties, or positions held internally or externally.

All Recipients must act fairly, avoiding any situation of conflict of interest with the Company and refraining from assuming commitments or maintaining relationships that could jeopardize their impartiality or affect FIDIM’s interests.

6. FAIR COMPETITION

6.1 Company Objectives

The Company recognises the importance of protecting competition and the free market, as well as the need to uphold honesty and fairness in commercial activities. FIDIM bases its business on the quality of the products and services it offers. FIDIM is committed to conducting its operations without disrupting competition, freedom of industry, trade, or market dynamics—under any jurisdiction and in any manner—and undertakes to cooperate with market regulatory authorities.

6.2 Definition

For descriptive purposes, competition refers to a situation in which multiple companies are able to compete in the same market, understood as the meeting point between supply and demand for goods or services.

6.3 Principles and Rules of Conduct

To this end, the Company prohibits Recipients from engaging in any behaviours contrary to professional fairness, as well as collusive or predatory practices carried out through threats, violence, or abuse of dominant position, or any conduct aimed at altering fair and balanced market competition or misleading consumers about the origin, provenance, or quality of products.

Examples of prohibited conduct include:

- (i) entering into agreements with competitors aimed at setting prices or otherwise limiting commercial freedom;
- (ii) exchanging or receiving information from competitors concerning prices or offers (such as guidelines on pricing, discounts, promotions, royalties, terms and conditions of sale);
- (iii) entering into agreements with competitors regarding customers, distributors, or market allocation;
- (iv) providing false or misleading information about competitors' products or services;
- (v) offering customers commercial terms—such as prices or payment conditions—that are not consistent with standard market practices.

All forms of concerted practices, informal discussions, or “gentlemen’s agreements” (i.e., unwritten arrangements) that have the purpose or effect of restricting competition are strictly prohibited.

Each FIDIM manager must ensure that Personnel are aware of the above principles, rules, and all applicable regulatory provisions concerning competition law.

7. PROTECTION OF PERSONALITY AND INDIVIDUAL FREEDOM

7.1 Company Objectives

FIDIM recognises and protects individual freedom in all its forms and rejects any manifestation of violence, especially when aimed at limiting personal freedom.

The Company is committed to promoting—within its operations and among all Recipients—the adoption and sharing of these same principles.

7.2 Definition

Rights of personality refer to all absolute subjective rights inherent to a person as such, aimed at affirming and protecting their essential existential needs.

Individual freedom refers to the set of inherent and inalienable freedoms of every individual, such as freedom of opinion, freedom of movement, and freedom of expression.

7.3 Principles and Rules of Conduct

The following principles and rules are intended to ensure the protection of personality, individual freedom, and the physical safety of any person, including those external to the Company.

All FIDIM Personnel must contribute to promoting and maintaining a respectful working environment, considering the sensitivity of others.

It is strictly forbidden for anyone to bring weapons, whether proper weapons (e.g., firearms) or improper weapons (e.g., sticks, knives)—as well as any dangerous or illegal substances into Company facilities, offices, or any Company-related premises.

8. PROTECTION OF PRIVACY

8.1 Company Objectives

FIDIM respects privacy and protects the personal and sensitive data of all individuals—both inside and outside the Company—in compliance with the applicable regulations in each country where the Company operates.

8.2 Definition

For the purposes of this Code, privacy refers to an individual's right to ensure that information concerning them is processed in accordance with legal provisions.

8.3 Principles and Rules of Conduct

FIDIM undertakes to process data in compliance with applicable laws and regulations in each country where it operates, with the aim of preventing the improper use or disclosure of personal and/or sensitive data without the consent of the data subjects.

Recipients commit to using data only for the purposes for which it was collected and, in any case, in accordance with applicable legal and regulatory provisions.

Accordingly, in handling information, Recipients must:

- ❖ store all data—of any type—acquired in the performance of their duties with great care and strict confidentiality;
- ❖ obtain consent for data processing for the purposes communicated, in accordance with EU Regulation 679/2016 (GDPR).

Recipients:

- ❖ may not misuse or exploit the data they process, nor use it for their own benefit or that of family members, acquaintances, or any third party;
- ❖ must protect data from access by unauthorized third parties and prevent disclosure without specific Company authorization;
- ❖ must not seek or attempt to obtain data unrelated to their area of responsibility or duties;
- ❖ must classify and organise data so that authorized individuals can access it easily and obtain a complete and accurate overview.

Recipients who are not expressly authorized—according to the terms and conditions of EU Regulation 679/2016 on the protection of personal and sensitive data—are prohibited from accessing, recording, processing, or disclosing data relating to other employees or third parties.

9. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY RIGHTS AND IT SYSTEMS

9.1 Company Objectives

Intellectual property plays a central role in FIDIM’s activities and constitutes an integral part of its assets.

The Company complies with all regulations in force in each country in which it operates regarding intellectual property and works of authorship.

9.2 Definition

For the purposes of this Code, intellectual property includes, but is not limited to patents, trademarks and other distinctive signs, designations of origin, designs and models, inventions, utility models, confidential business information, and copyright—each as defined and regulated by applicable laws in the countries in which the Company operates.

9.3 Principles and Rules of Conduct

FIDIM promotes research and innovation by management and employees within the framework of their roles and responsibilities.

Personnel must consistently contribute—within the limits of their duties—to the management, development, protection, and enhancement of the Company’s intellectual property assets.

The Company does not permit the unlawful use of third parties’ intellectual property and prohibits the reproduction of computer programs and database contents, as well as the misappropriation and dissemination, in any form, of protected intellectual works, including through the disclosure of their content prior to public release.

FIDIM does not allow, under any circumstances and for any purpose whatsoever, the use of products bearing counterfeit trademarks or signs, nor the manufacture, marketing, or any other activity involving products patented by third parties over which it holds no rights.

9.4 IT Tools and Responsible Use of Artificial Intelligence

FIDIM undertakes to use IT and telematic tools and services in full compliance with applicable regulations (particularly those relating to cybercrime, cybersecurity, privacy, and copyright), as well as internal procedures.

FIDIM is committed to using third-party artificial intelligence (AI) tools responsibly, transparently, and in compliance with current regulations, with particular attention to personal data protection, cybersecurity, and respect for fundamental rights.

The Company adopts the following guidelines:

- ❖ Verification of the compliance of AI tools with European and national regulations (including the AI Act).
- ❖ Use exclusively of reliable solutions provided by partners that ensure transparency, security, and privacy protection.
- ❖ Prohibition on the use of AI systems that may pose high risks to individuals’ rights, non-discrimination, or information security
- ❖ Training and awareness-raising of personnel on the conscious and responsible use of AI.
- ❖ Commitment to monitor regulatory developments and updating internal policies on AI.

All Recipients are required to use the artificial intelligence (AI) tools made available by the Company in a responsible, informed, and compliant manner, in accordance with applicable laws and regulations, in particular the European Artificial Intelligence Regulation (AI Act) and Regulation (EU) 2016/679.

In particular, Recipients must:

- ❖ Use only AI tools approved and verified by the Company, avoiding software or services that do not meet standards of security, transparency, and privacy protection.
- ❖ Not relying on AI systems to make decisions with significant impact on people without adequate human oversight and without transparency regarding system functioning.
- ❖ Promptly report any anomaly, risk, or improper use of AI tools.
- ❖ Respect confidentiality and protect personal and corporate data when using AI systems.
- ❖ Participate in training and refresher activities promoted by the Company for the responsible use of AI.
- ❖ Refrain from using AI for purposes contrary to FIDIM’s ethical principles and values, such as discrimination, manipulation, or violations of human rights.

10. ENVIRONMENTAL PROTECTION

10.1 Company Objectives

FIDIM considers the environment to be a fundamental asset that must be safeguarded in the interest of the community and future generations.

The Company complies—whenever possible—with environmental regulations, fully aware that respect for such regulations is essential for its reputation and helps protect the Company from significant economic and legal risks.

10.2 Definition

For descriptive purposes, the term environment refers to the set of natural and human resources—considered individually or in interaction—that support the development of life.

10.3 Principles and Rules of Conduct

The Company is committed to environmental protection and contributes to sustainable territorial development by using and seeking the best available technologies and continuously monitoring internal processes to reduce the environmental impact of its activities.

All Recipients must ensure—within their respective roles and responsibilities—that FIDIM complies with this principle.

The pursuit of corporate benefits cannot and must not justify any action or omission that may result in a violation, whether intentional or negligent—of environmental regulations.

11. PROTECTION OF WORKERS' HEALTH AND WORKPLACE SAFETY

11.1 Company Objectives

FIDIM recognises the protection of workers' health and safety as essential.

The Company, in particular, ensures that all workers conduct their activities in a safe and healthy working environment, in compliance with the applicable legislation on the protection of health and safety in the workplace.

The Company adopts appropriate measures to prevent potential risks to the health and safety of workers.

11.2 Definition

The workplace shall be understood as any location that a Company worker accesses, even occasionally, to conduct his or her activities within the scope of the duties assigned.

11.3 Principles and Rules of Conduct

FIDIM devotes adequate resources to studying, developing, and implementing policies and action plans aimed at preventing and avoiding any negligent or intentional behaviour that could cause direct or indirect harm to individuals or to the Company's material and immaterial assets.

All Personnel—within their respective functions and responsibilities—must actively contribute to maintaining optimal safety standards by avoiding unlawful or dangerous conduct that may endanger themselves or others and reporting to their supervisor or relevant Company body any activity or behaviour by third parties that may harm Company assets or Personnel.

Personnel must comply with all procedures, instructions, and rules concerning workplace safety. They must avoid any conduct that could jeopardise their own or others' safety and must promptly report to their supervisor any situation they become aware of that poses a risk to the safety of themselves or third parties.

The Company provides appropriate training programs aimed at ensuring the protection of workers' health and workplace safety.

12. REJECTION OF VIOLENCE, TERRORISM AND CRIMINALITY

12.1 Company Objectives

FIDIM rejects all forms of violence, terrorism, and criminal activity (whether organized or not) and adopts, during its activities, all measures necessary to prevent any risk of involvement in acts of terrorism or organized crime—whether at national or transnational level.

Involvement in acts of violence, terrorism, or organized crime would not only be contrary to FIDIM's fundamental values but would also cause serious harm to the Company's reputation and image, exposing it to severe economic and legal consequences.

12.2 Definition

Terrorism means any form of political and/or religious struggle conducted through violent and premeditated acts or using force (such as attacks, murders, massacres, kidnappings, or sabotage).

Organized crime means any form of organized criminal activity (whether mafia-type or non-mafia-type) conducted through an association of several individuals for the purpose of committing crimes.

12.3 Principles and Rules of Conduct

FIDIM rejects any form of criminal organization, particularly terrorist or mafia-type organizations.

Recipients must adopt all measures necessary to prevent the risk of personal involvement—or involvement of Company personnel—in relationships or activities of any kind, including mere connivance or assistance, with such criminal or terrorist organizations.

Accordingly, the Company does not establish any employment, collaboration, or commercial relationship with individuals or entities directly or indirectly involved in criminal or terrorist organizations, does not engage with individuals linked by family or affinity ties to members of known criminal or terrorist groups, and does not finance or facilitate, in any form, activities attributable to such organizations.

All Recipients must conduct themselves in full compliance with the principles described above.

13. HARASSMENT OR MOBBING IN THE WORKPLACE

13.1 Company Objectives

FIDIM recognises the importance of respecting workers' rights and dignity. The Company promotes initiatives aimed at establishing working conditions that foster organisational well-being.

13.2 Definition

Harassment and mobbing practices are considered to include: (i) unwanted attitudes and behaviours that cause discomfort or embarrassment, or any form of discrimination that undermines the dignity of individuals; (ii) systematic acts of persecution or omissions against individuals or groups, consisting of social marginalization, psychological or physical violence, and acts of professional sabotage.

13.3 Principles and Rules of Conduct

FIDIM is committed to avoiding all forms of direct or indirect discrimination of any kind in employment relationships and to promoting positive actions that support equal opportunities, valuing the strength of diversity.

FIDIM strives to maintain a working environment free from physical or verbal harassment, where the dignity of all Personnel—regardless of level or role—is protected.

FIDIM requires that in both internal and external work relationships, no behaviours amounting to harassment or mobbing occur; all such conduct is strictly prohibited.

All Recipients must:

- ❖ prevent and actively oppose any form of mobbing or personal harassment;
- ❖ avoid behaviours, language, or clothing that may create discomfort, lack of respect, or an unsuitable work environment;
- ❖ maintain an atmosphere of mutual respect, considering personal, cultural, and religious differences.

Any form of violence, harassment, and mobbing practices related to personal and cultural diversity is prohibited. The following are considered as such:

- ❖ conditioning employment-related decisions based on personal or cultural differences and/or on the solicitation or exchange of sexual favours;
- ❖ inducing collaborators to engage in sexual favours through the influence of one's hierarchical role;
- ❖ making derogatory remarks related to disabilities, physical or psychological conditions, cultural or religious identity, or sexual orientation.

14. USE OF ALCOHOL, NARCOTICS AND SUBSTANCES WITH SIMILAR EFFECTS

14.1 Company Objectives

FIDIM has a particular interest in safeguarding public health and the health of every individual. In pursuing this objective, the Company adopts concrete corporate policies aimed at combating the use of narcotic substances and the abuse of alcoholic beverages or substances with similar effects.

14.2 Definition

An alcoholic beverage is defined as any beverage containing ethyl alcohol.

A narcotic substance is defined as any natural or chemical substance with psychotropic effects, i.e., capable of altering mental functioning. The regulatory framework is characterized by the absence of an all-encompassing definition of “narcotic substance” and is based on the principle of lists of prohibited substances. Under the applicable legal framework, substances are considered narcotic only if they are expressly included in the schedules attached to Presidential Decree No. 309/1990.

14.3 Principles and Rules of Conduct

In order to protect the asset of “health”, within the scope of its responsibilities, FIDIM is committed to actively contributing to the promotion and maintenance of a working environment based on mutual respect and consideration for others’ sensitivity.

Being or remaining under the influence of alcoholic substances, narcotic substances, or substances with similar effects during the performance of work activities and in the workplace shall be considered a conscious assumption of the risk of compromising such environmental conditions. States of chronic dependency, where they affect the working environment, shall—for contractual purposes—be treated as equivalent to the aforementioned cases.

Accordingly, it is strictly forbidden to:

- possess, consume, offer, or distribute in any manner narcotic substances or substances with similar effects during working hours or in the workplace;
- smoke inside offices and in areas where smoking is prohibited.

15. RELATIONS WITH PUBLIC ADMINISTRATION

15.1 Company Objectives

FIDIM recognises the high value of public functions and pursues the objective of ensuring maximum integrity and fairness in its relationships, including commercial relationships, with Public Administration. The Company is fully aware that respecting integrity and fairness in such relationships is essential for safeguarding its reputation, while failure to comply may expose FIDIM to significant economic and legal risks.

15.2 Definition

For the purposes of this Ethical Code, Public Administration includes: public entities; entities holding public service concessions; natural or legal persons acting as public officials or as officers of public service for the Italian State, the European Community, or any foreign State; officials of the European Community or of foreign States; the judiciary; public supervisory authorities; any institution or organisation carrying out public functions.

15.3 Principles and Rules of Conduct

Relations with public counterparties are maintained exclusively through the parties specifically authorized to do so.

In order to ensure the lawfulness of the Company's conduct, all relations with the Public Administration must be conducted in full compliance with the laws and regulations in force from time to time, as well as with this Code of Ethics.

Where situations of conflict of interest, including potential conflicts, arise in dealings with the Public Administration, a consultant or another third party shall represent the Company.

To this end, any conduct intended or likely to interfere with investigations or inspections carried out by the competent Authorities and Institutions is prohibited, in particular any conduct aimed at obstructing the establishment of the truth, including by inducing persons summoned by the judicial authority to refrain from making statements or to make false statements.

FIDIM undertakes to adopt all necessary measures to provide the cooperation requested by the Authorities, in compliance with applicable laws, and, in the event of investigations, inspections, or requests by the Public Administration or Public Institutions, all Recipients are required to ensure due cooperation.

In dealings with the Public Administration, any acts conducted in violation of legal provisions and of this Code of Ethics are prohibited.

It is strictly forbidden:

- ❖ to mislead anyone by using deceptive practices or schemes to obtain an undue profit to the detriment of the Public Administration. Compliance with the law and with fair commercial practices is mandatory in the context of tenders, negotiations, concessions, licenses, and similar procedures, as well as in connection with requests for funding, contributions, grants, or other disbursements from the Public Administration;
- ❖ to use or submit false statements or documents, or to omit mandatory declarations, in order to obtain contributions, financing, subsidized loans, or other similar benefits connected with or granted by the Public Administration;
- ❖ to allocate for purposes other than those intended any funding obtained from the Public Administration to support initiatives aimed at carrying out works or activities of public interest;
- ❖ to alter the functioning of an information technology or telematic system by manipulating data or software contained therein in order to obtain an undue profit and cause harm to the Public Administration;

- ❖ to improperly and/or unlawfully influence, in any manner whatsoever, the decisions of representatives of the Public Administration (for example, by soliciting and/or accepting and/or offering and/or giving, directly or indirectly through third parties, sums of money or other benefits in exchange for favours, remuneration, or other advantages for oneself or for the Company). Acts of commercial courtesy (such as, by way of example, gifts or hospitality) are permitted only if they do not exceed normal commercial or courtesy practices and, in any event, are such as not to compromise the impartiality and independence of judgment of the representative of the Public Administration;
- ❖ to receive, even indirectly, money or other benefits in order to omit or delay acts, or to perform acts contrary to the duties of office of a public official or a person entrusted with a public service (pursuant to Article 357 of the Italian Criminal Code, public officials are those who exercise a public legislative, judicial, or administrative function; pursuant to Article 358 of the Italian Criminal Code, persons entrusted with a public service are those who, in any capacity, perform a public service);
- ❖ in any event, to engage in any action or omission that may compromise the independence of the Parties or that may be interpreted as a means to obtain undue advantages.

Where connected with the above-mentioned relationships, any requests for or offers of money, gifts (with the exception of items of modest value, meaning those customary in relation to the circumstances), or favours of any kind, made or received by individuals acting on behalf of the Company, must be promptly reported to the Company.

During business negotiations or commercial relationships with the Public Administration, general principles of fairness, transparency, and integrity must always be applied.

In particular, it is prohibited to:

- ❖ consider, propose, or promise employment and/or business opportunities that may provide personal advantages to employees of the Public Administration;
- ❖ offer, in any manner whatsoever, gifts, payments, benefits, even indirect, goods, services, performances, or undue favours that exceed ordinary practices of courtesy;
- ❖ solicit or obtain confidential information that may compromise the integrity or reputation of both parties or provide significant indirect benefits to oneself or to FIDIM;
- ❖ undertake actions aimed at improperly influencing the decisions of the counterparty.

Furthermore, Recipients must not accept from the Public Administration any goods or services, gifts, benefits, performances, or payments that exceed ordinary practices of

courtesy, particularly where such actions or conduct may undermine the principles of fairness, transparency, and legality in relations between the Parties.

Recipients who receive gifts or favourable treatment from the Public Administration exceeding ordinary practices of courtesy must immediately inform the Company thereof.

16. RELATIONS WITH CUSTOMERS AND CONSUMERS

16.1 Company Objectives

FIDIM recognises that customers' and final consumers' appreciation is a fundamental factor for its success.

The Company pursues its business policies by offering high-quality products and services at competitive conditions and in full compliance with all regulations on competition and consumer protection. FIDIM also seeks to avoid even the slightest suspicion of inappropriate behaviour Towards customers and consumers.

16.2 Definition

A customer is any party requesting services, products, or deliverables under a contract that implies mutual obligations.

A consumer is the natural person acting for purposes unrelated to entrepreneurial, commercial, artisanal, or professional activities that they may carry out.

16.3 Principles and Rules of Conduct

FIDIM's commercial policies aim to ensure a high standard of quality for its goods and services.

The following principles and rules apply to relations with customers and final consumers of FIDIM's products and services.

FIDIM is committed to respecting consumer rights and to avoiding the provision of products that may harm their health or physical integrity, as well as ensuring the provision of truthful and complete information on products offered on the market.

All Recipients, within the scope of their responsibilities, must:

- ❖ comply with internal procedures and rules governing the proper management of relationships with customers and consumers;
- ❖ provide high-quality products and services that meet the reasonable expectations and needs of customers and consumers;
- ❖ ensure the truthfulness of advertising and any other form of communication, enabling customers and consumers to make informed decisions;

- ❖ refrain from entering into agreements with customers that differ from the commercial and financial conditions established by FIDIM.

17. RELATIONS WITH SUPPLIERS, EXTERNAL COLLABORATORS AND PRIVATE COUNTERPARTIES

17.1 Company Objectives

For FIDIM, the professionalism of suppliers and external collaborators is an essential factor in ensuring the quality of the products offered and, therefore, in the Company's success.

FIDIM promotes the development of long-term relationships with its suppliers and external collaborators, requiring their commitment to sharing the principles set out in this Ethical Code.

FIDIM requires the highest standards of integrity and fairness in its dealings with private counterparties and rejects any form of corruption, including in relations with private parties, in the awareness that compliance with the principles of integrity and fairness in such relationships is essential to safeguarding its reputation and that any breach of these rules of conduct exposes the Company to significant economic and legal risks.

17.2 Definition

Suppliers are defined as third parties that provide goods or services.

An External Collaborator is any individual who provides intellectual services to the Company (freelancer).

A Private Counterparty means any party that represents interests opposing those of FIDIM.

17.3 Principles and Rules of Conduct

The Company applies objective and transparent criteria in the selection of suppliers and external collaborators, which must be based on objective assessments of competence, quality, and the economic conditions offered, and conducted in compliance with applicable laws and the procedures adopted by FIDIM.

The rules set out below apply to contractual and non-contractual relationships with suppliers, external collaborators (including, by way of example, consultants, agents, and contractors), and any other private counterparties of FIDIM.

Suppliers, external collaborators, and private counterparties are also selected on the basis of their ability to ensure compliance with the Code of Ethics and on the existence of adequate corporate quality systems, as well as appropriate organizational resources and structures.

The Company adopts specific procedures to ensure the highest level of transparency in the selection of suppliers, external collaborators, and external counterparties.

In order to ensure the lawfulness of the Company's conduct, all relationships with the above-mentioned parties must be conducted in full compliance with the laws and regulations in force from time to time, as well as with the Code of Ethics.

FIDIM adopts all appropriate tools and safeguards to ensure the transparency and fairness of commercial transactions. In particular, it is mandatory that appointments granted to service companies and/or natural persons entrusted with managing the Company's economic and financial interests be formalized in writing, specifying the agreed scope, terms, and conditions, including economic conditions.

Where situations of conflict of interest, including potential conflicts, arise with suppliers, external collaborators, or private counterparties, the Company shall be represented by a consultant or by another third party.

18. RELATIONS WITH ASSOCIATIONS, TRADE UNIONS AND POLITICAL PARTIES

18.1 Company Objectives

FIDIM recognises—within the maximum limits permitted by the laws of each country in which it operates—the freedom of thought, expression, and the right to association as fundamental prerogatives of individuals.

FIDIM, however, maintains a position of autonomy and independence from all political or trade-union organisations.

18.2 Definition

An Association is a group of individuals organised and operating for the pursuit of a common purpose.

A Trade Union Organisation is a collective body that represents and protects the rights and interests of workers belonging to a specific category.

A Political Party is an association of individuals united by a common political objective, a shared vision for the governance of the State or society, or specific views on particular issues.

18.3 Principles and Rules of Conduct

The rules set out below apply to any movement, organization, or association with political purposes or that may be traced back to movements, organizations, or associations pursuing political purposes.

In order to prevent any potential forms of corruption, FIDIM does not provide, directly or indirectly, contributions for the financing of organizations, parties, movements, political or trade union committees, nor of their representatives or candidates.

The Company also does not fund associations nor sponsor events or conferences whose purpose is political propaganda.

19. RELATIONS WITH INTERNATIONAL OPERATORS AND CONDUCT OF ACTIVITIES ABROAD

19.1 Company Objectives

The Company rejects the commission of offences of any kind. To minimise the risk of committing transnational offences, FIDIM is committed to ensuring that all relationships — including commercial relationships — with entities operating at the international level, are conducted in full compliance with applicable laws.

19.2 Definition

For the purposes of this Code, relations with international operators include all relationships (such as commercial, contractual, or institutional relationships) conducted with public or private entities located outside Italy.

19.3 Principles and Rules of Conduct

The Company undertakes to adopt all necessary measures to verify the reliability of such international operators.

Furthermore, within the scope of its responsibilities, FIDIM commits to cooperating — with fairness and transparency — with national and foreign authorities that may request information or conduct investigations regarding the Company's relationships with international operators.

20. RELATIONS WITH SHAREHOLDERS

20.1 Company Objectives

FIDIM believes that the existence of efficient and consistently effective internal operating rules is an essential tool for strengthening its reputation in terms of reliability and transparency, as well as for maximising value for shareholders in a medium- to long-term perspective.

20.2 Definition

Shareholders are the individuals or entities that have invested in the Company's capital.

20.3 Principles and Rules of Conduct

FIDIM's internal structure and its relationships with the parties directly and indirectly involved in the Company's activities are organized according to rules designed to ensure the reliability

of management and a fair balance between management powers, shareholders' interests, and those of any other Stakeholders.

As part of initiatives aimed at maximizing value for shareholders and ensuring transparency in management activities, FIDIM progressively adopts a structured and consistent system of rules of conduct governing both its internal organizational structure and its relationships with shareholders and third parties, in line with the most advanced corporate governance standards at national and international level.

Through its Corporate Bodies, FIDIM ensures that shareholders are enabled to participate in decisions within their competence and to make informed choices, and it is committed to guaranteeing the utmost transparency and timeliness of corporate information provided to shareholders, in compliance with applicable laws and regulations.

21. RELATIONS WITH LOCAL COMMUNITIES

21.1 Company Objectives

FIDIM is committed to actively contributing to improving the quality of life, the socio-economic development of the communities in which it operates, and the development of local human capital and capabilities, while at the same time conducting its business activities in a manner consistent with correct commercial practices.

21.2 Definition

Local Communities are defined as groups of individuals forming a recognizable entity, united by organizational, linguistic, religious, economic ties, as well as by shared interests.

21.3 Principles and Rules of Conduct

FIDIM conducts its activities with an awareness of the social responsibility it bears towards all its Stakeholders and, in particular, towards the local communities in which it operates, in the conviction that the ability to engage in dialogue and interaction with civil society represents a fundamental corporate value. FIDIM respects the cultural, economic, and social rights of the local communities in which it operates and is committed, where possible, to contributing to their fulfilment, with particular reference to the right to adequate food, access to drinking water, the highest attainable standard of physical and mental health, adequate housing, education, and culture, while refraining from actions that may hinder or prevent the realization of such rights.

FIDIM promotes transparency in the information addressed to local communities, with particular regard to matters of greatest interest to them, with the aim of duly considering the legitimate expectations of local communities in the planning and conduct of corporate

activities and of fostering mechanisms for the appropriate redistribution of profits deriving from such activities.

FIDIM therefore undertakes to disseminate knowledge of its corporate values and principles both internally and externally, including through the establishment of appropriate control procedures, and to protect the specific rights of local populations, with particular reference to their cultures, institutions, relationships, and lifestyles.

FIDIM also commits to encouraging, supporting, and promoting initiatives that demonstrate its active engagement in contributing to the satisfaction of the needs of the Communities in which it operates.

22. RELATIONS WITH THE PRESS AND OTHER MEDIA AND PROTECTION OF CONFIDENTIAL INFORMATION

22.1 Company Objectives

FIDIM considers communication with the public an essential factor for its growth and for achieving its mission, as it is the means through which the Company's values and image are conveyed externally.

However, FIDIM also considers confidential information to be part of the Company's assets—understood in its broadest sense—and therefore deserving of protection, since the loss or improper disclosure of such information may have serious consequences for the Company.

22.2 Definition

The following rules and principles apply to relations between FIDIM and: television broadcasters, radio broadcasters, magazines, newspapers, online news outlets, press agencies, with respect to facts, news, and information directly or indirectly concerning the Company.

Confidential information refers to personal, technical, scientific, or commercial information that is not publicly available. This includes, by way of example: information regarding product prices and costs; product compositions and scientific research results; production methods and marketing or sales strategies; information on ongoing or forthcoming contracts; customer, consumer, patient, and supplier lists and data; financial information; inventions, trade secrets, know-how; product developments and unexpected findings.

22.3 Principles and Rules of Conduct

FIDIM considers the dissemination of accurate, complete, and truthful information about corporate matters—and the protection of confidentiality when required—fundamental for creating and maintaining a relationship of transparency and trust with all Recipients.

FIDIM communicates with the press and media exclusively through corporate bodies and functions within the Company (or its Group) that are formally designated for this purpose,

always ensuring the highest standards of correctness, availability, and transparency, in accordance with the Company's communication policy.

Information and communications regarding the Company and its activities, when intended for external audiences, must be accurate, truthful, complete, transparent, and consistent across all channels.

Personnel are prohibited from issuing statements or disclosing data relating to FIDIM's confidential information.

Third-party Recipients are likewise prohibited from making public statements, releasing data, or sharing information regarding FIDIM.

23. TRANSPARENCY AND EFFICIENCY

23.1 Company Objectives

FIDIM considers transparency and efficiency in the management of corporate processes to be essential factors for its success and for achieving its mission. These elements contribute significantly to the creation of value and to fostering trust among the market, suppliers, customers, and consumers.

23.2 Definition

Transparency means clarity and accuracy in recording operations, transactions, and any information relating to the Company.

Efficiency refers to managing corporate activities in a cost-effective manner, while always maintaining the highest quality standards.

23.3 Principles and Rules of Conduct

All Recipients, in carrying out their duties, must provide information that is truthful, accurate, complete, and understandable.

Every operation and transaction must be properly recorded and authorised, verifiable, legitimate, coherent, and appropriate.

All decisions and transactions must be documented adequately, allowing verification of their approval, implementation, and justification, even through appropriate supporting documentation.

The Company's records must be complete, orderly, and promptly accessible.

Any form of correspondence—whether by letter, fax, email, or even verbal comments—must be expressed using appropriate tone and form, clear and consistent in content, and suitable to be shown or delivered to third parties (e.g., investigative authorities, courts, governmental bodies, or auditors).

All corporate activities must be managed cost-effectively and responsibly, while respecting high-quality standards.

Each Recipient is a responsible custodian of the Company's resources and assets, both tangible and intangible, entrusted to him or her.

It is strictly prohibited to request, use, or appropriate Company assets for personal use, damage or destroy Company assets, or allow or permit others to misuse Company resources or assets assigned to them.

24. FINANCIAL STATEMENTS AND OTHER ACCOUNTING DOCUMENTS

24.1 Company Objectives

FIDIM, in the context of its relations with shareholders and the market, considers accuracy in accounting management a fundamental value and pays particular attention to the preparation of financial statements and other accounting documents.

24.2 Definition

A Financial Statement is a document summarising a company's financial position, economic performance, and cash flows at a specific point in time.

An accounting document refers to any record or written declaration relating to an administrative event requiring accounting recognition within the Company.

24.3 Principles and Rules of Conduct

The following principles and rules apply to the preparation of the annual financial statements, interim financial statements, balance sheets, reports and other corporate communications required by law, and any documents intended for shareholders, creditors, or the public concerning the Company's economic, financial, or equity situation.

FIDIM ensures that all financial transactions—and in particular any disbursement of funds—are correctly recorded in the accounting books in accordance with principles of transparency, truthfulness, accuracy, and completeness.

Each member of Personnel must collaborate, within the scope of their duties and responsibilities, to ensure that management facts are correctly and promptly reflected in the accounting records.

It is strictly forbidden to engage in behaviours that undermine the transparency and traceability of financial reporting and, in particular, to falsify accounting entries or the supporting documentation on which they are based.

For every transaction, adequate supporting documentation must be kept, ensuring timely and accurate accounting registration, clear allocation of roles and responsibilities, separation of duties, and full traceability for verification and audit purposes.

Any Recipient who becomes aware of omissions, inaccuracies, or falsifications in accounting entries or in the documentation on which they are based must promptly report such facts to their supervisor or the relevant corporate body.

Personnel involved in preparing financial information intended to be made public are responsible for ensuring that such information is complete and accurate.

Each member of Personnel must collaborate with internal control bodies and external auditors, reporting any fact, circumstance, or behaviour that is not consistent with the principles of this Ethical Code and signalling any transaction that appears to lack a legitimate commercial or financial purpose.

25. INVITATIONS TO CONFERENCES AND CONGRESSES

25.1 Company Objectives

FIDIM aims to ensure that participation in and organisation of conferences, congresses and scientific meetings are carried out according to principles of fairness and professionalism.

25.2 Definition

Conferences and congresses refer to conventions, congresses, and scientific meetings focused on topics related to the use of medicinal products and other related items.

25.3 Principles and Rules of Conduct

Without prejudice to the applicable legal provisions in force:

- ❖ the agenda of conferences and congresses must be consistent with the qualifications of the participants and with the scientific and medical objectives of the event;
- ❖ the event venue must be easily accessible to participants and appropriate for the type of meeting and audience;
- ❖ travel expenses for any accompanying person may not be covered by the Company.

If local laws or regulations in a specific country are more restrictive than the Company's internal rules, the local legislation must always prevail.

26. GIFTS AND ACTS OF COURTESY

26.1 Company Objectives

FIDIM is committed to conducting its activities and its relations with any third party—whether private or public—in accordance with principles of fairness, transparency, and independence, relying on high levels of service and quality, and without accepting or offering anything of value that could in any way influence the outcome of a transaction.

26.2 Definitions

A Gift is understood as a gesture offered out of courtesy, respect, or even commercial promotion.

An Act of Courtesy is defined as a selfless act performed within the context of polite and respectful conduct, in accordance with generally accepted standards of social etiquette.

26.3 Principles and Rules of Conduct

Except where expressly permitted below, it is forbidden to accept, offer, or promise—directly or indirectly—money, gifts, goods, services, benefits, favours, or other advantages in relation to dealings with any third party, whether private or public, for the purpose of influencing their decisions, seeking preferential treatment, facilitating improper performance, or for any other purpose, including inducing or omitting actions connected with their role or duties.

Any request or offer of money, gifts (except those of modest value—meaning customary items given in connection with the circumstances), or favours of any kind made to or by individuals acting on behalf of the Company must be promptly reported to the Company.

Gifts and acts of courtesy—including invitations to lunches, dinners, or social events—addressed to any third party, whether private or public, are permitted only when they are of modest value; they cannot in any way compromise the independence of the individuals involved; and they cannot be interpreted as a means to obtain undue advantages.

Such gifts and acts of courtesy, including invitations to lunches, dinners, or social events, must be authorized in advance by one's direct supervisor and are permitted only when the following conditions are met:

- ❖ the gift or act of courtesy is permitted by law;
- ❖ the gift or act of courtesy takes place within the context of a working relationship inspired by fairness;
- ❖ the gift or act of courtesy is consistent with industry practices;
- ❖ the gift or act of courtesy, if made public, would not cause embarrassment to the Company.

Reporting any violations of the Ethical Code and Personnel Support



Any individual required to comply with this Ethical Code who becomes aware of a fact or circumstance that may represent a potential violation must promptly report it to the Company.

A dedicated email inbox has been set up for this purpose: codice.etico@fidimholding.com. This inbox may also be used to submit anonymous reports, i.e., reports where the sender's identity cannot be traced.

The Company is committed to ensuring that individuals who submit such reports are protected from any form of retaliation, discrimination, or penalization, thereby guaranteeing appropriate confidentiality (except where disclosure is required by applicable law).

Where a person subject to compliance with this Code of Ethics wishes to obtain clarifications or guidance regarding the principles and rules of conduct set out herein, he or she may contact the appropriate parties in order to resolve any doubts:

- ❖ Direct Supervisor (for questions related to one's specific area of responsibility);
- ❖ Human Resources Department (for questions regarding internal rules, policies, or organisational matters);
- ❖ Chief Financial Officer (for clarifications relating to financial or accounting aspects);
- ❖ Board of Directors (for matters concerning corporate policies or practices).

If an individual prefers to report questions or concerns outside their immediate organisational unit, particularly regarding possible violations of laws or of the Ethical Code, they may contact the Board of Statutory Auditors directly.