



Code of Ethics Sanico srl

Sanico srl – Cusago (MI), 25/04/2025– SD/GM

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1 FOREWORD

At Sanico, we believe in a strong sense of family, preserving the spirit that has defined us since our foundation in 1964; We are committed to fostering personal growth, valuing the contribution of each individual member of our team and promoting a culture of mutual trust and collaboration. Over the decades, while preserving this distinctive identity, we have embraced an entrepreneurial mindset that has enabled us to become an industry leader. We strive for reliability by being a constant presence for our clients for over 60 years; we strive for innovation, always looking beyond limits and striving to exceed them, to anticipate people's needs.

1.1 What is the Code of Ethics

The purpose of this Code of Ethics (hereinafter also referred to as the "**Code**") is to define the values and principles by which Sanico S.r.l. (hereinafter also referred to as "**Sanico**" or the "**Company**") is inspired, as well as the criteria of conduct aimed at regulating its activities.

The Code consists of four sections:

1. the Foreword, which outlines the purpose of the Code of Ethics, its scope of application, the Addressees and the main regulatory references;
2. the Ethical Charter, which sets out Sanico's mission, vision and values;
3. the Code of Conduct, which states rules and standards of behaviour;
4. the section on **Implementation, Monitoring, and Updating**, which describes how the Code of Ethics is applied and maintained.

1.2 Scope of Application and Addressees

The values and principles of conduct described in this Code apply:

- members of the corporate bodies, management, employees and collaborators of Sanico S.r.l.;
- all those who, directly or indirectly, on a permanent or temporary basis, establish relationships with the Company, or collaborate with it in pursuit of its objectives.

These individuals are hereinafter collectively referred to as '**Addressees**'.

The Addressees are required to conform their conduct and actions to the values and principles set out in this Code of Ethics. To this end, the Code is disseminated in accordance with paragraph 4.1.

Sanico ensures that its collaborators, clients, suppliers and, more broadly, all third parties with whom it interacts are promptly and adequately informed of the obligations arising from this Code of Ethics and expects full compliance therewith.

1.3 Main international references

This Code of Ethics is inspired by the main national and international guidelines on human rights, corporate social responsibility and corporate governance:

- the United Nations **Universal Declaration of Human Rights**;
- the UN **Convention on the Rights of the Child**;
- the UN **Convention on the Elimination of All Forms of Discrimination against Women**;
- the **UN Global Compact Principles**;
- the **Eight Core Conventions of the ILO** (International Labour Organisation);
- the **OECD** (Organisation for Economic Co-operation and Development) **Guidelines** for Multinational Enterprises;
- the **Charter of Fundamental Rights** of the European Union;
- the **Corporate Governance Code** of Borsa Italiana;
- the **Charter of Corporate Values** of the European Institute for Social Reporting;
- **International Standard SA 8000** (Social Accountability System).

2 ETHICAL CHARTER

2.1 Mission

For over 60 years, Sanico has contributed to the wellbeing, health and beauty of consumers by addressing their needs through the research and distribution of a diverse range of cutting-edge, high-quality medical and orthopaedic products, inspired by the highest standards of sustainability, enabling us to maintain and strengthen a widespread presence throughout the national territory and to foster expansion into new markets.

2.2 Vision

We aim to be recognized as solid and reliable leaders in the well-being, health and beauty industry, satisfying people's needs through innovative solutions. We strive for a sustainable growth model that enables us to respond to future challenges and market changes, while remaining true to our corporate traditions and values.

2.3 Values

All those who contribute to the fulfillment of Sanico's mission, without distinctions or exceptions based on role or responsibility, are required to conform their actions and behaviour to the values outlined below. Consistency with these values represents a fundamental point of reference for the Company's operations, promoting a culture of integrity in all business activities and relationships with stakeholders.

2.3.1 Person-centred approach and empowerment

Sanico places paramount importance on individuals and is committed to protecting their physical and moral integrity. The Company is committed to safeguarding the dignity, freedom and equality of every human being, upholding labour rights and trade union freedoms, and promoting health and safety in compliance with applicable laws and regulations. Sanico places special emphasis on valuing its human resources, rejecting all forms of discrimination, corruption and exploitation. The Company embraces diversity in gender, age, ethnicity, religion, political affiliation, language and individual abilities. Relationships between members of the organisation are based, at all levels, on mutual trust, cooperation and respect.

2.3.2 Attention to stakeholder needs

Sanico conducts its business with a focus on the needs and legitimate expectations of its stakeholders. By promoting a constructive and responsible dialogue with all stakeholders, the Company is committed to generating value for the community, with the aim of concretely improving people's quality of life.

2.3.3 Innovation and quality

Sanico pursues excellence through intensive R&D activities, striving to foster the highest level of technological innovation within its sector. This ensures superior performance standards and strengthens the Company's leadership based on the quality of its products and services.

2.3.4 Respect and protection of the environment

Aware of its role in sustainable development and its responsibility toward future generations, Sanico considers it essential to carry out its activities in a responsible manner, with respect for and protection of the environment and natural resources. With the aim of inspiring and disseminating these values, the Company is committed to raising awareness among the Addressees of this Code.

2.3.5 Efficiency and cost-effectiveness

In carrying out its activities, Sanico considers it fundamental to operate effectively, while safeguarding the efficiency and cost-effectiveness of management. Inspired by these values,

the Company strives to meet the needs of its clients by guaranteeing fairness and transparency in its business practices and in all stakeholder relations.

3 CODE OF CONDUCT

3.1 General principles of conduct

The values described above are embodied in the following principles, which govern the conduct of Sanico S.r.l. and the relations between the Company and its stakeholders.

3.1.1 Compliance with laws

In carrying out their work and professional activities, all Addressees shall act in strict compliance with national, European and international laws in force and applicable to the Company. This principle represents an essential foundation of the Company's business conduct and a cornerstone of its organisational culture.

3.1.2 Anti-corruption

Addressees representing the Company, pursuing its interests or maintaining business relations with it, shall perform their duties with honesty and integrity, refraining from any form of corruption, active or passive, involving public or private entities.

Sanico prohibits any form of payment or benefit granted to clients, business partners or any third party that does not stem from a contractual obligation or a business relationship, that is not provided in exchange for actual goods, services, or deliverables received by the Company in accordance with the contractual terms, or that is not required by law. Anyone engaging in negotiations or interactions with public or private counterparts shall be subject to supervision, particularly regarding the following activities:

- Execution of commercial contracts;
- Access to financial resources;
- Engagement consultancy and professional services;
- Granting of benefits (gifts, donations, etc.);
- Hiring of personnel;

The Company expects the Addressees of the Code of Ethics to act in compliance with the regulations in force and to uphold this principle.

Addressees are required to:

- refrain from offering or promising, directly or indirectly (including through a third party), any financial advantage or other benefits to a Public Official or a private individual, to unlawfully or improperly perform or omit any public function or private duty, or to reward such behaviour (active corruption);
- refrain from soliciting or accepting directly or indirectly (including through third parties), any offer or promise of a financial or other benefit from any party, in order to perform or omit any act in violation of their obligations stemming from their employment or role within the Company, or otherwise in its interest (passive corruption).

3.1.3 Confidentiality and data protection

Protecting the confidentiality of information acquired during the performance of professional duties is a fundamental obligation for all Addressees. Any information, knowledge, or data acquired or processed by the Addressees in the course of their duties must remain strictly confidential and may not be used, communicated, or disclosed without specific prior authorization.

The Company formalizes specific instructions for all individuals involved in data processing through appointments and designation acts. These instructions define appropriate procedures for ensuring the proper handling of personal information, both internally and externally.

Sanico is committed to safeguarding information and data concerning Addressees and third parties, and to preventing any misuse thereof. To this end, the Company processes personal data in full compliance with applicable laws and regulations, adhering to principles of transparency, legality, fairness, relevance to declared and legitimate purposes, and data security.

Sanico also pledges to respect the confidentiality and dignity of its employees, collecting and retaining only personal data strictly necessary for efficient human resource management, in compliance with current legislation. Access to such data is granted only to those whose role within the Company justifies such access. The Company's commitment to protecting the dignity and private life of its staff excludes any form of interference in their conduct outside the workplace, unless such behaviour compromises professional performance or damages the Company's reputation.

Addressees are required to:

- Comply with current legislation regarding personal data protection and processing;
- Collect and process only data necessary and directly related to their duties;
- Safeguard such data through appropriate measures to prevent unauthorized access;
- Communicate and disclose data only as provided in Company procedures or with the authorization of the designated person;
- Classify information as confidential and reserved, in accordance with the procedures established by the Company.

3.1.4 Conflict of interest prevention¹

In performing their duties, Addressees shall pursue Sanico's general objectives and interests, in compliance with applicable laws and this Code of Ethics.

When acting on behalf of the Company, Addressees shall make decisions responsibly and transparently, using objective evaluation criteria and taking the necessary steps to avoid and prevent potential conflicts of interest.

Sanico requires all Addressees to maintain the highest standards of integrity and transparency in their dealings with third parties, such as suppliers, clients, and sales agents, ensuring traceability of information sources and compliance with applicable regulations.

¹ Conflict of interest means any situation in which the Addressee entrusted with a given decision-making responsibility has personal and/or professional interests that conflict with the impartiality required by that responsibility.

Addressees who find themselves in situations that may give rise to a conflict of interest are required to formally notify Management or their direct supervisors of any personal or third-party interest that could affect their impartiality in decisions they are responsible for. Such disclosure must detail the nature of the interest, the terms of any involvement, the origin of the interest, and the potential scope of the conflict.

By way of example, but not limited to, the following situations may give rise to a conflict of interest:

- Ownership of economic or financial interests by the employee and/or their family that are in competition or conflict with those of the Company;
- Engagement in operational roles with third parties such as suppliers, clients, business partners, or competitors;
- Undue personal influence over Company decisions regarding contracts with third parties;
- Acceptance of money, favours, or benefits from individuals or companies that are, or intend to be, in a business relationship with the Company.

3.1.5 Anti-Money laundering²

Sanico demands the utmost transparency in its business operations and relationships with third parties, in full compliance with national and international anti-money laundering regulations. The Company firmly condemns any conduct aimed at using, replacing, transferring, or concealing money, goods, or other benefits of suspected or proven illicit origin.

The Company is committed to carefully evaluating the reliability and reputation of its business partners.

Addressees are required to:

- act in full compliance with anti-money laundering regulations;
- refrain from any conduct that may constitute laundering of money, goods or benefits of unlawful origin.

² Money laundering is understood as the set of operations designed to give an appearance of lawfulness to money, goods or benefits of illicit origin, so as to make it difficult to identify their origin.

3.1.6 Protection of intellectual and industrial property ³

The Company bases its activities on principles of legality and transparency, requiring all individuals operating on its behalf to comply with applicable national, EU, and international regulations on the protection of intellectual and industrial property.

Addressees are required to:

- promote the correct use of trademarks, distinctive signs, patents, industrial designs and models, as well as all creative intellectual works, while respecting the economic and moral rights of their legitimate owner/author;
- avoid any conduct aimed at counterfeiting, alteration, duplication, reproduction or dissemination, in any form and without right, of another person's work.

3.1.7 Transparency of accounting records

Sanico considers transparency, clarity, and accuracy in accounting records to be fundamental prerequisites in the management of the Company's financial flows. To this end, all operations and transactions must be properly recorded in the company's accounting system in accordance with legal requirements and applicable accounting principles. Transactions must be authorized, verifiable, legitimate, consistent, and appropriate. The Company has suitable administrative and accounting systems in place to accurately represent management activities and to identify, prevent, and manage financial and operational risks as far as possible.

In particular:

- all activities and actions carried out by Addressees in the performance of their duties must be verifiable;
- adequate supporting documentation for each transaction must be kept on file to facilitate accounting entries, ensure traceability of responsibility levels, and allow for an accurate reconstruction of the transaction;
- every entry in the accounting books must faithfully reflect the nature of the transaction and correspond to the data in the supporting documents;
- the Company promotes training and continuous updates for Addressees on the rules governing the preparation and management of accounting records.

³ Intellectual property is the set of rights aimed at protecting the creations of the human mind in the scientific, industrial and artistic fields, while industrial property is the set of exclusive rights recognised, inter alia, over trademarks and other distinctive signs, designs and models, and inventions.

Addressees are required to:

- provide transparent, truthful, complete, and accurate information in the management of corporate activities and in contractual and business relationships;
- ensure correct and timely accounting of all business transactions, guaranteeing the truthfulness, completeness, and verifiability of each piece of accounting and tax-relevant data, whether directly produced or received/transmitted to other company functions;
- verify the consistency of invoices and other tax documents related to the purchase of goods or services in terms of amount, purpose, and issuer, refusing payment in the event of anomalies and avoiding their improper use for tax purposes;
- issue invoices and tax documents for sales operations strictly in accordance with the actual nature of the goods or services provided, with particular attention to the amount, purpose, and counterparty;
- ensure the preservation and immutability of their accounting and tax documentation;
- ensure timely filing of the Company's tax returns and accurate reporting of relevant elements for determining due taxes.

3.1.8 Protection of company assets

Each Addressee is directly and personally responsible for the protection, proper management, and preservation of the Company's assets and resources—whether tangible or intangible—as well as the human, material, and financial resources entrusted to them within the scope of their duties. This responsibility includes the obligation to adopt all necessary measures to prevent damage, misuse, or dispersion that may compromise the value and integrity of such assets and resources.

The use of company assets must always serve the Company's goals and align with its interests. The use of Sanico's assets, tools, or resources for personal purposes or for reasons unrelated to company activities is expressly prohibited, unless explicitly authorized.

3.1.9 Use of IT resources

IT and telecommunication resources are essential tools for the management and control of business activities, ensuring speed, accuracy, and security in information flow.

Any improper use of company IT resources is prohibited, such as using internet access for non-work-related purposes, sending offensive messages or those damaging the company's image, and unauthorized collection, storage, or dissemination of data. All data stored in company systems are the property of the Company and must be used exclusively for professional purposes, in accordance with internal regulations. The alteration of IT systems,

installation and use of unauthorized software, and illegal duplication of programs and databases in violation of copyright laws are also strictly forbidden.

The use of IT and telecommunication tools is subject to monitoring and verification by the Company. Each Addressee is responsible for the protection of the resources entrusted to them and is required to promptly report any threats or anomalies to the appropriate departments.

3.1.10 Control processes

Addressees must be fully aware of the existence of policies and procedures that safeguard business processes and of their role in ensuring the achievement of the Company's objectives.

The responsibility for ensuring an effective internal control system is shared at all operational levels. Each employee, within the scope of their duties, must contribute to the definition, implementation, and proper functioning of controls relevant to their area of responsibility, ensuring their effectiveness and compliance with company regulations.

3.1.11 Antitrust and fair competition

Sanico recognizes and promotes the principles of a free market and fair competition, considering them fundamental to its business conduct.

The Company is committed to avoiding any anti-competitive behaviour that may lead to an unfair advantage. Addressees, in the performance of their duties, are required to comply with antitrust laws, ensuring respect for market rules and preventing any form of unfair competition.

3.2 Principles of conduct towards stakeholders

3.2.1 Human Resources

Sanico places the utmost importance on its human resources, considering them essential for the proper functioning and development of the company. Mutual trust, collaboration, fairness, and transparency are the principles that guide relationships at all levels within Sanico and contribute to fostering a positive corporate climate, which supports the achievement of business objectives.

The Company is committed to protecting its human resources by valuing the qualities and aptitudes of each individual, promoting dialogue, and ensuring a calm and stimulating work environment.

Respect for human rights

Sanico is committed to upholding and protecting human and workers' rights, in compliance with current regulations and in line with major international standards.

The Company recognizes the right to freedom of association and collective bargaining, respects the role of trade unions, and is open to dialogue on key issues of common interest.

Sanico prohibits the use of corporal punishment, psychological pressure, or verbal abuse towards personnel. Any disciplinary action is applied in full compliance with the Workers' Statute and the relevant National Collective Labor Agreement.

Occupational health and safety and working conditions

Sanico ensures a safe, healthy, and comfortable working environment for its employees by complying with all legal obligations regarding the prevention of occupational accidents and the protection of workers.

Furthermore, the Company is committed to raising staff awareness about safety with the aim of fostering a shared safety culture and encouraging responsible behaviour, also through ongoing training, the implementation of occupational safety management systems, and the pursuit of relevant certifications.

The Company ensures compliance with current laws regarding working hours, rest periods, weekly rest, mandatory leave, and vacation time, and guarantees that employees receive a salary that ensures a decent living standard for themselves and their families. Sanico also ensures that social security contributions are calculated according to applicable law and paid regularly.

Employees are required to:

- Strictly comply with all safety procedures during work activities;
- Actively participate in training and, where applicable, practical instruction sessions organized by the Company;
- Promptly report to the Health and Safety Officer (RSPP) any information that may help prevent accidents, as well as any situation that could have resulted in harm but did not (so-called "near misses");
- Behave responsibly to protect their own safety and that of others;
- Refrain from smoking within company premises.

Equal opportunities and non-discrimination

Sanico rejects all forms of discriminatory behaviour, whether based on physical condition, gender identity, nationality, ethnicity, religion, sexual orientation, political or trade union beliefs, or any other personal characteristic.

Employees are expected to behave in accordance with the above-mentioned values and principles, basing all relationships on mutual respect and the protection of others' rights and dignity. To this end, the Company encourages the reporting of discriminatory behaviour and has set up appropriate channels to ensure confidentiality for whistleblowers, committing to handle such reports appropriately and, when necessary, apply disciplinary measures.

In all stages of human resource management—recruitment, hiring, performance evaluation, remuneration, and training—the Company ensures merit and individual competencies are valued, excluding penalizing practices and guaranteeing that each worker has the opportunity to fully express their professional potential.

Personnel managers must take all necessary steps to avoid favouritism, nepotism, or cronyism. The information requested during selection processes must be strictly aimed at assessing a candidate's match to the job profile, with full respect for their privacy and personal beliefs.

Employees are required to:

- Avoid making decisions or engaging in behaviour influenced by characteristics such as gender, ethnicity, religion, age, sexual orientation, or other personal traits, and treat all colleagues and collaborators fairly and objectively;
- Respect the cultural and religious beliefs and practices of others, avoiding comments or actions that could be offensive or disrespectful;
- Foster a welcoming work environment where everyone feels valued and respected, regardless of personal inclinations;
- Promptly report any discriminatory episodes to the Human Resources Manager.

Harassment or mobbing

Sanico firmly condemns any behaviour that could be classified as mobbing or any other form of physical or psychological harassment.

The Company is committed to promptly identifying, managing, and eliminating any practice that may create a hostile, intimidating, or humiliating work environment. In the event of confirmed violations, Sanico will apply appropriate disciplinary measures based on the severity of the behaviour, in accordance with current laws and internal regulations.

To effectively prevent and counteract such situations, Sanico encourages all personnel to report promptly any episode of mobbing or harassment they may experience or witness,

ensuring whistleblower confidentiality and protecting against retaliation. Sanico provides adequate communication channels and specific procedures for handling such reports, with the aim of maintaining a peaceful, respectful, and collaborative workplace.

Employees are required to:

- Behave with mutual respect and good manners;
- Maintain conduct that is consistent with the ethical and social values that inspire the Company;
- Use respectful and appropriate language in the workplace;
- Report any harassment or mobbing incidents to the Human Resources Manager without delay.

Employee development

For Sanico, the development of human capital is a strategic priority essential to achieving corporate goals. The Company considers the skills and professionalism of its collaborators a distinctive asset of the organization and a driving force of its innovation.

The Company is committed to actively promoting structured training paths that meet both Sanico's evolving needs and the professional growth aspirations of its employees.

Employees are required to:

- Carry out their work with the utmost professionalism and diligence;
- Take a proactive attitude to foster knowledge sharing and acquisition;
- Show openness and flexibility towards continuous skill development, committing to ongoing professional improvement.

Drugs and alcoholic beverages

Sanico enforces a strict and uncompromising policy regarding the use, sale, purchase, transfer, possession, and presence of drugs and alcoholic beverages in the workplace. The only exception to this rule concerns medications containing controlled substances, provided they are taken under strict medical supervision based on a specialist prescription and their use does not interfere with assigned duties or compromise the safety of the individual or others.

Employees are required to:

- Not report to work or perform duties under the influence of drugs or alcohol, even in the absence of evident signs of physical or mental impairment;
- Not introduce and/or consume drugs or alcoholic beverages in the workplace;
- Report any situations potentially related to drug or alcohol use that may compromise the safety of colleagues or collaborators.

3.2.2 Clients

Clients, acting as intermediaries between Sanico and the end users of its products, are considered strategic partners by the Company, with whom it aims to build strong and lasting relationships. To this end, Sanico recognizes the importance of fostering customer loyalty based on mutual trust, guiding every interaction by principles of transparency, fairness, and professionalism. Sanico is committed to continuously strengthening this trust-based relationship by remaining open to dialogue and collaboration.

In dealings with clients, employees are required to maximize customer satisfaction while respecting the values and principles outlined in this Code. Sanico adopts a commercial approach focused on clarity in negotiations, promoting its products with intellectual honesty and highlighting their intrinsic qualities without resorting to misleading representations. To ensure long-term trusted relationships, Sanico is committed to drafting clear and precise contracts, with well-defined terms and conditions, including payment terms. In the event of administrative or accounting errors, the Company undertakes to promptly correct them through credits, refunds, or other measures agreed upon by both parties, promoting constructive dialogue and shared solutions.

The Company strictly prohibits any form of corruption in relationships with clients, forbidding any benefits offered and/or received that are not contractually legitimate or that exceed normal business courtesy. Sanico's personnel are required to manage commercial relationships with integrity, transparency, and under proper supervision.

Sanico guarantees the confidentiality of information and data relating to its clients.

Clients are invited to:

- adopt a respectful and correct behaviour towards Sanico and all its personnel;
- preserve the quality of the products received;
- promptly communicate any critical issues encountered in relation to products and/or interactions with Sanico personnel;
- respect the values and principles contained in Sanico's Code of Ethics.

3.2.3 End-users

Meeting the needs of end users and contributing to their well-being and health is Sanico's primary corporate objective. With the aim of offering high-quality products, the Company continuously invests in the search for innovative solutions to improve the user experience.

Sanico is committed to providing all necessary information regarding the features, quality, use, and functionality of its products, enabling users to make informed choices. Furthermore, the Company ensures maximum attention to suggestions and potential complaints, committing to their verification and resolution.

End users are invited to:

- use products according to the instructions for use to ensure proper functionality and avoid health risks;
- promptly report any issues related to product quality and/or performance;
- dispose of products according to the guidelines provided in the user manuals.

3.2.4 Sales agents

Sanico's network of sales agents represents a strategic and valuable asset. Acting as privileged observers of market needs, agents serve as a vital link between the Company and the market itself.

Sanico is committed to cultivating its relationship with agents through a relational model based on ongoing dialogue and direct interaction with each individual agent. The Company actively promotes opportunities for engagement and listening, such as regular meetings for updates and training.

Sanico requires its agents to operate in full compliance with the values and principles of this Code, representing the Company with integrity and professionalism in every client interaction. Any conduct that may damage the Company's reputation is prohibited. Agents must communicate clearly, transparently, and comprehensively regarding product features and contractual conditions, avoiding deceptive commercial practices.

Sales agents are invited to:

- act with professionalism and integrity, communicating clearly and honestly with clients and maintaining a behaviour that directly reflects Sanico's values and ethics;
- comply with all anti-corruption regulations and promptly report any undue demands or pressure received from clients or third parties;
- avoid situations that may generate conflicts of interest, undertaking to make any business decision in the sole interest of the Company and its clients.

3.2.5 Suppliers

Sanico considers its suppliers to be key players in the Company's success. It is committed to establishing long-term commercial relationships based on reliability and mutual cooperation.

Supplier selection is carried out in compliance with principles of legality, fairness, transparency, and non-discrimination, evaluating objective parameters such as quality, performance, and price. Respect for current regulations on human and labor rights in countries of production is an essential requirement for maintaining business relationships, with special attention to avoiding child and forced labor, and ensuring workplace health, safety, and environmental protection. The Company is committed to continuously monitoring compliance with human and labor rights along the supply chain, and to taking appropriate measures in case of violations.

Sanico expects professionalism, fairness, and integrity from its suppliers. In the event of violations of this Code or applicable laws, the Company reserves the right to take appropriate action, including terminating the relationship and rescinding the contract.

In contracts, the Company commits to clearly and comprehensively outlining the negotiated terms, including payment conditions. Additionally, Sanico undertakes to promptly report and correct any accounting or administrative errors in ways mutually agreed upon by both parties.

In dealings with suppliers, Sanico prohibits the acceptance of gifts or significant favors. Similarly, offering or granting undue advantages beyond normal business courtesy to gain improper benefits for the Company is forbidden.

Suppliers are required to:

- respect and ensure compliance with labor and occupational health and safety regulations;
- provide products in accordance with contractual agreements, ensuring

- punctuality, quality, and compliance with safety standards;
- respect the values and principles of this Code of Ethics.

3.2.6 Banks and financial institutions

To ensure the Company's reliability and credibility, Sanico recognizes the importance of maintaining a continuous and transparent dialogue with banks and financial institutions.

In particular, the Company promotes open communication and a constant flow of information, ensuring the complete and timely disclosure of any relevant data affecting its creditworthiness.

Sanico prohibits any conduct that may result in information asymmetries, instead promoting maximum transparency. Moreover, the Company is committed to honouring all contractual obligations with financial institutions punctually and correctly, thereby fostering long-term relationships of trust and collaboration.

Banks and financial institutions are invited to:

- treat Sanico's financial and strategic information with the utmost confidentiality, avoiding any unauthorized disclosure;
- propose financial solutions that support business growth, with particular attention to economic, social, and environmental sustainability.

3.2.7 Environment and future generations

Sanico is actively committed to promoting sustainable development and preserving natural resources, aware of its responsibility to safeguard the environment for future generations. Through careful and mindful management of its activities, the Company adopts strategies to monitor, reduce, and mitigate its environmental impact, focusing on efficient resource use and process optimization.

In particular, in line with circular economy principles, Sanico invests in the research of innovative product solutions that reduce waste and encourage material reuse, contributing to a more sustainable production model. Additionally, the Company promotes a culture of environmental responsibility, raising awareness and involving its stakeholders in adopting sustainability-oriented practices.

3.2.8 Community

Sanico acknowledges its key role within the community in which it operates, committing to responsible behaviour and actively contributing to local growth and development. The Company adopts a cooperative approach with local stakeholders, listening to their needs and carefully considering its impact on the territory. Sanico distinguishes itself through social sensitivity, participating—where opportunities arise—in charitable projects and initiatives in support of the community.

3.2.9 Public Administration

Sanico manages its relationships with Public Administration based on fairness, clarity, and transparency, maintaining ongoing and open dialogue with national, regional, and local institutions.

In its dealings with Public Administration, Sanico promotes behaviour in line with the values and principles of this Code and complies with all applicable laws, avoiding any conduct that may compromise the integrity or reputation of the Company. To this end, any direct or indirect offers, promises, or solicitations of money or other benefits to public officials or civil servants are strictly prohibited. Likewise, the acceptance of gifts or favors exceeding normal business courtesy is forbidden.

The Company requires all Addressees to fully cooperate with any inspections or audits conducted by public bodies, and prohibits the concealment, destruction, or alteration of records, minutes, accounting documents, or any type of documentation, as well as providing false or misleading information to competent authorities.

Sanico ensures that its dealings with the Judiciary at all levels, as well as with its auxiliaries and law enforcement bodies, are characterized by maximum transparency, fairness, and cooperation. To this end, Addressees must refrain from any behaviour that may, even indirectly, obstruct the activities of such authorities (e.g., persuading others to provide false or misleading statements to judicial authorities).

3.2.10 Competitors

Sanico promotes a market based on the principles of free competition, recognizing it as essential for fostering development and improvement. To this end, the Company complies with all applicable competition laws and strives to build fair, respectful, and competitive relationships with its competitors, avoiding any conduct that may constitute unfair competition.

Anyone acting in the interest or on behalf of Sanico is required to comply with this Code's principles, avoiding unethical behaviour toward competitors and their products.

Communication must be based on mutual respect and should not defame or harm the reputation of other companies in the sector.

Competitors are invited to:

- operate in compliance with the principles of free competition and antitrust laws;
- refrain from using disparaging or disrespectful language toward Sanico;
- avoid using names or trademarks that may cause confusion with those of Sanico;
- promote a collaborative and constructive relationship with Sanico, encouraging information exchange and dialogue.

4 IMPLEMENTATION, MONITORING AND UPDATING OF THE CODE OF ETHICS

4.1 Dissemination and updating of the Code of Ethics

This Code of Ethics comes into force as of the date of its approval by the Sole Director, i.e. 14/04/2025.

Sanico is committed to ensuring the dissemination of the Code so that the values and principles of conduct that guide the company's operations are made known to all Addressees through specific information and communication activities.

Should there be regulatory changes, developments in the relevant context, or changes in the company's organization, Sanico undertakes to update the contents of the Code of Ethics. Any revisions to the Code are approved by a Committee composed of the Sole Director Amet Zhabjaku, the General Manager Sergio Crespi, and the COO Luisa Paladini.

It should be noted that the Code is published on the company website (<https://sanicare.it/>) and made available to all Addressees in compliance with the applicable regulatory provisions.

4.2 Monitoring the application of the Code of Ethics and reporting

The General Manager is responsible for monitoring the implementation and compliance with the Code of Ethics, as well as ensuring that company policies and procedures are aligned with the principles and values established in the Code.

The General Manager is also responsible for collecting reports regarding alleged violations, requests for clarification or opinions, which should preferably be submitted in non-anonymous form to the dedicated email address: sergio.crespi@sanicare.it

Each report will be carefully reviewed, ensuring, where appropriate, that the reporting party and/or the person involved are heard. Sanico protects the confidentiality of the identity of the reporting party and guarantees protection for those who, in good faith, report violations of the Code of Ethics, preventing any form of retaliation or intimidation.

Violations must be promptly reported to the Sole Director for appropriate action to be taken. A breach of the provisions of this Code undermines the relationship of trust established with the Company and may lead to the application of disciplinary sanctions and the adoption of measures against the Addressees, in accordance with the applicable laws and contractual frameworks. Such measures may include, where applicable, termination of employment or of the business relationship.

Sanico is committed to taking corrective action in response to internal behaviour that is not consistent with the values and principles set out in the Code of Ethics. Such actions must be based on criteria of fairness and equity and will be carried out in compliance with current regulations, including the applicable National Collective Bargaining Agreement (CCNL).

4.3 Value of the Code of Ethics

Compliance with the provisions of this Code of Ethics must be considered an essential part of the contractual obligations undertaken by all those who engage in business relations with the Company.

Violation of the principles and contents of the Code constitutes a breach of the fundamental obligations of the employment relationship and/or a disciplinary offense, with all legal consequences, including regarding the continuation of the employment relationship, and may result in compensation for any damages arising therefrom.