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1. FORWARD

Complife Italia S.r.l. in the context of business dynamics and requirements has among its primary values those of **business ethics**, through which it expresses a message of **loyalty, fairness and respect** for its customers and employees, but also for the social reality in which it operates.

Complife Italia shares not only ethics in conducting business, but also respect for moral principles, which, in a democratic country like Italy, must inspire all aspects of civil coexistence, all relations between individuals, associations and private and public companies, and institutions.

Complife Italia's Code of Ethics expresses the company's noble mission to create value within a society inspired by the principle of solidarity set out in our Constitution. Complife Italia believes that compliance with the values of this Code of Ethics is instrumental to the growth of a culture of values in full respect of a democratic society that in the first article of the Constitution recognises work as a fundamental value for the expression of the dignity of the individual.

Inspired by the principle of economic freedom of our Constitution, Complife Italia, with this Code of Ethics, is willing to contribute to the dissemination of a culture of legality and ethics in the construction of economic relations.

2. VISION

To contribute to the well-being of people internationally and act as a point of reference for all actors in the Health&Wellbeing market.

3. MISSION

3.1 MISSION: "COMMITTED TO SCIENCE & BUSINESS"

Complife is an **international** group, with many **complementary specializations** in the **health and wellness** market. Our training and passion for research and compliance, together with the dislocation of our laboratories allows us to always be updated on the latest market news, to offer **an increasingly complete and targeted support** to our customers, aimed at guiding their business to success.

3.2 MISSION BY SECTOR OF ACTIVITY

Cosmetics: bringing safe, tolerable and effective cosmetics to the market thanks to testing activities carried out in our state-of-the-art laboratories spread throughout Europe and our scientific know-how;

Nutraceutical: to become a point of reference for testing the effectiveness of products, thanks to a solid base of volunteers and a diverse network of professionals, for market-focused advice;

Medical devices: to be the reference provider for the verification of the compliance of the medical device, in every phase of its life cycle;

Pharmaceutical: contribute to the research and development of new active ingredients in the pharmaceutical field through a dedicated chemical synthesis laboratory and thanks to a complete team of experts in the service of the project.

4. WHO IS THE CODE OF ETHICS ADDRESS TO?

The set of ethical principles and values indicated in the Code shall inspire the activity of all those who work in the Organisation, taking into account the importance of their roles, and the complexity of the functions and responsibilities entrusted to them for the pursuit of the Organisation's purposes.

In particular, the members of the corporate bodies are inspired by the principles of the Code when setting business objectives. Individual managers give concrete expression to the values and principles contained in

the Code, assuming responsibility both internally and externally and strengthening trust, cohesion and team spirit. External collaborators on an ongoing basis, in due compliance with the law and regulations in force, adapt their actions and conduct to the principles, objectives and commitments set out in the Code. The Code of Ethics applies to corporate bodies, employees, proxies, and collaborators who in any capacity - regardless of the contractual relationship - operate with and on behalf of Complife Italia.

The Organisation requires third parties (partners, customers, suppliers, professionals, consultants and other external parties with whom it establishes relations or business relationships) to comply with the Code.

Furthermore, the Code of Ethics represents an integral part and constituent element of the Organisational Model adopted by the Organisation under the regulations on the administrative liability of organisations set out in Legislative Decree 231/2001.

5. ENVIRONMENTAL PROTECTION

The Company considers environmental protection a key factor in its business activities and is inspired by the principles of respect for and protection of the environment and the territory, considered to be of utmost importance both in terms of their intrinsic value and their impact on human health and other living species. To this end, the Company is committed to complying with current legislation and ensures that its business activities, in any sector, comply with the highest standards of environmental compatibility and safety.

Special attention is paid to the collection and disposal of waste generated by the company, which - where possible - are treated according to the principles of differentiation and recycling, in accordance with existing legislation and best operational practices.

6. THE ETHICAL PRINCIPLES OF REFERENCE

Transparency: Complife Italia is committed, in its relations of any nature and with any stakeholder, to ensure that every operation and transaction is correctly recorded, authorised, verifiable, legitimate, consistent and appropriate while respecting confidentiality and the obligations arising from the relevant regulations;

Verifiability: all Company's activities are properly recorded so that the decision-making, authorisation and execution processes are verifiable;

Confidentiality: the Company ensures the confidentiality of the information in its possession and its processing by the provisions of the Organisational Model of Privacy adopted by the Organisation, also regarding data security;

Fairness and moral integrity: Since its establishment, Complife Italia has considered ethics and humility a functional basis of the Organisation's management. The understanding and respect for these values represent a guiding element in the management of the company's relations with both the outside world and its employees. The pursuit of mere economic interest cannot be considered as a discriminating element to the pursuit of the values of fairness and moral integrity as well as to the provisions of the law and the regulations in force. It is not permitted to grant advantages and courtesies in exchange for gifts and benefits of any kind. The Company, in all actions aimed at pursuing its business activity, whether directly or indirectly, avoids incurring in situations of conflict of interest or potentially such, in compliance with the rules of fairness, integrity and ethics.

By the aforementioned principles, a division of company resources is made based on the functions held to avoid situations of conflict of interest and to allow certain traceability of the actions performed by company resources;

Legality: Complife Italia in the exercise of its activities acts in compliance with its Articles of Association, the laws and regulations in force in all the countries with which it operates and asks the Recipients to respect this Code and the above-mentioned principle, which is fundamental for the Company;

The value of human resources: Complife Italia recognizes the fundamental value of each employee and their potential as individuals and as active contributors to the achievement of the Organization's goals.

The Company strives to ensure that every relationship is based on respect, active listening, and the appreciation of individuality, providing working conditions that safeguard well-being, safety, and peace of mind. Every individual must be able to express themselves freely, participate actively, and be themselves in an atmosphere of mutual respect.

The Company recognizes the fundamental value of human dignity and is committed to implementing internal policies aimed at upholding fundamental human rights, particularly the principle of non-discrimination;

Corporate social value: Complife Italia is committed to respecting the social value of the company and protecting open competition in the market, inspired by the principles of fairness, correctness and legality.

Respect for human values: Complife Italia is committed to promoting and safeguarding respect for human dignity, integrity, and fundamental rights in all its relationships and activities, ensuring equal opportunities, valuing diversity, and combating any form of discrimination, abuse, or harmful behavior, in compliance with applicable laws and regulations.

Impartiality and inclusivity: Complife Italia is committed to acting with objectivity, fairness, and respect, ensuring equal treatment for everyone with whom it interacts, without any discrimination based on gender, origin, nationality, age, religion, personal orientation, social status, or other individual characteristics, while promoting an inclusive, collaborative environment that values diversity.

Health and safety: Complife Italia considers the protection of health and safety to be a core value and works to ensure that workplaces are safe, healthy, and compliant with current regulations. The Company promotes responsible behavior, preventive measures, and a culture focused on the physical and psychological well-being of its employees, with the aim of preventing risks, accidents, and harmful situations.

Work-life balance: Complife Italia promotes flexible work policies to ensure a balance between personal life and work.

Participation and engagement: Complife Italia fosters an open and collaborative environment in which people are encouraged to actively contribute to decision-making processes and the improvement of operations through mutual listening, information sharing, and the recognition of individual skills. The Company fosters dialogue, cooperation, and accountability, recognizing each person's contribution as a fundamental element for shared growth and the achievement of common goals.

Combating all forms of violence and discrimination: Complife Italia opposes and condemns any form of violence, abuse, harassment, or discriminatory behavior, whether direct or indirect, by promoting an environment based on mutual respect, human dignity, and equal opportunities. Any harmful behavior, whether verbal or physical, is identified, discouraged, and addressed with appropriate measures, fostering an inclusive culture in which every person can work and interact in conditions of safety, respect, and peace of mind.

7. GENDER EQUALITY

Complife Italia recognizes the **value of people** and their differences as a central element of its organizational identity, and is committed to ensuring **equal opportunities for professional development and personal growth** for all employees. The promotion of gender equality is a guiding principle of its human resources management policies, aimed at fostering skills, talents, and potential with a focus on equity, sustainability, and long-term performance. In line with this principle, the Company promotes an **inclusive, respectful, and non-discriminatory work environment**, adopting appropriate measures to prevent all forms of gender inequality and to counteract behavior that undermines people's dignity, regardless of role or level of responsibility. The **promotion of diversity** is integrated into business processes and represents a fundamental element for organizational growth and the quality of work.

In terms of human resources management, the Company ensures that recruitment, professional development, training, and career paths are based on **merit and equal opportunity**, guaranteeing **fairness in compensation policies as well**. The selection and hiring processes are defined according to a clear and formalized procedure, covering all stages from candidate search to onboarding, using **objective and inclusive criteria** consistent with the principles of fairness and equal opportunity. A structured onboarding process ensures a consistent experience for all new hires, promoting **integration** and **reducing the risk of unequal treatment**. Career management is supported by formalized performance evaluation mechanisms, applied to all employees using **objective and uniform criteria**, and by a turnover analysis system that accounts for gender in order to monitor potential issues and identify targeted corrective actions. Exit interviews are also formalized as a tool for collecting structured feedback and understanding the reasons behind departures, including in relation to potential gender dynamics. Regarding **pay equity**, the Company adopts a structured process for periodic pay reviews, aimed at monitoring and reducing any gender pay gaps, ensuring equity with respect to role, responsibility, and experience.

In this context, Complife Italia supports **employee well-being** through **welfare initiatives and flexible organizational solutions** designed to promote a **healthy work-life balance**. Work-life balance measures are communicated clearly and accessible to all staff, with particular emphasis on the various types of leave available and the procedures for taking them, in order to encourage a more equitable and informed use of the available tools. Particular attention is given to **supporting parents**: initiatives dedicated to maternity and paternity leave are systematized and made accessible to all employees, ensuring transparency and uniform application and guaranteeing, within the limits of organizational needs, the continuity of career paths and the maintenance of contractual and compensation terms.

The Company also implements a structured set of measures to prevent all forms of physical, verbal, and digital abuse in the workplace. A dedicated reporting channel is in place, allowing employees to safely and confidentially report any behavior that does not comply with company principles, and specific regulations are in place to prevent bullying and harassment. Employee perceptions regarding **equal opportunity** are also monitored through climate surveys, a tool used to collect systematic feedback, assess the level of perceived inclusivity, and identify areas for improvement.

Finally, Complife Italia promotes a **culture of equality** at all levels through information campaigns, awareness-raising initiatives, and training programs for all employees, **aimed at overcoming gender stereotypes and biases and strengthening women's empowerment**. This commitment also extends to **mindful language and daily conduct**, which must be respectful and inclusive, as well as to transparent internal and external communication that aligns with the company's values. In terms of external representation, the Company promotes **gender balance** in participation at events, panels, and conferences on every relevant occasion, to ensure equal visibility and inclusion.

8. STAFF RELATIONS

Complife Italia protects and promotes the **value of human resources** - as an indispensable element for the existence and development of the company - to increase the wealth of skills of each employee and promotes respect for the **physical, moral and cultural integrity of the person**.

Right from the staff selection phase, the Company undertakes to adopt **merit-based criteria** and professional competence for any decision concerning a worker; it actively involves workers in the company's decision-making project, to allow the expression of personal abilities and professional fulfilment. Complife Italia protects the moral integrity of its staff, guaranteeing the **right to working conditions that respect the dignity and potential of the individual**. For this reason, the Organisation is committed to safeguarding workers from

acts of psychological violence or mobbing and opposes any attitude or behaviour that is discriminatory or harmful to the person, his or her beliefs and inclinations.

The Company prevents employees from being subjected to unlawful influences and discomfort in the course of their work by intervening to prevent insulting and defamatory attitudes. It guarantees working conditions that respect individual dignity and a safe working environment, in full compliance with current legislation and regulations. Staff is only hired based on regular employment contracts, as no irregular employment is tolerated.

The Organisation complies with the legislative provisions on working time, holidays, leave and the payment of overtime. The candidate must be made aware of all the features relevant to the employment relationship, following the provisions of the Transparency Decree Legislative Decree 104/2022.

When the employment relationship is established, staff receive clear and specific information on regulatory and salary aspects. Complife Italia invests in human resources training through specific training programmes.

9. HEALTH, SAFETY AND QUALITY

Occupational **health, safety** and **quality assurance** are priorities for Complife Italia and play a central role in the development of its activities.

Health, safety and quality are organisational and personal responsibilities that must be effectively applied in **strategic, organisational, managerial and executive choices**, to be pursued with a view to **constant improvement**. Under no circumstances may the adoption of preventive measures and compliance with them be subordinated to the interest in getting the job done, keeping to schedules (effectiveness) and reducing costs (efficiency).

Therefore, Complife Italia S.r.l. is committed to complying with all regulatory provisions that allow for the protection of workers' health in the workplace, through the continuous activity of specifically appointed company functions. Employees must scrupulously comply with the company regulations in force and, in any case, with the legal requirements concerning personal safety and health protection.

10. STAFF RULES OF CONDUCT

Staff is required to perform its duties by the general principles of fairness and good faith, the provisions of the Civil Code by the duties of **diligence, obedience and loyalty**, the obligations subscribed in the employment contract, Complife Italia's Company Regulations and the policy on the use of IT devices, as well as the remote working policy prepared for this purpose by the Organisation. Staff is expected to respect the team by behaving with **mutual respect and cooperation**, bringing their contribution of ideas, **proactivity and enthusiasm**.

It is forbidden for staff to receive and/or give money, gifts, goods, services, favours or any benefit whatsoever, from customers (the value of which does not constitute mere courtesy), suppliers, representatives of the Public Administration of any country, and in any case from any external party with which Complife has relations. This is necessary in order not to influence decisions to obtain better treatment, undue perceptions or any other purpose.

Complife Italia demands that no harassment of any kind or abuse by a supervisor occurs in internal and external labour relations. Harassment is any action, omission or verbal offence that is an obstacle to the smooth conduct of work and the achievement of objectives. Complife also requires that, in the performance of its activities and its internal and external relations, no discriminatory acts against colleagues, customers, suppliers or any person encountering the Organisation take place.

11. HEALTH, SAFETY AND QUALITY

Staff is obliged to comply with Complife Italia health, safety and quality requirements and to observe the internal procedures adopted by the Organisation for this purpose.

It is prohibited to omit or alter measures to prevent health and safety risks in the workplace to gain profit for oneself or the Organisation.

All employees and collaborators must:

- be an active participant in the process of risk management and application of security and control measures;
- be aware of the actual and potential consequences that one's activities and behaviour in the workplace may have on one's health and the health of others;
- apply the measures of Complife Italia in matters of safety at work;
- comply with the rules and regulations and any other provisions issued by the Organisation to protect health and safety.

12. RECIPIENTS' DUTIES

Each Recipient of this Code must:

- act with objective and documentable criteria;
- scrupulously comply with internal procedures relating to the selection and management of relations with suppliers;
- observe the principles of transparency and completeness of information in correspondence with suppliers;
- verify, using appropriate documentation and following the company's processes, that they have suitable documentation to prove the requisites necessary to fulfil the role of supply, in compliance with the ethical principles and this Code, which inspire the Organisation;
- avoid any form of conditioning by third parties outside Complife Italia to take decisions and/or the implementation of acts relating to one's work.

13. CUSTOMER RELATIONS

Complife Italia aims to meet the expectations of its customers by providing **high-quality** services in compliance with competition and market protection regulations, and by basing its conduct on values of **fairness, honesty and professionalism**.

In their relations with customers, the Recipients of this Code of Ethics undertake not to arbitrarily discriminate against customers, respect the obligations undertaken and provide accurate information, avoiding the use of any type of deceptive, elusive or unfair contrary practice.

14. SUPPLIERS RELATIONS

Complife Italia's selection of suppliers or external collaborators for the purchase of goods and services is based on assessments of objective parameters of proven **quality, integrity, reliability and cost-effectiveness**. In particular, when choosing suppliers, the Organisation assesses compliance with the principles set out in this Code by carrying out a specific investigation on compliance with the legislation in force from time to time and with the specific rules governing the activity carried out.

15. SUPPLIERS RULES OF CONDUCT

Suppliers are sensitised to conduct their business by following standards of conduct consistent with those set out in the Code.

In particular, they must ensure that they take their business seriously, respect the rights of their workers, invest in quality and manage environmental and social impacts responsibly.

If a Supplier, in carrying out its activities for the Company, adopts behaviors not in line with the principles contained in this Code of Ethics or in the Organizational Model 231, appropriate measures will be taken, which - in the most serious cases - would result in the termination of existing contracts until further collaboration could no longer be possible.

It is forbidden for anyone dealing with them to request gifts (not only in the form of sums of money but also goods), benefits or other utilities, to facilitate their work position with Complife Italia, to the detriment of others and the Organisation.

16. RELATIONS WITH PUBLIC ADMINISTRATION

Relations with the Public Administration (by way of example only, Ministries, the Personal Data Protection Authority, the Inland Revenue Agency, the Supervisory Authority, and local or national authorities) of an institutional or public nature must be inspired by the strictest compliance with the applicable legal and regulatory provisions, as well as the general principles of **fairness and loyalty and the company procedures**. Complife Italia also identifies and defines communication channels with all Public Administration interlocutors.

In particular, the assumption of commitments vis-à-vis the Public Administration is reserved for the corporate functions appointed and authorised for that purpose, which are required to perform their duties with integrity, independence and fairness.

The Organisation condemns any conduct, by anyone on its behalf, consisting in promising or offering, directly or indirectly, money or other benefits to representatives of the Public Administration or to their relatives or relatives-in-law, from which an interest or advantage for Complife Italia, even if only potential, may arise. Furthermore, Complife condemns any conduct, by anyone on its behalf promising or giving, directly or indirectly, money or other benefits to intermediaries, by way of undue remuneration, to obtain a benefit for the Organisation of which the latter guarantees the attainment thanks to the actual or vaunted knowledge of representatives of the Public Administration or their relatives or relatives-in-law.

The Organisation may not be represented in relations with the Public Administration by third parties or internal staff when a conflict of interest may arise, even if only in the abstract.

Third parties or internal staff working on behalf of the Company are obliged to refrain from having relations with the Public Administration in any other case in which there are serious reasons for convenience.

If a business negotiation, request or institutional relationship is initiated with representatives of the Public Administration, the following actions may not be taken, directly or indirectly:

- propose, in any way, employment and/or business opportunities that may personally benefit, directly or indirectly, representatives of the Public Administration;
- solicit or obtain confidential information that may compromise the integrity or reputation of both parties;
- perform any other act aimed at inducing representatives of the Public Administration to do, or to omit to do, something in violation of the laws of the system to which they belong;
- adhere to any request for contributions and sponsorships, which may influence part of the Public Administration;

- deny, conceal or delay any information requested by the Public Authorities or Supervisory Authorities and other regulatory bodies in their inspection functions, undertaking, on the contrary, to cooperate actively in the course of any investigation procedures.

It is also forbidden to use or present false declarations or documents or ones certifying untrue things, or to omit due information, to unduly obtain contributions, financing, subsidised loans or other disbursements of the same kind from the State, the European Union and/or other public bodies.

All Recipients of the Code are obliged to verify that public funds, contributions or subsidised financing granted in favour of Company, are used for the performance of activities or the realisation of the initiatives for which they were granted. Any use other than that for which they were provided is prohibited.

17. RELATIONS WITH JUDICIAL AUTHORITY

Complife Italia ensures and promotes correct, transparent and collaborative behaviour towards the Police and the Judicial Authority. It is forbidden to implement any form of conditioning towards anyone (employee, collaborator or third party) who is called upon to give evidence before the judicial authorities.

18. RELATIONS WITH MEDIA

Staff do not engage in relations with the press or other mass media about the activity of Complife Italia, unless such activity constitutes a specific mandate by the Company.

19. RELATIONS WITH PARTIES, POLITICAL ORGANISATIONS AND TRADE UNIONS

The Organisation does not make contributions of any kind, directly or indirectly, to political parties, movements, committees and political and trade union organisations, nor their representatives or candidates, except for contributions due based on specific regulations.

Complife Italia refrains from any direct or indirect pressure on political or trade union representatives through its employees or collaborators. Directors and employees, in turn, may not engage in political activities during working hours, or use the Organisation's property or equipment for that purpose.

In relations with other interest-bearing associations (e.g. trade associations, environmental organisations, etc.), no director, employee or collaborator shall promise or pay sums, personally promise or grant goods in kind or other benefits to promote or favour the interests of Complife Italia.

20. PREVENT OF MONEY LAUNDERING

It is mandatory to comply with all national and international rules and regulations on fighting money laundering.

Recipients must refrain from performing any transaction that may contribute to the transfer, substitution or otherwise use of illicit proceeds or that could in any way hinder the identification of money, property or other useful assets of criminal origin.

21. FIGHT AGAINST CORRUPTION AND CONFLICTS OF INTEREST

Complife Italia, consistently with the values of honesty and transparency, undertakes to implement all necessary measures to prevent and avoid corruption and conflict of interest.

This is deemed to be the case if the staff has, directly or indirectly, an interest in conflict, even if only potential, with that of the Organisation, regardless of whether it seeks to take "personal" advantage of the Organisation's business opportunities.

Any person operating in a conflict of interest is obliged to notify immediately the hierarchical superior and to refrain from carrying out the conflicting activity.

22. COMPETITION

Complife Italia recognises that competition is a fundamental element for the development and economic and social progress of the country.

To this end, in carrying out its activities, the Company shall ensure that the general conditions for freedom of enterprise are complied with, allowing economic operators to have access to the market and compete on an equal footing, and protect its customers, encouraging price containment and improvements in the quality of services resulting from free competition. It is prohibited to enter into agreements, even of an informal nature, or to take part in business practices that in any way aim at distorting the principle of free competition on the market and are therefore in breach of national and EU competition law.

23. CORPORATE DISCLOSURE

Corporate bodies are obliged to comply with the provisions and principles of this Code of Ethics. In particular, their members are required to:

- behave autonomously, independently, and fairly with public institutions, private entities, economic associations, and political forces, as well as with any other national and international entity;
- behave with integrity, loyalty and a sense of responsibility;
- ensure assiduous and informed participation in the meetings and activities of the corporate bodies;
- evaluate situations of conflict of interest or incompatibility of functions, assignments or positions outside and within the Entity, refraining from performing acts in situations of conflict of interest within the scope of their activity;
- make confidential use of information for which they know official reasons, avoiding to use their position to obtain personal advantages, whether direct or indirect.

The Recipients of this Code of Ethics and, in particular, the Directors are prohibited from:

- returning, also employing simulated acts, contributions to shareholders or releasing them from the obligation to execute them, outside the cases of legitimate reduction of share capital;
- distributing profits or advances on profits not earned or allocated, by law, to reserves; and releasing reserves, including the ones not consisting of profits, which may not be distributed by law;
- purchasing or subscribing to shares or quotas that cause damage to the integrity of the share capital or reserves that cannot be distributed by law, except in cases permitted by law;
- fictitiously forming or increasing, even in part, the Company's capital through the allocation of shares or social quotas for a sum lower than their nominal value, reciprocal subscription of shares or quotas, significant overvaluation of assets in kind or receivables or of assets in the event of conversion.

24. BOOKKEEPING, BUDGETING AND CASH FLOW MANAGEMENT

The Company acts in compliance with the laws and regulations on the keeping of accounts and the preparation of financial statements.

The Recipients, to the extent of their competence and concerning the tasks assigned to them, are required to provide the utmost cooperation to ensure that management facts are represented correctly and promptly in the company accounts and to keep all supporting documentation so that it can be easily found and consulted by the persons authorised to control it.

All operations of a financial nature, as well as all incoming and outgoing money movements of the Organisation, are carried out by persons with the relevant powers, subject to justification, and are always justified, traced and recorded.

25. PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY

The Recipients of the Code shall act in full respect of the industrial and intellectual property rights, legitimately belonging to third parties, as well as in compliance with the provisions contained in laws, regulations and conventions protecting such rights.

All Recipients must refrain from conduct that may constitute a usurpation of industrial property rights and the unlawful and/or improper use of intellectual works or parts thereof, protected by copyright laws.

26. EXTERNAL INFORMATION AND COMMUNICATION

The Recipients of the Code of Ethics undertake not to disclose information relating to the Company. All information acquired as a result of the performance of the task or function shall be kept confidential. All external communications are carried out in compliance with applicable company regulations and procedures.

27. IMPLEMENTATION, CONTROL AND MONITORING

Complife Italia takes care of the application and dissemination of this Code; a similar responsibility is assigned to all staff who ensure its compliance.

Reports

The Code of Ethics is an integral part of the Organisational and Control Model.

Requests for interpretation of the Code, made by staff, may be forwarded to their managers or directly to the Compliance Function.

All Recipients are required to meet the Code and to report any conduct that does not comply with the principles and rules contained therein.

Also, they are subject to reporting any hypothesis of crime or violations with particular reference to the crimes presupposed in D.lgs. 231/01.

The reports must be made, in written or oral form, also in anonymous mode, through the internal reporting channel (c.d. Software Whistleblower), managed by the Compliance Function, at the following address: <https://whistleblowersoftware.com/secure/COMPLIFEITALIA>.

Once the report has been received, the Compliance Function analyses, assesses the admissibility and validity of the report and, if the conditions are met, transmits the report to the Supervisory Body.

The Supervisory Body carries out the appropriate verifications and draws up a final report that it transmits and/or shares with the Board of Directors for the adoption of possible disciplinary measures.

According to Guidelines ANAC no. 311 of 12 July 2023, relating to Legislative Decree no. 24/2023 (c.d. Decreto Whistleblowing), staff may consider making the report also to their hierarchical superior. In this case, the superior has the obligation to transmit the report to the Compliance Function within 7 (seven) days of the report, when the reporting person declares to make use of the protections provided for by Legislative Decree no. 24/2023 or when this will can be deduced from the reporting.

In any case, Complife Italia shall take all necessary measures to protect confidentiality, also taking into account the obligations laid down regarding whistleblowing and ensure that no complainant, following a report, is subject to retaliation.

Sanctions System – Disciplinary Measures

Compliance with the Code of Ethics is an integral part of the contractual obligations of employees, collaborators and, more generally, all Recipients. Any violations make measures applicable by the Company,

modulated to the seriousness and within the limits of the applicable regulatory framework. As regards employees, non-compliance may result in the non-fulfilment of contractual obligations entered into and lead to the initiation of disciplinary proceedings explicitly referred to by the Organisation in the Company Regulations adopted by Complife Italia, within the framework of Article 7 of the Workers' Statute and any special and/or sector regulations.

Suppliers, collaborators and all Recipients of business relations with Complife Italia are obliged to comply with the provisions contained in this Code and the Organisational and Control Model under Legislative Decree 231/2001; non-compliance constitutes a breach of contractual obligations undertaken and the application of contractual remedies.

Failure to comply with this Code of Ethics and the Organisation and Control Model adopted by Complife Italia on the part of the directors of the Organisation shall result in the adoption of the most appropriate protective measures, within the scope of those provided for by the laws in force, by the competent Corporate Bodies.

28. CODE OF ETHICS DISCLOSURE

The Code of Ethics and its updates are brought to the attention of all Recipients (internal and external) through adequate communication and dissemination activities so that the values and principles contained therein are known and applied and to avoid that individual initiative may generate behaviour inconsistent with the ethical profile that Complife pursues.

The Code of Ethics is published on the website of Complife Italia, accessible to everyone.

29. FINAL PROVISIONS

The Board of Directors of the Company approves the Code of Ethics by resolution and takes care of its revision and possible updating.

Any amendment, revision and updating of this Code of Ethics must be approved by the Board of Directors.