



# **CODE OF ETHICS**

**MULTIMED s.r.l.  
Headquartered in  
Turin, Strada del  
Drosso, 49**



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## **PREMISE**

With this Code of Ethics, the Management intends to remind you of the fundamental ethical values to which the Company Multimed s.r.l. is inspired and to which all employees and external collaborators (consultants, agents, service providers) must comply in the performance of the tasks and functions entrusted to them.

The ethical principles contained in this Code apply both to employees and external collaborators of the Company bound by any continuous or occasional contractual relationship with the Company (hereinafter also referred to as "Recipients").

Everyone's commitment is essential to ensure that the Company's activities are carried out in compliance with the law, in a framework of fair competition, with honesty, integrity, fairness and good faith, respecting the legitimate interests of customers, employees, commercial and financial partners and the communities in which the Company is present with its activities.

It is therefore appropriate to reiterate to all those who work in the Company or who work for the achievement of the Company's objectives, without distinction or exception, the importance of observing and ensuring compliance with these principles within the scope of their functions and responsibilities.

In no way can the conviction of acting for the benefit of the Company justify the adoption of conduct contrary to these principles.

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of the Company's employees and external collaborators pursuant to and for the purposes of the law.

Contracts with suppliers will be provided with a specific express termination clause in the event of violation of the rules of this code of ethics or of the company organization model by third parties.

## **1. GENERAL PRINCIPLES AND ETHICAL PRINCIPLES**

1.1. The Company's Management is required to comply with the contents of the Code in proposing and implementing projects, actions and investments aimed at increasing the economic value of the company and the well-being of its employees in the long term. The company carries out the function of distribution and marketing of disposable medical devices, electromedical and robotic equipment, surgical instruments and safety devices, having private and public bodies among its customers.

1.2. It is primarily the responsibility of managers to promote the values and principles contained in the Code, taking on responsibilities internally and externally and strengthening trust, cohesion and team spirit.

1.3 Multimed s.r.l. expects the Addressees of the Code to strictly apply the ethical principles listed below, which are grouped into two distinct (but related) subsets: that of the codified principles (the so-called principle of legality) and that of the principles of common experience (the so-called ethical-behavioural principles).

#### **I. Principle of respect for the law.**

The conduct of the Addressees of the Code must first of all comply with the laws in force in the State in which the Recipients operate, including the supranational and international laws that the State implements.

Multimed s.r.l. operates and intends to operate in absolute compliance with these rules: the Sole Director and the employees of Multimed s.r.l., as well as those who interact with it in various capacities, are required, within the scope of their respective competences, to know and observe the codified disciplines (laws, equivalent acts, regulations) by international, state, regional and local institutions and in particular the rules of company law with specific attention to the discipline of accounting records and financial statements, the rules on the protection of personal data, health and health and safety at work (in particular following the amendments made by Legislative Decree 81/2008).

#### **II. Ethical-behavioural principles**

All the work activities of those who work for Multimed s.r.l. must be carried out with professional commitment, moral rigor and managerial correctness, also in order to protect the company's image. All Recipients, as well as those who work with Multimed s.r.l., are required, in the performance of their duties and in the development of their professional life in Multimed s.r.l., to align with the following ethical-behavioral principles:

- A. Fairness**, i.e. a behavioural regime inspired by the common sense of substantive justice;
- B. Equality**, i.e. uniformity of treatment and social relationship with each interlocutor, regardless of differences in age, sex, race, physical handicaps, religion, company rank, economic power, social influence;
- C. Protection and enhancement of the person**, i.e. respect for each individual, enhancement

of their respective capacities, establishment of mechanisms of trust and empowerment of individuals, aimed at making the Recipients supportive and the company mission common;

- D. Diligence**, i.e. the performance of one's duties with assiduous care and scrupulous attention and accuracy;
- E. Honesty**, i.e. inability to carry out illegal, illicit or even just evil acts, both for observance of legal principles, the Code and moral principles, and for a deep-rooted sense of justice: the Recipients must be aware of the ethical significance of their actions, they must not pursue personal or business profit to the detriment of the laws in force and the rules set out herein, or even just to perform actions which, according to the common sense of conscience, are contrary to honesty;
- F. Transparency**, i.e. the execution of one's duties through a regime of full intelligibility of the work by anyone; every action carried out by the Recipients and by those who have relations with Multimed s.r.l. must be fully reconstructable and easily individual in all its steps, so that all relationships are comprehensible and the respective acts justifiable. Multimed s.r.l. believes it is necessary, therefore, that each company function corresponds to a formal and written assignment and factual figures will not be admitted that do not allow to understand exactly "who does what" and to reconstruct the actions of each one. If they are found, any de facto "figures" will be immediately abolished;
- G. Impartiality**, i.e. an objective and fair way of operating and judging, without favouritism for any of the parties involved, whether public or private, linked with the Recipient by relations of friendship or enmity, kinship or affinity;
- H. Confidentiality**, i.e. scrupulous abstention from the disclosure of any company data (whether technical, logistical, strategic, economic) and personal, in compliance with all current regulations also on privacy (and in particular EU Regulation 2016/679 and Legislative Decree 196/2003 as amended by Legislative Decree 101/2018); the collection and processing of data are strictly reserved to the company bodies appointed for this purpose and must be strictly carried out according to the regulations corporate. It is also expressly forbidden to disclose inside information to third parties in accordance with the Consolidated Banking and Financial Acts. On this point, it should be noted that Multimed S.r.l. has adopted a Privacy Organizational Model (M.O.P.);
- I. Opportunity**, i.e. critical evaluation of every action and omission according to criteria that, if not falling within another specific ethical-behavioural principle, comply with the common sense of adequacy and relevance;
- J. Health protection**, i.e. compliance with all current regulations on accident prevention and

prevention of occupational diseases, as well as scrupulous attention to hygiene and personal and workplace conditions;

- K. Protection of the environment**, i.e. compliance with all current regulations on the environment and pollution, as well as scrupulous attention to any conduct that, even minimal, offends the common sense of environmental education; implementation of programs for the separate collection of waste and recycling of reusable material; reduction of all forms of pollution, be it environmental, acoustic, radioelectric or of any kind.
- L. Protection of industrial property**: i.e. all national and EU laws on the protection of industrial property and in particular Legislative Decree no. 30 of 2005.
- M. Protection of copyright**: The company guarantees and respects copyright in its principles and precepts provided for by Law 633/1941 and subsequent amendments and additions.

Multimed s.r.l. is committed to enhancing the value of the person and maintaining his physical and moral integrity, promoting the dissemination of ethical-behavioral principles, encouraging their observance and punishing non-compliance.

The Recipients must comply with and apply the principles indicated above, resorting, in the performance of each task and in any circumstance, to the common sense of morality and conscientiousness.

1.3. If there are any doubts on how to proceed on the part of the employee, he or she must report the matter to the Sole Director, who must adequately inform his employees and provide solutions and answers in accordance with this code of ethics.

1.4. Each employee is required to be familiar with the Code, to actively contribute to its implementation and to report any deficiencies and violations. The company undertakes to facilitate and promote employees' knowledge of the Code by delivering a copy for each employee and/or posting a copy in a place accessible to employees. In addition, periodic training protocols are provided.

1.5. The Supervisory Body and the A.U. will carefully monitor compliance with the Code, providing adequate information, prevention and control tools to ensure the transparency of the operations and conduct carried out, intervening, if necessary, with corrective actions.

1.6. The employee is obliged to promptly report to the Supervisory Body (see point 3) any news regarding the violation of the rules of the Code or the Company Organization Model.

## **2. APPLICATION OF THE PRINCIPLES AND RULES OF CONDUCT**



In order to allow a rigorous application of the principles set out, this Code intends to identify the areas of application of the same, focusing attention on the main types of working relationships that the Recipients will have to entertain; To this end, it is necessary to distinguish two macro-groups: the one concerning intra-company relations; that of extra-company relations.

The. **Intra-company relationships**

By intra-corporate relationships we mean all those relationships between the subjects who hold top level functions in Multimed s.r.l. (administrative body, corporate bodies, management bodies; hereinafter "top managers"), between the subjects who hold subordinate level functions in Multimed s.r.l. with respect to the former (hereinafter "employees"), between top management and employees and, finally, among all of them is the Supervisory Body.

In general, Multimed s.r.l. expects all those who work within it to respect, even during the selection process, the personality and dignity of each individual, avoiding the creation of circumstances in which people may find themselves in situations of discomfort; discrimination against abuses of all kinds; training appropriate to the position that each one holds; the definition of roles, responsibilities, delegations and availability of information such as to allow each person to take the decisions that are his/her responsibility in the interest of the company and in compliance with the rules to which it complies; a prudent, balanced and objective exercise of their powers in the exercise of their respective functions; a correct and confidential use of both personal and business data; the absolute elimination of any factual figure.

### **3. CONFLICT OF INTEREST**

In order to avoid conflicts of interest, every operation and activity must be undertaken solely and exclusively in the interest of the Company and in a lawful, transparent and correct manner.

With regard to conflicts of interest, no employee or worker of Multimed may carry out activities in favour of competition, assume the status of consultant, member of the Board of Directors or Board of Statutory Auditors of a competing company, nor lend his or her professional activity to competitors; moreover, no one may use company assets at work or in their free time or provide services that Multimed s.r.l. offers to customers, without being previously authorised by the competent company department or by their direct superior; No one may carry out, during their working hours, other activities that are not congruent with their duties or organizational responsibilities, nor use company assets other than the

above-mentioned tasks; No one will be able to accept money, favours, benefits from persons or companies that are or intend to enter into business relations with Multimed s.r.l.

More generally, given the relationship of trust between Multimed s.r.l. and those who work for it, all Recipients must avoid any situation and refrain from any activity that may oppose a personal interest to those of the company or that may interfere and hinder the ability to take, in an impartial and objective manner, decisions in the interest of Multimed s.r.l.

#### **4. RELATIONSHIPS BETWEEN SUBJECTS**

In particular:

##### **A. Relationships between top managers.**

The top management who work in Multimed s.r.l. are required to fully collaborate and provide mutual information, in order to promote the coordination and full pursuit of the company's goals; they are required to respect both the principles of moral legitimacy and that of the ethical-behavioural principles, with reference to the functions they hold (management, supervision, control); in particular, they must comply with confidentiality obligations and non-competition agreements, carrying out their duties with full loyalty to Multimed S.r.l.; they have the duty to operate with complete transparency in order to allow the reconstruction of all the transactions they carry out, with special reference to those relating to the movement of money by Multimed S.r.l.; as the first representatives of Multimed S.r.l., they are required to convey an image of the company that fully adheres to the principles of this Code. Persons in top positions are required to direct employees and collaborators to comply with this Code as well as to ensure that everyone understands it.

##### **B. Employee relations.**

Multimed S.r.l. employees are the workforce that lives in daily contact with the outside world. They are required to fully and constantly respect the principles of moral legitimacy and ethical-behavioural principles; as they are all indiscriminately employed by Multimed S.r.l. – although hierarchically organized – must observe and apply the ethical-behavioural principles of diligence, honesty and equality, promoting collaboration and mutual solidarity, favouring the creation of a working environment suitable for the protection of the person and the worker



both from a professional and relational point of view; they are required to use the resources and brands of Multimed S.r.l. – or belonging to it – within the limits allowed by the tasks they are called upon to perform, without ever abusing them either for extraneous purposes or outside the hours required by their work activity; finally, they are called upon to comply with all the provisions set out in the Collective Agreement that concerns them, as well as with all the trade union requirements relating to the conduct to be adopted among fellow employees.

**C. Relationships between top management and employees.**

Top management is required to exercise their powers in a balanced, fair and non-discriminatory manner vis-à-vis employees, with respect for the person and his or her dignity; they must not abuse their position in any way either during the selection of employees (a moment that must take place on an exclusively merit-based basis and/or on a mechanism imposed by law), or during the execution of the employment relationship; they must always and only provide provisions that comply with the law and the principles of the Code and must refrain from any vexatious and/or intimidating conduct aimed at causing employees to violate the aforementioned principles.

Employees, for their part, are required to comply with the directives given to them by the persons in top management and to carry them out diligently, provided that the orders themselves are not clearly in conflict with the laws in force and/or with the principles of this Code; they must also report any factual situations they may encounter that are in contrast with the laws in force and/or with the principles of this Code.

**D. Relations between top management, employees and the Supervisory Body.**

Both top management and employees are compulsorily required to implement and pay attention to all the directives and communications of the Supervisory Body, scrupulously following the instructions provided; they are also strictly required to report to the Supervisory Body any situation, conduct, event, circumstance that is in contrast with the laws in force and/or with this Code; they have the right, for any doubts or advice of an ethical-behavioural nature, to contact the Supervisory Body to obtain anonymous and confidential suggestions on the conduct to be adopted to comply with the Code.

(For further information on the Supervisory Body, please refer to the appropriate section).



### **The. Extra-company relationships.**

Multimed s.r.l. is a company that maintains daily relations with third parties, whether they are suppliers, customers (private individuals, hereinafter "customers", or P.A., hereinafter "P.A.") or mass media.

In general, the Recipients are required, in the aforementioned business relationships with third parties, to behave ethically and in compliance with the law, based on maximum transparency, clarity, correctness, efficiency, fairness as defined by the standards of the Code.

#### **A. Supplier Relations.**

The selection of suppliers and the choice of purchases of goods, goods and services must be made in accordance with the principles of this Code. The service performed by the supplier must be documented in writing.

The selection of suppliers must be made exclusively on the basis of objective parameters such as quality, convenience, price, capacity and efficiency.

In relations with suppliers, donations, gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at obtaining preferential treatment are prohibited. *Gifts of use* – meaning those gifts that practice requires to be exchanged on the occasion of particular holidays such as, for example, Christmas – where practiced by custom, must marry the double requirement of tenuousness (i.e. modest symbolic value) and equality (i.e. equal cost in the choice of gift for all suppliers).

In any case, any gift made on personal initiative or drawing from own or social funds but not previously allocated for this purpose is prohibited: only Multimed s.r.l. has the power to decide the company policy on gifts and allocate the related finances; This entails an unavoidable burden of documentation of expenditure incurred and transparent reporting of the same.

In any case, those who work in Multimed s.r.l. cannot receive donations, gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality from suppliers; in the event of a promise of donations or unenforceable delivery, the Multimed s.r.l. operator is required to immediately report it to the Supervisory Body which will provide, after the appropriate checks, to inform the author of the gift about the company's policy on the matter, returning the gift or donating it to charities, O.N.L.U.S. *et similia*.

Finally, Multimed s.r.l. observes and demands compliance with the contractual conditions, maintaining a frank and open dialogue with suppliers in line with good commercial practices.



The recipients (employees or collaborators), without delay, must bring to the attention of the Sole Director of Multimed s.r.l. the problems that have arisen with a supplier, so that the legal consequences can be assessed.

Contracts with suppliers are required to include a suitable express termination clause if the supplier violates the principles contained in the Code of Ethics.

#### **B. Relations with customers/clients.**

Customers can only be approached through advertising channels approved and promoted by Multimed s.r.l.

Any form of customer hoarding that violates competition law and does not comply with regulations and laws is prohibited; it is also forbidden to do anything else surreptitiously approaching customers that takes the form of unlawful acts or acts contrary to the Code.

In particular, donations, gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing customers' choices are prohibited.

In any case, any gift made on personal initiative or drawing from own or social funds but not previously allocated for this purpose is prohibited: only Multimed s.r.l. has the power to decide the company policy on gifts and allocate the related finances; This entails an unavoidable burden of documentation of expenditure incurred and transparent reporting of the same.

In any case, those who work in Multimed s.r.l. may not receive donations, gifts, benefits (whether direct or indirect), gifts, acts of courtesy and hospitality from customers in order to obtain preferential treatment; nothing is due to Multimed s.r.l. employees, other than their own salary, for the services they perform.

In the event of a promise of donations or unenforceable delivery, the operator Multimed s.r.l. is required to immediately report it to the Supervisory Body which, after the appropriate checks, will inform the author of the gift about the company policy on the matter, returning the gift, or donating it to charitable associations, o.n.l.u.s. *et similia*.

The Company's employees are required to:

- comply with internal procedures for managing customer relationships;
- provide accurate and comprehensive information about products and services so that the customer can make informed decisions;
- Be truthful in advertising or other communications.



### **C. Relations with Authorities and Public Administrations.**

Relations with Public Institutions are reserved exclusively for the functions and responsibilities delegated to them.

No employee is authorised to make payments, direct or indirect, to public officials and/or public administrations in general that cannot be connected with the provision of services or contracts duly authorised by the company functions responsible for managing such services.

The reports that Multimed s.r.l. entertains with public officials or with persons in charge of a public service – who operate on behalf of the central and peripheral Public Administration, or Legislative bodies, Community Institutions, international public organizations and any foreign State – with the Judiciary, with the Public Supervisory Authorities and with other independent Authorities, as well as with private partners concessionaires of a public service, they must be undertaken and managed in absolute and strict compliance with the laws and regulations in force, the principles set out in the Code of Ethics and internal procedures and protocols.

With particular reference to transactions relating to tenders, contracts, authorisations, licences, concessions, requests and/or management and use of public funding (regional, national and/or EU), management of orders, relations with supervisory authorities or other independent authorities, social security institutions, tax collection bodies, bankruptcy and civil proceedings, criminal or administrative and similar matters, any contact with third parties must take place by the corporate bodies and the subjects expressly delegated to do so, in line with the company's strategies and in writing; Any correspondence with the above-mentioned public bodies must be registered and inventoried, as well as telephone contacts. The parties delegated to carry out the operations listed above must report to the delegating party in accordance with the law or internal organizational procedures.

It is forbidden to give gifts, gifts, benefits (both direct and indirect), gifts, acts of courtesy and hospitality aimed at influencing the choices of the P.A. or even just to raise awareness among its members; Gifts of use must marry the dual requirement of tenuousness (i.e. modest symbolic value) and equality (i.e. equal cost in the choice of gift for all public and private customers).

In any case, any gift made on personal initiative or drawing from own or social funds but not previously allocated for this purpose is prohibited: only Multimed s.r.l. has the power to decide the company policy on gifts and allocate the related finances; This entails an unavoidable burden of documentation of expenditure incurred and transparent reporting of the same.



Multimed s.r.l. refrains from providing any contribution, direct or indirect, in any form, to political parties, movements, committees and political and trade union organizations, their representatives and candidates, except for what is permitted and provided for by the laws and regulations in force.

**D. Relations with the mass media and information management.**

Relations with the press, the means of communication and information and, more generally, external interlocutors, must be maintained only by persons expressly delegated to do so, in accordance with the procedures and provisions adopted by Multimed s.r.l. Employees may not provide information or opinions and make statements on behalf of the Company to representatives of the media (such as press, television, radio, etc.) nor undertake to release them without the necessary delegation of the competent functions.

Any request for information from the mass media received by Multimed s.r.l. personnel must be communicated to the company subject/function expressly assigned to do so, who will take care, where necessary, to disseminate non-confidential information.

Communication to the outside world, however, must follow the guiding principles of truth, fairness, transparency and prudence, in order not to lead to partial, distorted, ambiguous or misleading interpretations.

Any form of investment, direct or through an intermediary, that finds its source in confidential company news is strictly prohibited.

Under no circumstances, in the management of information, may insider trading or use for one's own or third party's benefit of data, news or business opportunities learned in the exercise of the office or conduct of any other nature that results in the impoverishment of company assets or is aimed at bringing undue personal or third party advantages.

All those who work in any capacity on behalf of Multimed s.r.l. are required to maintain the utmost confidentiality and not to disclose or unduly request information on documents, know-how, research projects, business operations and, in general, on all information learned by reason of their job function.

Confidential or secret information is that which is subject to specific laws or regulations (because it pertains, for example, to national security, military sectors,

inventions, scientific discoveries, protected technologies, new industrial applications), as well as those contractually classified.

In addition, all information learned in the course of work whose dissemination and use may cause danger or damage to the company and/or undue gain to the employee or third parties is also reserved.

## **5. COMPANY COMMITMENTS**

The Company intends to set up an independent control body (Supervisory Body) with the aim of promoting knowledge and verifying the application of the rules contained in this Code.

The Company will ensure:

- 1) the maximum dissemination of the Code to employees and external collaborators (Recipients);
- 2) the willingness to provide any possible clarification regarding the interpretation and implementation of the rules contained in the Code and in the company procedures;
- 3) carrying out checks on any notice of violation of the provisions of the Code;
- 4) the assessment of the facts and the consequent implementation, in the event of ascertained violation, of appropriate sanctioning measures.

## **6. CONTROL AND SANCTIONS: THE SUPERVISORY BODY**

The task of supervising the observance and functioning of the Organisation and Management Model adopted by Multimed s.r.l. pursuant to Legislative Decree 231/01 and subsequent amendments is entrusted to the Supervisory Body, which has autonomous powers of initiative, control and initiation of disciplinary action.

### **I. Attributions and characteristics.**

The Supervisory Body is subject to the laws and the principles of this Code; It operates with impartiality, authority, autonomy, continuity, professionalism.

The Supervisory Body may be constituted in monocratic or collegial form depending on the needs felt by each investee and/or controlled company, it being understood that obvious reasons of expediency do not recommend that the natural person who is responsible by statute, or by delegation received from the Board of Directors (currently Sole Director), for the ordinary administration of the

company and/or its legal representative or to whom proxies have been assigned; therefore, theoretically, members of the Board of Directors without proxies and/or powers of attorney, persons outside the Board of Directors with managerial functions and/or external consultants with specific and adequate training may be part of the Supervisory Body.

In the case of Multimed S.r.l., the Body is composed of two external professionals and has the following institutional activities:

- the dissemination of this Code to all Recipients and third parties who work with Multimed s.r.l. through the preparation of (in)training and refresher courses (the content and methods of which are described in detail in the specific folder called "Code of Ethics and Organizational Model: Dissemination");
- the management, in-depth analysis and verification of the principles and rules expressed by the Code, as well as their updating and adaptation;
- the interpretation of the Code, becoming a point of reference for settling any conflict or doubt on the application of the principles expressed therein;
- the protection, assistance and protection of employees who report conduct that does not comply with the Code, protecting them from pressure, interference, intimidation and retaliation;
- reporting to the competent corporate departments, in accordance with the procedures indicated below, any violations of the law and/or the provisions of this Code;
- the imposition (or control of the regularity and punctuality of the same) of the disciplinary sanctions provided for in respect of violators of the Code of Ethics or of the organizational model;
- coordination of supervisory activities within the group;
- the preparation of an annual report for the Sole Director.

In order to achieve the purposes set, the Body is free to access all Multimed s.r.l. sources of information – in compliance with current legislation – and has the right to view documents and consult data; carries out periodic checks on the functioning and compliance with the adopted organisational model; verifies the destination and actual allocation of financial movements in and out of Multimed s.r.l., with the exception of current expenses of ordinary administration (e.g. payment of salaries, suppliers, social security contributions, payments to the treasury); It is equipped with adequate availability of human and material resources that allow it to operate quickly and efficiently.



The Body operates with wide discretion and with the full support of the top management of Multimed s.r.l., with whom it collaborates in absolute independence.

The composition and election of the Supervisory Body are subject to the provisions of the Organisation Model (of which this Code is an integral part).

## **II. Reports to the Supervisory Body and "whistleblowing" reports.**

In order to guarantee the effectiveness of the Organisation Model through specific protocols, Multimed S.r.l. – in respect of privacy and the rights of the individual – sets up autonomous and confidential internal channels of information through which all those who become aware of any unlawful conduct carried out within the company – or in any case in the performance of the company's activities or within the same – report, directly and confidentially, to the Supervisory Body. This Body is responsible for the punctual and rigorous verification of the information transmitted, in order to promote the imposition of any disciplinary sanctions or the activation of contractual termination mechanisms with the competent company function.

There is a specific procedure for the so-called "reporting". *whistleblowing*, which provides internal channels for communication to the Managers of the report, with a guarantee of protection of the confidentiality of the reporting parties, first of all, and of all those who are involved for whom the law has provided adequate levels of confidentiality protection, extended to the documentation produced.

Among the channels and methods adopted by Multimed S.r.l. is the use of an IT platform that guarantees maximum protection.

There is an express prohibition of retaliation against the whistleblower and related persons (e.g. facilitator, etc.) without prejudice to the application of the sanctions provided for conduct in violation of the prohibition.

## **III. Sanctioning system.**

The Supervisory Body, once it has learned of the commission of an offence (either through reports by employees or ex officio), must assess whether it is not manifestly unfounded by carrying out the appropriate investigations, in compliance with current legislation on labour and trade union law, privacy and personal rights.

Once it has been ascertained that the information is not manifestly unfounded, the Body has the task of reporting the violation in writing to the competent company functions and of suggesting to the Company Administration the application of any disciplinary sanctions, among those provided for in



the appropriate folder of the organization and control model. It will be the responsibility of the competent corporate functions to sanction the censured conduct in accordance with current legislation, regulations and CCNLs.

In any case, the violation of the principles set out in the Code of Ethics and in the procedures provided for by the internal protocols compromises the relationship of trust between Multimed s.r.l. and its directors, employees, consultants, collaborators, customers, suppliers, commercial and financial partners.

Such violations will therefore always be prosecuted in accordance with the law.

This Code, revised, will be applied to all employees of the Company who will be hired as of March 15, 2024 (revision), while for those previously hired it will be approved by them through specific acceptance.

## **7. USE OF COMPANY VEHICLES AND TOOLS**

The employee is required to ensure maximum respect for the Company's infrastructures, means, tools and materials, promptly reporting to the Supervisory Body any non-conforming use of such equipment that he/she believes others may make of them.

They belong to these categories, for example:

- premises, furnishings and furnishings;
- operational equipment and equipment such as: company cars, tools, personal computers, printers, calculation or writing instruments and the like;
- photocopying, reproduction, printing and collation systems;
- communication tools such as telephone, fax, e-mail;
- personal stationery, paper, office stationery, and the like;
- functionalities offered by the company's information system such as: processing procedures, software, access to the Internet and databases and the like;
  - books, newspapers, magazines and publications in general;
  - personal protective equipment and the machinery to which they are employed.

The employee is required to use the company's equipment only for the performance of the work tasks to which he is assigned. It is therefore strictly forbidden for employees to use company means – whether IT, technical or any other type – to achieve private purposes or interests or in competition with company activities.

The employee is allowed to use the Company's equipment and/or material outside the Company's facilities only in cases of use for business reasons, such as, for example: business trips to locations



other than the usual one, work on secondment, and the like. In all other cases, express authorization from your manager or hierarchical superior is required.

In any case, Multimed S.r.l has adopted a specific regulation on the correct use of work tools, including IT tools, which is an integral part of the MOP and which has been disclosed to employees and those who use these work tools, through specific training activities.

## **8. CONFIDENTIALITY**

The employee is required to comply with all the precepts of Legislative Decree no. 196/2003, (as amended by Legislative Decree 101/18) and EU Regulation 2016/679 and to maintain the strictest and absolute confidentiality on all information relating to the Company and/or its employees of which it is aware by virtue of its work activity.

This is in order to avoid the disclosure of confidential information relating to the organization, industrial secrets, *know-how*, production methods and any other information whose disclosure may cause damage to the Company.

Furthermore, the employee is strictly required to communicate to his/her superior any requests for information relating to the Company and/or its employees that he/she receives during the performance of his/her work duties, avoiding to comply with the aforementioned requests before a specific express authorization to this effect.

Any information, data or document that employees become aware of during their work is the exclusive property of Multimed s.r.l. and the employee has the right to use it exclusively during the exercise of his or her corporate function.

Without prejudice to the prohibition of divulging information relating to the organization and production methods of the enterprise or of using them in such a way as to be detrimental to it, each employee, in particular, shall:

1. acquire and process only the data necessary and appropriate for the purposes directly attributable to the function performed;
2. acquire and process the data only within specific procedures;
3. store the data in such a way that it is prevented from being known to others who do not authorise it;
4. communicate the data within the framework of pre-established procedures and/or with the explicit authorization of superiors;
5. ensure that there are no absolute or relative constraints on the possible disclosure of information concerning third parties connected to the Company from a relationship of any nature and, where



appropriate, obtain their consent.

## **9. COMPLIANCE WITH COMPETITION RULES**

Without prejudice to compliance with the rules on free competition, all employees are required to act in such a way as to achieve the best results in competition.

It is contrary to the Company's policy to have discussions, communications and exchanges of information, agreements, understandings with any competitor regarding pricing, pricing policies, discounts, promotions,

conditions of sale, markets, production costs (which have as their purpose the restriction or distortion of the free play of competition).

It is also forbidden to enter into any form of agreement, direct or indirect, that is made or entered into with competitors in order to modify or disturb the progress of public supply tenders, public procurement procedures or other procedures relating to the purchase of goods or services by public administrations.

## **10. ACCOUNTING TRANSPARENCY**

Every operation and transaction must be properly recorded, authorized, verifiable, legitimate, consistent and congruous.

Accounting transparency is based on the accuracy, completeness and authorisation of the basic information for the relevant accounting records. Each employee is required to cooperate so that the management facts are correctly and promptly represented in the accounts.

For each operation, adequate supporting documentation of the activity carried out is kept, in order to allow:

1. easy accounting entry;
2. the accurate reconstruction of the operation, also to reduce the probability of interpretative errors.
3. Each record must reflect exactly what is reflected in the supporting documentation. It is the responsibility of each employee to ensure that the documentation is easily traceable and ordered according to logical criteria.
4. In any case, the company payments to be paid must be exclusively commensurate with the performance and methods indicated in the contract and may not be made to a party other than the contractual counterparty.
5. The use of company funds for illegal or improper purposes is strictly prohibited. No one and for



no reason shall be paid payments that are not based on properly authorized corporate transactions or given illegal forms of remuneration.

6. Any negligence, omission or falsification of which employees become aware must be promptly reported to the Supervisory Body.

#### **11. HEALTH AND SAFETY AT WORK.**

The company Multimed s.r.l. s.r.l. carries out its business activities in pursuit of the corporate purpose, in primary compliance with the laws and regulations of the Italian Republic, in particular on health and safety at work.

To this end, compliance with the relevant laws and in particular with Legislative Decree no. 81/2008 and subsequent amendments and additions, without prejudice to the general principles previously set out in this Code of Ethics.