

OSARTIS®

OSARTIS G.m.b.H. shareholder's meeting adopted its Code of Ethics during the meeting held on 14 December 2023.

The Code identifies the set of **values** and **ethical principles** guiding the Company and the **lines of conduct** it is committed to complying with when carrying out its activities.

Giovanni Faccioli

Chairman

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PREFACE

OSARTIS has issued this Code of Ethics to inform all those with whom it has relations that all its actions and decisions are influenced by the values forming the company's mission:



OSARTIS has issued this Code of Ethics to assert its aspirations in terms of ethical principles, which also constitute obligations and responsibilities for all of those involved in advancing the company's mission in various capacities (shareholders, administrators, managers, researchers, office staff, manual labourers, distributors, consultants).

OSARTIS has issued this Code of Ethics to express the lines of conduct that convert its values into the behaviour which all employees and collaborators are obligated to implement when carrying out their roles.

1. DESIGNATED RECIPIENTS OF THE CODE OF ETHICS

This Code of Ethics (hereinafter also the “Code”) represents the values and behaviour that OSARTIS G.m.b.H. and its affiliated companies (hereinafter also the “Company”) expects of the designated recipients indicated below.

The designated recipients of the instructions in the Code are: all OSARTIS employees in any capacity, also including the members of the Management Board and even the Supervisory Board, managers and all other employees - including trainees and temporary and contract workers, administrators, statutory auditors, proxies, consultants, agents, suppliers, clients and any subject operating in the name and on behalf of OSARTIS who has relations with the entity (hereinafter as a whole, also "Designated Recipients"). We only maintain business relationships with business partners whose business activities are in line with the requirements of this Code at the beginning of the business relationship and on an ongoing basis.

The Company undertakes to ensure that all Designated Recipients have access to the contents of this Code while ensuring an adequate training program and refraining from beginning and pursuing any relations with individuals who do not intend to comply with the principles set forth in this Code.

The Designated Recipients are invited to be acquainted with the contents of this Code and to comply with it. We will not tolerate any violations.

2. ETHICAL PRINCIPLES

When performing activities, the Company and Designated Recipients (each in reference to their specific role) must carefully comply with the principles below.

Correctness and Honesty

OSARTIS implements correctness and honesty when carrying out its business. All subjects who directly or indirectly perform any activities for or on behalf of the Company are obligated to operate in compliance with these principles and all other fundamental ethical values.

For example fraudulent practices and behaviour are prohibited, as well as corruption, favouritism and illegal conduct in general, or conduct contrary to the industry rules or to in-house regulations in force in all countries in which the Company operates. In particular, any action the intention of which is to benefit an individual or the Company, or which may also simply be interpreted as falling outside regular business practices or practices of courtesy, is prohibited.

A Designated Recipient is obligated to have the professional, scientific and moral requirements set forth by the Company to fulfil his/her task in compliance with the above principles of correctness and honesty.

Ethical conduct also includes acting in accordance with the discernible meaning of our internal guidelines and requirements and not attempting to circumvent them with formalistic justifications. All employees should take care not to damage the Company's good reputation in their private lives, for example in social media.

Compliance with the law

An all-important principle for OSARTIS is compliance with the laws and regulations in force in all countries in which it operates. Designated Recipients are to perform their tasks in complete compliance with the reference regulatory framework.

Designated Recipients are prohibited from implementing any behaviour which may involve any type of crime, or other corporate criminal law or regulatory offenses.

Designated Recipients shall not have undergone a conviction or to be aware of investigations for crimes concerning their profession and more generally, for crimes which may involve the Company's business and relations with the Public Administrations.

Compliance with company rules

OSARTIS prepares and discloses within the organization, company rules in complete compliance with the rights of workers, current regulations and the reference Employment Agreement. All Designated Recipients are to acquaint themselves and comply with such regulations based on their tasks and duties.

Research and innovation

OSARTIS is always researching and developing new products by constantly studying and experimenting, implementing quality materials and aiming to improve the quality of life of individuals.

To this end, it has implemented and uses a consolidated quality and traceability system in order to safeguard the proper production process.

Impartiality and respect of human rights standards including employee rights

When performing all activities, OSARTIS respects the rights of the individual, ensures they are complied with and especially avoids any harassment or discrimination based for example on the age, gender, sexuality, health status, ethnic background, nationality and political and religious opinions of its interlocutors.

We therefore set a good example, promote compliance with human rights standards, including fair working conditions, and observe the relevant statutory provisions on due diligence in the supply chain.

In our working environment, we do not tolerate forced labor, slavery or other forms of oppression, or child labor. We create a working environment in which all rights of the core labor standards of the International Labor Organization (ILO) and, for example, the principles of the UN Global Compact are observed. In particular, we reject all forms of injustice and discrimination in the working environment and respect the right to freedom of association. We comply with the applicable national laws on minimum wages and working hours. Occupational safety and health protection have the highest priority. We comply with the applicable laws, regulations and other rules on occupational health and safety. In addition to the occupational health and safety measures we implement, each of our employees is responsible for ensuring a safe and healthy working environment and, in particular, for complying with applicable safety regulations. Human rights protection also applies to our use of security personnel.

Correctness and completeness of disclosed information

OSARTIS believes it is a primary value to provide truthful, correct and complete information concerning its products, the activities it performs, its financial and economical reports, the financial statement data and any other data. All Designated Recipients generating information are to comply with this principle.

Confidentiality of company information and obligation of confidentiality

OSARTIS places the utmost importance on all company information not published concerning know-how, activities, products, strategies, processes, technical data, commercial and marketing data, company operations and all other information constituting a strategic company component. OSARTIS implements all means to ensure such information is protected and requests all Designated Recipients to refrain from disclosing such data and to implement all precautions for this purpose.

Protecting company assets

All Designated Recipients diligently act to protect the company assets they have been entrusted with to perform their respective tasks by carefully safeguarding them from loss, damage, theft, embezzlement and destruction and avoiding the improper or detrimental use of them.

Using telecommunication systems

When performing their duties, all Designated Recipients are obligated to implement current legislation, use telephony systems, access email, the Internet and the Intranet in a proper and respectful manner while avoiding use for any reasons other than professional reasons and always considering that all information in the computer system belongs to the Company.

Process legitimacy, authorization and traceability

All operations and transactions are to be properly registered and authorized and to be verifiable, legitimate, consistent and coherent.

Suitable documents substantiating the characteristics of and reasons for the operation and identifying who authorized, performed, registered and verified the operation itself, must be available for all operations so that checks may be performed at any time.

Relationships with the Public Administration and public service concessionaires

OSARTIS expects any relationships established with the Public Administration to comply with the law and the principles of fairness, correctness, transparency and verifiability.

Designated Recipients are not allowed to offer, grant, request or receive any benefits, for themselves or for others or by means of third parties, which aim to even only potentially influence the decisions, actions and assessments of subjects of the Public Administration.

In those countries where it is customary to offer gifts to clients or to others, it is possible to act in this regard when these gifts are of an appropriate nature and of a modest value, but always in compliance with the laws and principles of traceability and transparency. In any case, this must never be interpreted as a request for favours.

The Designated Recipient is not to hold offices with the Public Administration or public or private agencies which may be incompatible with the task undertaken with the Company.

Safeguarding work, health and safety

OSARTIS is committed to pursuing goals to improve the safety and health of workers as an integral part of its business and as a strategic commitment relative to the more general company goals, and as a result makes human, instrumental and economic resources available to this end. It pursues this activity by applying its ***Policy for the Health and Safety of Workers***.

Sustainability and protecting the environment

The sustainability of our business activities and especially a sustainable environment and climate protection as well as resource efficiency are important corporate goals for the Company. We therefore comply with the applicable laws, regulations and other rules of environmental protection. Both in the development of new products and services and in the operation of production facilities, we take care to ensure that any resulting impact on the environment and climate is kept as low as possible and that our products make a positive contribution to environmental and climate protection.

The Management ensures the environment is protected through behaviour and considers this obligation as a productive investment, growth factor and added value for the Company. Every employee has the responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through his or her individual behaviour.

The Company is committed to spreading and consolidating a culture of protecting the environment by developing the knowledge of the environmental aspects and promoting responsible behaviour by all individuals, who are provided with adequate information and

training to ensure complete and prompt compliance with the in-house regulations and procedures, and who are requested to promptly report any deficiencies or the failure to comply with applicable regulations.

In this regard, the organization's relevant company offices carefully follow the evolution of the applicable binding legislation and social development and of the organizational structure and propose to take action in compliance with its ***Company Policy for Safeguarding the Environment***.

Respecting privacy and protecting data

OSARTIS ensures the personal and sensitive information it has concerning collaborators, business partners, clients and suppliers or users of its products is processed in complete compliance with the pertinent legislation. In this regard, it implements measures suitable for protecting the inviolability of the data and its proper processing.

The Company guarantees the absolute protection of the information and data available to it while ensuring it is used within the limitations set forth by current legislation.

Compliance with the requirements of IT-security is a high priority for the Company.

Ban on corruption

The Company does not tolerate any form of corruption. For us, corruption means demanding, allowing oneself to be promised or accepting an advantage (passive corruption) as well as offering, promising or granting (active corruption) an advantage - for oneself or a third party - in order to influence a business decision.

Benefits in the business environment, such as gifts or invitations, must remain

within the scope of socially customary attentions and hospitality and be transparent. They may never lead to an undue influence on a business decision or create such an appearance. Demanding benefits is always prohibited for our employees.

Particular caution is required in the case of donations to public officials. These are only permissible in very narrow exceptions. Therefore, the following principle applies to us: We do not make donations to public officials.

When it comes to donations and sponsoring measures, we also pay attention to transparency and a socially customary and appropriate framework in order to avoid even the appearance of corrupt behaviour.

Preventing Conflicts Of Interest

The Company expects our employees to be loyal to our companies. Every employee must avoid situations in which his or her private interests - including those of persons close to him or her - come into conflict with the interests of the company. Business decisions must not be influenced by private interests. Unless prior written consent has been obtained from the competent office, the following activities in particular are prohibited

- participating in business decisions despite the existence of a conflict of interest,
- the economic involvement in competitors and business partners,
- entering into business relationships with competitors or business partners outside the context of the Company's activities (competitive situations); and
- engaging in sideline occupations insofar as these lead to conflicts of interest or objectives.

If there is an actual or potential conflict of interest, the respective employee is obliged to report this immediately to the competent office.

Anti-Money Laundering

The Company does not tolerate money laundering. Money laundering means that the origin of illegally obtained money - e.g. from terrorism, drug trafficking, organised crime or other crimes - is concealed by smuggling it into the legal economic cycle, thereby creating the appearance of legality. It is the Company's stated aim not to be misused for or contribute to money laundering or other illegal purposes.

Every employee must comply with anti-money laundering laws and report suspicious circumstances to the competent office without delay.

3. SUBMITTING REPORTS

All Designated Recipients are invited to report situations, facts and actions which violate the principles set forth in this Code, while including circumstances and reasons.

Reports are to be submitted to the Advisory Board (advisoryboard_aap@tecre.it).

Whistleblowing reports are to be submitted through Osartis' dedicated tool:
<https://osartis.interne-meldestelle.de>

For any enquiry or clarification make reference to Demetra Group Compliance Manager: Esmeralda.filippini@tecre.it