

Code of Ethics

of

Elesta S.p.A.

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1. Foreword

Elesta S.p.A. (hereinafter “Elesta” or the “Company”) is a company that develops innovative hi-tech applications in the field of interventional medicine.

This Code of Ethics (hereinafter “Code”) is an integral part of the Organisation, Management and Control Model adopted by the Company. By adopting the Organisation, Management and Control Model, Elesta not only intended to comply with the legislative changes and the requirements introduced into the Italian legal system by (It.) Legislative Decree no.231/01, regarding the "administrative liability" of legal entities, but also wanted to take advantage of the opportunity offered by this law to highlight the Company's conduct policies, specifically by clearly and forcefully establishing the values of ethics and respect for the law. Its ultimate goal is to create a true manual for the prevention and containment of the risk of crime that will allow individuals to promptly trace, in any situation, the framework of the values pursued and the operational tools available for this purpose.

2. Introduction

The Code lays down the principles of corporate ethics that must inform every moment of the production process and which must be consistently observed in relationships of collaboration, cooperation, and commercial relations.

The principles and rules contained therein supplement the legislative, regulatory, statutory, and contractual provisions that govern the functioning of the corporate bodies and the rights and duties of the recipients of the Code itself.

3. General guidelines

Elesta recognises the importance of ethical and social responsibility in the conduct of business and corporate activities and is committed to respecting the legitimate interests of its stakeholders.¹ and those of the community in which it operates.

At the same time, the Company expects that all its associates² comply with the corporate rules and principles set forth in this Code and that they operate in accordance with the

¹ The terms “Stakeholders” is applied to those who make investments connected to the Company's activities, first and foremost the shareholders and then the directors, employees, associates, customers, suppliers, and business partners. In a broader sense, Stakeholders also include all those individuals or groups, as well as the organisations and institutions that represent them, whose interests are directly or indirectly influenced by the Company's activities.

² The term "Associates" is applied to the directors, executives, employees, and all those who work with the Company on the basis of a contractual relationship, even occasional and temporary, at all levels of the organisation.

highest ethical standards and in compliance with all applicable laws.

The Code is issued to prevent unlawful acts and to promote:

- honest and ethical conduct, including the ethical management of actual or apparent conflicts of interest between personal and professional relationships;
- full, accurate, timely, and easily understandable disclosure in reports and documents submitted or sent in compliance with the law, the articles of association, this code, and internal company procedures;
- compliance with the applicable laws, rules, and regulations;
- timely internal reporting of any violations of the code;
- responsibility for compliance with this code.

The standards set forth in the Code, which in some cases may be more stringent than legal requirements, are intended to protect the integrity of Elesta and ensure compliance with the laws and regulations of any country in which it operates.

Conduct that does not comply with the Code may result in disciplinary action and therefore in the sanctions provided for by the National Collective Bargaining Agreement (CCNL) being applied to violators, following a process that is separate from and independent of any disciplinary action taken for a breach of the duties set forth in Articles 2104 and 2106 of the (It.) Civil Code.

4. Scope

This Code of Ethics applies to the Company and is therefore binding on the conduct of all its employees.

Furthermore, the Company requires that all affiliated companies or subsidiaries, major suppliers, distributors (or licensees), and agents conduct themselves in line with the general principles of this Code.

The Code is valid both in Italy and abroad, while taking into account the cultural, social, and economic diversity of the various countries in which the company operates.

In particular, the Company's directors are required to be guided by the principles of the Code when setting the Company's objectives, proposing investments, and implementing projects, as well as in any decision or action relating to the management of the Company. Executives, in concretely implementing management activities, must be inspired by the same principles, both within the Company, thus strengthening cohesion and the spirit of mutual collaboration, and towards third parties who come into contact with the Company.

The Company undertakes to disseminate the Code among its associates through specific communication activities.

5. Ethical principles

Below are the fundamental ethical principles recognised by the Company, to which all parties involved must necessarily refer in order to promote the proper functioning, reliability, and reputation of the Company.

a) Lawfulness

In carrying out its activities, the Company acts in compliance with the applicable laws and regulations, as well as with the Code of Ethics and the internal procedures.

The Company considers compliance with national and international regulations to be a non-negotiable condition of its conduct.

In carrying out their respective activities, the Company's associates comply with the principles of lawfulness expressed in the Italian legal system, with specific regard to the purpose of preventing the crimes referred to in (It.) Legislative Decree no.231/2001.

Under no circumstances may the pursuit of an interest or advantage for the Company, however indirect, justify conduct that violates the aforementioned principles, rules, and procedures.

b) Impartiality

In decisions that affect relationships with its Stakeholders, the Company avoids any form of discrimination except as provided by the applicable laws.

c) Honesty

In carrying out their activities and in relationships of any kind and nature, the Company's associates are required to diligently comply with the applicable laws, the Code, and all other internal procedures. Under no circumstances may the alleged pursuit of the Company's interests or benefits justify actions that do not conform to honest conduct.

Indeed, the Company affirms that breaking the law can never, under any circumstances, be considered in its interest or a means to achieve an advantage.

d) Fairness and Transparency

In the conduct of any business activity, situations that lack transparency must be avoided, as must any situation in which the parties to a transaction have an actual or apparent conflict of interest.³.

The Company's associates are required to provide complete, transparent, comprehensible, and

³ A "conflict of interest" occurs when personal or external interests influence and contaminate the objectivity of judgement and choices of a Company associate.

accurate information, so that, when establishing relationships with the company, Stakeholders are able to make autonomous and informed decisions regarding the interests involved, the alternatives, and the relevant consequences.

e) Confidentiality

The Company ensures the confidentiality of the information in its possession and uses it in compliance with current legislation.

Company associates are required not to use or disclose confidential information for purposes not related to the performance of their work duties and, in any case, always within the Company itself.

f) Valuing and empowering our people

The Company's associates are an indispensable factor in its success.

For this reason, the Company protects and promotes the value of its associates with the aim of maximising their satisfaction and increasing their skills.

Therefore, in managing relationships that involve the establishment of hierarchical relations, the Company requires that authority be exercised with fairness and correctness, prohibiting any behaviour that could in any way undermine the personal dignity and professionalism of the Associate.

g) Integrity of the individual

The Company guarantees the physical and moral integrity of its associates, working conditions that respect individual dignity, and safe and healthy work environments.

Therefore, requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviours that are harmful to their moral and personal beliefs and preferences, are not tolerated.

6. Rules of conduct

6.1 Relations with the supervisory bodies

Relations with the supervisory bodies are inspired by the principles of transparency, completeness, truthfulness, and accuracy of information.

Information that, according to current legislation, must be communicated to the supervisory bodies may not be withheld or distorted.

6.2 Fair competition rules

The Company aligns its business activities with the principles of competition and market freedom and its corporate activities are informed by these principles.

Pursuant to its strategy, the Company competes vigorously, independently, and fairly in compliance with all applicable antitrust and competition laws and without anticompetitive agreements or contracts with other companies. Accordingly, the Company's associates may not enter into agreements – formally or informally – with competitors to fix prices, manipulate or divide the market or customers, boycott customers, or attempt to unfairly monopolise a market or engage in other acts or agreements that limit or constrain competition.

All Company units are required to operate in accordance with the above and in compliance with the professional practices and antitrust guidelines provided by the Company.

6.3 Relations with the shareholders

To make sound investment decisions and participate effectively in company votes, shareholders must have access to all relevant, available information.

The Company creates the conditions for widespread and informed shareholder participation in decisions within their remit, promotes equal access to information, and protects the interests of the Company and its shareholders from actions brought by coalitions of shareholders seeking to assert their particular interests.

6.4 Relations with the authorities

The Company fully and scrupulously complies with the requirements of all market regulatory authorities.

The Company does not deny, conceal, manipulate, or delay any information requested by regulatory bodies during inspections, and actively cooperates during investigative procedures.

To ensure maximum transparency, the Company undertakes not to find itself in conflicts of interest with employees of any Authority and their families.

6.5 Protecting and enhancing company value

The Company strives to ensure that its economic/financial performance safeguards and increases the enterprise value, in order to adequately remunerate the risk that shareholders assume by investing their capital.

6.6 Financial reporting

All transactions and operations carried out must be reflected in adequate accounting records and the related decision-making, authorisation, and execution processes must be verifiable. For each transaction, there must be adequate documentary support to enable checks to be carried out at any time to certify its characteristics and motivations and identify who authorised, performed, recorded, and verified the transaction.

It is forbidden to make any false or misleading entries in the books or records of the Company for any reason nor is it allowed to conceal or fail to record any Company funds or assets.

6.7 *Accounting policy*

All actions, operations, and negotiations carried out by the designated bodies are inspired by the following principles:

- the highest standards of managerial conduct;
- completeness and transparency of the information;
- legal legitimacy;
- clarity and accuracy of accounting records in accordance with current regulations and internal procedures.

The Company requires all its employees to fully and comprehensively dedicate themselves to ensuring that all management events and transactions carried out in the course of all its activities are correctly and promptly recorded in the accounts.

Each accounting transaction must therefore be supported by suitable documentation certifying the activity carried out so as to allow:

- easy accounting registration;
- the identification of the origin and/or formation of the documents;
- the accounting and mathematical reconstruction of the operations.

It is the responsibility of each employee involved in preparing the financial statements to ensure that the accounting documentation complies with the above-mentioned principles and is easily traceable and organised according to logical criteria.

The law requires the application of the principles of transparency, correctness, and truthfulness in financial statements and corporate communications. The Company requires its employees to adopt these principles, also to safeguard the trust that must be placed by all recipients in the truthfulness of all the information contained in such documents.

Many items of the financial statements and the notes thereto require estimates (so-called valuations). Especially in these cases, compliance with accounting principles is essential by anyone involved (including third-party consultants) in forming these items.

The Company requires that the recording of all items in the financial statements—such as receivables, inventories, equity investments, and provisions for risks and charges—must be based on unconditional compliance with all applicable regulations governing the preparation and valuation of such statements.

In particular, the employees responsible for preparing year-end accounting balances are required to control or promote the control of all accounting operations necessary for the production of said balances, also in order to reduce the possibility of interpretative errors.

The Company has also established as its ethical policy the ongoing promotion, among all its employees, of compliance with the principles of transparency, correctness, and truthfulness in reports and other corporate communications required by law. Therefore, anyone involved in drafting such documents is required to present truthful material facts and must not in any way conceal and/or alter information regarding the Company's economic, financial, or equity situation, the truthful and transparent disclosure of which is required by law.

6.8 Quality, health and safety policy

The success of the Company depends on customer trust and satisfaction. The Company's commitment to quality, value, and safety is essential to its continued growth and success. The Company is committed to providing products that deliver value to customers and to maintaining customer confidence in its products based on quality, reliability, and safety.

The Company is committed to promoting and consolidating a culture of safety by developing risk awareness and promoting responsible behaviour among all associates. It also works to protect the health and safety of its workers, as well as the interests of other Stakeholders, primarily through preventative measures.

The Company's objective is to protect its human, physical, and financial resources by constantly seeking the necessary synergies not only within the Company but also with the suppliers, businesses, and customers involved in its business.

To this end, its internal organisation actively monitors the evolving business environment and the resulting changes in the threat landscape, implementing the necessary technical and organisational measures, such as:

- a continuous analysis of the risk and criticality of the processes and resources to be protected;
- compliance with laws regarding working hours;
- the involvement of all levels of the Company and all employees, ensuring that responsibilities and operating procedures are precisely defined, appropriately communicated, and clearly understood;
- the adoption of the best technologies.

The Company clearly articulates and communicates the fundamental principles and criteria that govern all health and safety decisions, at every level, through training and the dissemination of its existing procedures.

6.9 Environmental protection policy

The environment is a primary asset that the Company is committed to protecting; to this end, it plans its activities by seeking a balance between economic initiatives and essential environmental needs, taking into account the rights of future generations.

The Company is therefore committed to monitoring the environmental impact of its activities and preventing environmental risks, not only in compliance with current legislation but also taking into account the development of scientific research and the best practices in the field.

6.10 Privacy protection policy

The Company protects the principle of confidentiality of information, data, and records relating to its activities and ensures that it is respected and safeguarded by its associates, as well.

In order to protect the Company's technical, financial, legal, administrative, and personnel management know-how, associates are required—subject to any applicable legislative and contractual provisions—not to disclose non-public information they have acquired and to use it solely for purposes strictly related to the performance of their duties.

In this regard, each associate must:

- acquire and process only the data necessary and directly connected to his or her duties;
- store the data in such a way as to prevent third parties from gaining knowledge of them;
- communicate and disclose data within the scope of established procedures or with the prior authorisation of the person delegated to do so;
- determine the confidential and proprietary nature of the information in accordance with the provisions of the relevant (including IT) procedures;
- ensure that there are no confidentiality obligations by virtue of relationships of any nature with third parties.

The Company binds third parties to whom it intends to communicate confidential information to compliance with specific confidentiality agreements.

6.11 Anti-money laundering policy

The Company and its employees must always comply with the application of anti-money laundering laws, in any relevant jurisdiction.

It is not permitted to be involved in activities that imply money laundering, receiving stolen goods, or the use of money, goods, or utilities of illicit origin in any form or manner.

The Company and its employees must first verify the available information, including financial disclosures, on business partners and suppliers, in order to ascertain their respectability and the legitimacy of their business before establishing business relationships with these parties.

6.12 Insider Trading policy

It is illegal to buy or sell securities (personally or on behalf of others) based on material non-public information. It is also illegal to communicate (i.e., “tip”) material non-public information to others so that they may buy or sell securities based on that information.

Individuals are aware of any material non-public information about the Company or any other company, including contractors, suppliers, or business partners, are prohibited from trading (directly or indirectly) or suggesting that others trade in securities of that company.

Material non-public information is factual information that a reasonable investor would want to know before making an investment decision.

Examples of material non-public information include:

- annual or quarterly financial results;
- financial forecasts;
- significant financial or business developments;
- possible mergers, joint ventures, or divestitures;
- significant product developments.

These prohibitions remain in effect for as long as the known information remains material and non-public.

7. Human resources

7.1 Protecting human resources

Human resources are an essential element for the existence and development of the Company, which considers the professionalism and commitment of its employees and associates essential values for achieving its objectives.

The Company respects and protects the dignity, health, safety, and privacy of its employees and associates, informing them, upon hiring and following changes to company processes, of their rights and the risks they may face while performing their work.

The Company protects, in particular, the physical and moral integrity of its employees and associates, ensuring working conditions that respect individual dignity, in compliance with current legislation on worker health and safety.

The Company ensures that neither acts of violence or psychological coercion, nor any attitude or behaviour that harms individual dignity, are tolerated.

7.2 Impartiality and equal opportunities

One of the fundamental principles for creating a positive work environment is the way in which everyone who works in and with the Company collaborates.

The Company is committed to ensuring a positive, constructive, and dynamic work environment that supports the diversity of its people and their talents, opinions, and views, guaranteeing equal opportunities for all based on the principles of impartiality.

The Company is committed to avoiding any form of discrimination based on gender, race, class, national origin, language, religion, political or philosophical opinions, membership in political associations or trade unions, health, disability, or age.

This commitment applies to all aspects of the employment relationship, including hiring, training, job assignment, promotion, transfer, and termination.

7.3 Positive work environment

The Company is committed to providing a positive and productive work environment for all associates, ensuring fair treatment of all employees with equal dignity and respect.

The Company supports and respects the rights of the individual in accordance with the UN Universal Declaration of Human Rights.

Furthermore, requests or threats aimed at inducing people to act against the law and the Code of Ethics will not be tolerated. Any behaviour that threatens the safety of people or property or that is potentially violent must be reported immediately.

The conduct of each employee and associate complies with the principles of legality, loyalty, fairness, transparency, and professionalism expressed by the Italian legal system, as well as compliance with the rules of the Code of Ethics, the legislative and contractual provisions governing the employment relationship with the Company, and company procedures.

Employees and associates shall refrain from behaviours and statements that could damage the image or harm the personal identity of the Company.

7.4 Practices for a healthy and safe environment

The Company is committed to providing a healthy and safe working environment that respects the environment and complies with all regulations protecting worker safety and the environment.

Each associate must pay the utmost attention to the prevention of hazards in order to avoid accidents and personal injuries. All employees are responsible for observing all health and safety regulations and practices relevant to their work. They are also responsible for taking all necessary precautions to protect themselves and their co-workers.

7.5 Selection of employees and collaborators

The personnel to be hired is evaluated based on the correspondence of the candidate profiles with those expected and with the company's needs, respecting equal opportunities for all interested parties.

The information requested is strictly related to the verification of the aspects required by the professional and psychological aptitude profile, while respecting the candidate's privacy and opinions. The Company, to the extent of the information available, adopts appropriate measures to avoid favouritism, nepotism, or forms of clientelism in the selection and hiring phases (for example, ensuring that the individuals responsible for selection are not related to the candidate by family ties).

When entering into contracts with employees and associates, the Company complies with the rules established by the applicable legislation and the current collective bargaining agreements.

In managing relationships with employees and associates, the Company recognises and protects all their rights, also taking into account their position subject to the Company's managerial and hierarchical authority.

7.6 Relationships with employees and associates

The Company ensures that no behaviour is adopted that directly or indirectly induces or forces employees and associates to behave in a manner that is contrary to the law, the articles of association, the Code of Ethics, or company procedures.

The Company protects and promotes the training of its employees and associates, with the aim of enriching their experience and professional and cultural heritage.

Internal communication is conducted using a range of tools, tailored to specific objectives, audiences, and content.

8. Company assets

8.1 Corporate resources

The effective use of company resources is a critical factor for the well-being of the Company.

The Company maintains such resources and technologies for legitimate business purposes and to support a professional and positive environment.

Employees are required to use company assets, resources, and equipment in accordance with their intended use and in a manner that protects their preservation and functionality.

When using company assets, resources, and equipment, employees are required to behave responsibly and in accordance with the operating procedures established to regulate their use.

Each employee is responsible for the goods, means and resources entrusted to him or her and is required to promptly inform his or her hierarchical superior of any use of them that is contrary to their intended use.

8.2 *Intellectual property rights*

Employees are required to safeguard the Company's intellectual property by using it only as permitted by the applicable laws and by preventing its use or disclosure to third parties without the prior authorisation of their superior.

8.3 *Confidential information*

The Company's confidential information is vital to the Company's success. "Confidential information" includes financial, business, or technical information, whether verbal or written, about the Company, its products, suppliers, or customers that is:

- a) classified as secret or confidential;
- b) not known to the public or to competitors and which guarantees the Company a competitive advantage. No employee may use or disclose confidential information relating to the Company or its customers, locations, finances, business dealings, projects, and products except in strict connection with his or her work for the Company or if required by legal proceedings.

This rule applies to any confidential information of which the associate may become aware in the course of his or her work. Employees are required to take the utmost care in safeguarding documents containing confidential information, in particular not to leave them visible on the desk, not to throw them in a waste basket without first shredding them, and not to discuss confidential information in public places.

8.4 *Misappropriation of Company property*

Employees are forbidden from appropriating the Company's assets (or those of third parties doing business with it) for their own personal use. Similarly, they may not charge personal expenses to the Company, except as permitted by the approved fringe benefit rules.

All Company property, including employee-generated materials and confidential information, must be returned upon termination of employment.

8.5 *Use of the Company's software*

Unauthorised acquisition, copying, or use of Company or third-party software is prohibited. The software must be used only in accordance with the terms of the applicable licence agreement. Unless otherwise specified in the licence, no employee may make or distribute copies of the software or documentation for use within the Company or for any other purpose, nor for the personal use of others, including clients and family members. All software used by or on behalf of the Company or on any computer owned by the Company must be purchased through appropriate channels in accordance with approved Company procedures. It is forbidden to introduce into the Company software from unauthorised sources, including software downloaded from the Internet or that

does not require the purchase of licences.

8.6 *Use of electronic devices*

The electronic devices belonging to the Company and the electronic services provided must be used for the performance of work activities; they may also be used for private use, provided that this use does not in any way compromise the primary work use.

All computer users are expected to use these resources responsibly, professionally, ethically, and lawfully. The systems must not be used in any way that disrupts or harms the Company's business or violates its policies or laws. Furthermore, data, programs, documents, correspondence, and other files stored or transmitted via electronic devices are the property of the Company and must be safeguarded with the same diligence as traditional paper documents.

9. Relationships with third parties

9.1 *Corruption and extortion*

The Company undertakes to implement all necessary measures to prevent and avoid corruption and extortion.

In accordance with the principles of lawfulness, loyalty, fairness, and transparency established by the Italian legal system, Company employees are prohibited from making or promising to third parties, even indirectly, gifts of money or other benefits, for the purpose of unduly promoting or favouring the interests of the Company or those of third parties, as well as from accepting, for themselves or others, the promise or gift of sums of money or other benefits to unduly promote or favour the interests of third parties. Giving or accepting gifts is generally prohibited. An exception is made for gifts of a nature and value that do not compromise the Company's image and cannot be interpreted as an attempt to obtain favourable treatment outside of normal market rules. Such gifts must be classifiable as promotional activities, hospitality, or business courtesies, and must comply with all internal procedures.

9.2 *Institutional relationships*

All relationships with Italian or international institutions are limited exclusively to communication activities for the purpose of assessing the impact of legislative and administrative actions on the Company, responding to informal inquiries, and addressing formal acts of parliamentary scrutiny (such as legislative questions, hearings, etc.), or otherwise making known the Company's position on issues relevant to the Company.

To this end, the Company undertakes to:

- establish, without any kind of discrimination, stable channels of communication with all

institutional interlocutors at international, EU and local level;

- advocate for its interests and positions transparently, consistently, and with the utmost integrity, while avoiding any form of collusive conduct.

To ensure maximum clarity in relationships, contact with institutional stakeholders occurs exclusively through representatives who have received explicit authorisation from the Company's top management.

9.3 Relationships with the Public Administration and other relevant entities

Relationships between members of corporate bodies, employees, and associates, on the one hand, and, on the other, the Public Administration, both Italian and foreign, EU institutions, international organisations, bodies, and agencies, and, in general, public officials and those in charge of public services, even if private, must always be inspired by the principles of lawfulness, loyalty, fairness, and transparency enshrined in the Italian legal system, with regard to the purposes of preventing the crimes referred to in (It.) Legislative Decree no.231/2001.

In order to ensure maximum transparency, the Company also undertakes to avoid gaining any form of undue advantage from any personal or family relationships with public administration officials and other relevant parties.

Company employees are prohibited from making or promising to officials or employees of the Public Administration and other relevant persons, even indirectly, gifts of money or other benefits, for the purpose of unduly promoting or favouring the Company's interests. Only symbolic or low-value gifts, attributable to promotional activities or acts of courtesy, are permitted, in compliance with internal procedures.

When engaging with the legislative, regulatory, and administrative process in areas relevant to its interests, the Company shall, at all times, conduct itself in a fair and transparent manner. Furthermore, any collusive or coercive conduct toward the public entities, bodies, or officials responsible for these activities is strictly prohibited.

The Company maintains relationships with all authorities performing inspection, supervisory, regulatory, and enforcement functions based on full and active cooperation, promptly providing any information requested by them in carrying out their investigations and complying with the provisions issued.

9.4 Requesting, receiving and managing public funding

All information requested and/or presented to public institutions must be truthful and transparent. It is not permitted to submit false declarations to public, national, or EU bodies in order to obtain public grants, contributions, or subsidised financing, or to obtain concessions,

authorisations, licences, or other administrative documents.

In particular, employees are prohibited from:

- promising or granting money or other benefits or submitting false declarations and certifications of requirements or engaging in fraudulent schemes or deceptive practices in order to unduly obtain the issuing of concessions, licences, authorisations, contributions, grants, financing, contribution, social security or welfare benefits or other provisions from the Public Administration or other relevant parties;
- preventing or hindering the exercise of inspection and supervisory functions by the Public Administration or other relevant entities;
- adopting fraudulent, deceptive or unfair behaviour that may mislead the Public Administration or other relevant parties, during or as a result of public tender procedures and other business activities.

It is prohibited to allocate sums received from public, national, or EU bodies, as grants, contributions, or financing, to purposes other than those for which they were allocated.

By way of example, and not exhaustively, behaviours falling under the aforementioned prohibition include:

- false attestation of the existence of essential conditions for participating in a tender to obtain licences, authorisations, concessions, or public grants;
- false certification of the destination of funds legitimately received for purposes other than those that justified their disbursement;
- alteration of the functioning of a Public Administration IT or data transmission system or manipulation of the data contained therein for the purpose of obtaining an unfair profit.

9.5 Relations with political parties, trade unions, associations and other representative bodies

The Company refrains from making contributions, directly or indirectly, to political parties, committees, and movements, or to their representatives or candidates, and refrains from any form of pressure aimed at obtaining undue favours or privileged treatment.

Likewise, the Company refrains from making contributions, directly or indirectly, to trade unions or associations and other entities representing collective or widespread interests, in order to influence their conduct in legal proceedings against it or to prevent potential disputes regarding its initiatives and activities.

However, it is possible for the Company to contribute to the activities of political parties, organisations and associations and other representative bodies, including through the provision of financial resources, only

in the cases and in the manner established by law and, in any case, within the scope of specific, clearly identified projects and initiatives, respecting precise conduct criteria, such as the clear and verifiable allocation of resources and the express authorisation of the administrative body.

9.6 Relations with the media

The Company manages relationships with media representatives based on the principle of transparency.

The Company is committed to constantly informing all parties involved, directly or indirectly, in its activities.

In addition to regularly publishing its financial statements in accordance with the law, the Company is committed to making public, through its own tools or by disseminating information to the media, information useful for understanding its activities, the potential impacts on the community, and future plans.

Given the sensitivity of this task, the communication and dissemination of information relating to the Company's operations is reserved exclusively to the Chairman and the Chief Executive Officer, or, where they exist, to the competent functions.

All other persons are therefore prohibited from disseminating information regarding the Company without prior authorisation.

Furthermore, all personnel must refrain from spreading false or misleading information that could mislead the public or cause undue changes in stock prices.

9.7 Sponsorships and patronages

Sponsorship and patronage activities may concern sports, cultural, social, humanitarian, or environmental events and initiatives, or other topics of general interest, provided they offer a guarantee of seriousness and quality.

In any case, when entering into sponsorship or patronage agreements, the Company conducts itself fairly and transparently, avoiding any undue pressure on relevant parties and ensuring strict compliance with all regulations governing the advertising of the company's products.

9.8 Responsibility towards the community

The Company is aware of the influence, even indirect, that its activities can have on the conditions, economic and social development, and general well-being of the community.

For this reason, the Company intends to conduct its activities in compliance with universal human rights, with respect for local and national communities, and to support initiatives of cultural and social value in order to improve its reputation and social acceptance.

10. Customers, suppliers and consultants

10.1 Customers

The Company's primary objective is to fully satisfy the needs of its customers and clients, as well as to create relationships inspired by the principles of lawfulness, fairness, loyalty, and transparency. Relationships with customers and clients are governed by specific contracts, designed for maximum clarity and comprehensibility.

The Company ensures that negotiations and business relationships with customers are conducted with the utmost fairness and in compliance with current legislation. It also ensures that multi-year framework agreements with customers consistently comply with company principles and policies. In accordance with the principles of impartiality and equal opportunity, the Company's companies are committed to not arbitrarily discriminating against their customers, to providing high-quality products and services that meet reasonable customer expectations and protect their safety and security, and to adhering to truthfulness in advertising, commercial, and other communications.

10.2 Suppliers

In managing processes related to relationships with suppliers and contractors, the Company continuously conducts preventive analyses and assessments of market trends, the evolution of current and potential suppliers, technical updates, and the regulations governing the trade of relevant products.

In selecting and establishing relationships with suppliers and contractors, the Company objectively evaluates, in accordance with internal procedures and corporate planning, the economic viability of said relationships for the Company, with particular reference to profitability and liquidity objectives, as well as the market position, technical capabilities, and overall reliability of its counterparties.

In particular, the Company takes into account elements such as:

- financial strength;
- the experience gained in the sector;
- the reliability demonstrated in relations with the Company;
- the resources and technical and design capabilities, also on the basis of specific testing of the relevant products;
- the production capacity;
- the adoption of corporate quality control and product safety systems consistent with those required by the Company.

The Company's primary objective is to establish relationships with suppliers and contractors based on the principles of lawfulness, fairness, loyalty, and transparency.

The Company ensures that negotiations and business relationships with suppliers are characterised by the utmost fairness and professionalism and are conducted in compliance with current legislation.

Relationships with suppliers and contractors, including financial and ancillary ones, are governed by specific agreements, which are designed to be as clear and understandable as possible.

10.3 Consultants and intermediaries

The Company's primary objective is to establish relationships with consultants, intermediaries, and other service providers based on the principles of lawfulness, fairness, loyalty, and transparency.

In selecting its consultants, intermediaries, and other service providers, the Company adopts criteria of merit, reliability, competence, and professionalism.

Relationships with consultants, intermediaries, and other service providers are governed by specific agreements, designed for maximum clarity and comprehensibility.

11. Monitoring compliance with the Code of Ethics

Compliance with the provisions of this Code must be considered an essential part of the contractual obligations established for the Company's employees, pursuant to Articles 2104 and 2106 of the (It.) Civil Code, as well as for the Company's collaborators with reference to the existing contractual relationship.

The Company undertakes to provide and impose, consistently, impartially, and uniformly, sanctions proportionate to any violations of the Code and in compliance with current provisions on employment relationships and applicable national collective bargaining agreements.

Specifically, in the event of violations of the Code of Ethics committed by Company employees, the latter will adopt the relevant measures and will impose the relevant sanctions in full compliance with applicable laws and the provisions of the current collective bargaining agreement.

This Code establishes the mandatory nature of disciplinary action in the event of non-compliance with the rules of conduct defined therein.

Violation of the provisions of the Code constitutes a breach of the fiduciary bond inherent in the mandate of the members of the corporate bodies and executives, with all legal consequences.

The Supervisory Board must be informed of any measures taken as a result of violations of this Code.

Elesta promotes the prevention and investigation of any unlawful conduct or conduct contrary to

the Code of Ethics and encourages recipients to promptly report such conduct using the implemented specific communication channels when they become aware of even potential violations of laws or regulations, the Model, the Code of Ethics, or internal procedures within the scope of company operations.

Elesta, in accordance with the applicable legislation, will ensure that the person making the report, if identified or identifiable, is not subject to retaliation, discrimination, or any other form of penalisation, thus ensuring confidentiality, unless otherwise required by law.

Under no circumstances, except in cases of liability for defamation or libel, or for the same reason pursuant to Article 2043 of the (It.) Civil Code, may anyone who reports in good faith to the Supervisory Board any unlawful conduct or conduct contrary to the Code of Ethics of which they have become aware by virtue of their relationship with Elesta, be sanctioned.

Reports can also be made anonymously; Elesta offers the following options to those making the report:

- online platform: <https://elestaecholaser.whistlelink.com/>
- by e-mail to the SB address: odv.elesta@protectiontrade.it
- by ordinary mail to the address "OdV [SB] c/o Elesta S.p.A. Via Arsiero Salvanti, 43 - 50041 Calenzano (FI)".

12. Final provisions

This document was approved by the Board of Directors of Elesta S.p.A. at the meeting of 9 December 2024.

Any changes and/or additions thereto will be approved by resolution of the administrative body and promptly disseminated to all recipients.