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# **CODE OF ETHICS**

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## INTRODUCTION

Lifeanalytics S.r.l. (“**Lifeanalytics**” or the “**Parent Company**”) and its subsidiaries (collectively as a whole the “**Lifeanalytics Group**” or “**Group**”) provide analysis services across various matrices, as well as training and consultancy in the areas of EHS, Product Safety, Food, Cosmetics and Medical Device and Engineering.

The **Lifeanalytics Group** was established in 2018 through the merger of twenty-five Italian companies, each with over forty years of experience in providing analytical services in chemistry, microbiology, and biology across sectors such as food, environmental, pharmaceutical, healthcare, cosmetics, cultural heritage, industrial hygiene, engineering, and geotechnics.

Thanks to the Lifeanalytics Group’s professional team and specialised technical and scientific knowledge, it helps individuals, companies, public institutions, and healthcare providers delivering tailored solutions for every need.

This Code of Ethics (“**Code**”) has been developed to ensure that the values and principles of the Lifeanalytics Group are clearly defined, making them the foundation of the culture across its member companies and the benchmark for business conduct and practices.

For these reasons, this Code complements other Group guidelines, such as the Ethics and Business Conduct Charter and Policies, adopted by the companies.

The Code of Ethics also aims to help prevent the offences outlined in Legislative Decree no. 231/2001 (hereinafter also referred to as “**Decree 231**”).

Under no circumstances, can the belief that one is acting in the interest or for the benefit of the Group or its member companies justify behaviour that goes against the principles outlined in this Code.

**SCOPE OF APPLICATION AND RECIPIENTS** Il contenuto  
The provisions of this Code of Ethics are mandatory for Lifeanalytics and the Italian companies controlled by it (i.e., Lifeanalytics Torino S.r.l., C.S.G. Palladio S.r.l., Veram S.r.l. and 3A Laboratori S.r.l., Ecol Studio S.p.A., Abich S.r.l., Sepack Lab S.r.l., Pack CO S.r.l., Alpha Ecologia S.r.l.).

As a result, the values and principles outlined in this Code of Ethics are binding for all individuals holding positions of representation, administration, or management across the Group's companies. This includes all employees without exception, as well as those engaged through temporary, interim, or para-subordinate working arrangements and anyone collaborating with these companies in any capacity to achieve their objectives. Additionally, this applies to service providers, business partners, and anyone with business relations with any of the Group's companies (hereinafter referred to as the "**Recipients**").

Recipients must familiarise themselves with and adhere to the principles and standards of conduct outlined in this Code of Ethics, as well as ensure that compliance with the Code is upheld by individuals operating within their designated functions, or who have any contractual relationship with a company in the Lifeanalytics Group.

## VALUES

I valori («**Valori**») del Gruppo Lifeanalytics sono:

The values ("Values") of the Lifeanalytics Group are:

- **CUSTOMER FOCUS**

We are committed to being a valued partner to our customers in achieving their success. We are dedicated to meeting their business needs, whether they are clearly stated or implied.

- **RESPECT FOR COLLEAGUES**

We strive to create a work environment that fosters talent development and growth opportunities. We believe that a team's value outweighs individual contributions and we support the creation of a strong, cohesive team culture.

- **RESPONSIVENESS**

We work diligently to act quickly, recognising that time is of the essence. We embrace mistakes as opportunities for personal development.

- **RELIABILITY**

Each employee treats their responsibilities as if they were their own, driven by a passion for excellence.

- **SKILLS**

Each employee is committed to becoming a subject matter expert, focusing on the benefit of those they serve and fostering the professional development of their team.

- **AUTHENTICITY**

We act with transparency and fairness. We communicate what we believe is right, with all the passion and enthusiasm we can muster.

- **INTEGRITY**

We comply with legislation, regulations, guidelines and company policies.

- **LEADERSHIP**

An effective leader should demonstrate courage, enthusiasm, confidence, dedication, and ambition. It enhances the strengths and talents of its employees by creating teams dedicated to shared objectives.

# **ETHICAL PRINCIPLES**

The Group acknowledges and promotes the ethical principles ('Principles') set out below:

1. Legality
2. Impartiality and equality
3. Professionalism, integrity and excellence
4. Conflicts of interest prevention
5. Confidentiality
6. Openness and fairness in the management of corporate data
7. Fairness in contractual matters
8. Open and fair competition
9. Industrial and intellectual property protection
10. Anti-money laundering measures
11. Privacy protection
12. Anti-corruption measures
13. Valuing people and the human capital
14. Occupational safety protection
15. Sustainability and environmental protection

## **1. LEGALITY**

All actions taken by the Recipients during work activities conducted for or in the interest of the Group must adhere strictly to all applicable national, community, and international laws in force.

This obligation applies not only to employees, but also to collaborators, suppliers, customers and anyone who has business relations with Lifeanalytics Group companies.

The Group, in fact, firmly believes that honesty and compliance with applicable laws, particularly those relevant to the specific sector, are essential principles guiding its operations.

## **2. IMPARTIALITY AND EQUALITY**

The Group firmly opposes any form of discrimination in its interactions with stakeholders, regardless of age, gender, sexual orientation, health status, race, nationality, political opinions, or religious beliefs.



### 3. PROFESSIONALISM, INTEGRITY AND EXCELLENCE

Lifeanalytics is dedicated to achieving excellence in the provision of its services and organisational processes, continually improving professional skills, while adhering to the highest standards of ethical and professional conduct. All activities should be carried out with the highest levels of commitment, diligence, professionalism, reliability, and efficiency, alongside moral integrity and sound management practices, to safeguard the Group's reputation.

The Recipients are expected to deliver the highest standards of performance when carrying out their duties, focusing on appropriateness, timeliness, effectiveness, systematic execution, and continuity to ensure customer respect and satisfaction.

In addition, the Lifeanalytics Group companies aim to achieve the following objectives while conducting their activities and delivering chemical analysis services:

- ensure that the services provided meet the necessary quality standards in accordance with established methods tailored to customer needs by selecting, qualifying, and monitoring suppliers of materials, services, or equipment that affect quality;
- ensure that accredited testing activities are conducted in accordance with ISO 17025:2018 and the standards set by the Italian Accreditation Body (ACCREDIA), and that laboratories implement a quality management system compliant with UNI EN ISO 9001:2015;
- ensure the ongoing maintenance of existing certifications and their regular application to achieve high-quality standards, thereby increasing customer satisfaction;
- implement policies and procedures to avoid engaging in activities that may compromise trust in competence, impartiality, judgement, or professional integrity;
- ensure that the laboratory acts impartially and is aware of the importance of impartiality in its work;
- implement regular measurements of the services provided along with systematic evaluations to confirm compliance with customer agreements and all mandatory requirements;

- work diligently to uphold and increase customer satisfaction, placing special emphasis on assessing and addressing complaints and non-compliant services to promptly implement corrective and improvement actions;
- implement corrective actions and preventive measures to avoid the recurrence of problems or prevent their occurrence by adopting a risk-based thinking approach;
- encourage the growth and development of corporate expertise by organising regular meetings and other initiatives designed to share and promote insights gained from the Group's workshops;
- encourage and facilitate participation in inter-laboratory comparisons while adhering to the current customer and method requirements.

#### **4. CONFLICTS OF INTEREST PREVENTION**

In their corporate activities and decision-making processes, the Recipients must avoid any potential conflict of interest situations that may arise from:

- engaging in business-related decisions from which a personal interest might arise;
- accepting agreements from which personal benefits may arise;
- undertaking actions, entering into agreements, and generally engaging in any conduct that could directly or indirectly harm any of the companies within the Lifeanalytics Group, particularly regarding their reputation and credibility in the marketplace;
- interfering with the Group's interests by compromising the decision-making independence of an individual responsible for managing business relations with or on behalf of one of the Group's companies.

Conflicts of interest are defined as situations where the Recipients pursue their own interests or those of third parties that diverge from the corporate mission, engage in activities that may compromise their ability to make decisions solely in the Group's interest, or take advantage of business opportunities for personal gain at the expense of the Group or any of its companies.

The following scenarios may result in conflicts of interest, including but not limited to:

- having economic and financial interests, including those held through

- family members, in suppliers or competitors;
- exploiting their position to fulfill personal interests that may conflict with those of the Lifeanalytics Group;
- engaging in, finalising, or initiating negotiations and/or contracts—in the name of and/or on behalf of one of the Group's companies—with their own family members, partners, or legal entities in which the Recipients have an ownership stake or have a vested interest;
- performing any type of work with customers, suppliers, competitors, and/or third parties that conflicts with the interests of the Lifeanalytics Group, except where permitted by law and/or authorised by the parent company;
- personally benefiting from information and business opportunities acquired during the performance of one's duties.

While conducting any activities, Group companies must steer clear of situations where the parties involved in transactions are, or may seem to be, in a conflict of interest. Consequently, in the event of a conflict of interest, Recipients must not take part, whether directly or indirectly, in any decision or discussion related to the issue in question.

## **5. CONFIDENTIALITY**

The Lifeanalytics Group considers confidentiality to be an essential principle governing all its dealings.

Group companies guarantee the confidentiality of the information in their possession and refrain from searching for or handling confidential data (including, but not limited to, non-public corporate information, business process management methods, and information related to customers, suppliers, and consultants) unless there is explicit and informed authorisation or compliance with existing regulations.

The sharing of confidential information to third parties is restricted to authorised individuals; when such disclosure is warranted for official or professional reasons, the confidential nature of the information must be explicitly mentioned, and the third party must be bound to uphold confidentiality.

In dealings between Group companies and their stakeholders, Recipients should refrain from using confidential information obtained in the course

of their duties for personal gain, especially if it is not related to their official responsibilities or the interests of the Group, to maintain the confidentiality of all information, even if it is not clearly identified as confidential.

The requirement to uphold confidentiality regarding information applies to all individuals or entities engaged in contractual or other relationships with Lifeanalytics Group companies. Similarly, the Group commits to protecting the information of its employees and third parties, preventing any form of misuse. No Recipients are permitted to gain any form of advantage, either directly or indirectly, personally or financially, from confidential information or personal data acquired while performing activities for the Group companies; they also must not share such information with others or encourage others to use it.

To guarantee confidentiality, appropriate security and protection measures are established for company data stored on digital platforms, designed to avert external intrusion risks; these measures may include controls on access to facilities, passwords, personal identification codes, and screen savers.

## **6. OPENNESS AND FAIRNESS IN THE MANAGEMENT OF CORPORATE ACTIVITIES AND DATA**

The Group strives to ensure that all information it releases is based on the utmost transparency and accuracy. The dissemination of false information is prohibited.

In line with the principle of transparency, each action, operation, and/or transaction must be accurately recorded in the company's accounting system, following regulatory and legal guidelines and applicable accounting standards, with proper authorisation and ensuring it is verifiable, legitimate, consistent, and appropriate. Information recorded in both general and analytical ledgers must adhere to principles of clarity, transparency, accuracy, completeness, and correctness.

For accounting documents to meet the requirements of data accuracy, completeness, truthfulness, and transparency, sufficient and thorough supporting documentation must be retained for every accounting transaction to allow for:

- the accurate bookkeeping of accounting records;
- the immediate recognition of the key details and reasons behind the

- transaction;
- the straightforward reconstruction of the decision-making, authorisation, and implementation processes, along with clear identification of responsibility levels.

Each Recipients, within their area of responsibility, must ensure that all company management data is accurately and promptly recorded in the accounting ledgers.

During the management and execution of corporate activities, Recipients are required to provide transparent, truthful, complete, and accurate information to external parties, refraining from spreading misinformation or engaging in simulated operations, and maintain a collaborative approach to guarantee the thorough and consistent communication of information, data, and activities by Lifeanalytics Group companies.

## **7. FAIRNESS IN CONTRACTUAL MATTERS**

Contracts, whether for the public or private sector, must be meticulously drafted to adhere to current regulations and, like all work assignments, must be carried out as mutually agreed by the parties.

The Group companies are dedicated to delivering timely and detailed information on all business-related issues and will not capitalise on situations resulting from a lack of information or knowledge about their counterparts.

## **8. OPEN AND FAIR COMPETITION**

The Group is committed to promoting open and fair competition within a competitive market, adhering to antitrust laws to guarantee free and fair competition that benefits competitors, customers, and Group companies alike. Deceptive behaviour, arrangements, or mutual understandings between existing or potential competitors that may result in unfair competition or violate antitrust regulations are strictly prohibited. In particular, the Group pledges not to resort to unethical methods, such as employing personnel from competitors to acquire confidential information or incentivising competitors' employees to disclose sensitive information regarding its own operations.

For example, in this context, Recipients are prohibited from discussing

pricing or other commercial terms with competitors, including market sharing, customers, territories, business opportunities, capacities, volume quotas, or corporate strategies.

Deceptive behaviour, arrangements, or mutual understandings between existing or potential competitors that may result in unfair competition or violate antitrust regulations are strictly prohibited. In particular, Lifeanalytics pledges not to resort to unethical methods, such as employing personnel from competitors to acquire confidential information and Recipients are prohibited from discussing pricing or other commercial terms with competitors, including market sharing, customers, territories, business opportunities, capacities, volume quotas, or corporate strategies.

## **9. INDUSTRIAL AND INTELLECTUAL PROPERTY PROTECTION**

In accordance with the principle of legality, the Group ensures compliance with internal, European Union, and international regulations related to the protection of industrial and intellectual property.

As such, it guarantees compliance with regulations governing the protection of trademarks and copyright, and in this regard, prohibits any actions aimed at duplicating or reproducing the work of others without proper authorisation.

## **10. ANTI-MONEY LAUNDERING MEASURES**

By upholding values of fairness, transparency, and honesty, the Group companies ensure that business transactions and interactions with third parties are conducted with maximum transparency, while fully complying with national and international anti-money laundering regulations.

Every financial transaction, including inter-Group dealings, is adequately substantiated within the contractual relationships and carried out using payment methods that ensure traceability.

Any conduct that seeks to utilise, replace, transfer, or conceal funds known or suspected to have an unlawful origin, whether originating internally or externally, is categorically condemned. Accordingly, the Recipients are prohibited from entering into business relations with consultants, customers, suppliers or third parties who cannot provide assurances of integrity, do not have a good reputation or are associated with money laundering activities.

## **11. PRIVACY PROTECTION**

Throughout its business activities, the Lifeanalytics Group ensures that the collection, management, and processing of personal data adhere to applicable laws.

In this regard, the Group has implemented all mandatory requirements set forth by laws and regulations regarding the protection of personal data. All Recipients are required to maintain the confidentiality of personal and sensitive data in their possession, for which they have received authorisation for processing, by adhering to the established standards and security measures designed to prevent unlawful use, unauthorised access, processing, or disclosure.

## **12. ANTI-CORRUPTION MEASURES**

The Lifeanalytics Group unequivocally prohibits any form of corruption in its dealings with third parties. Therefore, it is crucial that interactions with external parties exhibit:

- full transparency and fairness;
- adherence to the law, particularly regarding provisions related to offences against local and national government bodies, corruption between private individuals, and the prevention of corrupt practices in general;
- freedom from all types of external and internal pressures or influences.

The Recipients must abstain from any form of corruption with reference to both public and private parties. In particular, it is forbidden to:

- offer, promise, solicit an economic advantage or any other benefit, either directly or indirectly, to a public official or private individual (active corruption);
- accept a request or solicitation, or authorise someone to accept or solicit, directly or indirectly, an economic advantage or any other benefit from a public official or private individual (passive bribery);

The restriction applies not only to monetary payments but also covers, for corrupt purposes:

- gifts or giveaways;
- expenses related to representation, including meals and transportation;
- contributions in kind, such as sponsorships;

- business, jobs or investment opportunities;
- confidential information;
- discounts or personal credits;
- commissions;
- facilitation payment;
- other advantages or other benefits.

In any event, such expenses must be approved and properly documented if they are incurred.

### **13. VALUING PEOPLE AND THE HUMAN CAPITAL**

The Lifeanalytics Group considers human resources to be an essential and irreplaceable asset for its success, ensuring full respect for workers' rights in its management of labour relations and collaborations, supporting their comprehensive development and professional growth, while avoiding any discriminatory practices.

In pursuit of this goal, the Group's companies encourage an organisational culture that respects the individuality and dignity of each individual, particularly during employee selection, while consistently working to avoid any situations that could lead to discomfort, hostility, or intimidation.

The Lifeanalytics Group advocates for the safeguarding of individual freedom and identity, rejecting any actions that may lead to the potential exploitation or oppression of individuals.

Committed to upholding current labour laws, particularly concerning child labour, the Group ensures that its employees, suppliers, and collaborators comply with these standards, offering equal employment opportunities based on professional qualifications and abilities, without discrimination, and selecting, hiring, and compensating staff according to merit and competence.

To ensure that personnel receive appropriate salary and contribution treatment, the Group commits to fulfilling all regulatory requirements, including lawful residency for foreign employees in the territory.

### **14. WORKPLACE SAFETY AND PROTECTION**

The Lifeanalytics Group's companies actively promote and ensure the health and safety of their employees in offices, laboratories, and any locations



where staff perform their work duties. They implement all necessary and appropriate measures, aligned with the latest technical and scientific knowledge, to ensure that all workplaces meet the highest standards of safety and hygiene.

Group companies are also committed to maintaining working conditions that uphold individual dignity and quality, providing safe and healthy environments. This is achieved through promoting a culture of safety and risk awareness, encouraging responsible behaviour among all employees, and implementing training activities in line with company procedures and current accident prevention regulations.

The objective is to ensure compliance with the measures necessary to protect health and safety at work from the design phase of work processes and activities, by implementing strategies to enhance performance in this area and identify opportunities for improvement.

With this in mind, each Recipient is encouraged to embrace this value and actively participate, within their specific setting, by upholding the safety of their working environment, while acting responsibly to safeguard their health and safety, as well as that of their colleagues.

## **15. SUSTAINABILITY AND ENVIRONMENTAL PROTECTION**

The Lifeanalytics Group understands the importance of protecting the environment and expects Recipients to consider the environmental effects of their choices to reduce any potential negative consequences. In this regard, the Group designs its operations to find the most effective equilibrium between economic pursuits and environmental requirements, encouraging the adoption of a corporate management framework that safeguards and respects the environment.

To achieve this goal, Group companies:

- undertake to comply with current safety and environmental regulations;
- develop and communicate guidelines and policies to be followed by the Recipients;
- promote employee participation in the process of risk prevention, safeguarding and environmental protection;

- undertake, in carrying out their business activities, to adopt environmentally sound techniques and systems;
- manage the disposal of waste produced as a result of the company's activities.

# RELATIONS WITH RECIPIENTS

## SECTION I: Relations with employees

The Lifeanalytics Group Companies uphold the principle of corporate delegation, which is enacted through general and/or special powers of attorney and delegation of tasks, to ensure that authority and responsibilities are distributed among individual team members, guaranteeing the presence of legally responsible individuals in various corporate procedures for oversight and supervision.

### 16. EMPLOYEE SELECTION

While adhering to the obligations set by relevant legal requirements, the selection of employees is contingent upon confirming candidates' complete compliance with the required professional profiles, all while maintaining equal opportunities for everyone concerned. Lifeanalytics Group companies, within the limits of available information, take appropriate measures to avoid favouritism, nepotism or forms of patronage in the selection and recruitment stages.

With regard to employee assessment, the Group companies pledge to ensure that their organisational framework sets annual or interim objectives, whether general or individual, that are specific, measurable, achievable, relevant, and time-bound.

Discrimination based on race, gender, nationality, religion, language, union affiliation, or political beliefs in hiring, pay, promotion, or dismissal is strictly forbidden, as is any form of preferential treatment.

### 17. TALENT ACQUISITION

Employees are recruited under standard employment contracts, as any type of employment arrangement that fails to adhere to or attempt to bypass existing legal provisions is not allowed.

At the start of the employment relationship, each employee receives information about the nature of their role and tasks, the legal and salary elements as specified in the employment contract, and the guidelines and procedures to be followed to prevent any health risks associated with their work activities.

This information is shared with the individual in a way that guarantees their acceptance of the role is based on a thorough understanding of what it entails.

## **18. EMPLOYEE TRAINING**

Group companies place significant importance on training, allocating resources, suitable tools, and time to achieve behavioural objectives.

The Group equips individuals with information and training materials, utilising the best techniques available to develop specific skills and encourage innovation and scientific research.

## **19. HEALTH AND SAFETY**

The companies within the Group are dedicated to ensuring a working environment that safeguards the health and safety of their employees and all individuals who access their facilities.

To achieve this, the Lifeanalytics Group encourages responsible and safe behaviour by implementing all necessary safety measures driven by technological advancements, ensuring a safe and healthy working environment in strict accordance with current workplace prevention and protection legislation.

Every employee is given the necessary information and training to guarantee complete and timely compliance with the internal rules and procedures in place, and they must immediately notify any shortcomings or breaches of the relevant regulations.

## **20. EMPLOYEE RESPONSIBILITIES**

It is the employee's duty to:

- know and comply with current legislation, processes, procedures and guidelines as well as the principles contained in this Code of Ethics;
- comply with the provisions and instructions issued by the relevant Group company or its Managers;
- fulfil all obligations necessary for the protection of health and safety in the workplace;
- ensure effective collaboration with their colleagues or supervisors by communicating necessary information and adopting behaviours

that facilitate maximum efficiency in their assigned tasks and the achievement of shared goals;

- refrain from misusing their position or create misleading beliefs about their authority;
- not engage in actions that contradict their official responsibilities, nor should they withhold or postpone official acts in return for the unlawful receipt or promise of money or benefits for themselves or others;
- preserve the market's confidence, especially among suppliers of the Group, ensure that all interactions are conducted fairly and equitably, avoiding any actual or perceived favours or coercion aimed at securing special advantages from particular suppliers;
- not leverage information gained during business activities for personal gain or to secure financial or non-financial benefits;
- promote awareness of the Code of Ethics among all those with whom it has relations, of a formal and informal nature, in the course of its activities;
- not speak negatively, under no circumstances, about the Lifeanalytics Group or those who have had any form of dealings with it;
- refrain from joining associations, clubs or other bodies of any kind, if this may give rise to obligations, constraints or expectations that interfere with the exercise of one's activity;
- not use work tools, including telephone lines, for personal purposes, except in cases of urgent need, while also ensuring proper care of the premises, furniture, vehicles, and materials provided;
- not gain any profit or advantage, whether direct or indirect, financial or otherwise, from their work, regardless of any impact on the Group;
- act in a manner and choose clothing and language that is fitting for the professional setting;
- not issue duplicate invoices for the same service or fail to issue credit notes for services that are non-existent or cannot be financed, even if invoicing was done in error;
- not use, for its own purposes, the designs, systems, processes, methodologies, reports or other inventions or activities developed by Group companies;
- not perform work under the influence of alcohol or drugs, nor smoke on

company premises.

Employees must also avoid publicly portraying the image of the Lifeanalytics Group or its member companies in a way that could harm their reputation and create distrust.

# RELATIONS WITH RECIPIENTS

## **SECTION II: Relations with Local and National Government Bodies**

Relationships with local, national and international government bodies, including central and local entities, are conducted with strict adherence to relevant regulations and the principles of transparency, completeness, integrity, and fairness.

Only company representatives who are explicitly authorised or delegated may undertake commitments and manage relations, of any kind, with the local and national government bodies or engage in public relationships.

In particular, the Recipients must, to the extent of their competence:

- fulfil its obligations to the local and national government bodies with the highest level of diligence and professionalism, ensuring the provision of clear, accurate, complete, and truthful information while avoiding and reporting any potential conflicts of interest;
- ensure that the documentation submitted to the local and national government bodies is prepared by individuals who are competent in the subject matter and have been identified beforehand;
- ensure confidentiality in the submission of information;
- use communication channels with the local and national government bodies that enable the subsequent traceability/formalisation of information sent and/or received;
- ensure that the procedures relating to the application for, issue and maintenance of licences, authorisations or concessions, as well as general relations with authorities carrying out judicial, inspection, and regulatory functions, are managed solely by the appropriate departments and adhere to the principles of legality, transparency, cooperation, and fairness.

In their relations with the local and national government bodies, Recipients must not exert undue influence on the officials responsible for negotiations or decisions on its behalf, and should avoid any actions that could compromise the impartiality and independence of the local and national government bodies' judgement.

As a result, Recipients are forbidden from offering, giving, or accepting requests for money or other benefits from public officials, nor may they

authorise anyone to directly or indirectly give or pay any amount of money, advantages, or valuable items to or from a public official, with the intent of improperly promoting or favouring the interests of the Group, or in any way that contravenes applicable laws.

## **21. MANAGING COMMUNICATION WITH LOCAL AND NATIONAL GOVERNMENT BODIES**

While managing communications with local and national government bodies, Group companies pledge to act fairly and impartially via the appropriate corporate communication channels, ensuring that their interests and positions are represented truthfully, transparently, and consistently, and avoiding the dissemination of any untrue, incomplete, or misleading information or statements to secure an unfair advantage.

In cases where the documentation intended for the local and national government bodies is produced, either fully or partially, with the help of third parties (like consultants or technicians), the Lifeanalytics Group companies guarantee that their selection is consistently based on criteria of professionalism, independence, and competence at all times.

## **22. MANAGEMENT OF CONTROL ACTIVITIES**

The companies of the Lifeanalytics Group undertake to fully and scrupulously implement any requests from public authorities in areas related to their activities, as well as to facilitate the proper performance of controls by bodies legally mandated to do so. Therefore, inspection visits by regulatory bodies and relations with judicial authorities must be conducted by personnel with proper authorisation, promoting cooperation, fairness, and transparency, while strictly prohibiting any actions that obstruct verification activities, such as concealing or destroying documents.

## **23. PARTICIPATION IN CALLS FOR TENDERS AND DISBURSEMENT OF PUBLIC FUNDS**

In the activities involved in participating in calls for tenders, the Group undertakes to:

- operate according to the principles of fairness, transparency and good faith;



- when examining the tender notice, assess the appropriateness and feasibility of the services required;
- maintain transparent and fair relations with the local and national government officials in charge.

If awarded, they commit to ensuring:

- the clear and correct implementation of the provisions of the notice;
- the diligent and timely fulfilment of contractual obligations, also towards third parties involved.

Finally, as far as the disbursement of public funds is concerned, it is not allowed:

- using or submitting declarations and documents certifying untrue facts and information, or omitting information in order to obtain grants, financing or other public funds;
- use contributions, financing or other disbursements, however denominated, for purposes other than those for which they were granted.

# **RELATIONS WITH RECIPIENTS**

## **SECTION III: Relations with third parties**

### **24. RELATIONS WITH CUSTOMERS**

To succeed in its target markets, the Lifeanalytics Group is committed to offering high-quality services that prioritise customer satisfaction and ensuring prompt availability and responsiveness to their needs.

Consequently, employees of Lifeanalytics Group companies are required to:

- comply with internal procedures and instructions for managing customer relations;
- efficiently and politely supply high-quality products that fulfil or exceed the customer's reasonable expectations and needs, adhering to the terms of the contract;
- provide accurate and comprehensive information about products and services so that customers can make informed decisions;
- ensure accuracy in all business-related communications.

### **25. RELATIONS WITH SUPPLIERS, COLLABORATORS AND CONSULTANTS**

Recipients involved in the process of acquiring goods and/or services

- are bound to respect the principles of impartiality and independence in performing the tasks and roles assigned to them;
- must not have any personal ties to suppliers and consultants;
- must maintain relations and conduct negotiations in such a way as to create a solid basis for mutually beneficial and long-lasting relations;
- must not accept goods or services from external or internal parties in exchange for obtaining confidential information or initiating actions or conduct aimed at favouring such parties, even if there are no direct repercussions for the Group.

In all cases, the Lifeanalytics Group requires that suppliers and collaborators operate in compliance with all applicable laws, including, but not limited to, employment laws relating to child labour, minimum wages, overtime compensation, recruitment and workplace safety.

The selection of consultants is also based on operators who adhere to standards of ethics, reliability, good reputation, credibility in the target market, and professional integrity.

Thus, we will not engage in any dealings with individuals who are known or reasonably suspected to support criminal organisations in any capacity.

## **26. RELATIONS WITH POLITICAL PARTIES AND TRADE UNION ORGANISATIONS**

The Lifeanalytics Group does not endorse political parties or trade unions and refrains from making any contributions to them, either directly or indirectly, except for those mandated by specific regulations.

Additionally, it does not engage with or support organisations, associations, or movements that pursue any aims that are prohibited by law, either directly or indirectly.

## **27. RELATIONS WITH INSTITUTIONS, OTHER ORGANISATIONS AND ASSOCIATIONS**

Relations with the institutions are characterised by the utmost rigour, transparency and fairness in respect of institutional roles.

The Lifeanalytics Group opposes any affiliation with organisations or associations, whether domestic or international, that seek to achieve objectives prohibited by law, that are unethical or disrupt public order, or that infringe upon fundamental individual rights. Sponsorship opportunities and/or requests for contributions may pertain to subjects related to medicine, scientific research, the social sector, environmental concerns, sports, art, and entertainment, along with entities and associations that possess high cultural significance and engage a large segment of the community.

## **28. COMMUNICATION WITH EXTERNAL STAKEHOLDERS**

External communication of Lifeanalytics Group companies is defined by a commitment to respecting the right to information; under no circumstances should false news or comments be disseminated.

All communication activities adhere to legal standards, regulations, and professional conduct practices, ensuring clarity, transparency, and timeliness while maintaining the confidentiality of information.

Recipients are urged, in line with the principles of confidentiality, integrity, and loyalty, to refrain from disclosing any confidential or false information regarding the Group or any news that could harm its reputation.

Communications of an institutional nature and interactions with information bodies are solely the responsibility of individuals who hold representation powers or those to whom such powers have been delegated.

## **RELATIONS WITH RECIPIENTS**

### **SECTION IV: Intra-Group transactions**

All intra-group relations are managed in full compliance with current regulations, as well as in accordance with the principles set out in this Code of Ethics.

The relations between the companies of the Group and the information of each company intended for the management of commercial activities meet the criteria of transparency, correctness, effectiveness and traceability of the underlying economic relations and the related financial flows.

The Lifeanalytics Group pays special attention to transactions with related parties, including intra-group transactions, which must be carried out in accordance with the corporate procedures adopted.

## **FINAL PROVISIONS**

### **29. APPROVAL OF THE CODE OF ETHICS AND ITS AMENDMENTS**

This Code of Ethics is approved by each Group company by resolution of its administrative body. Any changes and/or updates are approved in the same manner.

### **30. COMMUNICATION AND TRAINING**

The Lifeanalytics Group companies commit to distributing the Code of Ethics by providing a copy to their employees and ensuring that all Recipients understand its contents. They will also provide tools to support its implementation, relying on Recipients to adhere to the values and principles it embodies, while also communicating this to customers, suppliers, and any other third parties they engage with. For this purpose, the Code of Ethics is published on the [www.lifeanalytics.it](http://www.lifeanalytics.it) website.

### **31. REPORTING BREACHES OF THE CODE OF ETHICS**

In order to ensure the effectiveness of this Code of Ethics and in compliance with the provisions of Legislative Decree No. 24/2023 (“Whistleblowing Decree”), the companies of the Lifeanalytics Group have adopted their own reporting channel, accessible through the following link <http://cerbahealthcare.ethicspoint.com/> and appointed a Whistleblowing Manager, with the task of managing reports of unlawful conduct, including violations of this Code of Ethics.

Reports will be received and managed by the Reporting Manager and shared with the Supervisory Board (where applicable) for those related to Decree 231.

The procedure for the management of internal reports, i.e. the formalities and procedures for their collection, management and filing, as well as the information flows between the appointed Whistleblowing Manager and the other corporate bodies/functions which, depending on the type of report, may be involved in its management, are governed by the Whistleblowing Procedure published on the website [www.lifeanalytics.it](http://www.lifeanalytics.it), the details of which are fully referenced in this document.

### **32. SANCTIONING PROCEDURES AND DISCIPLINARY POLICY**

Violation of the provisions set out in this Code of Ethics constitutes a breach of the obligations arising from the employment relationship and/or a disciplinary offence, carrying all associated legal consequences, including

potential impacts on employment retention.

The Group companies are dedicated to administering sanctions that are proportionate to the breaches of the Code, applied consistently and impartially, and in accordance with the relevant labour relations regulations. In particular, in the event of violations of the Code of Ethics committed by employees, the relevant measures will be taken and the relevant sanctions will be imposed in full compliance with Article 7 of Law 300 of 20 May 1970, current legislation and the provisions of collective bargaining.

Adherence to the provisions of this Code of Ethics, which is formalised in contractual agreements or in the general terms and conditions through the inclusion of a specific clause, is a fundamental obligation for third parties (suppliers, appraisers, business partners, etc.) engaged in business relationships with the Group. Consequently, as far as third parties are concerned, a breach of the provisions of this Code will result in the termination of existing contracts with those parties, without affecting the right to seek compensation for damages caused by such actions.

If the Directors fail to comply with the provisions of the Code, the Board of Directors will be notified to take suitable actions against those responsible for the breach, in line with the authorities granted by law and/or the Articles of Association.

