



Medical Devices for Anaesthesia and Resuscitation
Medical Devices for Anaesthesia and Intensive Care

DIMAR S.P.A. a Socio Unico
Via G. Galilei, 6 - 41036 Medolla - Modena - ITALY
Tel. 0535-611336 Fax. 0535-611328

CODE OF ETHICS



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CODE USER GUIDE

What is the Code?

The Code is a document, approved by the Board of Directors of Dimar S.p.A. (hereinafter, 'Dimar'), that summarises the principles of conduct in the Company's business, as well as the respective obligations and responsibilities of directors, employees, *partners* and collaborators.

It is a key element in ensuring effective prevention and detection of violations of laws and regulations applicable to its activities.

It is divided into:

- Foreword, outlining the organisation's ethical vision and how it wants to achieve its *mission*;
- General provisions, which define the addressees of the Code, the obligations of the company and its staff, the value to be given to the Code vis-à-vis third parties, the contractual value of the Code;
- Corporate ethical principles, which define the reference values in activities;
- Rules and *standards of* conduct, which define guidelines that must guide, on the basis of ethical principles and beyond compliance with the law, the behaviour of all personnel, with regard to those with management and control responsibilities;
- Implementation and control procedures, which describe the mechanisms and bodies set up to implement, monitor and disseminate respect for and compliance with the Code and to ensure that it is constantly updated;
- Disciplinary mechanisms, which provide for sanctions related to cases of violation of the rules of conduct set out in the code.

Where can the Code be found?

The Code may be consulted by all addressees in a place accessible to everyone in the company, in the most appropriate manner and in accordance with local rules and customs. The Code can be consulted on the Company's website and intranet from which it can be freely downloaded.

Copies of the Code may also be requested from the Management.

Can the Code be amended?

The Code is subject to review by the Dimar Board of Directors.

The review activity takes into account, among other things, constructive comments and suggestions received from directors, other employees and third parties, regulatory developments and established international practices, as well as experience gained in the application of the Code itself. Any changes to the Code introduced as a result of this review activity are published and made available in the manner described above.

SECTION I - FOREWORD

C.F.C. and VAT no. 02779340369 Cap. Soc. 100.000,00 euro i.v. - R.E.A. MO-330016

Management and coordination HMC Premedical S.p.A.



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IDENTITY

Dimar was founded in 2002.

A journey that began with the desire to provide innovative devices for respiratory support in Non-Invasive Ventilation.

After the first years characterised by hard work, dedication and a relentless pursuit of excellence with the first patents obtained, Dimar today has rapidly gained an international reputation for its cutting-edge solutions and a healthcare practitioner-centred approach aimed at patient well-being.

In fact, Dimar continues to expand its product line and its name has become synonymous with trust and reference in the sector, with customers who appreciate its constant commitment to the pursuit of quality and innovation.

In the course of Dimar's history, it is worth mentioning the year 2012.

In May 2012, an earthquake devastated the companies in Emilia, causing serious damage to the area's infrastructure and interrupting all work activities. A difficult moment, during which only the determination and constant work of the entire company made it possible to recover and restore operations in just a few days.

In 2020, Dimar faces the global COVID-19 pandemic as a major challenge.

The demand for medical devices for ventilation increases suddenly and exponentially. Despite the fact that supply lines are being cut, Dimar once again manages to adapt quickly by increasing daily production by a factor of 10 and pushing deliveries to the limit to safeguard patients suffering from acute respiratory failure caused by Coronavirus.

In 2023, Dimar joined HMC Premedical spa.

An acquisition capable of bringing new opportunities and resources to the group, accessing new markets and continuing its growth.

The group's shared knowledge, expertise and resources will accelerate Dimar's growth and consolidate its position as a leader in the field of Non-Invasive Ventilation.

CONTENTS

With this Code of Ethics, Dimar emphasises its ethical and legal responsibility with principles and values assumed by the Company's employees in the conduct of business and company activities.

The code also represents the set of rights, duties and responsibilities that the Company intends to adopt from an ethical-behavioural standpoint, in order to adapt its structure to the requirements of Legislative Decree 231/2001 (hereinafter, for the sake of brevity, referred to as the 'decree'), and to



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set out the lines of conduct within and outside the Company to be followed in the realisation of corporate objectives: it is therefore a directive whose rules of conduct must be kept in mind in everyday work by everyone and which presupposes, *first and foremost*, compliance with the laws and regulations in force, including those internal to the Company.

It aims to recommend, promote and set benchmark ethical '*standards*', while prohibiting certain behaviours, beyond and independently of what is provided for by law.

The Company conducts its business in compliance with EU, national and international regulations in force in all the countries in which it operates, rejecting corruption and any illegal practice; particular attention is paid to the laws and ethical and behavioural rules adopted by Assobiomedica (hereinafter also Confindustria Dispositivi Medici) in order to promote transparent and fair behaviour in the health sector.

No conduct contrary to the laws in force, to this Code of Ethics or to the internal rules and regulations, put in place by the corporate governing bodies, the company management and - in general - by all employees and collaborators in the performance of their duties and assignments, even if motivated by the pursuit of an interest of the Company, may be considered justified.

Its occurrence leads to sanctions against those responsible.

This Code is desired and approved by the Company's top management; therefore Dimar hopes for the spontaneous sharing, adherence and dissemination of the Code and prescribes its observance and application by any person operating on behalf of the Company or coming into contact with the same, constituting the inspiring principle and the foundation of all that is envisaged in the Model adopted pursuant to art. 6 of Legislative Decree 231/2001, which Dimar undertakes to apply, strengthen and continuously develop.



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SECTION II - MODALITIES OF APPLICATION

ARTICLE 1 - ADOPTION AND UPDATING

This Code of Ethics was adopted by the Administrative Body of the Company by resolution on 30 December 2021 and revised on 11 December 2023.

The Code is subject to periodic review by Dimar's Board of Directors; the review activity will take into account the contributions received from the addressees of this Code, any internal and external changes in the Company, regulatory developments and the most established national and international practices, as well as the experience gained in applying the Code itself.

All this in order to ensure full consistency between the guiding values assumed as the Company's fundamental principles and the conduct to be adopted according to the provisions of this Code.

Dimar's Code of Ethics is based on the Confindustria Guidelines for the construction of organisation, management and control models pursuant to legislative decree no. 231 /2001, updated June 2021, on the Confindustria Dispositivi Medici (formerly Assobiomedica) Guidelines for the construction of organisation, management and control models pursuant to legislative decree no. 231/2001, updated 2013, on the CNDCEC Guidelines of December 2018 as well as on the Confindustria Dispositivi Medici (formerly Assobiomedica) Code of Ethics updated September 2020.

ART. 2 - ADDRESSEES

The addressees of the Code of Ethics, for whom the rules contained therein are binding, are:

- The Board of Directors;
- Partners and special attorneys;
- The corporate control bodies (Supervisory Board; Board of Auditors);
- Those responsible;
- Employees with permanent or fixed-term employment contracts;
- External collaborators;
- Other persons with whom the company has contractual relations for the achievement of the company's objectives, involving the performance of work, including temporary work, or the performance of activities in the name of and on behalf of the company, such as to establish a fiduciary relationship with the latter.

The principles and *standards of* conduct set out below must inspire all corporate behaviour; in no case may the pursuit of Dimar's interest justify conduct contrary to the laws in force or to the rules of the Code of Ethics.

Each addressee must provide professional contributions appropriate to the responsibilities assigned, acting in such a way as to protect the prestige and image of the Company. Addressees must avoid situations and/or activities that could lead to conflicts of interest with those of the Company or that



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could interfere with their ability to make impartial decisions, in safeguarding the Company's best interests.

Those who in various capacities are or will be working with Dimar are obliged to respect the Code of Ethics.

Compliance with the rules and provisions contained in the Code of Ethics is an integral and essential part of the contractual obligations arising from employment relationships, for employees, and from contractual regulations, for non-employee collaborators.

Violation of the aforementioned rules will constitute a breach of the obligations arising from the employment or collaboration relationship, with all consequences of law or contract.

ART. 3 - THE OBLIGATIONS OF THE ADDRESSEES

The set of ethical principles, values and behavioural rules set out in the Code of Ethics and the Code of Conduct must inspire the activities of all those who operate, internally or externally, in Dimar's sphere of action (hereinafter 'internal and external collaborators').

All the actions, operations, negotiations and, in general, the conduct of the addressees in the performance of their work must be marked by the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect, as well as being open to verifications and controls in accordance with the rules in force and internal procedures.

All activities must be carried out with commitment and professional rigour.

Each addressee must provide professional input appropriate to the responsibilities assigned and must act in such a way as to protect Dimar's prestige.

Recipients undertake to actively cooperate in verification activities, in accordance with the applicable rules and internal procedures.

Each addressee must make professional contributions appropriate to the responsibilities assigned and must act in such a way as to protect the prestige and image of the company.

In particular, by way of example:

- The members of the Board of Directors are guided by the principles of the Code of Ethics when setting business objectives;
- The members of the Control Body ensure the respect and observance of the contents of the Code of Ethics and the Code of Conduct in the performance of their duties;
- The members and special attorneys give concrete expression to the values and principles contained in the Code of Ethics and the Code of Conduct, taking responsibility internally and externally and strengthening trust, cohesion and team spirit;
- Employees, with due respect for the law and regulations in force, adapt their actions and conduct to the principles, objectives and commitments set out in the Code;
- Employees on an ongoing basis (agents, consultants, etc.), suppliers and business *partners* shall conform their conduct to the Code.



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All addressees are required to observe and, to the extent of their competence, enforce observance of the principles contained in the Code of Ethics and in the Code of Conduct: under no circumstances does the claim of acting in the interest of Dimar justify the adoption of conduct in conflict with those set out herein and, in general, with laws, regulations and disciplines.

Dimar, while taking into account the differences that exist from a regulatory, social, economic and cultural point of view, is committed to ensuring timely internal and external dissemination of the Code of Ethics and the Code of Conduct through:

- Distribution to all members of corporate bodies and employees;
- Posting in a place accessible to all and publication on the company *intranet*;
- Made available to agents, consultants, suppliers and business *partners* on the website.

ARTICLE 4 - VALIDITY OF THE CODE VIS-À-VIS THIRD PARTIES

In relation to third parties, all company personnel - by reason of the responsibilities assigned to them - shall undertake to

- Provide adequate information about the commitments and obligations imposed by the code;
- Demanding compliance with obligations that directly affect their business;
- Implement appropriate internal and, if within its competence, external initiatives in the event of failure by third parties to comply with the Code.

ARTICLE 5 - CODE OF ETHICS AND MODEL

The Company's Organisation, Management and Control Model conforms to the prescriptions contained in this Code of Ethics, which forms an integral part of it.

In this respect, in fact:

- The Code of Ethics is voluntarily adopted by the Company and expresses values and principles of conduct recognised as its own on which to call the observance of all addressees, constituting the first instrument for the prevention of any offence;
- The Organisation, Management and Control Model *pursuant to* Legislative Decree 231/2001, inspired by the principles of the Code of Ethics, responds to specific legal requirements, in order to prevent the commission of particular types of offences.

ART. 6 - TRAINING ACTIVITIES

The Management, possibly availing itself of the collaboration of external consultants, shall include in the annual training plan initiatives aimed at promoting the knowledge of the values of the rules of conduct referred to in this Code of Ethics.

A training programme on the contents of the Code of Ethics is provided for new employees as part of induction courses.



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Training on the Code of Ethics is usually carried out in conjunction with that on Model 231, adopted by the company.



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SECTION III - ETHICAL PRINCIPLES

In the course of its activities, the Company has identified certain values that guide the conduct of all persons acting on its behalf, in order to ensure fairness in the conduct of business and corporate activities, and to protect the company's assets and image.

All actions, operations and negotiations and, in general, the conduct of the "addressees" of this Code in the performance of their work must be marked by the principles of honesty, fairness, integrity, transparency, legitimacy, clarity and mutual respect.

Everyone, within the scope of the responsibilities related to their role, must provide the highest level of professionalism and commitment to appropriately meet the needs of customers and internal users, contributing concretely to the achievement of the company's objectives and the respect of the stated values.

All the addressees of this Code of Ethics are required to adapt their conduct to the provisions and principles of this document, and not to take initiatives that conflict with it.

ARTICLE 7 - LEGALITY

The Company, in carrying out its activities, acts in compliance with the laws and regulations in force in the territories in which it operates, with the Code of Ethics and with the company's internal rules. The Company is also committed to requiring compliance with internal regulations and/or all laws by its staff, collaborators, customers, suppliers and any other third parties with which it has a legal relationship.

Dimar absolutely prohibits any action, whether by individuals or in the form of an association, that could in any way support, promote or simply favour criminal or mafia-type conduct.

ART. 8 - HONESTY, FAIRNESS AND INTEGRITY

Dimar establishes relations with *stakeholders* in accordance with the rules of fairness, loyalty, cooperation, mutual respect and integrity.

Under no circumstances may the pursuit of the company's interest justify improper conduct.

Dimar is concretely committed to trying to conduct its business with integrity. Integrity is an important element of the company's assets and a strong guarantee of the company's civil commitment to all the people who work in it, to all its customers and to all its *stakeholders* in general.

The principle of honesty requires the Management, all employees and collaborators of Dimar to refrain from any behaviour that could be, or even appear to be, included in the following definition of corruption: offering, promising, providing, accepting or requesting an undue advantage of any value (which may be economic or non-economic), directly or indirectly, and regardless of location, in violation of the law in force, as an incentive or reward for a person to act or omit to act in relation to the performance of the tasks entrusted to that person.



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ARTICLE 9 - CONFIDENTIALITY

As part of their obligations to the Company, all recipients must safeguard Dimar's confidential information, using it only within the Company in its exclusive interest.

Employees undertake to maintain the secrecy of confidential information of which they become aware in the course of their work and not to disclose it outside the scope of their duties.

Confidential information may include, but is not limited to, trade secrets and *know-how*, inventions, programmes and strategies for both *marketing* and sales, customer and supplier information, pricing and purchasing strategies, financial data, computer *software*, data, formulas, compositions, techniques, products.

The *know-how* and intellectual property developed by Dimar constitute a fundamental resource that every director, *manager*, other employee and other recipient of the Code must protect. Indeed, in the event of improper disclosure of such *know-how* and intellectual property, the Company could suffer damage to both its assets and image.

Therefore, all directors, shareholders, special attorneys, other employees and other addressees of the Code are required to

- Do not disclose to third parties information concerning the Company's technical, technological and commercial knowledge, except in cases where such disclosure is required by law or other regulatory provisions or where it is expressly provided for in specific contractual agreements with which the counterparties have undertaken to use such information exclusively for the purposes for which it is transmitted, and to maintain its confidentiality;
- Refrain from using the information for one's own benefit or for the benefit of persons outside the Company;
- Ensure that confidential information is only accessible with a *password* or, alternatively, stored in a secure location.

The obligations of confidentiality set out in the Code remain even after the termination of the employment relationship : with the termination of the employment relationship also comes the obligation to hand over to one's direct superior all documents and other materials containing confidential information about Dimar.

The Company requires that the information obtained not be used for its own interests to gain undue advantage in a manner contrary to the law.

The obligation of confidentiality on the information acquired is also imposed on persons with whom the Company has contractual or other relations, by means of specific contractual clauses or the request to sign confidentiality agreements.

Every addressee of this Code of Ethics shall therefore:

- Only acquire and process data necessary for the performance of its functions;
- Acquire and process data only within specific procedures;
- Store the data in such a way that access by unauthorised persons is prevented;

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- Disclose the data themselves within the framework of pre-established procedures and/or with the explicit authorisation of the competent functions and, in any case, after having verified their disclosure;
- Associate the data in such a way that any person authorised to have access to them can easily draw as accurate, comprehensive and truthful a picture of them as possible.

If the addressees should unduly become aware of confidential information, or of disclosures by persons bound by secrecy, they are obliged to contact the Management.

In turn, Dimar is committed to respecting the confidentiality of the personal information of its employees and collaborators, internal and external; access to personal data is in fact limited to duly authorised persons who have a real need to know.

Employees and authorised associates who have access to personal information shall observe the highest principles of confidentiality with regard to its use.

ARTICLE 10 - TRANSPARENCY

Dimar has always endeavoured to ensure that with regard to its external contacts its actions are authorised, verifiable, recorded, legitimate, consistent and congruous.

Corporate bodies, shareholders, special attorneys, and employees must behave correctly and transparently in the performance of their duties, especially in relation to any requests made by shareholders, corporate bodies, supervisory bodies and public authorities.

An attitude of utmost helpfulness and cooperation must be guaranteed towards such persons.

Dimar's corporate bodies, shareholders, special attorneys and employees are obliged to ensure the truthfulness, authenticity and originality of the documents and information provided in the performance of their duties.

ARTICLE 11 - ABSENCE OF CONFLICTS OF INTEREST

Conflict of interest situations are carefully avoided in all activities, understood as those situations in which a member of corporate bodies or an employee has an interest, including a personal one, that conflicts with the interest pursued by Dimar.

Situations in conflict with this rule must be immediately communicated to the person in charge, if any, or to the Supervisory Board, and the person in conflict must refrain from performing any act.

All corporate bodies, department heads and employees must ensure that every *business* decision is taken in the interest of the Company; they must therefore avoid any situation of conflict of interest, which could affect their independence of judgement and choice.

ARTICLE 12 - IMPARTIALITY

Dimar respects the fundamental rights of people by protecting their moral integrity and guaranteeing equal opportunities.



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In internal and external relations, behaviour with discriminatory content based on age, gender, sexuality, health, race, nationality, political opinions and religious beliefs is not permitted.

The company sees diversity as an opportunity in terms of innovation and the development of dialogue and the exchange of ideas, opinions and experiences.

ART. 13 - WORK ETHICS AND PROTECTION OF THE INDIVIDUAL

The Company guarantees the physical integrity and moral personality of its employees, working conditions that respect individual dignity and a safe and healthy working environment, in full compliance with current legislation on accident prevention and protection of workers in the workplace.

The Company disassociates itself from and condemns any conduct aimed at the illegal entry of a foreigner into the territory of the Italian State or into another State of which the person is not a citizen or not a resident, in order to make a profit, even indirectly.

It also guarantees a workplace free from discrimination based on gender, class, religion, race, nationality, disability, sexual orientation, political opinion, trade union membership, political affiliation and age.

Furthermore, actual or potential workers should not be subjected to *medical* examinations/pregnancy tests that could be used in a discriminatory manner.

The competent functions also ensure that the working environment is free of prejudice : each individual must be treated with respect, without any intimidation and with respect for his or her moral personality, avoiding undue conditioning and inconvenience.

The Company also attaches primary importance to the protection of minors and to the repression of exploitative conduct of any kind perpetrated against them: it is therefore forbidden and completely extraneous to the Company to make improper use of IT tools, specifically aimed at perpetrating or even only facilitating possible conduct relating to the crime of child pornography, possibly also involving virtual images.

The company also pays special attention to women's work, working conditions and hours, and social security, social security and salary treatments.

The working week, including overtime, shall not exceed the number of working hours permitted by law.

Workers must have at least one day off per seven-day week.

There shall be no use of forced, bonded or indentured labour or involuntary prison labour: any work performed shall be voluntary , and workers shall be free to terminate employment on reasonable notice.

The Company condemns the exploitation, in any form, of workers.

The company firmly opposes the phenomenon of 'caporalato'.



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The Company does not use child or underage labour, i.e., it does not employ persons younger than the minimum age stipulated by the laws in force in the country in which the work is performed and, in any case, younger than fifteen years of age, without prejudice to the exceptions expressly provided for by international conventions and local legislation.

The Company considers the exploitation of forced or compulsory labour unacceptable.

Regular apprenticeship programmes that comply with all laws and regulations can be used.

Workers under the age of eighteen must not perform dangerous tasks and night work may be prohibited for them in view of school requirements.

The Company applies labour legislation and the provisions of national and second-level collective bargaining.

Any employee who, in the performance of his or her work activity, becomes aware of conduct that may favour the injury of personal safety, constitute exploitation or reduction to a state of subjection of the person, or conduct aimed at discrimination, must report the incident to the function in charge of human resources management and/or to his or her superior as well as to the Supervisory Board.

The Company also requires its suppliers and *partners* to comply with current labour legislation on time.

In hierarchical relationships, or those involving disparate positions, the exercise of authority must be exercised with fairness, respect and restraint, avoiding any abuse.

In particular, any exercise of power detrimental to the dignity and autonomy of employees and *partners* must be avoided, and choices of work organisation must always safeguard the value of individual contributions.

Dimar develops an active policy to ensure gender equality and to counteract harassment behaviour in the workplace:

- Any harassing behaviour, such as those related to race, gender or other personal characteristics;
- The creation of an intimidating, hostile or isolating working environment towards individuals or groups of workers;
- Violation of the dignity of the person to whom such harassment or conduct is directed;
- Unwarranted interference with the performance of others' work;
- The obstruction of others' individual job prospects for mere reasons of personal competitiveness;

The Company does not tolerate sexual harassment, meaning the subordination of the possibility of professional growth or other advantage to the provision of sexual favours and any other behaviour with sexual connotations or based on gender, undesirable by either party and damaging to the dignity of the person.

The Company ensures working conditions that respect the rules of good manners, acting so that no episodes of intimidation, *mobbing* or *stalking* occur in the working environment.



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The Company requires each recipient to personally contribute to maintaining a work environment that respects the sensitivities of others.

In the course of work and in the workplace, it is therefore prohibited to

- Serving under the influence of alcohol, drugs or substances of similar effect;
- Consuming or disposing of drugs for any reason in the course of work;
- Smoking.

All senior management and employees of the Company shall use the Company's assets and resources to which they have access or which are in their custody in an efficient manner, solely for the purpose of achieving the Company's goals and objectives, and shall also use such assets in a manner that protects their value. Furthermore, everyone is responsible for protecting such assets and resources against loss, theft and unauthorised use or disposal. Any use of such assets and resources that may be in conflict with the interests of the Company or that may be dictated by professional reasons unrelated to the employment relationship is prohibited.

It is also forbidden to install and use unlicensed programmes on company computers.

ARTICLE 14 - SAFETY, HEALTH PROTECTION AND WORKING CONDITIONS

Dimar considers the environment and nature to be fundamental values and the heritage of all, to be protected and defended; to this end, the company is committed to contributing to the development and well-being of the community in which it operates, pursuing the objective of guaranteeing the safety and health of employees, external collaborators, customers and the communities concerned.

The focus on full and complete compliance with all health and safety legislation has resulted in the development of the DVR (Risk Assessment Document) through which safety-related risks have been analysed and assessed and actions defined.

The Management ensures a suitable working environment in compliance with current regulations in the field of health and safety in the workplace, which can positively influence the *performance* and satisfaction of users and staff performance.

It also ensures that the company's infrastructure (offices, equipment) is capable of enabling the realisation of services in accordance with the specifications and satisfying the stakeholders. It ensures adequate space, well-maintained and efficient equipment and facilities, communication and information systems.

In the workplace, they are insured:

- Environments for breaks and meetings and moments of social interaction;
- Participation of employees in the life of the company in decisions and choices that may affect the working environment.

The company undertakes to act scrupulously in compliance with current occupational safety and hygiene regulations



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By complying with the rules, the Company's senior management and employees contribute to ensuring health and safety in the workplace.

These principles and criteria can be identified as follows:

- Health and safety risk assessment;
- Prevention planning, aiming at a complex that coherently integrates the technical and production conditions of the Company, as well as the influence of environmental factors and work organisation;
- Elimination of risks and, where this is not possible, minimisation of risks in relation to knowledge gained from technological progress;
- Evaluation of all risks that cannot be eliminated;
- Reducing risks at source;
- Respect for the principles of ergonomics and health and safety in the workplace in the organisation of work, in the design of workplaces and the choice of work equipment, in the definition of work and production methods, particularly with a view to reducing the health effects of monotonous and repetitive work;
- Replacing what is dangerous with what is not dangerous or is less dangerous;
- Limitation to a minimum of workers who are, or may be, exposed to risks;
- Compatible with the type of business activity, the limited use of physical, chemical and biological agents in the workplace;
- Planning of measures deemed appropriate to ensure the improvement of security levels over time, including through the adoption of codes of conduct and good practices;
- Priority of collective protection measures over individual protection measures;
- Information, training, consultation and participation of workers, or their representatives, on matters concerning health and safety at work;
- Emergency measures to be implemented in the event of first aid, fire fighting, evacuation of workers and serious and immediate danger;
- Hygiene and health control measures for workers according to specific risks;
- Use of warning and safety signs;
- Removal of a worker from exposure to risk for health reasons relating to his or her person and, where possible, assignment to another task;
- Adequate communication and involvement of the Addressees, within the limits of their respective roles, functions and responsibilities, in matters related to health and safety at work; in this perspective, particular importance is attached to the prior consultation of stakeholders on the identification and assessment of risks and the definition of preventive measures;
- Adequate education and training of the Addressees, within the limits of their respective roles, functions and responsibilities, with respect to issues related to health and safety at work, in



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order to ensure awareness of the importance of the compliance of actions with the model and of the possible consequences of conduct that deviates from the rules dictated by it; from this perspective, particular importance is attached to the education and training of persons performing tasks that may affect health and safety at work;

- Constant monitoring of the premises and related facilities - whether owned or rented or in any way at one's disposal - even beyond legal obligations and the prevention of risks considered imminent;
- Regular maintenance of rooms, equipment, machines and installations, with particular regard to safety devices in accordance with the manufacturers' instructions;
- Clear definition of the chain of responsibilities, in line with the provisions of Legislative Decree No. 81/2008.

ARTICLE 15 - COMMITMENT TO SUSTAINABLE DEVELOPMENT AND ENVIRONMENTAL PROTECTION

All production activities are managed in compliance with current environmental regulations (among others, the Consolidated Environmental Act, Legislative Decree 152/2006).

The focus on full and complete compliance with all environmental legislation has resulted in obtaining the 14001:2015 certification.

Consistent with its line of attention to environmental and territorial issues, Dimar undertakes, in particular, to

- Take measures to limit - and, if possible, eliminate - the negative impact of economic activity on the environment;
- Plan careful and constant monitoring of scientific advances and regulatory developments in the environmental field;
- Conduct business with the utmost respect for the protection of water, air, soil, subsoil, ecosystems, biodiversity, including agricultural biodiversity, flora and fauna;
- To disseminate and consolidate a culture of environmental protection and pollution prevention among all its function managers, employees and *partners*, developing risk awareness and promoting responsible behaviour by all employees;
- Do not carry out any activity related to environmental protection in violation or absence of the prescribed authorisation;
- Promptly and without delay put in place the activities of recovery and restoration of the state of the places in the presence of situations harmful to the environment in general;
- Outside permitted cases, do not kill, capture or possess specimens belonging to a protected wild animal species;



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- Not importing, exporting, transporting, possessing, using for profit, buying, selling, displaying or holding for sale or for commercial purposes specimens indicated in EC Regulation no. 338/97 in the absence of or in breach of the prescribed certifications or permits; not to offer for sale or otherwise dispose of the aforementioned specimens without the prescribed documentation; not to possess live specimens of mammals and reptiles of wild species and live specimens of mammals and reptiles from captive breeding that constitute a danger to public health and safety;
- Not to dispose of, receive, transport, import, export or procure for third parties, possess, transfer, abandon or unlawfully dispose of high-level radioactive material;
- Promptly and without delay put in place the activities of recovery and restoration of the state of the places in the presence of situations harmful to the environment in general;
- Outside permitted cases, do not destroy, take or keep specimens belonging to a protected wild animal species;
- Outside permitted cases, do not destroy, take or possess specimens belonging to a protected wild plant species;
- Do not discharge industrial waste water without a permit, or after the permit has been suspended or revoked;
- Do not cause the pollution of soil, subsoil, surface water or groundwater by exceeding the risk threshold concentrations and, if necessary, carry out remediation;
- When preparing a waste analysis certificate, provide the correct information on the nature, composition and chemical and physical characteristics of the waste;
- Ensure maximum transparency towards the Authorities and towards the Company's stakeholders, including local communities involved in projects with environmental impact;
- Constantly updating technological systems to ensure the reduction of polluting factors;
- Do not exceed the air quality emission limit values stipulated in current authorisations, prescriptions and legislation;
- Minimising the direct and indirect environmental impacts caused by the operation of production facilities, while reducing the use of natural resources (electricity, water, gas) and raw materials during the execution of works at the Company's sites;
- Reducing the hazardousness of the substances used;
- Adopt eco-efficient technologies;
- Reduce waste production, preferring separate collection in all cases;
- Prepare a waste analysis certificate, providing the correct information on the nature, composition and chemical and physical characteristics of the waste;
- Do not illegally traffic in waste.

The interest of the company can never prevail over the integrity of the primary environmental asset.

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The company also demands respect for environmental protection from its suppliers, so that actions can be considered truly sustainable.

ART. 16 - TRANSPARENCY OF ACCOUNTING AND CORPORATE OPERATIONS; MANAGEMENT OF TAX COMPLIANCE

Dimar is aware of the importance of transparency, accuracy and completeness of corporate books and communications, accounting records, financial statements and interim situations, prospectus reports, all economic, equity and financial documents, as well as anything else required for the functioning of the Company, by legal provisions and corporate organisational procedures.

It strives to have an administrative-accounting system that is reliable in correctly representing management events and in providing the tools to identify, prevent and manage, as far as possible, risks of a financial and operational nature, as well as fraud to the detriment of the Company.

Every operation or transaction carried out in the name of and on behalf of Dimar must be carried out exclusively by the personnel in charge and must be authorised, verifiable, legitimate, congruous, consistent, correctly and promptly recorded, registered in the company accounting system, according to the criteria indicated by law, on the basis of applicable accounting principles, and in full compliance with existing company procedures.

Administrative and accounting activities are carried out with the use of up-to-date tools and computerised procedures that optimise efficiency and correctness.

Accounting records must make it possible to

- Produce accurate and timely economic, asset and financial statements;
- Provide the tools to identify, prevent and manage, as far as possible, fraud and financial and operational risks;
- Carry out controls that reasonably ensure that the value of assets is preserved and that losses are protected.

Each record must reflect exactly what is shown in the supporting documentation - easily retrievable and ordered according to logical criteria and in accordance with company regulations and procedures

- so as to enable

- Easy and timely bookkeeping;
- The timely determination of the underlying characteristics and motivations;
- The identification of different levels of responsibility, allocation and segregation of duties;
- The accurate reconstruction of the operation.

Dimar provides the utmost cooperation at all levels, providing correct and truthful information regarding the company's activities, assets and operations, as well as regarding any reasonable request received from the competent bodies.



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Conduct aimed at altering the accuracy and truthfulness of the data and information contained in financial statements, reports or other corporate communications required by law and addressed to shareholders and the public is condemned.

All persons called upon to draw up the aforementioned deeds are required to verify, with due diligence, the correctness of the data and information that will then be incorporated for the drawing up of the aforementioned deeds.

If they become aware of any omissions, falsifications or negligence in the accounts or in the documents on which the accounting records are based, they are obliged to communicate the facts to the superior body or, alternatively, to the competent function.

If the report is unsuccessful, or if the person feels uncomfortable approaching his or her direct superior, he or she may refer the matter to the Supervisory Board.

ARTICLE 17 - TAX RISK MANAGEMENT

A correct management of the tax variable and the correct fulfilment of the obligations - provided for by law - of participation in public spending are fundamental for Dimar in order to contribute to the creation/maximisation of value for all its stakeholders, in particular for employees and collaborators, shareholders and institutional stakeholders.

In the performance of all activities, Dimar promotes and implements a tax management aimed at minimising the risk of operating in violation of tax regulations, or contrary to the principles and/or aims of tax systems, also in order to prevent disputes in tax matters, maintaining an attitude of transparency and dialogue with the tax authorities of the countries in which it operates.

The company does not adopt aggressive tax-saving policies.

Dimar applies a fiscal policy aimed at:

- Ensure the correct and timely fulfilment of tax obligations and, more generally, compliance with the tax regulations applicable in the countries in which it operates;
- Ensure proper and efficient management of taxation by avoiding, within legitimate limits, double taxation and/or an unjustifiably excessive tax burden.

In this respect, Dimar's tax policy is guided by the following principles:

- Corporate culture: Dimar is committed to fostering the dissemination and development over time of a corporate culture marked by the management and prevention of tax risk, as well as marked by the principles of honesty, fairness and compliance with tax regulations;
- Tax compliance: in implementing its business and financial strategies, Dimar is committed to formal and substantive compliance with the applicable laws, regulations and provisions in the geographical areas in which it operates, also in the light of relevant practice and case law;
- Tax risk management: Dimar adopts tools and procedures aimed at facilitating the timely identification and active management of tax risks, which could also originate in the processes



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managed on a daily basis by line functions, and not only from the mere management of tax compliance;

- Management of relations with tax authorities: in managing its relations with Italian and foreign tax authorities, Dimar is committed to maintaining a collaborative and transparent attitude, to ensure constructive relations and minimise possible disputes.

ARTICLE 18 - PROTECTION OF *PRIVACY*

The Company is sensitive to the *privacy* of the recipients, through the adoption of the most appropriate precautions and security measures regarding the processing of sensitive data as set out in Legislative Decree No. 196/2003 and European Regulation No. 679/2016 (GDPR).

Any investigation into the opinions, preferences, personal tastes and, in general, the private life of the addressees is prohibited.

It is also forbidden, subject to specific exceptions provided for by law, to disseminate sensitive data without the prior consent of the person concerned.

Should any activities emerge that are deemed non-compliant with the privacy legislation or *policies* adopted by the Company on the matter, or that do not comply with security *standards*, an appropriate report must be made immediately to the competent body.

ARTICLE 19 - ETHICS OF SCIENTIFIC INFORMATION

Scientific information is the main communication activity of the Society; it must be accurate, balanced, correct, objective, unambiguous or misleading, and documented.

Information must be realised and disseminated in compliance with the relevant provisions.

ART. 20 - QUALITY ASSURANCE

Dimar bases its reputation on the highest quality of its medical devices, services and therapies, so that healthcare professionals are able to provide the best possible patient outcome.

The company's commitment is not limited to meeting the quality and safety *standards* prescribed by law, but goes beyond this wherever possible to ensure increasingly effective products, services and therapies.

Dimar takes appropriate precautionary measures to ensure compliance with quality requirements and timely consideration and resolution of any quality issues

Production controls are designed and implemented to ensure compliance with internal standards and applicable laws.

Each recipient undertakes to contribute to the maintenance of these *standards* by providing high quality services and being fully aware of the applicable laws and regulations relating to their area of responsibility, as well as to actively participate in the specific training programmes set up by the Company, which cover a wide range of activities.



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Employees are also encouraged to diligently identify and prevent practices that could jeopardise the quality of products as well as their safety or compliance with laws.

Dimar employees are then obliged to:

- Observe internal protocols concerning customer relationship management;
- To supply promptly, efficiently and courteously - and always within the limits of contractual agreements - high quality products;
- Adhere to the truth in advertising or commercial communications.

In order to meet the above-mentioned requirements, Dimar has been awarded the UNI EN ISO 13485:2016 certification, which guarantees full compliance with legal requirements - both national and international - relating to product quality and safety, thus meeting the expectations of *partners* and customers.



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SECTION IV - THE CRITERIA FOR CONDUCT

ARTICLE 21 - RELATIONS WITH STAFF

Dimar recognises the centrality of human resources as the main success factor of any company, within a framework of mutual loyalty and trust between employer and employee.

The Company identifies and selects employees with absolute impartiality, autonomy and independence of judgement, in full compliance with current legislation and internal procedures.

The selection process exclusively takes into account objective elements such as competence, experience and education.

All staff are employed under a regular employment contract and work is carried out in accordance with the industry's collective bargaining legislation and social security, tax and insurance regulations. When the employment relationship is established, staff receive clear and specific instructions on regulatory and remuneration aspects: the company guarantees in any case fair, decent remuneration in compliance with the provisions of the CCNL and supplementary contracts.

Any wage deduction must comply with local legislation.

Dimar is committed to fostering the continuous improvement of the professionalism of its employees, on the basis of their skills and professional qualifications, without any discrimination or any form of favouritism; to this end it considers the meritocratic criterion, professional competence, honesty and fairness of behaviour, privileged foundations for the adoption of any decision concerning the career and any other aspect relating to the employee.

The Company is also committed to training all employees, encouraging their participation in refresher courses and training programmes.

The Company does not carry out dismissals except in cases permitted by law and by the CCNL, and in any case never for discriminatory reasons.

The Company also requires its suppliers and *partners* to comply punctually with current labour legislation, with particular attention to child labour, women's work, working conditions and hours, and social security, social security and wage treatments.

ARTICLE 22 - RELATIONS WITH [INTERNATIONAL OPERATORS](#)

Dimar is committed to ensuring that relations with parties operating internationally, including those of a commercial nature, are characterised by and take place in full compliance with the law and regulations in force.

Dimar undertakes to take all necessary precautions to verify the reliability of international operators, as well as the legitimate origin of the capital and means used by them in their relations with the Company.



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The Company guarantees cooperation, fairness and transparency, to the Authorities, including foreign ones, that may request information or carry out investigations concerning its relations with international operators.

ARTICLE 23 - RELATIONS WITH CUSTOMS AUTHORITIES

Dimar is attentive to relations with customs authorities and compliance with the laws governing customs relations, so as not to compromise the integrity and image of the Company in any way.

The company guarantees cooperation, fairness and transparency in the fulfilment of *import/export* operations, customs procedures and the payment of customs duties.

Dimar undertakes to maintain an adequate administrative organisation, taking into account its business model, for the management of the flow of goods, as well as an adequate internal control system. All employees are obliged to inform the customs authorities whenever they encounter difficulties in complying with customs regulations.

All personnel are aware of the importance of correct classification of goods and the need to keep key data up-to-date.

The following behaviour is prohibited, by way of example only:

- Introducing foreign goods across the border by land, sea or air in violation of requirements, prohibitions and restrictions;
- Unloading or depositing foreign goods in the intermediate space between the borders and the nearest customs;
- Concealing foreign goods on your person or in your luggage or among other goods or in any means of transport, in order to evade customs inspection;
- Taking out of the customs territory without having paid the duties due or without having guaranteed their payment;
- Taking national or nationalised goods subject to border duties out of the customs territory;
- Providing false documents or information to the shipper and the Customs Agency;
- Acknowledging money or other benefits to Customs Agency officials;
- Bringing in or exporting goods in breach of the prohibitions and restrictions laid down in the Consolidated Text of Legislative Provisions on Customs Matters.

ARTICLE 24 - RELATIONS WITH EXTERNAL COLLABORATORS

The Company proceeds with the identification and selection of collaborators and consultants with absolute impartiality, autonomy and independence of judgement.

In their selection, Dimar takes care to assess their competence, reputation, independence, organisational capacity and suitability for the correct and punctual performance of contractual obligations and assigned tasks.



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External collaborators (consultants, professional firms, intermediaries) are required to observe the principles contained in this code when conducting business with and on behalf of the Company.

Those who act in the name and on behalf of Dimar are obliged to maintain and protect the image of seriousness, respectability and fairness of the Company.

The directors, special attorneys, partners and, more generally, all employees of Dimar must in relation to their duties:

- Carefully consider using external collaborators, selecting only counterparts of appropriate professional qualification and reputation;
- Obtain the support of external collaborators in constantly ensuring that the needs of customers and consumers are met to an extent that meets their legitimate expectations in terms of quality, cost and time;
- Verify, also by means of appropriate documentation, that these collaborators have the means, including financial means, organisational structures, technical skills and experience, management systems (quality, environment, health and safety) and resources appropriate to the Company's needs and image;
- Require external collaborators to abide by the principles of this Code and include in contracts an express obligation to abide by them;
- Verify compliance with labour legislation, including on child labour, health and safety of workers;
- Promptly report possible violations of the Code to one's superior or the Supervisory Board.

ARTICLE 25 - RELATIONS WITH THE PUBLIC ADMINISTRATION

Dimar respects the principles of impartiality, legality and independence that characterise the work of the public administration.

Relations between Dimar and the Public Administration (by way of example only, the Ministries, the Authority for the Protection of Personal Data, the Inland Revenue), public officials, persons in charge of a public service, public agents and, more generally, healthcare professionals, must be inspired by the strictest compliance with applicable laws and regulations, as they cannot compromise the company's integrity and image in any way.

Moreover, these relationships must only be handled through persons for whom this task is part of the performance of their role, as provided for in the company organisational structure and job description. Relations are also characterised by the utmost cooperation, in all cases avoiding hindering their institutional activity, and are conducted by preserving, in relations with them, correct areas of mutual independence, avoiding any attitude that could be interpreted as an attempt to improperly influence their decisions.

Dimar guarantees the completeness and integrity of the information provided as well as the objectivity of the assessments.



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Having said this, it is forbidden for anyone working on behalf of Dimar, whether employees or *partners* collaborating with it, to promise or offer, even through intermediaries, directly or indirectly, money or other benefits to members of the Public Administration, whether Italian or foreign, or to their relatives or relatives-in-law, in order to obtain an undue advantage for Dimar, even if only potential, or such as to create the impression of illegality or immorality.

Similarly, employees are forbidden:

- Receive gifts or favourable treatment, except within the limits of normal courtesy and provided they are of modest value. If an employee receives gifts beyond the above-mentioned limits, he/she must immediately inform his/her superior and/or the Supervisory Board, which will immediately arrange for the return or the most appropriate use of what has been received;
- Accepting, even indirectly, money, gifts, goods, services or favours in connection with relations with any third party with whom the company has an existing relationship, for the sole purpose of influencing their decisions with a view to seeking more favourable treatment or undue benefits.

No 'recipient' may circumvent the above-mentioned requirements by resorting to other forms of aid or contributions which, in the guise of sponsorship, appointments, consultancy, advertising, recruitment have the same purposes as those prohibited above.

In the course of negotiations with the Public Administration, whether Italian or foreign, it is forbidden to improperly influence, or attempt to influence, the decisions of the counterparty, including those of officials dealing with or making decisions on behalf of the Public Administration.

If the entity uses a consultant or a 'third party' - without prejudice to the prohibition of the existence of a possible conflict of interest on its part - to represent it in its relations with the Public Administration, provision must be made for the same guidelines to be applied to the consultant and his staff or to the 'third party' as to the entity's employees.

The following actions - potentially damaging not only to the State and other Italian public bodies, but also to the European Union - should be considered, merely by way of example, as improper conduct:

- In the three years following the termination of the public employment relationship, employ *former* employees of the Public Administration who, in the last three years of service, have exercised authoritative or negotiating powers over the Company;
- Offering or in any way providing free gifts, including in the form of employee-only company promotions or through, for example, payment of travel expenses;
- Offering or in any way providing gifts that are not of modest value and that can in any case be construed as remunerative;
- Providing, promising to provide, soliciting or obtaining confidential information and/or documents, or otherwise likely to compromise the integrity or reputation of either or both parties;
- Giving or offering gifts, even in small unit amounts;

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- Favouring, in purchasing processes, suppliers and sub-suppliers only because they are indicated by the Public Administration employees themselves as a condition for the subsequent performance of activities;
- Knowingly producing false documents or documents containing false or altered data, withholding or omitting documents, omitting due information, in order to unduly steer decisions by the Public Administration in one's own favour or in favour of one's clients;
- Engaging in misleading conduct that could mislead the Public Administration in the technical-economic assessment of the products and services offered/supplied, or unduly influence the Public Administration's decision;
- Submitting false declarations or documents certifying untrue facts or omitting due information in order to obtain undue contributions, financing, subsidised loans or other disbursements of the same kind from the State, public bodies or the European Communities;
- Carrying out activities that unduly interfere in the formation of the will of the Public Administration with respect to the subject matter of the tender procedure;
- Misleading a representative of the public administration in order to appropriate something possessed by him/her for official reasons offends the financial interests of the European Union;
- Knowingly taking advantage, together with a representative of the public administration, of an error of another person, taking unfair advantage to the detriment of the financial interests of the European Union;
- Instigating a representative of the public administration to carry out an administrative act in breach of the law in order to gain an unfair pecuniary advantage from it to the detriment of the European Union.

Recipients are obliged to verify that public funds, contributions and subsidised loans, granted in favour of the Company, are used for the performance of the intended activities; any other use is prohibited.

When participating in operations characterised by a competitive environment - whether public or private tenders - Dimar undertakes to

- Act in accordance with the principles of fairness, transparency and good faith;
- Carefully assess the appropriateness and feasibility of the services required, with particular regard to technical and economic conditions, safety and environmental aspects, ensuring that any anomalies are promptly detected where possible;
- Provide all data, information and news requested during the selection of participants and instrumental to the awarding of the tender;
- In the case of supplies: a) maintain, with the public officials in charge, clear and correct relations, avoiding any behaviour likely to compromise the freedom of judgement of the competent officials; b) execute the order in a workmanlike manner, according to ordinary



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diligence, refraining from illegal conduct or conduct detrimental to the interest of the principal that is lawful or contractually agreed; c) carry out the control of the design d) carry out document and data control; e) provide procurement in accordance with the Customer's requirements; f) carry out tests, checks and inspections both upon receipt and during production and final testing; g) carry out control of test, measurement and inspection equipment; h) carry out control of non-conforming product; i) carry out control of quality records in line with certification 13485:2016; j) ensure the proper management of contracts; k) prepare for each job a file containing: i) the job opening form; ii) the indication of the person responsible for the job; iii) the contract; iv) the documentation relating to the purchase of materials; v) the work plan; vi) the progress of the work; vii) any deviations that have occurred during the execution of the contract, with an indication of the reasons for such deviation.

Tenders will be formulated in such a way as to ensure compliance with adequate quality *standards*, appropriate salary levels for employees and the applicable safety and environmental protection measures.

In the event of being awarded the tender, the company undertakes in its relations with the contracting authority:

- To ensure that negotiation and business relations are conducted in a clear and correct manner;
- To ensure the diligent performance of contractual obligations.

Those within the company who deal with the Public Administration shall base their actions on the principle of transparency and shall be obliged to inform the control bodies (including the Supervisory Board) of any anomalous situation encountered and to make available to them any document or information requested.

Where a public official or person in charge of a public service makes an explicit or implicit request for benefits of any kind, it is mandatory:

- Suspend all relations with them;
- Report the incident to your direct superior and inform the Supervisory Board.

The company will only resort to litigation when its legitimate claims do not find due satisfaction in the interlocutor.

ART. 26 - RELATIONS WITH POLITICAL PARTIES AND TRADE UNION ORGANISATIONS, CONTRIBUTIONS, DONATIONS AND SPONSORSHIPS

Dimar respects the freedom of association and the right to collective bargaining.

Dimar guarantees that staff representatives can communicate with their members in the workplace and ensures that these representatives are not subject to any form of discrimination.

Dimar does not support events or initiatives with an exclusively political purpose.



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Furthermore, it does not provide contributions, advantages or other benefits to political parties and workers' trade union organisations, nor to their representatives, except in compliance with the applicable regulations.

Relations with trade unions - reserved to the competent functions authorised to do so - are characterised by principles of fairness and cooperation in the interest of the company, employees and the community.

The participation, in a personal capacity, of the addressees of the Code of Ethics in political organisations takes place outside working hours and without any connection with the function performed in the Company.

ARTICLE 27 - RELATIONS WITH CUSTOMERS

Fair dealing, contractual fairness and quality are the principles that must characterise relations with customers.

In its relations with customers and clients, Dimar ensures fairness and clarity in business negotiations and in the assumption of contractual obligations, as well as faithful and diligent contractual fulfilment. Dimar has defined transparent customer-oriented contractual rules, introducing customer-friendly dispute resolution tools aimed at finding rapid solutions, also by adhering to conciliation tools administered by independent or associative bodies.

Responsibility and the sustainability of business activity constantly require that everything possible be done to eliminate the causes of conflict with customers, ensuring a correct quality-price ratio for all services provided, as well as transparent information of the constraints resulting from inclusion in a regulated system that imperatively replaces freely defined agreements between the parties.

The excellence of the products and services offered constitute the distinctive elements of the company's relationship with its customers.

In particular, it is obligatory to:

- To provide, with efficiency and courtesy, within the limits of contractual provisions, quality products, maintaining high *standards of* quality in its services, as well as developing a pricing policy in line with the quality of the service offered. The internal procedures and information technologies used support these aims, also through continuous monitoring of the customers themselves;
- Provide accurate, timely and comprehensive information about the services so that the customer can make informed decisions;
- To provide health workers, *partners* and patients with correct information on the use of the products marketed by the Company, in strict compliance with the rules governing *marketing* and medical-scientific information activities; in particular, it is mandatory to provide health workers with complete information on the indications, use, safety, contraindications and any



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side effects of the products marketed by the Company and, where applicable, on their technical requirements and characteristics;

- Adhere to the truth in advertising or commercial communications;
- Paying care and attention to every customer or category of customers, without any discrimination on the basis of their nationality, religion or gender;
- Identifying the risk profile of customers is a fundamental starting point for offering products that are consistent with their needs; discriminating against customers on the basis of their nationality, religion or gender is absolutely forbidden;
- Respond promptly to complaints, aiming for a substantive resolution of disputes, to overcome conflicts and regain customer trust and satisfaction;
- Monitor the achievement of customer satisfaction and loyalty targets, being open to suggestions and proposals from customers regarding services and products;
- Commit to making their customers and services accessible to disabled people by removing any architectural barriers;
- Comply with the law, with particular reference to anti-money laundering provisions, as well as the fight against receiving and using money, goods or benefits of illicit origin.

In the conduct of any negotiations, situations in which the parties involved in the transactions are or may appear to be in conflict of interest must always be avoided.

In any case, it is forbidden to entertain relations, direct or indirect, with persons known to be, or merely suspected of being, involved in unlawful activities - with particular reference to trafficking in arms, drugs, money laundering and terrorism - and, in any case, with persons lacking the necessary requisites of seriousness and commercial reliability.

It is also prohibited to finance activities aimed at producing products that pollute health and the environment, as well as activities that, even indirectly, hinder human development by contributing to the violation of human rights (e.g. exploitation of child labour).

Dimar maintains the confidentiality of confidential information provided to it by customers and undertakes not to make unlawful or unethical use of it.

During negotiations with customers, it is forbidden to influence or attempt to influence the customer's decisions improperly by engaging in improper conduct.

The following actions are to be considered, by way of example only, as improper conduct:

- Propose employment and/or business opportunities that may directly or indirectly benefit the client's representatives;
- Offering gifts, even of small unitary amount and even on holidays, such as to create, in the other party or in an extraneous and impartial third party, the impression that they are aimed at acquiring from the Company or granting it undue advantages;



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- Hiring *former* employees of the client, their relatives or relatives-in-law, who participate or have participated personally and actively in business negotiations with Dimar.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted only if they comply with defined company procedures, or in any case are such that they do not give rise to doubts as to the lawfulness of the conduct carried out.

Finally, function managers, employees and collaborators must not take part on behalf of Dimar - unless they are expressly authorised to do so - in agreements or discussions with actual or potential competitors concerning

- Prices or discounts;
- Terms or conditions relating to the services provided by the Company and the competitors;
- Profits, profit margins or costs;
- Systems for promoting the services provided by the company and its competitors;
- Offers to acquire shareholdings or plans to offer such acquisitions;
- Sales territories or markets;
- Entry into or exit from geographical markets or market sectors.

ART. 28 - RELATIONS WITH SUPPLIERS

Fair negotiation, contractual fairness, quality and transparency are the principles that must characterise relations with suppliers.

Dimar uses suppliers who operate in accordance with current legislation and the rules set out in this Code, ensuring their reliability, honourableness and professionalism.

The selection process is based on objective evaluations according to principles of fairness, cost-effectiveness, quality, innovation, continuity and ethicality: it is forbidden to preclude any supplier company meeting the requirements from competing for a supply contract by not adopting objective evaluation criteria in the selection process, in a declared and transparent manner.

The requirements of professionalism, experience, the ability to comply with contractual agreements, the absence of conflicts of interest, the ability to innovate, respect for one's workers, respect for the environment, as well as compliance with current legislation are fundamental criteria for the selection of suppliers.

Suppliers are expected to behave correctly, diligently and in accordance with the law, with particular attention to compliance with regulations and good practice in the areas of ethics, health and safety in the workplace and respect for the environment and protection of intellectual property, industry and trade.

It is the company's obligation to constantly monitor the quality and presentation of the goods/services provided.



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The best price cannot be the sole criterion for choosing *partners*, especially in cases where the supplier has already been disputed as to the conformity of its work with current legislation or this Code of Ethics.

Dimar encourages its suppliers to apply the same selection criteria as its subcontractors.

Dimar undertakes to work to ensure that suppliers of products and services respect the commitments made, the protection and confidentiality of professional know-how, requiring the same correctness from counterparts in the management of the relationship.

In application of the above principles, the Company and its resources undertake to

- Operate a process of selecting, evaluating and managing suppliers to achieve the corporate good;
- Evaluate and select suppliers on the basis of the service provided, understood as competence, quality, service precision and cost-effectiveness;
- Evaluate and select according to the ability to comply with contractual agreements, in the absence of conflicts of interest, according to the application of laws and according to the adoption of corporate behaviour oriented towards corporate social responsibility;
- Evaluate and select on the basis of innovation capacity and ability to be a *partner* in business development;
- Demand and verify prompt and proper compliance with contractual provisions;
- Promptly report any problems arising in the course of business relations, informing management of violations of the Code of Ethics and other material non-compliance.

During negotiations with suppliers, it is forbidden to be influenced in the choice of supplier by the latter's improper conduct.

The following actions are to be considered, by way of example only, as improper conduct:

- Accepting the proposal of employment and/or business opportunities that may directly or indirectly benefit Dimar representatives;
- Accepting gifts, even of small unitary value, from external parties or from those who are, or intend to become, suppliers. In the event that the supplier nevertheless intends to make a gift, this must be formally communicated to the head of function in order to take the appropriate actions in line with corporate ethics, also providing appropriate supporting documentation;
- Requesting gifts, benefits or other advantages from suppliers in order to facilitate their position with the Company.

Acts of commercial courtesy, such as gifts or forms of hospitality, are permitted only if they comply with defined company procedures, or in any case are such that they do not give rise to doubts as to the lawfulness of the conduct carried out.

The remuneration to be paid to suppliers shall be exclusively commensurate with the performance specified in the contract and payments may not be made to a party other than the contracting party.



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Suppliers are contractually required to abide by the provisions of this Code, and appropriate sanctions are established for its violation.

Dimar undertakes to exclude suppliers and subcontractors who do not comply with the rules of this Code of Ethics as well as with the regulations in force.

ART. 29 - RELATIONS WITH HEALTH PROFESSIONALS

Adherence to ethical *standards* and compliance with applicable laws are essential for medical technology sectors to develop and sustain collaborative relationships with Health Care Professionals. This collaboration may take the form of: a) development of medical technologies; b) provision of training, education, service and support to enable the effective and safe use of medical technologies; c) support of medical research, education and enhancement of professional skills.

These activities are necessary for the advancement of medical science and the improvement of patient care, which must take place through interactions marked by maximum transparency, fairness and ethicality.

Education and training programmes must be held in appropriate locations.

Dimar is committed to ethical business practices and socially responsible conduct in relation to interactions with Healthcare Professionals.

Dimar shall also respect the obligation of Health Care Professionals to make independent decisions with respect to clinical-diagnostic practice.

Dimar shall, therefore, independently ensure that their respective interactions with Healthcare Professionals comply with current national, European and local laws, regulations and professional codes.

In general, from the moment when the Company, even before the publication of a call for tenders (or any other document or deed assimilated thereto), learns of the existence of an administrative procedure aimed at its publication, it is advisable to refrain from offering any opportunity for collaboration or other, even free of charge (e.g. consultancy appointments, *speaking* engagements, moderator activities, *training*, etc.) that would personally benefit Public Administration employees who may have negotiating and/or authoritative powers or such as to be able to influence the outcome of the procedure.

The company will independently assess the continuation of any existing relationship upon learning of the existence of an administrative procedure.

The provisions set forth in the preceding paragraph are to be understood as applying to Healthcare Professionals also operating outside the Public Administration in all cases of negotiation for the supply of goods and services with the private healthcare facilities to which the Professional belongs. The relations that the Company will establish, at all levels, international, national, regional and local, including promotion and propaganda activities towards Public Administration employees and



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towards Professionals in the public and private health sector, must be marked, at all times, by the principles of officialdom, transparency, ethical and professional correctness.

Corporate bodies, shareholders, special attorneys, employees and collaborators in any capacity, including external collaborators, must not promise or pay sums of money, promise or grant goods in kind, utilities or other benefits to public employees and/or persons similar to them, to Professionals of the public and private Health Care Sector, who in any capacity intervene in an acquisition process, including in a personal capacity, with the aim of promoting or favouring the interests of the Company.

ARTICLE 30 - THE MARKET AND COMPETING ENTERPRISES

Dimar considers entrepreneurial activity as the means to achieve its purpose and to contribute to the economic, social and civil development of the community; therefore, it operates on the market with fairness and honesty and endeavours to safeguard free competition and transparent behaviour of all economic operators.

Dimar reminds all those who work in the interest of the Company to respect the existing regulations on the protection of instruments or signs of authentication, certification or recognition, on the protection of industry and trade and on copyright.

In any communication with external parties, information concerning the company and its activities must be truthful, clear and verifiable.

Obtaining competitive information by unlawful or unethical means as well as knowingly infringing the intellectual property rights of others is prohibited.

Dimar avoids practices (e.g. creation of cartels, market sharing) that constitute a violation of competition laws.

In its activities, the Company places respect for antitrust regulations as a primary requirement, with a view to guaranteeing the correct functioning of competitive dynamics in the markets, economic efficiency and, consequently, virtuous processes of innovation and reduction of the prices of goods and services such as to ensure the maximum achievable welfare for the community. For this reason, all those behaviours and conducts of companies that, by reducing competitive pressure through concentration operations, abuses of dominant position or cartels, may prevent or hinder the competitive process among the operators active in the market are prohibited.

The Company undertakes to reject any conduct aimed at acquiring business opportunities by unlawful means, by offering or promising money or other undue benefits.

More specifically, they are forbidden:

- Cartels (agreements, concerted practices between competing undertakings and decisions by associations of undertakings) that have as their object or effect the prevention, restriction or distortion of competition in the relevant market;



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- The abuse of a dominant position in the market, which, for example, may be perpetrated through: excessively onerous pricing policies; particularly onerous contractual terms; tying practices; abusive discounts; predatory pricing; margin squeeze; predatory behaviour;
- Any initiative or contact between competitors (e.g., but not limited to: discussions on prices or quantities, division of markets, limitations on production or sales, agreements to share customers, exchanges of price information, etc.) that may appear to violate competition and market protection regulations.

ARTICLE 31 - RELATIONS WITH THE MEDIA

Media communication plays a key role in enhancing Dimar's image.

To this end, Dimar undertakes to cooperate fully with all media, without discrimination, while respecting each other's roles.

All information concerning the Company must be provided truthfully and uniformly, and only by the persons responsible for the communication itself.

Relations with the *media* are characterised by respect for the right to information.

It is absolutely forbidden to spread false news.

It is absolutely forbidden for unauthorised persons to have contacts aimed at disseminating company news with representatives of the *media*, without first informing the competent function of any questions posed by them.

Strict adherence to these provisions is essential, as an inappropriate or inaccurate response, or a denial or disavowal of information, could have an adverse effect on the Company.

Participation, in the name and on behalf of the company, in events, interviews, committees and associations of any kind, whether scientific, cultural or trade, must be duly authorised, in accordance with procedures.

ARTICLE 32 - RELATIONS WITH SUPERVISORY AUTHORITIES

The Company imprints its relations with persons in charge of supervision and control on the utmost cooperation, in full respect of their role, undertaking to promptly implement their prescriptions.

The Company undertakes to provide all the information requested by the parties responsible for supervision and control, in a complete, correct, adequate and timely manner.

It is prohibited to exert pressure, of any kind whatsoever, on a person called upon to make statements before the judicial authorities, in order to induce him/her not to make statements or to make false statements; it is also prohibited to help a person who has committed a criminal offence to evade the investigations of the authorities or to evade their investigations.

To this end, the Company prepares and implements appropriate procedures for internal communication and for the collection, processing and transmission of the information requested by these parties.



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ART. 33 - RELATIONS WITH THE JUDICIAL AUTHORITIES

In the event of participation in legal proceedings (administrative, civil and criminal), the Company undertakes to act in compliance with the law and the rules of this Code of Ethics.

In particular, it is forbidden for corporate bodies and special attorneys to represent the Company in court, to promise or give money or other benefits to magistrates, judges, court clerks and witnesses in order to condition the outcome of the trial in favour of Dimar.

ARTICLE 34 - COMPUTERS AND MEDIA

Each addressee is obliged to take the necessary measures to ensure the security of its computer equipment.

All sensitive, confidential or reserved electronic information must be protected by a *password*, which must be periodically changed and kept secret.

The use of computers and media must be in line with company *policies*, *privacy*, copyrights, trademarks, trade secrets and other intellectual property considerations.

It is forbidden to make improper use of the Company's IT and telematic resources; by way of example, the following should be considered as improper conduct: using the communication tools made available by the company (e.g. mobile phones, *tablets*, company *email accounts*) for personal communications, transferring *passwords* and/or access codes to the network or accounts to third parties, beyond the scope of the office, using the *Internet* network to access unlawful sites or for personal purposes, copying company *software*.

The falsification, in form and content, of public or private electronic documents is prohibited.

Any use of false computer documents is also prohibited, as is the suppression, destruction or concealment of genuine documents.

It is prohibited to gain unauthorised access to a computer or telecommunications system protected by security measures or to remain in it against the express or tacit will of the system owner.

It is prohibited to unlawfully retrieve, reproduce, disseminate, deliver or communicate codes, passwords or other means of access to a protected computer or telecommunications system, or even merely to provide indications or instructions suitable for that purpose.

It is forbidden to procure, produce, disseminate, hand over or, in any case, make available to the Company or to third parties equipment, devices or programs capable of damaging a computer or telecommunication system of others, the information contained therein or alter its operation in any way.

It is prohibited to intercept, impede, or interrupt communications relating to one or more telematic or computer systems.

Any form of disclosure, even partial, to third parties of the content of intercepted information is also prohibited.



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It is also forbidden to install equipment designed to prevent, intercept or interrupt the aforementioned communications.

The destruction, deterioration, deletion, alteration or suppression of computer or telecommunications systems and of the information, data or programs contained therein, privately owned or used by the State or other public body or pertaining thereto or otherwise of public utility, is prohibited.

ARTICLE 35 - COPYRIGHT PROTECTION

It is prohibited to counterfeit or alter trademarks or distinctive signs, whether national or foreign, of industrial products, or to make use of such counterfeited or altered trademarks or signs.

It is prohibited to alter domestic or foreign patents, designs or industrial models, or to make use of such counterfeit or altered patents, designs or models.

It is prohibited to introduce into the territory of the State, for the purpose of profiting therefrom, industrial products with counterfeit or altered trademarks or other distinctive signs, whether national or foreign.

It is prohibited to unlawfully duplicate computer programmes or for the same purposes to import, distribute, sell, possess for commercial or business purposes programmes contained in media not marked by the SIAE.

It is prohibited to reproduce, transfer to another medium, distribute, communicate, present or publicly demonstrate the contents of a database without the author's authorisation, or to extract or reuse the database.

The addressees of this Code of Ethics are prohibited from

- Using other people's business secrets;
- Engaging in conduct aimed at hindering the normal operation of the economic and business activities of competing companies;
- Engaging in fraudulent acts capable of producing a diversion of the customers of others and damage to the company's competitors;
- Unlawfully reproducing, imitating, tampering with trade marks, distinctive signs, patents, industrial designs or models owned by third parties;
- Making use, in an industrial and/or commercial context, of trademarks, distinctive signs, patents, industrial designs or models counterfeited by third parties;
- Introducing into the territory of the State for trade, holding for sale or putting into circulation in any way industrial products with counterfeit or altered trademarks or distinctive signs by third parties.

ART. 36 - MANAGEMENT OF ELECTRONIC AND NON-CASH PAYMENT INSTRUMENTS



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Dimar requires all addressees to comply with the specific rules defined for the use of electronic instruments, credit cards and/or other payment instruments and the internet in the working relationship, with the obligation for all users to take note of them.

In particular:

- Each internal recipient is responsible for contributing to the security of the Facility's information assets, data, access codes provided and information contained in and managed by means of IT assets/systems;
- Assigned assets/computer systems (e.g. fixed or portable personal computers, credit cards and/or other payment instruments) must be used correctly and exclusively for the performance of one's duties. These assets must be stored appropriately and Dimar must be promptly informed of any theft or damage;
- Access to computer procedures and the relevant sections reserved for electronic payments is restricted to authorised persons only and must take place in accordance with internal procedures so as not to alter or damage the Company's information assets;
- It is forbidden to install unauthorised software on personal computers and/or mobile phones supplied to recipients, which could potentially carry viruses, or to connect unauthorised devices or instruments to the Company's network;
- There is an obligation to guard one's authentication credentials with the utmost security and secrecy, avoiding unlawful access to them; these credentials must be changed in accordance with the defined timeframe and must not be disclosed in any way to unauthorised persons;
- Independent installation and use at one's own workstation of any software without prior authorisation and without a regular licence is prohibited.

ARTICLE 37 - ANTI-MONEY LAUNDERING

The Company ensures that its economic and financial activities do not become a tool to favour, even potentially, illegal activities and criminal or terrorist organisations.

Dimar is committed to complying with all national and international rules and regulations on money laundering and self laundering.

The Company proceeds to verify with the utmost diligence the information available on commercial counterparties, suppliers, *partners* and consultants, in order to ascertain their compliance with the requirements of respectability, honourableness and reliability.

The Company also verifies that the transactions to which it is a party do not present, even potentially, a risk of favouring the receipt, substitution or use of money or goods derived from criminal activities.

ARTICLE 38 - CONTRIBUTIONS. SPONSORSHIPS. DONATIONS. GIFTS

Dimar may adhere to requests for contributions and sponsorships, while taking the utmost care to avoid any possible conflict of interest on a personal or corporate level.

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Management and coordination HMC Premedical S.p.A.



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With regard to the disbursement of contributions, this may only be made in response to requests from organisations and associations that are declared non-profit and have regular by-laws and articles of association, for initiatives that are of high cultural, social or charitable value and, in any case, involve a significant number of citizens. All contributions must be made in strict compliance with the laws in force and properly registered.

Sponsorships must be governed by a written contract that clearly sets out the conditions agreed between the parties and in particular the synallagmatic relationship between *sponsor* and *sponsee*.

Sponsoring is only intended for initiatives and events that offer guarantees of quality and are related to the company's sphere of activity.

Dimar can also support independent conferences, educational, scientific or policy-making events that promote scientific knowledge, medical progress and effective healthcare.

Contributions and sponsorships may also be granted to public entities, provided that the amounts are small and with which Dimar has not had recent business relations and is not expected to have any in the near future.

Donations or gifts are granted exclusively to recognised associations and foundations, as well as duly constituted *non-profit* organisations, in compliance with accounting, civil and tax regulations.

Dimar may occasionally make modest gifts to Health Care Professionals.

Gifts must be for promotional purposes and related to the activity of the health professional or for the benefit of patients.

Gifts must never be in the form of cash or its equivalent (e.g. vouchers, book vouchers, fuel coupons, prepaid cards, etc.).

It is expressly forbidden for the Addressees of this Code of Ethics to offer, request or receive, sponsorships, gifts, compensation or other benefits that may even only be interpreted as exceeding normal business courtesy practices, or intended as aimed at acquiring an undue advantage related to the Company's activity.

ART. 39 - TRAINING CONFERENCES HELD BY THIRD PARTIES

In order to make product-related education and training and technical-administrative and managerial activities available to health care professionals - in order to facilitate the dark, effective and efficient use of medical and diagnostic technology - Dimar may support independent conferences, educational, scientific or policy-making events that promote scientific knowledge, medical progress and effective health care.

These generally include conferences organised by international, national, local or specialist medical associations or accredited bodies for continuing medical education (CME).

The company may in particular support and

- Conferences organised by independent, educational, scientific or policy-making third parties that promote scientific knowledge, medical progress and effective health care;

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- Higher or advanced level training and refresher courses on technical, regulatory, organisational-management (health management) and/or social-political issues related to the reference sector; support is also allowed for initiatives to protect the health and psycho-physical wellbeing of the individual and to disseminate the culture of prevention;
- Procedure courses or training, i.e. specific events whose programme is dedicated to the provision of practical training on the safe and effective performance of one or more clinical procedures, where most of the training takes place in a clinical setting.

It is expressly forbidden to provide financial support directly to individual health professionals in order to cover the costs of participation in training, educational activities organised by third parties. The aforementioned support may be paid directly or through a third party company that undertakes to comply with the provisions of this Code of Ethics, to the entity to which the health professional belongs or to the third party organiser of the event.

Dimar may also provide such support through the purchase of sponsorship rights, such as, purely by way of example, the reproduction of its logo on the event programme, congress badges or the congress website; the rental of exhibition space; the display of banners or the organisation of satellite symposia by deciding on their content and speakers.

As part of the sponsorship packages, and included in the same, the Company may purchase a certain number of conference participation fees for a certain number of healthcare professionals (registration fees and/or travel and hospitality expenses) depending on the type of sponsorship implemented, for the sole purpose of contributing to the updating of healthcare professionals by promoting the valorisation and knowledge of technologies and their innovation.

It is understood that in this case individual health professionals, who will be able to benefit from participation in the event by reason of the payment of these registration fees, will be chosen in absolute autonomy and independence by the promoting body or the body to which the Professional belongs.

The company will be totally uninvolved in the process of identifying health professionals, and there shall be no conduct aimed at reaching agreements with the promoting and/or affiliating body regarding the prior identification of the health professional(s) to be supported in a given event.

Dimar must enter into a specific sponsorship contract directly or through a third party company that undertakes to comply with the relevant provisions, with the entity promoting and/or to which the health professional belongs, in which the individual sponsorship rights acquired and the individual amounts paid in relation to each of them will be punctually and specifically identified.



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SECTION V - IMPLEMENTATION OF THE CODE OF ETHICS

ARTICLE 40 - SUPERVISORY BODY AND CODE OF ETHICS

Pursuant to the aforementioned Legislative Decree 231/2001, the company has set up a Supervisory Board with powers and control.

The Supervisory Board is entrusted with the following tasks:

- Supervise compliance with the Code of Ethics by promptly reporting any violations thereof to the Board of Directors;
- Ensure the widest dissemination of the Code through an adequate information and awareness-raising plan aimed at fostering knowledge of the principles and rules contained therein;
- Ensure that the Code is constantly updated, in relation to its concrete effectiveness and to changing business needs and legislation;
- Carry out checks on all reports of violations of the Code's provisions, assessing the facts and indicating - in the event of an ascertained violation - appropriate sanctioning measures;
- Guaranteeing against possible retaliation of any kind resulting from reporting possible violations of the Code;
- Protect the anonymity of those reporting possible violations.

ARTICLE 41 - DISSEMINATION OF THE CODE OF ETHICS

Dimar will ensure wide dissemination of this Code of Ethics and will set up *ad hoc* training courses, held by qualified personnel and with an adequate number of hours in order to ensure full and conscious knowledge by corporate bodies, department heads, employees and *partners* of the values to be followed in the exercise of business activities.

The Code is brought to the attention of all employees and collaborators and, in view of the volume of its contents, can be consulted on the Company's website <http://www.dimarsrl.com/ita/>.

The Code of Ethics must be handed over to employees as well as to new *partners* at the start of their collaboration; the indicated recipients must sign a document of acceptance and acknowledgement.

Similarly, a copy of the Code of Ethics must be given to employees already recruited as well as to *partners* already collaborating with Dimar, who will have to sign an appropriate document of acceptance and acknowledgement.

The addressees of this code are obliged - under penalty of a sanction in this respect - to report any instructions received that are contrary to the law, employment contracts, internal regulations and this Code of Ethics.

In particular, any breach or suspected breach may be communicated, in writing, also anonymously, to the Supervisory Board, using the whistleblowing platform accessible from the corporate website. It is also possible to make the communication by sending a letter by post, also internally.



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The confidentiality of the whistleblower's identity is guaranteed, as well as protection against any kind of retaliation.

The report must contain the name if a natural person (or the company name if a legal person) of the accused person and the facts that led to the offence being alleged.

For the purposes of assessing and handling the report, the provisions of the rules of the Supervisory Board apply.

The contact details of the Supervisory Board are as follows:

- c/o head office of Dimar S.p.A., via Galilei n. 6 - 41036 Medolla (MO)
- whistleblowing platform accessible from the corporate website.

ARTICLE 42 - SANCTIONS AND DISCIPLINARY PROCEEDINGS

Compliance by Dimar's corporate bodies, shareholders, special attorneys, managers as well as all employees and *partners with* the rules of the Code must be considered an essential part of their obligations.

The observance of this code is an integral part of the contractual obligations of the Company's employees, also pursuant to and for the purposes of art. 2104 of the Civil Code, and its violation may constitute a breach of contract and/or a disciplinary offence and, where applicable, may lead to compensation for any damages that Dimar may suffer as a result of such violation, in accordance with current legislation and collective agreements applicable from time to time.

With regard to the typification of violations of the prescriptions and principles of this Code of Ethics, as well as the relevant applicable sanctions, please refer to the provisions of the Disciplinary System, an integral part of the Organisation, Management and Control Model *pursuant to* Legislative Decree 231/2001 adopted by Dimar.

ARTICLE 43 - WHISTLEBLOWING

The Company promotes the prevention and verification of any unlawful conduct or, in any case, of reports concerning "violations" provided for in Legislative Decree 24/2023, as detailed in the specific company procedure drawn up (Whistleblowing Reporting Procedure).

In this perspective, the Company promotes the culture of speak up, i.e. the freedom to question, with a view to confrontation, colleagues and/or hierarchical superiors when it is deemed appropriate or necessary to express doubts or concerns, expose problems, formulate proposals and ideas or, in general, express opinions to improve work within the organisation.

The Company also intends to guarantee its employees, top management, as well as all stakeholders and shareholders the possibility of reporting, even confidentially or anonymously, a possible crime, an offence or any irregular conduct of which they have become aware ("Whistleblowing"). The Company protects employees who have confronted each other or made a report. Whistleblowers who



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report a suspected irregularity may not suffer any negative consequences, except in the case of unfounded reports made with malice or gross negligence.

The Company therefore does not tolerate any form of retaliation against whistleblowers on account of a report made.

Please refer to the company document 'Whistleblowing Reporting Procedure'.