LC MEDICAL SRL SOCIETÀ BENEFIT

CODE OF ETHICS

English translation

This is an unofficial English translation of LC Medical Srl Società Benefit's "Codice Etico", provided for the convenience of English-speaking readers. The document was drafted in Italian, under Italian law, with specific reference to Legislative Decree No. 231/2001. In the event of any discrepancy or inconsistency between this translation and the Italian original, the Italian text shall prevail and shall be the only version with legal effect.

TABLE OF CONTENTS

1. PURPOSE	2
2. FUNDAMENTAL PRINCIPLES	3
3. EXTERNAL COMMUNICATIONS	5
4. EXTERNAL RELATIONS	6
5. HUMAN RESOURCES AND EMPLOYMENT POLICY	10
6. IMPLEMENTING RULES OF THE CODE	13
7. BREACH OF THE CODE AND DISCIPLINARY SYSTEM	14

2.1 Compliance with the law

The Company regards compliance with the laws and regulations in force in Italy, as well as in any other country in which it may operate, as a fundamental principle. In carrying out their functions and activities, employees and External Collaborators are required to comply with the rules of the legal system (national, supranational or foreign) in which they operate, and must in every case refrain from breaching laws and regulations.

Each Addressee must diligently acquire the knowledge of the laws and regulations applicable to the performance of their duties, as amended from time to time; the Company does not tolj T* conduct contrary to these requirements and does not in any way excuse a failure to acquire adequT* knowledge of them.

In addition to the genj Tl principles of diligence[1] and loyalty under Article 2104 of the Italian Civil Code, each employee must also observe the conduct requirements set out in the collective bargaining agreements applicable to them.

2.2 Integrity

In carrying out their duties, employees must act with transparency and mo Tl integrity and, in particular, in accordance with the values of honesty, fairness and good faith. LC Medical does not engage in any conduct intended to influence, in any way, stT* ments to be made to the judicial authorities.

2.3 Dignity and equTlity

The Company recognises and respects the personal dignity, privacy and personality rights of every individuTl. Discrimination of any kind is not tolj T* d.

2.4 Traceability

[1] Article 2104 of the Italian Civil Code – Diligence of the employee: "The employee must exercise the diligence required by the nature of the task performed, the interest of the business, and the higher interest of national production. The employee must also comply with the instructions on the performance and discipline of work issued by the employer and by the Collaborators on whom the employee is hij Trchically dependent."

AdequT* documentation must be kept for every transaction carried out, in order to allow the reasons underlying each decision, and the characteristics of the transaction itself, to be checked, both at the authorisation stTge and during execution, recording and verification.

2.5 Health and safety of the working environment

The Company regards safeguarding the safety and health of its workers as a matter of primary importance, aiming not only to comply with the requirements of the relevant legislation but also to act continuously to improve working conditions.

The Company therefore complies with the legislation in force on workplace safety and hygienj.

Everyone must take the utmost care in carrying out their activities, strictly observing all the safety and prevention measures established, in order to avoid any possible risk to themselves and to others.

Each individuTl's responsibility towards their colleagues requires the greT* st care in preventing the risk of accidents. Everyone must strictly comply with the instructions and directives provided by those to whom the Company has delega* d responsibility for health and safety obligations.

2.6 Professionalism and a spirit of cooperation

Each employee carries out their activities with the professionalism required by the nature of the tasks and functions performed, making every effort to achieve their assigned objectives and taking responsibility as appropriate to their role. Each employee diligently pursues the necessary training and professional development. For the Company, mutual cooperation among those involved, in any capacity, in the same project or production process is an essential principle. The quality and efficiency of the Company's organisation, and its reputation, are significantly determined by the conduct of each employee, who is therefore required to contribute to safeguarding these values.

2.7 Conflicts of interest

Situations of conflict of interest between activities carried out in one's personal interest and activities carried out in the interest of the Company are not permitted.

By way of example, a conflict of interest exists where there is:

- a shared interest (whether disclosed or concealed) in the activities of suppliers, customers or competitors;
- the use of one's position for purposes at odds with the interests of the Company;
- the use of information obtained in the course of work for one's own benefit or that of third parties, in any case in conflict with the interests of the Company;
- the holding of corporate offices or the carrying out of any type of work for customers, suppliers, competitors or other third parties in conflict with the interests of the Company.

Any situation potentially liable to compromise the ability to make decisions in the Company's best interest must be reported immediately to the Supervisory Body appointed pursuant to Legislative Decree No. 231/2001 (the “Supervisory Body”), without prejudice to any applicable legal requirements, and gives rise to an obligation to refrain from carrying out any acts connected with, or relating to, that situation.

2.8 Sustainable development and cooperation with the community

As a Benefit Corporation (since 2025), LC Medical pursues responsible growth, assessing the impact of its activities on people, communities and the environment. The Company promotes sustainable conduct along its value chain and initiatives in favour of the local area and its stakeholders, in compliance with the law, transparency and the principles of this Code.

4.1 Gifts, benefits or other advantages

It is forbidden to offer, provide, promise or grant to third parties, in the name and interest of the Company, gifts, benefits or other advantages, including in the form of sums of money, goods or services.

It is forbidden to accept or receive from third parties gifts, benefits or other advantages, including in the form of sums of money, goods or services.

Only gifts of modest value, directly attributable to normal commercial courtesy, are permitted, and only where they cannot give the other party, or any impartial third party, the impression that they are intended to obtain or grant improper advantages, or that they might otherwise suggest illegality or impropriety. In any event, such gifts must always be made in accordance with the rules set out in Company procedures and must be adequately documented.

Anyone who receives gifts, or offers of gifts, that do not comply with the above must immediately inform the Supervisory Body, so that appropriate measures can be taken.

It is in any event forbidden to solicit the offer or granting, or the acceptance or receipt, of gifts of any kind, even of modest value.

performing a public service, personally, with the aim of promoting or furthering the Company's interests. These requirements may not be circumvented by resorting to other forms of assistance or contribution, such as appointments, consultancy arrangements, advertising, sponsorship, employment opportunities, business opportunities or any other means;

- engaging in, or undertaking, such conduct and actions towards the spouses, relatives or persons connected to the individuals described above;
- engaging in conduct intended, in any way, improperly to influence the decisions of officials who deal with, or make decisions on behalf of, the Public Administration;
- providing or promising to provide, soliciting or obtaining confidential information and/or documents liable to compromise the integrity or reputation of one or both parties, in breach of the principles of transparency and professional fairness;
- having the Company represented by a consultant or a “third party” where this could give rise to conflicts of interest; in any event, such persons, and their staff, are subject to the same requirements set out in this Code of Ethics.

The conduct described above is prohibited both during the course of, and once concluded, any business negotiation, request or relationship with the Public Administration, where engaged in towards officials who have dealt with, or made decisions on behalf of, the Public Administration.

Under no circumstances may the verification or inspection activities of bodies of the Public Administration be prevented or obstructed.

4.4 Relations with political parties, trade unions and other interest groups

Relations with political parties, trade unions and other interest groups are conducted only by those authorised to do so, or by persons delegated by them, in compliance with the provisions of this Code of Ethics, with particular attention to the principles of impartiality and independence.

In dealings with such organisations, the conduct and actions described in the preceding paragraph are prohibited.

4.5 Relations with suppliers of goods and services

The selection of suppliers of goods or services, and in any event the purchase of goods and services of any kind, is carried out by the functions specifically delegated to do so, on the basis of objective, documentable criteria, aimed at achieving the best balance between economic advantage and quality of performance.

In its dealings with suppliers, the Company is guided by the principles of transparency, equality, fairness and free competition. In particular, in such dealings, employees are required to:

- establish efficient, transparent, fair and cooperative relationships, maintaining an open and honest dialogue consistent with best commercial practice;
- avoid conduct that might place a supplier in a position of psychological subordination such that it feels compelled to accept contractual terms that are severely inequitable or otherwise inconsistent with the market;
- secure the cooperation of suppliers in consistently ensuring the most favourable balance between quality, cost and delivery times;
- require compliance with contractually agreed terms;
- require suppliers to comply with the principles of this Code of Ethics and include a specific provision to that effect in contracts;
- operate within the scope of applicable legislation and require strict compliance with it.

4.6 Relations with Collaborators

In relations with External Collaborators, the Company must:

- carefully assess the appropriateness of engaging External Collaborators, and select counterparties of suitable professional standing and reputation;
- establish efficient, transparent and cooperative relationships, maintaining an open and honest dialogue consistent with best commercial practice;
- secure the cooperation of External Collaborators in consistently ensuring the most favourable balance between quality of performance and cost;
- require compliance with contractually agreed terms;
- require External Collaborators to comply with the principles of this Code of Ethics and include a specific provision to that effect in contracts;
- operate within the scope of applicable legislation and require strict compliance with it.

4.7 Relations with customers

Products and services must be offered on competitive terms and in compliance with all the rules protecting fair competition.

The following is mandatory:

- scrupulous compliance with internal procedures governing relations with customers;
- providing accurate, truthful and comprehensive information about the services offered, so that the customer can make informed decisions;
- providing high-quality services that meet customers' reasonable expectations and safeguard their safety and wellbeing;
- ensuring truthfulness in advertising, commercial or other communications of any kind.

5.1 General principles

Loyalty, ability, professionalism, seriousness, preparation and a sense of belonging among staff represent values and conditions that are essential to achieving the Company's objectives.

In recruitment – conducted in compliance with the principles of this Code of Ethics, equal opportunities and without any form of discrimination – the Company ensures that the resources recruited correspond to the profiles genuinely required by its business needs, avoiding favouritism and preferential treatment of any kind.

In developing its human resources, the Company undertakes to create and maintain the conditions necessary to allow the abilities, skills and knowledge of each employee to be further developed, in order to ensure the effective achievement of the Company's objectives.

For this reason, the Company pursues a policy aimed at recognising merit, in compliance with equal opportunities.

In this context, employees are required to cultivate and pursue the acquisition of new skills, abilities and knowledge, and to act, in carrying out their work, in full compliance with the Company's internal organisation of work, including so as to allow the correct and orderly operation of the chain of internal controls and the establishment of a precise and detailed framework of responsibilities.

5.2 Selection, development and professional training

The selection and recruitment of personnel must take place in strict compliance with the standard procedures defined by the Company, and must also be based on criteria of transparency in assessing requirements of competence and professionalism, and of individual ability and potential. In recruiting and managing personnel, as in professional relationships generally, the Company requires that constant and express regard be had to respect for the individual, their dignity and their values, avoiding any discrimination based on sex, racial or ethnic origin, nationality, age, political opinions, religious beliefs, state of health, sexual orientation, or economic and social circumstances. Even the mere suggestion of increases in remuneration, other benefits or career progression as a counterpart for conduct at variance with the Articles of Association, the law, this Code of Ethics or internal rules and regulations – even within the limits of one's own remit – is likewise prohibited.

Any act of retaliation against anyone who refuses to engage in unlawful conduct, or who complains of or reports such conduct, is prohibited.

5.3 Remuneration

Without prejudice to compliance with mandatory legal requirements, the remuneration system, at every level, whether in the form of cash or benefits, must be based on the principle that remuneration is determined solely on the basis of assessments relating to training, specific professionalism, experience gained, demonstrated merit and the achievement of assigned objectives.

5.4 Outside activities

Employees may carry out work, whether occasional or unpaid, outside the Company, provided that such activities do not prejudice the Company's interests or reputation. Employees in particular are subject to the provisions on this matter contained in the applicable national collective bargaining agreement, including any prohibitions on outside activities set out therein.

5.5 Working environment

Conduct within the workplace must be characterised by seriousness, order and decorum. The Company expressly forbids any episode of harassment or intolerance towards any person in the workplace.

Everyone must cooperate with one another in order to achieve shared results, and must work to create a calm and rewarding working environment.

5.6 Use of company equipment and facilities

The Company's assets, and in particular the plant and equipment located in the workplace, are to be used for work-related purposes, in accordance with applicable legislation.

Under no circumstances may company assets, and in particular IT and network resources, be used for purposes contrary to mandatory legal provisions, public order or public decency, nor to commit or induce the commission of offences, or otherwise for racial intolerance, glorification of violence, or the violation of human rights. Audio, video, electronic, paper or photographic recordings or reproductions of company documents are not permitted, except where such activity falls within the normal exercise of assigned duties.

With specific regard to the Company's IT tools, it is likewise expressly forbidden to install unauthorised software or programs, or unlawfully to duplicate licensed programs; it is further forbidden to engage in conduct that could, in any way, damage, alter, deteriorate or destroy IT or telematic systems, programs or data. The use of such assets must be exclusively functional to the carrying out of Company activities or to purposes authorised by the managers of the relevant Company functions. In particular, it is expressly forbidden to use the Company's IT resources to view, access or otherwise engage with sites containing child sexual abuse material.

Everyone is personally responsible for maintaining the security of the Company assets made available to them, avoiding any fraudulent or improper use of such assets, and avoiding the disclosure, including to third parties, of their own user IDs and passwords.

5.7 Alcohol, drugs and smoking

Everyone must personally help to promote and maintain a climate of mutual respect in the workplace; particular attention must be paid to respecting the sensitivities of others.

Being under the influence of alcohol, drugs or substances with similar effects while carrying out work, or in the workplace, will be regarded as a knowing assumption of the risk of compromising these environmental characteristics.

5.8 Reporting of breaches and wrongdoing

LC Medical encourages good-faith reporting of breaches of this Code of Ethics, of the Organisational Model or of legal provisions. Reports may be addressed to the Supervisory Body through the channels indicated in the Organisational Model and in internal procedures. The Company protects the confidentiality of the reporting person's identity and prohibits any form of retaliation, in accordance with the whistleblowing legislation in force.

Breaches of the measures protecting the reporting person, abuse of the reporting mechanism, and

The Company ensures that this Code of Ethics is disseminated to all Addressees and promotes information and training initiatives consistent with the Organisational Model. The Code is updated as necessary, including to reflect regulatory developments and changes to the Company's organisational structure.

Responsibility for overseeing the operation of, and compliance with, this Code of Ethics rests with the Supervisory Body, which is vested with autonomous powers of initiative and control.

The Company's Supervisory Body has, in relation to overseeing compliance with and implementation of the Code of Ethics, the powers, tasks and duties set out in the Organisational Model. Without prejudice to any protections afforded by applicable legislation or collective bargaining agreements, and subject to statutory obligations, the Supervisory Body is entitled to receive requests for clarification, complaints or reports of potential or actual breaches of this Code of Ethics. Any such request for clarification, complaint or report will be kept strictly confidential, in accordance with applicable law.

The Supervisory Body operates with the utmost confidentiality and in accordance with the principles of impartiality, authority, continuity, professionalism and autonomy. It also suggests any updates to the Code of Ethics, including on the basis of reports received.

The Supervisory Body further operates with broad discretion and with the full support of the Company's senior management, with whom it cooperates in complete independence.

In order to ensure the effectiveness of this Code of Ethics, the Company puts in place communication channels through which anyone who becomes aware of unlawful conduct within the Company may report it freely, directly and in complete confidence to the Supervisory Body.

7.1 Supervisory Body and reporting

Any breach of the principles and provisions contained in this Code of Ethics must be promptly reported to the Supervisory Body by anyone who becomes aware of it: reports to the Supervisory Body must be sent to the designated email address or postal address.

The Company will take care to protect the confidentiality of the reporting person's identity, subject to the needs connected with the Supervisory Body's duties, and to protect the reporting person from retaliation, unlawful pressure, difficulties and discrimination of any kind in the workplace as a result of having reported a breach of this Code of Ethics. Following receipt of a report, the Supervisory Body carries out the relevant checks, where appropriate drawing on the support of the competent Company functions. The Supervisory Body then informs the managing shareholders of the need to impose disciplinary sanctions in respect of any breaches of this Code of Ethics that are found to have occurred.

7.2 Sanctions

The Company imposes sanctions, consistently, impartially and uniformly, proportionate to the respective breaches of the Code of Ethics and in accordance with applicable employment legislation.

The application of sanctions is independent of both the criminal relevance of the conduct in question and the commencement of any criminal proceedings by the judicial authorities where the conduct to be censured also constitutes a criminal offence, whether or not relevant for the purposes of Legislative Decree No. 231/2001. Sanctions may therefore be applied even where Addressees have engaged solely in a breach of the principles set out in the Code of Ethics that does not amount to an offence or an administrative violation, or does not give rise to the Company's direct liability.