



Code of Ethics

Rev. n° 5 - 14/03/2025

1. INTRODUCTION.....	2	6.2. <i>Training Activities.....</i>	10
2. GENERAL PRINCIPLES.....	3	6.2.1. <i>Training and Instruction on Company Products</i>	10
2.1. <i>Dynamism and Growth</i>	3	6.2.2. <i>Sponsorships.....</i>	11
2.2. <i>Care.....</i>	3	6.3. <i>Donations to the Public Administration</i>	
2.3. <i>Responsibility</i>	3	(<i>Donations, Scholarships, etc.</i>)	11
2.4. <i>Legality, Loyalty, and Fairness</i>	3	6.4. <i>Gifts to Public Administration Employees</i>	11
2.5. <i>Quality Assurance.....</i>	3	7. SUPPLIERS	11
2.6. <i>Privacy and Confidentiality Protection</i>	4	7.1. <i>General Principles.....</i>	11
2.6.1. <i>Ethical Principles in Managing Third-Party and</i>		7.2. <i>Supplier Selection.....</i>	12
<i>Company Data</i>	4	7.3. <i>Business Partner Selection.....</i>	12
2.6.2. <i>Ethical Principles in the Use of IT Systems</i>	4	7.4. <i>Ethical Safeguards in Supply and</i>	
2.7. <i>Respect for Individuals</i>	5	<i>Commercial Agreements</i>	12
2.8. <i>Objectivity, Fairness, and Impartiality</i>	5	8. RELATIONS WITH OTHER	
2.9. <i>Environmental Protection.....</i>	5	STAKEHOLDERS.....	13
3. HUMAN RESOURCES	5	8.1. <i>Financial relations with political parties,</i>	
3.1. <i>General Principles</i>	6	<i>trade unions, and associations</i>	13
3.2. <i>Recruitment</i>	6	8.2. <i>Contributions and sponsorships.....</i>	13
3.3. <i>Employment Contracts</i>	6	9. DUTIES OF THE CODE OF ETHICS	
3.4. <i>Personnel Management.....</i>	7	RECIPIENTS	13
3.5. <i>Health and Safety</i>	7	9.1. <i>General principles.....</i>	13
4. CORPORATE MANAGEMENT	7	9.2. <i>Diligence and good faith</i>	14
4.1. <i>Corporate Conduct</i>	7	9.3. <i>Protection of Company assets.....</i>	14
4.2. <i>Relations with Shareholders</i>	7	9.4. <i>Acceptance of gifts.....</i>	14
4.3. <i>Accounting Records.....</i>	8	9.5. <i>Conflicts of interest</i>	14
5. CLIENT RELATIONS.....	8	10.IMPLEMENTATION METHODS	15
5.1. <i>General Principles</i>	8	10.1. <i>General principles.....</i>	15
5.2. <i>Competition</i>	8	10.2. <i>Prevention.....</i>	16
5.3. <i>Payments and Unlawful Practices</i>	9	10.3. <i>Communication and training</i>	16
5.4. <i>Dealings with Public Administration.....</i>	9	10.4. <i>Sanctions</i>	16
6. RELATIONS WITH PUBLIC		10.5. <i>Implementation and control.....</i>	17
ADMINISTRATION	9	10.6. <i>Reporting violations of company rules and</i>	
6.1. <i>General Principles</i>	10	<i>unethical conduct.....</i>	17

**Code of Ethics**

Rev. n° 5 - 14/03/2025

1. INTRODUCTION

EUROIMMUN ITALIA S.r.l. was established in Padua in November 2001 as the sole Italian commercial branch of the German multinational company EUROIMMUN Medizinische Labordiagnostika AG. EUROIMMUN was founded in 1987 by the University of Lübeck (Germany). In 2018, the U.S.-based company PerkinElmer, Inc. became the sole shareholder of EUROIMMUN. In 2023, PerkinElmer's two business divisions, "Life Sciences" and "Diagnostics", were reorganized under the new company Revvity, Inc., which also includes the entire EUROIMMUN group.

Euroimmun Italia S.r.l. operates as a distributor of medical devices (reagents and in vitro diagnostics) in the field of human in vitro diagnostics, as well as a medical analysis laboratory in the fields of autoimmunity, infectious diseases, and allergology.

Euroimmun Italia S.r.l. is fully aware of the importance and responsibility of its activities, as it plays a crucial role in ensuring a primary good—public health—and in improving the healthcare system, thereby contributing to the development of society.

Its contribution to public health is fundamental, as evidenced by improvements, innovations, and achievements made possible through medical technologies in the diagnosis and treatment of patients—a significant contribution to patient care, quality of life, and, more broadly, life expectancy.

Within this context, Euroimmun Italia S.r.l.'s mission is to work together to generate long-term well-being and safety, constantly striving for excellence. In line with this mission, Euroimmun Italia S.r.l. places the utmost importance on an ethical approach to business management to build trust and satisfaction among its stakeholders (clients, users, patients, employees, shareholders, etc.), highlighting its performance and integrity.

The adoption of specific behavioral principles—especially in relations with public authorities, the market, and third parties—is a clear expression of the company's commitment to preventing crimes under Legislative Decree 231/2001.

The values that define and guide Euroimmun Italia S.r.l. are: dynamism, care, responsibility, and growth. Accordingly, the company endeavors to act in accordance with the principles of legality, loyalty, impartiality, confidentiality, and fairness.

Euroimmun Italia S.r.l. strictly prohibits any form of discrimination or harassment in the workplace and does not tolerate any form of corruption.

Under no circumstances can the pursuit of the company's interests justify behavior by executives, employees, or collaborators of Euroimmun Italia S.r.l. that violates current laws or the rules of this Code.

All actions taken by those who act in the name of or on behalf of Euroimmun Italia S.r.l. must comply with company procedures as well as applicable legal and regulatory provisions.

This "Code of Ethics" applies to members of the corporate bodies (Board of Directors), employees, agents, consultants, and, more generally, all those who act in the name of or on behalf of Euroimmun Italia S.r.l. (hereinafter referred to as "Recipients").

**Code of Ethics**

Rev. n° 5 - 14/03/2025

The Code defines the set of principles that Recipients are required to observe, including in their interactions with stakeholders connected to Euroimmun Italia S.r.l., and outlines conduct principles applicable to each stakeholder category.

Euroimmun Italia S.r.l.'s Code of Ethics is aligned with the Code of Ethics of "Confindustria Dispositivi Medici" and "MedTech Europe", the European trade association for medical device, in vitro diagnostics (IVD) and digital health manufacturers.

Recipients are required, through their behavior, to protect the reputation and image of Euroimmun Italia S.r.l. and to safeguard the integrity of the company's assets.

Dissemination of the Code and company procedures to Recipients is ensured through appropriate communication tools.

2. GENERAL PRINCIPLES**2.1. *Dynamism and Growth***

Euroimmun Italia S.r.l. strives for results through teamwork composed of individuals—both women and men—characterized by decisiveness, perseverance, and initiative. The company strongly believes that passion and commitment are the foundations of success. Effective teamwork requires each individual to actively collaborate and contribute their talents and abilities to the collective.

2.2. *Care*

Euroimmun Italia S.r.l. considers it essential that its employees and collaborators act with diligence, accuracy, and professionalism in order to provide high-quality service to its customers.

2.3. *Responsibility*

Euroimmun Italia S.r.l., aware of the impact of its activities on its context, conducts itself in accordance with the principles of corporate social responsibility across economic, environmental, and social dimensions.

2.4. *Legality, Loyalty, and Fairness*

Euroimmun Italia S.r.l. conducts its activities in compliance with applicable laws and regulations, this Code of Ethics, and internal company procedures, applying them with integrity and fairness.

The company and its collaborators must act correctly in activities involving the company and in interactions with public authorities.

Relations with stakeholders are based on fairness, cooperation, loyalty, and mutual respect.

2.5. *Quality Assurance*

**Code of Ethics**

Rev. n° 5 - 14/03/2025

Euroimmun Italia S.r.l. builds its reputation on the highest quality of the products and services it provides, enabling healthcare professionals to achieve the best possible outcomes for patients.

The company is committed to ensuring full compliance with contractual requirements through effective safeguards and quality control mechanisms, employing competent and qualified personnel.

2.6. Privacy and Confidentiality Protection

The company adheres to data protection regulations as set forth in the EU Regulation 2016/679 (GDPR) and Legislative Decree 196/2003, along with related amendments and implementing regulations, adopting appropriate organizational measures.

Euroimmun Italia S.r.l. ensures the confidentiality of processed personal data and the protection of information acquired through its operations and services (as both distributor and diagnostic laboratory). It also guarantees that such information is not used for personal gain or in a manner contrary to the law or detrimental to the company.

All information and materials related to company activities that Recipients become aware of or possess as part of their professional role are strictly confidential and the exclusive property of the company, including future plans and non-public data.

Particular importance is placed on information related to clients, users, and patients.

Any information or document not in the public domain and associated with specific job responsibilities must not be disclosed or used for purposes other than those authorized.

2.6.1. Ethical Principles in Managing Third-Party and Company Data

All company personnel (including data controllers and processors) who handle:

- Third-party data under Legislative Decree 196/03 and GDPR
- Company data in any form (paper, electronic, etc.)

must strictly comply with internal procedures to ensure proper data handling, security, integrity, availability, and confidentiality.

These security measures include:

- Information security policies and objectives
- Procedures within the Company Management System

Such measures are outlined in the "Privacy Manual" (prepared under Legislative Decree 196/03 and GDPR) and related privacy policies.

All personnel must protect the integrity, availability, and confidentiality of data and documents entrusted to them. No one may deviate from these obligations, even if it appears to benefit the company.

2.6.2. Ethical Principles in the Use of IT Systems

IT resources are essential for the efficient and competitive functioning of the company, ensuring the speed, breadth, and accuracy of information flows necessary for management and control.

All information stored in company IT systems, including email, is company property and must be used exclusively for professional purposes, in accordance with company policies and limitations.

Code of Ethics

Rev. n° 5 - 14/03/2025

Personnel accessing IT systems, including external systems, must use them solely for professional purposes, within the scope of their duties, and must strictly comply with applicable information security rules.

These include:

- Information security policies and objectives
- Procedures within the Company Management System

To ensure compliance with privacy regulations, all personnel must use IT systems lawfully and appropriately, avoiding any actions intended to damage others' data, systems, or communications.

Access to systems and software must be lawful and carried out using authorized credentials only.

Electronic transmissions to public entities or regarding official documentation must be truthful and factually accurate.

All personnel must protect the integrity, availability, and confidentiality of assigned data and documents. No one may deviate from these principles, even if doing so appears to benefit the company.

2.7. *Respect for Individuals*

Euroimmun Italia S.r.l. is committed to:

- Promoting respect for the physical, moral, and cultural integrity of individuals
- Ensuring working conditions that respect human dignity and providing safe working environments
- Valuing and promoting human capital to improve the skills and competencies of each employee and collaborator

2.8. *Objectivity, Fairness, and Impartiality*

In all its activities and services (both as distributor and diagnostic laboratory), Euroimmun Italia S.r.l. commits to operating with objectivity, fairness, and impartiality, respecting individual rights regardless of age, gender, ethnicity, language, religion, social status, physical or mental condition, or political opinion.

No employee or collaborator may act contrary to these principles, even if it appears to benefit the company.

2.9. *Environmental Protection*

Although Euroimmun Italia S.r.l.'s operations have limited environmental impact, the company recognizes that the environment is a vital community asset to be safeguarded. Therefore, it is committed to:

- Complying with environmental regulations
- Educating and raising awareness among staff on environmental issues

3. HUMAN RESOURCES

3.1. *General Principles*

Euroimmun Italia S.r.l. places the utmost importance on those who work within the company. Through its human resources, Euroimmun Italia S.r.l. is able to deliver its services and create value.

The primary interest of Euroimmun Italia S.r.l. is to foster the development and professional growth of each individual through:

- respect for each person's dignity and individuality, including during the recruitment process, avoiding situations that may cause discomfort;
- prohibition and prevention of favoritism, discrimination, and abuse of any kind, for example based on race, religion, political or union affiliation, language, gender, sexual orientation, age, disability, etc.;
- training appropriate to each individual's role;
- clear definition of roles, responsibilities, delegations, and access to information, enabling each person to make decisions within their remit in the interest of the Company;
- prudent, balanced, and objective exercise of delegated powers by responsible managers;
- enhancement of innovative thinking, within the limits of individual responsibilities;
- clear, accurate, and truthful internal communication on company policies and strategies;
- proper and confidential use of personal data;
- workplaces that ensure the safety and health of all users.

Euroimmun Italia S.r.l. believes that creating a working environment that reflects these principles requires the active engagement of every employee.

In particular, employees must interact with one another with civility and in a spirit of full cooperation.

Situations or decisions that could lead to actual or perceived conflicts of interest with Euroimmun Italia S.r.l. must be avoided. Any such situations must be promptly reported to the Supervisory Body.

Euroimmun Italia S.r.l. expects all employees and collaborators to act ethically, lawfully, and professionally. They are therefore required to act honestly and with integrity in all interactions — with colleagues, clients, public bodies, and private individuals — avoiding conflicts of interest and behaviors that could damage the Company's reputation.

3.2. *Recruitment*

The search and selection of personnel are carried out based on objectivity and transparency, ensuring equal opportunities and avoiding all forms of favoritism.

3.3. *Employment Contracts*

Hiring is carried out with a regular employment contract in full compliance with current legislation, the applicable National Collective Labor Agreement (CCNL), and any supplementary agreements, thus promoting smooth integration into the workplace.

**Code of Ethics**

Rev. n° 5 - 14/03/2025

3.4. Personnel Management

Euroimmun Italia S.r.l. adopts a human resource management and development policy that ensures all employees receive the same opportunities for professional growth and advancement — based on skills and results achieved — while considering the current and future needs of the Company.

Euroimmun Italia S.r.l. prohibits all forms of harassment (psychological, physical, sexual, etc.) against executives, employees, collaborators, suppliers, clients, or visitors. Harassment is defined as any form of intimidation or threat that interferes with a person's ability to perform their duties, or abuse of authority by a superior.

Anyone who believes they have been subject to harassment or discrimination may report the incident to the Supervisory Body. Retaliation against those who refuse, report, or complain about such behavior is strictly prohibited.

3.5. Health and Safety

In compliance with applicable workplace health and safety laws, Euroimmun Italia S.r.l. is committed to:

- safeguarding the physical and moral integrity of its employees;
- promoting working conditions that respect individual dignity;
- creating and maintaining safe and healthy workplaces;
- spreading and reinforcing a culture of safety by raising awareness of risks and encouraging responsible behavior from all staff.

4. CORPORATE MANAGEMENT**4.1. Corporate Conduct**

Euroimmun Italia S.r.l. believes in pursuing sound corporate conduct in compliance with laws and regulations, protecting shareholder rights, ensuring transparency and reliability for creditors, preserving the integrity of the company's capital and non-distributable reserves, and cooperating with regulatory authorities.

4.2. Relations with Shareholders

Euroimmun Italia S.r.l. ensures transparency and the right to be informed on all matters relevant to the company's operations, beyond what is required by law.

To this end, there are established information flows between company departments and the management body, and from the latter to the shareholders, ensuring up-to-date and comprehensive communication.

Code of Ethics

Rev. n° 5 - 14/03/2025

4.3. Accounting Records

Euroimmun Italia S.r.l. accurately and correctly records all corporate activities and transactions to ensure maximum accounting transparency for shareholders and external regulatory bodies and to avoid the inclusion of false, misleading, or deceptive entries.

The Company values accuracy and transparency in its financial statements and provides truthful and correct information about its activities, assets, and transactions, as well as responding to reasonable inquiries from qualified third parties.

Euroimmun Italia S.r.l. submits its annual financial statements to audit and certification by a leading auditing firm.

To ensure the accuracy, completeness, and transparency of accounting records, the Company keeps appropriate supporting documentation for each transaction, allowing:

- accurate accounting entries;
- immediate determination of the underlying characteristics and purpose;
- easy chronological and formal reconstruction;
- verification of the decision-making, authorization, and implementation process, including identification of responsibilities and controls.

No employee or collaborator may make payments on behalf of the Company without proper documentation and formal authorization.

Employees or collaborators who become aware of omissions, falsifications, or negligence in accounting records or supporting documentation must promptly report them to the Supervisory Body.

5. CLIENT RELATIONS**5.1. General Principles**

Euroimmun Italia S.r.l. aims to satisfy its clients by offering technologically advanced products and highly qualified services. These include training, technical-scientific education, support for the effective and safe use of medical technologies, assistance to medical research, education, and professional skill development, as well as specialized medical diagnostics services.

In its medical laboratory, Euroimmun Italia S.r.l. strives to provide accurate and reliable diagnostic services, ensuring the integrity of analytical results.

These activities must be conducted with the utmost transparency, fairness, and ethical standards, avoiding misleading information or behavior that exploits clients' vulnerability or lack of knowledge.

In particular, scientific information must be accurate, balanced, correct, objective, unambiguous, and well-documented. It must also comply with relevant regulations.

5.2. Competition

Code of Ethics

Rev. n° 5 - 14/03/2025

Euroimmun Italia S.r.l. firmly believes in competition and the free market, which must be safeguarded from undue internal or external pressures.

The Company commits to conducting its commercial activities in compliance with competition and procurement laws and avoids involvement—directly or through third parties—in any activity or discussion that may be seen as violating competition laws (e.g., price-fixing, market allocation, limiting production or sales, customer-sharing, exchanging pricing information, etc.).

Any action aimed at distorting fair competition is contrary to the Company's policy and strictly prohibited.

5.3. *Payments and Unlawful Practices*

Euroimmun Italia S.r.l. is committed to not offering, making, or authorizing — either directly or indirectly — any payment or valuable consideration for the unlawful purpose of:

- a) influencing any person's judgment or conduct;
- b) securing or maintaining business;
- c) influencing the decisions of public officials;
- d) gaining any improper advantage.

This commitment applies not only to direct incentives but also to indirect ones made through agents, consultants, or other third parties.

5.4. *Dealings with Public Administration*

Euroimmun Italia S.r.l. recognizes that compliance with ethical standards and applicable laws is essential in all dealings with Public Administration.

During any business negotiation, request, or relationship with Public Administration, collaborators must not attempt to unduly influence decisions, including those made by officials with decision-making authority.

In the context of public tenders, activities must be carried out in accordance with legal requirements and fair business practices.

Recipients must not promise or provide, either personally or through others, money, gifts, or other benefits to public employees in order to promote or further the interests of Euroimmun Italia S.r.l., including in response to illicit pressure.

During negotiations or business dealings with Public Administration, the following are strictly prohibited:

- offering employment or business opportunities that may personally benefit public officials (or their close relatives), particularly former officials who were involved in related negotiations, tenders, or approvals within the past year;
- giving or offering gifts that are not of nominal value;
- soliciting or obtaining confidential information beyond what is legally permissible.

6. RELATIONS WITH PUBLIC ADMINISTRATION

**Code of Ethics**

Rev. n° 5 - 14/03/2025

6.1. General Principles

All relations with the Public Administration and its personnel must comply with the provisions of Presidential Decree No. 62 of April 16, 2013, "Regulation containing the code of conduct for public employees", and must be based on maximum transparency and integrity.

To this end, Euroimmun Italia S.r.l. undertakes not to offer, either directly or through intermediaries, sums of money or other forms of payment to public officials or persons in charge of public services in order to influence their actions in the performance of their duties.

Such restrictions cannot be circumvented by using alternative forms of contributions which, under the guise of sponsorships, assignments, consultancy, advertising, etc., have the same prohibited purposes.

If the Company uses a consultant or third party to be represented in dealings with the Public Administration, the same directives applicable to employees shall apply to such subjects and their personnel.

6.2. Training Activities

Euroimmun Italia S.r.l. commits, including on behalf of its parent company, agents, and distributors, not to organize — either directly or indirectly — or participate in any form in congresses, conferences, workshops, or similar events where:

- a) entertainment elements prevail over scientific-technical content;
- b) hospitality and travel expenses are extended to accompanying persons of the invitees and/or to a period exceeding 24 hours before or after the event;
- c) travel or other expenses are paid for spouses or guests of Healthcare Professionals, or for any other person who does not have a genuine professional interest in the information shared at the event.

A specific procedure has been established whereby Euroimmun Italia S.r.l. sends the Public Administration an informative communication expressing its willingness to cover the registration and/or participation costs for one or more healthcare professionals whose area of expertise is relevant to the event. The Administration, in full autonomy, will decide whether participation is allowed.

If the healthcare professional is to be compensated for participation in the event, it is only permitted following written authorization sent to Euroimmun Italia S.r.l. by the Administration to which the professional reports.

6.2.1. Training and Instruction on Company Products

Euroimmun Italia S.r.l. provides training and instruction on its products to Healthcare Professionals to ensure safe and effective use. These educational sessions will be held in appropriate settings, such as laboratories or conference rooms, and led by our specialized technicians.

Whenever possible, such events will be held at the company headquarters; otherwise, locations will be chosen based on logistical, scientific, or organizational reasons. Tourist destinations are strictly excluded during the periods July 1–September 15 (beach destinations) and January 1–March 15, as well as July 1–August 31 (mountain destinations).

Code of Ethics

Rev. n° 5 - 14/03/2025

Participants may be reimbursed for reasonable travel, accommodation, and meal expenses, in compliance with applicable regulations.

6.2.2. Sponsorships

Euroimmun Italia S.r.l. may support independent educational or scientific conferences that promote medical progress, scientific knowledge, and effective healthcare. These typically include events organized by international, national, local, or specialized scientific associations, or by accredited Continuing Medical Education (CME) entities.

6.3. Donations to the Public Administration (Donations, Scholarships, etc.)

Euroimmun Italia S.r.l. may make donations (including financial contributions) for charitable or philanthropic purposes. Donations must be granted exclusively to organizations legally entitled to receive them under applicable laws and regulations.

Donations of money, goods, equipment, etc., to public administrations must comply with current legislation.

Scholarships must be awarded through transparent and objective selection procedures based on recognized scientific criteria, in accordance with applicable laws.

6.4. Gifts to Public Administration Employees

Euroimmun Italia S.r.l. may occasionally offer modest gifts to Healthcare Professionals. These must be of low value (appropriate to the occasion and not influencing the recipient's judgment) and in compliance with applicable laws and regulations. As a general rule, gifts should have an educational purpose.

All such expenses must be pre-authorized following internal company procedures and properly documented.

7. SUPPLIERS**7.1. General Principles**

Euroimmun Italia S.r.l. bases its relationships with suppliers and business partners on principles of transparency, fairness, loyalty, and free competition. The Company uses suppliers that comply with applicable laws and the rules outlined in this Code.

No supplier should be favored over another due to personal relationships, favoritism, or benefits that are not in the sole interest of the Company.

Specifically, Euroimmun Italia S.r.l. executives and employees must:

Code of Ethics

Rev. n° 5 - 14/03/2025

- Comply with applicable laws and contractual conditions in supplier and partnership relationships;
- Strictly follow internal procedures for selecting and managing supplier and partner relations;
- Seek supplier and partner cooperation in meeting customer needs in terms of quality, cost, and delivery times;
- Ensure transparency and completeness of information in communications with suppliers and partners;
- Avoid external influence when making decisions or performing duties related to their work.

7.2. Supplier Selection

In its purchasing policies, Euroimmun Italia S.r.l. aims to procure products, materials, works, and services under the most favorable quality-to-price ratio.

This objective must be aligned with engaging suppliers that have the financial resources, organizational structure, technical ability, experience, management systems, and resources to meet needs and operate in a manner that respects human and labor rights and environmental standards.

While favoring long-term partnerships, Euroimmun Italia S.r.l. continuously monitors its supplier base to enhance cost-effectiveness and efficiency. All qualified suppliers must be given the opportunity to compete.

Procurement personnel must follow internal procedures for supplier selection and management and must not accept gifts or benefits that could cause embarrassment, bias decisions, or raise concerns about transparency. Only modest gifts customary to the occasion and in line with company policy are permitted.

7.3. Business Partner Selection

The partner selection process must aim to achieve the greatest economic benefit for Euroimmun Italia S.r.l., while safeguarding the Company's image.

Those responsible for selecting partners must:

- Ensure equal opportunity to all qualified commercial partners;
- Verify that partners possess adequate financial resources, organizational structures, technical skills, quality systems, and other attributes compatible with the needs and reputation of Euroimmun Italia S.r.l.

7.4. Ethical Safeguards in Supply and Commercial Agreements

Euroimmun Italia S.r.l. communicates the content of this Code of Ethics to its suppliers and partners, who must agree to accept and uphold its principles and refrain from behavior that may induce (directly or indirectly) the Company or its personnel to violate them.

Contractual partners and commercial associates must sign a statement acknowledging the Code and committing to adhere to its ethical principles.

8. RELATIONS WITH OTHER STAKEHOLDERS

8.1. *Financial relations with political parties, trade unions, and associations*

Euroimmun Italia S.r.l. does not provide any contributions, either directly or indirectly, to political parties, movements, committees, or political and trade union organizations, nor to their representatives or candidates, in Italy or abroad, except for contributions required by specific legal provisions.

The Company refrains from any direct or indirect pressure on political or trade union representatives through its managers, employees, or collaborators (as well as their family members, friends, or acquaintances).

In dealings with other interest groups (e.g., trade associations, non-profit organizations, etc.), no manager, employee, or collaborator may promise or pay sums of money, promise or grant goods or other personal benefits to promote or favor the interests of the Company.

The directors, managers, and employees of Euroimmun Italia S.r.l. may not engage in political activity during working hours or use Company property or equipment for such purposes; they must also clarify that any political opinions expressed to third parties are strictly personal and do not represent the views or position of Euroimmun Italia S.r.l.

8.2. *Contributions and sponsorships*

Euroimmun Italia S.r.l. considers requests for contributions only from non-profit organizations or those of high cultural or charitable value.

Sponsorship activities may concern social, environmental, sports, entertainment, artistic, and cultural topics.

In assessing and selecting proposals to support, the Company pays particular attention to any potential conflicts of interest, whether personal or corporate.

For conduct guidelines in sponsorship relations with clients from the Public Administration, please refer to § 6 "Relations with the Public Administration".

9. DUTIES OF THE CODE OF ETHICS RECIPIENTS

9.1. *General principles*

**Code of Ethics**

Rev. n° 5 - 14/03/2025

The Code of Ethics is an integral part of the Company Regulations of Euroimmun Italia S.r.l., as well as of all contracts signed with the other Recipients, as defined in § 1. By signing such contracts, the Recipients agree to comply with and promote the principles and rules established in the Code.

9.2. Diligence and good faith

Each director, manager, employee, and collaborator must act loyally and in good faith, respecting the obligations established in the employment contract and ensuring the required performance.

They must also be familiar with and observe the ethical rules contained in this Code, shaping their conduct on mutual respect, cooperation, and collaboration.

All Company personnel, regardless of their role and/or level of responsibility, must be aware of and comply with all provisions related to environmental protection, occupational health and safety, and privacy protection.

9.3. Protection of Company assets

The Company's assets consist of physical and intangible property, the latter being the result of employees' work, structural and commercial information of strategic importance, and a substantial amount of confidential data entrusted to employees in the course of their work.

Protecting these assets is essential for the survival and success of the business. Loss, theft, or misuse of such assets could severely damage the Company's interests.

Each director, manager, employee, and collaborator is responsible for the preservation and protection of the assets and tools entrusted to them and must contribute to the safeguarding of the entire corporate patrimony. To this end, they must fully comply with the Company's operational and safety procedures and act diligently to protect Company property through responsible behavior consistent with Company policies.

In any case, documents related to the Company's business, work tools, and any other tangible or intangible property must be used solely to achieve the Company's institutional goals and according to its procedures. They may not be used for personal purposes or transferred or made available, even temporarily, to third parties.

9.4. Acceptance of gifts

Directors, managers, employees, and collaborators may not receive, directly or indirectly (via family members, friends, or acquaintances), gifts or favorable treatment from individuals, entities, or companies related to the business activities of Euroimmun Italia S.r.l., except within the limits of normal courtesy and only if of modest value.

If a director, manager, employee, or collaborator receives gifts or any other form of benefit not aligned with the above, they must refuse the gift and promptly inform the Supervisory Body.

This rule also applies in countries where high-value gifts are customary.

9.5. Conflicts of interest

Code of Ethics

Rev. n° 5 - 14/03/2025

Recipients of the Code of Ethics must avoid all situations and activities where a conflict of interest — even a potential one — could arise between their personal economic interests and their professional duties within the Company.

Employees and senior personnel of Euroimmun Italia S.r.l. must report to the Supervisory Body any situations where a conflict of interest may exist, even hypothetically, as well as any planned roles involving consultancy, management, or administration for any entity other than Euroimmun Italia S.r.l. They must not pursue personal interests at the expense of the Company's interests, use Company assets for unauthorized personal purposes, or hold direct or indirect interests in competitor companies, clients, suppliers, or auditing firms.

Examples of conflict of interest include, but are not limited to:

- Holding financial or economic interests, including through family members, in clients, suppliers, or competitors;
- Accepting money, gifts, favors, or benefits of any kind from individuals, companies, or organizations that have or seek business relationships with Euroimmun Italia S.r.l.;
- Exploiting one's position for purposes that conflict with the Company's interests;
- Entering into negotiations and/or contracts — in the name or on behalf of Euroimmun Italia S.r.l. — with family members or partners, or with legal entities in which they have a stake or interest.

10. IMPLEMENTATION METHODS

10.1. General principles

The Board of Directors of Euroimmun Italia S.r.l. is directly responsible for developing, maintaining, and improving the Company's Organizational and Management Model and this Code of Ethics, in terms of both effectiveness and efficiency.

To ensure compliance with and effectiveness of the Code of Ethics, the Board of Directors assigns the responsibility for monitoring, control, and updates of the Code to the Supervisory Body, established in accordance with Legislative Decree 231/2001.

The Supervisory Body is responsible for:

- Monitoring initiatives to promote awareness and understanding of the Code of Ethics, particularly ensuring the development of ethical communication and training activities;
- Continuously monitoring the application of the Code of Ethics by all relevant parties through ethical risk control processes and the analysis, evaluation, and management of received reports;
- Reporting violations of the Code by Company personnel to the relevant corporate functions for corrective action;
- Providing advisory support during disciplinary procedures, if required;
- Giving opinions on the review of Company policies and procedures to ensure alignment with the Code;
- Proposing revisions to the Code of Ethics when necessary.

10.2. Prevention

In compliance with current legislation and in line with its goals of efficiency, integrity, transparency, and quality, Euroimmun Italia S.r.l. adopts organizational and managerial measures suitable for preventing unlawful conduct or behavior contrary to the Code by any individual acting on behalf of the Company.

To ensure proper and functional management of its activities, the Company implements a system of delegated powers and responsibilities, explicitly assigning duties to qualified and competent individuals.

Euroimmun Italia S.r.l. has adopted and applies Organizational and Management Models that include measures to ensure operations comply with current legislation and the behavioral rules of this Code, and to identify and promptly eliminate potential risk situations.

10.3. Communication and training

The Code of Ethics is communicated to Euroimmun Italia S.r.l. stakeholders through a specific dissemination campaign. In particular, this Code is made known to the Parent Company, Euroimmun AG.

To ensure that all managers, employees, and collaborators correctly understand the Code, the Supervisory Body, in coordination with the Human Resources Manager, includes specific training on ethical principles and rules in the onboarding program for new hires.

Training initiatives are tailored according to the role and responsibilities of employees and collaborators; newly hired personnel receive a dedicated training program that also covers the contents of the Code of Ethics, compliance with which is mandatory.

10.4. Sanctions

Compliance with the Code of Ethics by the Company's Recipients is considered an essential part of the contractual obligations for employees (pursuant to Article 2104 of the Italian Civil Code) and for collaborators of Euroimmun Italia S.r.l.

Violation of the Code by Recipients may constitute a breach of primary contractual obligations or disciplinary offense, with all resulting legal consequences.

Euroimmun Italia S.r.l. undertakes to impose sanctions with consistency, impartiality, and uniformity, proportionate to the respective violations and in accordance with applicable labor laws.

In particular, in cases of Code violations committed by employees, the related measures and sanctions shall be applied in full compliance with Article 7 of Law No. 300 of May 20, 1970, applicable regulations, and current collective bargaining agreements.

**Code of Ethics**

Rev. n° 5 - 14/03/2025

Punishable offenses and related sanctions are listed in a specific document posted in a place accessible to all, as required by the applicable National Collective Labor Agreement.

This Code confirms the mandatory nature of disciplinary action in cases of non-compliance with its behavioral rules.

10.5. Implementation and control

Implementation of the Code of Ethics is entrusted to the Company's Legal Representative, with support from the Supervisory Body.

The Code of Ethics is widely disseminated to all recipients.

The Supervisory Body is responsible for:

- a) Monitoring compliance with the Code and its dissemination among all recipients;
- b) Investigating all reported Code violations and informing the appropriate corporate bodies and functions of the findings to adopt any necessary sanctions;
- c) Proposing changes to the Code to reflect the evolving Company context and needs.

10.6. Reporting violations of company rules and unethical conduct

Cases of (even suspected) violations of laws and/or company rules or of this Code of Ethics must be reported in writing and confidentially to the Supervisory Body, which will analyze the report and may hear from the whistleblower and the alleged violator.

Reports may be submitted via the following channels:

- **By email:** odv@euroimmun.it
- **By letter:** Euroimmun Italia srl con Socio Unico
Corso Stati Uniti 4, Scala F – 35127 PADOVA
Attn: Supervisory Body

The Company's Supervisory Body shall act in a manner that protects whistleblowers against any form of retaliation, defined as any act that could even imply discrimination or penalization.

Confidentiality of the whistleblower's identity is guaranteed, except where required by law.