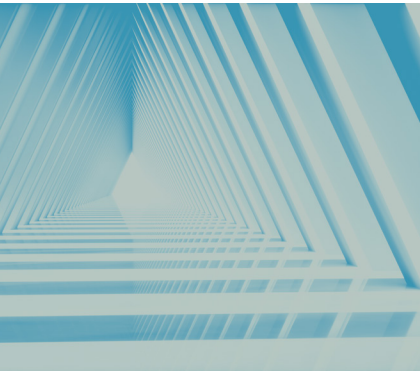


Dedalus

DEDALUS GROUP SUSTAINABILITY POLICY



Life Flows Through Our Software



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1. INTRODUCTION

1.1 Objective and purpose of the document

Dedalus Group (hereinafter also the “Group” or “Dedalus”) aims at creating a world-leading community based on the experience and expertise of its clients and team who, together, will create a path to advance knowledge and address the opportunities of modern healthcare. Dedalus supports, on a day-to-day basis, its clients in delivering value to each actor in the healthcare ecosystem, which includes individuals and their families, healthcare professionals, health, social and life science organizations, national/regional healthcare systems, and society at large.

The Group constantly strives to develop sustainability policies towards people, customers, providers, the community, and the environment in which we live.

Since its foundation, the Group has upheld the value of **acting sustainably** in the economic, social and environmental spheres.

Therefore, Dedalus Group has set out its **Sustainability Policy** (hereinafter also the “Policy”) to **guide** its **decisions** and **make concrete commitments** to ensure responsible business management. In line with the Group’s mission, vision, values, the Code of Ethics and the Business Partners Code of Conduct, on which the Dedalus’ principles of conduct, also for Business Partners, are based, the Policy has been developed to **guide the integration of sustainability issues in the Group’s strategy and activities** and to foster awareness of the commitments made in pursuing sustainable development in the medium and long term.

Dedalus views sustainability as a fundamental driver, incorporating it into its corporate culture, its strategy and its efforts to build long term value for the Group and its stakeholders. To this end, the Group is committed to conducting activities with the interests of all its stakeholders in mind, in the knowledge that dialogue and the sharing of objectives are tools through which creating shared value and promoting sustainable development.

The Policy outlines Dedalus’ commitment to ESG (Environmental, Social, and Governance) matters, which are deemed material in accordance with the results of the Double Materiality Assessment, subject to periodic review, and which identify priority sustainability issues for the Group’s strategies and stakeholders.

Furthermore, the Policy reaffirms, formalizes and articulates the Group’s belief that the creation of sustainable and long-lasting value must be pursued while complying with the ethical principles of legality and fairness, integrity and honesty, impartiality and transparency, with a view to continuous improvement, operational efficiency and cost-effectiveness.

1.2 Scope of application

The Sustainability Policy has been approved by the Board of Directors of Dedalus S.p.A. and its implementation and enforcement is mandatory for Dedalus S.p.A. and all its Subsidiaries around the world. This Policy is immediately applicable to whole Dedalus Group, without the possibility of derogation. In this regard, Subsidiaries shall ensure the adoption of this Policy, in a timely manner and in any case no later than six (6) months [by 31st December 2025], by resolution of their Board of Directors or equivalent body. The date of adoption of this Policy must be communicated to the Group Chief Risk & Compliance Officer.

Indee, the Policy applies to all the Subsidiaries of the Group around the world and to all individuals worldwide working on behalf of Dedalus at all levels and grades, including directors, senior executives, officers, employees (whether permanent, fixed term or temporary) and trainees.

It is disclosed and made available in full to all Group personnel, via the corporate intranet, and to stakeholders through publication on Dedalus global website (www.dedalus.com).

1.3 References

The Group Sustainability Policy reinforces and integrates the values and principles already stated in several Policies adopted at Group level, such as:

- Dedalus Code of Ethics;
- Group Business Partners Code of Conduct;
- Group Antitrust Code of Conduct;
- Group Anticorruption Policy;
- Group Conflict of Interests Policy;
- Group Whistleblowing Policy;
- Group D&I Commitment Statement;

providing a document through which the Group upholds the principles of responsible and sustainable growth.

In defining its principles, Dedalus has been inspired by the main standards issued by several international organizations of reference, including:

- the Sustainable Development Goals (SDGs) of the United Nations;
- the International Charter of Human Rights of the United Nations, including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;

- the United Nations Guiding Principles (UNGP) on Business and Human Rights;
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO) and related applicable covenants;
- the 10 principles of the UN Global Compact;
- the OECD Guidelines for Multinational Enterprises;
- the Women's Empowerment Principles (WEPs);
- the UK Modern Slavery Act 2015;
- ISO 14001 for Environmental Management System, SA8000 for Social Accountability Management System and UNI/PdR 125 on Gender Equality.

2. SUSTAINABILITY COMMITMENT

“Building a collaborative and people-centered digital health ecosystem, by reducing Dedalus’ carbon footprint and minimizing the Group’s environmental impact, fostering an inclusive, safe and respectful work environment, and promoting accountability in the supply chain by sharing ethical, transparent and sustainable practices. For Healthy People and a Healthy Planet.”

Sustainability is deeply embedded in Dedalus’ purpose *“Serving every actor in the healthcare ecosystem to provide better care on a healthier planet.”* Moreover, Dedalus’ vision of creating a digital health care ecosystem in which all stakeholders actively collaborate across the continuum of care to improve clinical outcomes for each individual not only guides the Group’s business strategy and model, but also its commitment to Sustainability. Indeed the vision shapes a commitment that is both strategic and operational: Dedalus strives to create long-term shared value for the communities where it operates, balancing economic growth, social progress, and environmental care. Through its **“Dedalus4Sustainability”** strategy, the Group is committed at every level to actively **contribute to sustainable development** by acting with integrity and ethical conduct, integrating environmental responsibility, respect for people, and a strong sense of accountability in every part of its operations, from product development and service delivery to the way it engages with suppliers and partners.

This means contributing to the future of healthcare while:

- fostering a **positive impact on the planet** by minimizing the Group’s environmental footprint;
- **empowering Dedalus’ people** by ensuring a good place to work, healthy and safe, where everyone is welcomed and where everyone can improve their skills and competences;

- developing **safe, high-quality and innovative products and services**, by improving solutions to meet the changing needs of healthcare, ensuring **data protection, privacy** and responsible management of confidential information in full compliance with applicable regulations, and **supporting a responsible and inclusive supply chain**.

Through these interconnected actions, Dedalus strives to cultivate a culture of openness, health and environmental consciousness, driving positive outcomes for individuals, communities, and the planet. This is why Dedalus' commitment is structured around three key pillars **Dedalus4Planet**, **Dedalus4People**, and **Dedalus4SupplyChain** which guide the Sustainability strategy and are based on the principles of fairness, transparency, ethics and integrity that Dedalus consistently adopts in managing its activities.

Finally, in line with these commitments, Dedalus is also determined to positively contribute to the United Nations' Agenda 2030 and to the achievement of the Sustainable Development Goals (SDGs), integrating this commitment into its business model to create value over time for stakeholders and generate opportunities for the communities and territories in which it operates. As a matter of fact, Dedalus has identified some tangible objectives that drive its business model towards inclusive, responsible and sustainable growth, as described in the following paragraphs.

2.1 Dedalus' values

Dedalus' commitments to sustainability originate from the Values which are the foundation of the Group's culture and guide the behaviors and decisions of every individual, as well as the interactions with Dedalus' employees, partners, suppliers, clients, and communities:

- **Personal Accountability** drives Dedalus' people to take ownership of their actions and their impact on the entire ecosystem, both individually and collectively.
- **Embracing People & Challenges** reflects a commitment to caring for stakeholders, building relationships based on openness, trust and transparency.
- **Innovation at Scale** reflects a commitment to share an innovative and continuous improvement approach, with the ambition to learn, grow and innovate.
- **Achieving Excellence Together** reflects a commitment to fostering an open, trusting and respectful working environment, and to harnessing the talents and qualities of individuals to achieve excellence.
- **Pursuing Diversity & Inclusion** means fostering a respectful, diverse, and inclusive environment where every voice is heard and valued.

2.2 Act with integrity, fairness and transparency

The Group undertakes to operate in compliance with the ethical principles of legality and fairness, integrity and honesty, impartiality and transparency in all relations with its stakeholders, promoting **full compliance with the regulations** as well as the highest ethical standards, rejecting all forms of active and passive corruption.

Dedalus recognizes that corruption, beyond being illegal, is a major barrier to economic development, fair competition, and sustainable growth. For this reason, the Group takes a **zero-tolerance approach** to **any form of corruption** or **unethical conduct**. Dedalus' internal policies clearly define rules of behavior and identify sensitive areas of our operations where risks may arise. Through preventive measures and strong governance systems, the Group works to ensure that no one at Dedalus, whether employee or partner, ever feels compelled or permitted to act outside of ethical boundaries.

To further strengthen this commitment, the Group has adopted its own Code of Ethics¹ and other compliance policies with the aim of translating its mission, vision and values into rules of conduct for all employees and all those who work with and for the Group. The Code of Ethics defines the general criteria of conduct relating to compliance with rules, regulations and ethical principles, human rights and personal dignity, respect for and protection of the market, competition and intellectual property, protection of personal data, proper use of technology and environmental protection.

The Code of Ethics also regulates the criteria of conduct with reference to personnel policies, health and safety at work, employee duties and the use of company assets, as well as acting ethically with public authorities and institutions.

Transparency and accountability are essential to Dedalus' way of working. The Group expects everyone representing Dedalus to reject improper advantages of any kind and to avoid situations that could create even the appearance of a conflict of interest. Whether dealing with Public Authorities, suppliers or customers, Dedalus' actions must reflect objectivity and integrity. Any doubts or concerns should be promptly raised with the appropriate internal channels.

2.3 Dedalus4Planet

Dedalus4Planet reflects the Group's commitment to environmental responsibility as a core value of its Sustainability strategy. The goal is to **minimize the environmental impact** of operations by promoting proactive and forward-looking actions that support sustainable development and contribute to the global **fight against climate change**.

¹ The document is available at <https://www.dedalus.com/global/en/esg/code-of-ethics/>

Always acting in compliance with applicable environmental laws and regulations, the Group continuously works to **improve energy efficiency, reduce GHG** (greenhouse gas) **emissions** and **pollution** and **minimize water consumption**.

The Group promotes **responsible** and **sustainable use of resources** (e.g. energy, water, waste) internally, towards its customers through products, services and information campaigns and with the inclusion of sustainability criteria in the selection and evaluation of the chain of suppliers.

Dedalus believes that technological innovation, as an integral part of its business, can be a powerful tool to **reduce the environmental footprint of healthcare ecosystem**. Through cutting-edge digital solutions, Dedalus is committed to helping healthcare providers operate more efficiently and sustainably, improving system resilience and reducing resources consumption, including their carbon footprint.

Although Dedalus' activities, by nature of its business, do not have a significant impact on waste generation and biodiversity, the Group is however committed to **promoting** and **encouraging reuse** and **recycling** across its operations, optimizing its processes with the aim of **reducing waste** and **protecting natural ecosystems** by recognizing the importance of biodiversity, soil and ecosystems (particularly marine ones) conservation as integral to sustainable development.



By acting according to the principles described above, Dedalus actively contributes to **Goal 12 - Responsible Consumption and Production** and **Goal 13 - Climate Action** of the **United Nations 2030 Agenda**.

2.4 Dedalus4People

The Dedalus4People pillar reflects the Group's strategic commitment to fostering a working environment that is not only healthy and safe, but also inclusive, diverse, and designed to support people's well-being, engagement, and professional growth.

To this end, Dedalus is committed to providing a **working environment free from discrimination, intimidation, harassment, bullying, or violence**, implementing appropriate health and safety measures, ad-hoc policies, and internal procedures to address and prevent them. The Group considers human resources as a fundamental capital for its growth and a key driver of innovation and long-term success.

The protection and enhancement of skills, the health and safety of workers, together with the quality of employment, are central to the pursuit of Dedalus' business strategies. This is why the Group is actively committed to providing all employees with good working conditions by ensuring that they have adequate wages, working hours and benefits. Dedalus is also committed to the **personal and professional growth** of its employees and collaborators, fostering an **inclusive, stimulating and constructive working environment**, by investing in continuous learning and design courses aimed at enriching skills and competences and promoting a periodic performance review. Furthermore, the ability to attract and retain **talent** is the key to long-term value creation: this is why Dedalus is committed to supporting and caring for its employees, investing in their **well-being** through **social protection** initiatives and promoting their continuous **engagement** aiming at building constructive relationships with them and with trade representatives.

Dedalus fosters a global culture where a variety of perspectives and experiences, enriched by different cultural and professional backgrounds, are seen as strategic assets to meet the evolving needs of the healthcare sector. The promotion of dialogue, the exchange of ideas, and teamwork are actively encouraged as levers for innovation, collaboration, and excellence. This is why Dedalus Group is committed to promote and enhance the expression of people while respecting all diversities. Indeed, **diversity, equality and inclusion (DEI)** is one of the Dedalus' Core Values embedded in the corporate culture and is applied across all phases of the employment lifecycle, from recruitment and onboarding to performance evaluation, training, and career development. Particular attention is paid to fighting all forms of discrimination, including those based on gender identity, sexual orientation, ethnicity, religion, age, disability, or other personal characteristics. The commitment to diversity and inclusion also extends to **women empowerment**. To achieve its purpose to serve each actor in the HealthCare Ecosystem and to provide better care for a healthier planet, Dedalus heavily relies on **STEM** (Science, Technology, Engineering and Maths) subjects. STEM is in Dedalus' DNA, and that's why the Group is committed to having diverse representation across STEM roles, including women, and to inspire future generations to consider STEM careers.

At Dedalus, **protecting people** is not just a legal or social obligation, but it is integrated into the operations of the Group. The Group is committed every day to the promotion and consolidation of good **health and safety** risk prevention and management practices by promoting a healthy and safety culture and employees' awareness on these topics. All the activities carried out in the field of occupational safety are aimed at minimizing any cause of injury or occupational disease through prevention and protection actions.

Respect for human rights represents the foundation for sustainable development, which is why Dedalus is committed to respecting all universally recognized human rights² in its activities and to promoting respect for them in activities entrusted to, or conducted with, partners and stakeholders. This includes a proactive stance in preventing modern slavery, forced labor, child labor (not allowing the use of child or forced labor under any circumstances), and protecting the right of freedom of associations, the right to collective bargaining, the right to adequate working conditions also in terms of working hours and rest, remuneration consistent with collective agreements and regulations in force, the respect for diversity, non-discrimination, the fight against any form of violence, as mentioned above, and the right to privacy of personal data.



By acting according to the principles described above, Dedalus actively contributes to **Goal 5 - Gender Equality** and **Goal 8 - Decent Work and Economic Growth** of the **United Nations 2030 Agenda**.

2.5 Dedalus4Supply Chain

Dedalus recognizes the importance of the role played by suppliers in its path of sustainable development. Suppliers are **strategic partners**, with whom the Group seeks long-term, transparent and ethical relationships, to achieve its objectives, both business and sustainability, as well as fostering dialogue and mutual collaboration.

Therefore, as part of its global commitment to **sustainable sourcing and procurement**, Dedalus integrates environmental, social, and governance principles into the management of its supply chain, encouraging alignment with its values, operational standards, and sustainability commitments and **fostering an inclusive supply chain**.

Supplier selection and evaluation processes go beyond traditional commercial criteria such as quality, delivery reliability, and cost-efficiency. Dedalus incorporates the expectations of sustainability in its contractual agreements, requiring the **acceptance of the Dedalus Code of Ethics and the Dedalus Business Partners Code of Conduct**, with a commitment not to work with partners that violate the fundamental principles of respect for human dignity³.

In particular, Dedalus requires all Suppliers to ensure that their operations comply with applicable environmental, social and governance laws and regulations.

² With particular reference to the United Nations Universal Declaration of Human Rights, OECD Guidelines for Multinational Enterprises and the ILO Conventions.

³ As a matter of example, Dedalus prohibits relationships with suppliers that do not comply with the Modern Slavery Act 2015 or similar.

Suppliers are asked to act according to principles of integrity, transparency and fairness and to commit to actions that contribute to the reduction of GHG emissions, energy efficiency, and responsible resources use. Moreover, they are required to promote a supportive and inclusive working environment that values the diversity of their employees and respect for human rights, applying high standards of health and safety in the workplace.

But the focus on responsible supply chain management, that starts already at the stage of supplier selection, extends continuously over time, through periodic dialogue, support and auditing activities. Dedalus periodically subjects its Suppliers to an **ESG risk assessment** through a dedicated portal, with the aim of managing the risks of adverse ESG impacts in Dedalus' supply chain and ensuring that Suppliers share the values and implement practices aligned with Dedalus' commitment to sustainability. Downstream from the assessment process, strengths and possible areas for improvement are highlighted. Suppliers deemed strategic are asked to implement specific measures, if necessary. Finally, the results of this assessment are shared with the functions concerned and influence the purchasing process with the aim of increasingly selecting Suppliers which implement the best ESG practices.



By acting according to the principles described above, Dedalus actively contributes to **Goal 12 - Responsible Consumption and Production** of the **United Nations 2030 Agenda**.

3. SUSTAINABILITY GOVERNANCE

The **Board of Directors** defines and maintains oversight of the organization's strategy and sustainability matters, by approving the Group Sustainability Plan that is based on sustainability-related impacts, risks and opportunities annually identified through the Double Materiality Assessment. The Board examines and approves also the content of periodic Group Sustainability Report.

As part of the integrated sustainability governance system, Dedalus has set up the **ERM & Sustainability Committee**⁴, composed by the Group Chief Executive Officer and members representing the Dedalus Group Top and Senior Management, and coordinated by the **Group Chief Sustainability Officer**.

⁴ Enterprise Risk Management.

It is responsible for discussing the Group's strategic guidelines and priorities in terms of sustainability by discussing and validating the ESG-related impacts, risks and opportunities (IROs)⁵, the Group Sustainability Plan, including related progress, and the periodic Group Sustainability Report.

The **Group Chief Sustainability Officer**⁶ is responsible for:

- carrying out the Double Materiality Assessment, in order to identify, assess and manage main ESG-related impacts, risks and opportunities according to the CSRD⁷ requirements, by involving corporate functions and stakeholders;
- drafting the Group Sustainability Plan and monitoring related targets;
- preparing the Group Sustainability Report and responding to any ESG-related requests from external stakeholders;
- preparing periodic reports for the Board of Directors, the ERM & Sustainability Committee and Top Management.

The **Group Sustainability function** supports the Group Chief Sustainability Officer by applying international best practices and providing it with the elements and information it needs to outline sustainability strategy, plans and actions. Moreover, the Group Sustainability function coordinates all activities at the Group level relating to sustainability, including the collection of data from all the countries and from all departments, and any other useful information for drafting the Group Sustainability Report and responding to ESG-related external stakeholder requests.

Each corporate **function** is therefore required to collect the data aimed at drafting the Group Sustainability Report and implement the sustainability practices promoted at Group level by integrating the rules and principles expressed in the Group's Policies in order to adopt the Group's values and vision, improving the approach to corporate responsibility and awareness of sustainability issues. They must operate to achieve the Group Sustainability targets.

⁵ Identified and assessed as relevant to the Group through the Double Materiality Assessment annually performed.

⁶ Dedalus has adopted an integrated internal control and risk management system. Therefore, the Group Chief Sustainability Officer is also head of the Risk, Compliance and Internal Audit functions.

⁷ The European Commission has adopted the Directive 2022/2464/EU or Corporate Sustainability Reporting Directive (CSRD) which introduced new environmental and social reporting obligations for companies exceeding defined thresholds.

4. IMPLEMENTATION OF GROUP SUSTAINABILITY POLICY

In order to transfer the commitments of the Sustainability Policy to the entire organization and to achieve the goals set out in the Group Sustainability Plan, the Group has adopted a sustainability management model that entails, among others, assigning specific functions and responsibilities to the actors indicated in the previous section.

Considering stakeholder involvement as fundamental and in order to build relationships based on transparency and mutual trust with its stakeholder, the Group undertakes to report annually on its environmental, social and governance aspects, highlighting the progress achieved in maintaining commitments and achieving sustainability objectives, monitoring compliance with this Policy, maintaining an active dialogue with stakeholders and responding to their requests and expectations.

4.1 Training, Education & Awareness

Dedalus encourages Dedalus' Persons to be informed about the Group Sustainability strategies and activities. In accordance with this purpose, Dedalus strives to provide necessary dedicated and periodic updates and training on sustainability topics. In addition, on-going diffusion of sustainability materials for raising awareness shall be provided through all available communication channels.

4.2 Monitoring and improvements

The Group Chief Sustainability Officer must periodically review this Policy to ensure that it remains effective to the highest degree, as well as that it reflects the results of the Double Materiality Assessment and when regulatory requirements, business strategies or changes in the context require it, including any feedback raised by the internal and external stakeholders.

Minor updates to this Policy will be approved by the Group Sustainability Officer, while significant variations will require the approval of the Board of Directors, upon discussion with the ERM & Sustainability Committee.

4.3 Guidance For Employees

For any questions or concerns, please refer to the Group Sustainability Function who will provide the necessary support or send a request to sustainability@dedalus.com.