

Code of Ethics

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1. MESSAGE FROM OUR CEO

Dear Everyone,

Dedalus is built around five core values: embracing people and challenges, innovation at scale, personal accountability, pursue diversity and inclusion, achieve excellence together. These values inspire and govern all our interactions in the business ecosystem: colleagues and communities, clients and patients, business partners and suppliers, investors and analysts. These values stick with us as we commit to operate continuously with integrity. Through these values we want to realize our vision: a digitally-enabled healthcare ecosystem where all stakeholders actively collaborate across the continuum of care to improve each citizen's health outcomes.

Our values and our Code of Ethics apply to you no matter what role you have in the company.

While you read this Code of Ethics I recommend you to take a moment to reflect on how it apply to your individual role at Dedalus. Think about the daily interaction you have with others, inside and outside the company, the impact on the software you develop, or the projects you run, the deals you're finalizing.

We are constantly committed to build on integrity the highest standards of quality, innovation, safety and environmental sustainability of our software, services and solutions. I'm convinced that integrity is and will remain the basis of our sustainable and successful business.

We fully embrace the EUROPEAN ETHICAL PRINCIPLES FOR DIGITAL HEALTH and the Dedalus Code of Ethics clearly expresses the company expectations as your employer and provides you with practical guidance, examples and references to further useful information. At the same time the Dedalus Code of Ethics can be viewed and used as an official document which evidences our company's commitment towards making a valuable and sustainable impact on society. Your thorough understanding and application of our Code of Ethics is one of the most critical ways we can uphold this responsibility.

Thank you for your dedication to these principles, and for everything you do to help Dedalus being the preferred partner of healthcare ecosystem stakeholders on their digital and cultural transformation journey.

Alberto Calcagno,
Dedalus CEO

2. ABOUT US

FOUNDED IN FLORENCE IN 1982, THE DEDALUS GROUP

(HEREAFTER ALSO “DEDALUS” OR “GROUP”) IS THE LEADING PROVIDER OF HEALTHCARE AND DIAGNOSTIC SOFTWARE IN EUROPE AND ONE OF THE LARGEST IN THE WORLD.

SINCE 2016, DEDALUS HAS EMBARKED ON AN EXPANSION STRATEGY, FOCUSING ON THE GROWING DEMAND FOR INNOVATIVE AND COMPREHENSIVE SOLUTIONS TO SUPPORT THE DIGITAL TRANSFORMATION OF THE HEALTHCARE ECOSYSTEM.



2.1 WHAT WE BELIEVE IN

PURPOSE & VISION

Our purpose is simple: Serve each actor of the Healthcare Ecosystem to provide better care in a healthier planet. This purpose shapes our vision for a digitally- enabled healthcare ecosystem in which all stakeholders actively collaborate across the continuum of care to improve each citizen's health outcomes.

We want to make a paradigm shift to meet the complex challenges that healthcare requires of us, both today and tomorrow.

We believe it is possible to innovate in health IT with a progressive and open approach, offering our clients full mastery of the evolution strategies.

We are committed to developing a **“continuity of care”** approach that puts the person and their needs at the center of the solution design process.

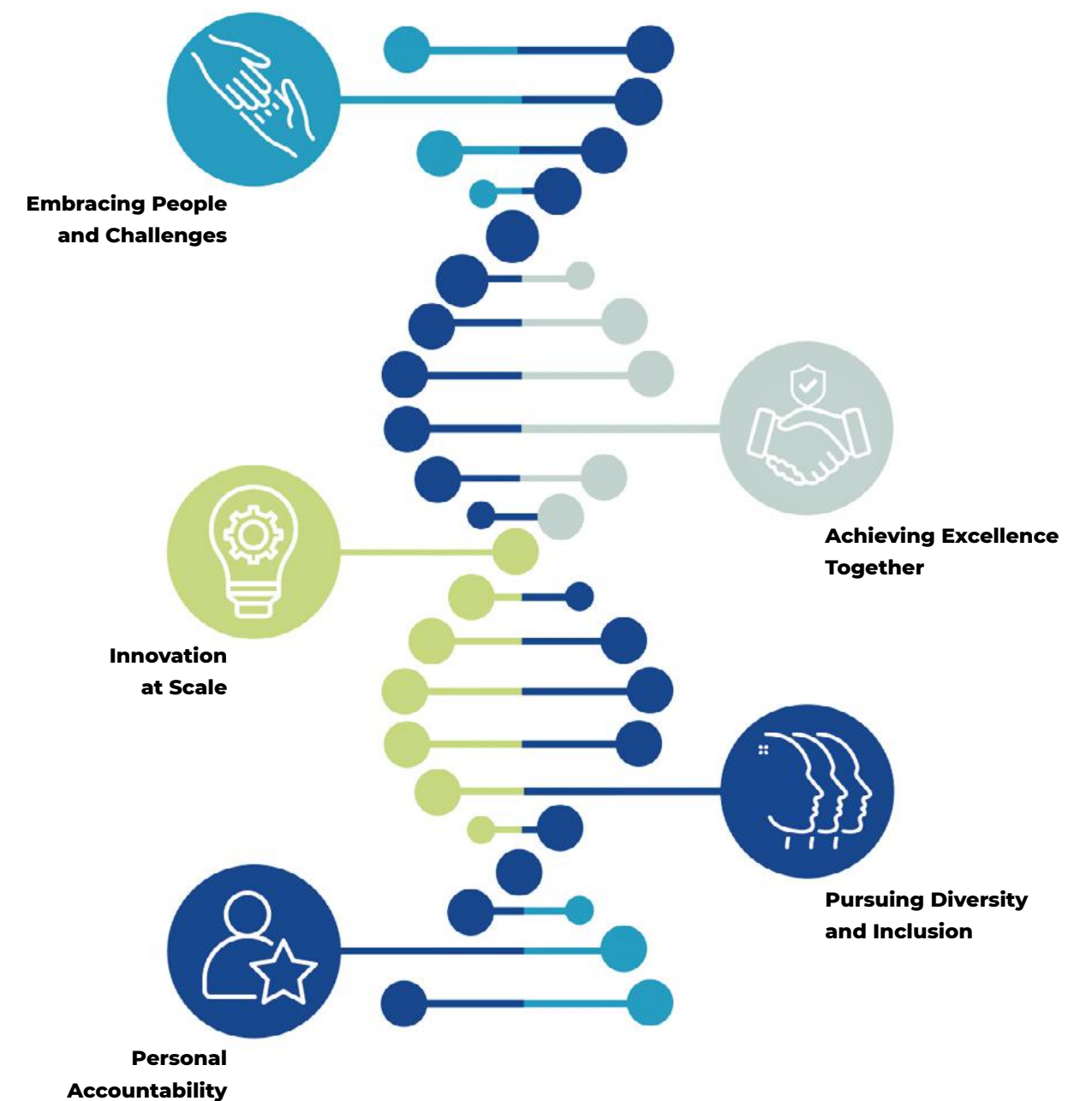
We support healthcare organizations, their professionals and patients with innovative end-to-end solutions, focused on clinical cooperation and process optimization, which can be activated gradually, thus protecting our customers' past investments. The person, as a complex individual with diverse needs, is the end point of our activities and the ultimate beneficiary. For this reason, we are aware and very proud to do a “special job”: **Life flows through our software.**



2.2 OUR CORE VALUES

TO TRANSFORM OUR VISION INTO REALITY **WE RELY ON OUR CORE VALUES**, WHICH ARE THE FOUNDATION OF OUR CULTURE AND GUIDE BEHAVIOR AND CHOICES, BOTH OURS AND OF ALL THOSE WITH WHOM WE INTERACT.

OUR CORE VALUES



2.2.1 EMBRACING PEOPLE AND CHALLENGES

Caring for the people in our community is at the heart of what we do: our people, our suppliers, our customers and their patients, our networks, our local communities and many more. We embrace their challenges with an enduring determination to succeed.

What it means to us:

- We care about the people who make up our community.
- By supporting others, it enables us to build relationships, based on openness, trust and transparency.
- We embrace the challenges and complexities of our community, striving for excellence together.



2.2.2 ACHIEVING EXCELLENCE TOGETHER

We want to be better than the day before! Our passion for achieving excellence together generates enthusiasm for what we do and more importantly, how we do it.

What it means to us:

- We strive to achieve excellence together with our community.
- We develop everyone's talents and qualities, valuing and building our relationships, despite it being difficult or challenging.
- We safely challenge ourselves and others whilst fostering an open, trusting and respectful environment.

2.2.3 INNOVATION AT SCALE

We passionately cultivate innovation, having the opportunity to test it in multiple international contexts and rapidly bringing it to scale. We play a part in innovation every day, by finding creative ways of working, encouraging curiosity, sharing new ideas, and being open to continuous learning.

What it means to us:

- Our innovative nature gives us the motivation to embrace change, learn from our mistakes and constantly strive to exceed expectations.
- We promote an environment which enables everyone to feel confident in sharing new ideas.
- We individually and collectively encourage new ways of looking at problems, processes, or solutions.

2.2.4 PERSONAL ACCOUNTABILITY

We ensure that as colleagues, managers and leaders we are individually and collectively accountable for transforming our future.

What it means to us:

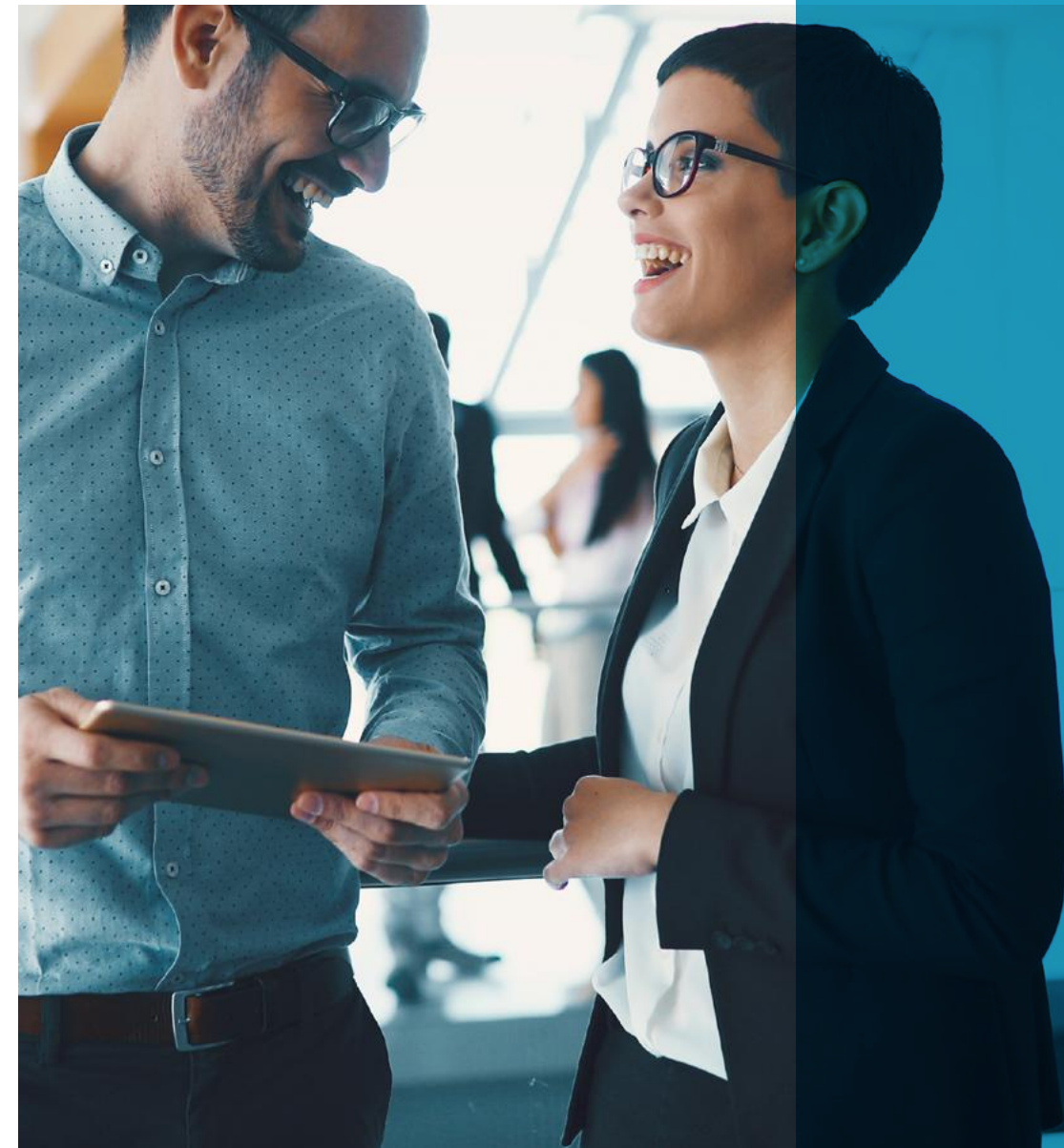
- We create a safe environment whereby we are accountable and responsible for the work we do.
- We value commitment, communication, trust, reliability, respect, integrity, empathy, creativity and more.
- We have the responsibility to prioritise our impact on others including all aspects of safety, acting with purpose, protecting our environment and the world we live in.

2.2.5 PURSUING DIVERSITY AND INCLUSION

We continue to build a respectful, diverse and inclusive environment, by recognising the unique needs, perspectives and potential of all members of our community.

What it means to us:

- We individually lead by example and role model respectful colleagues, managers, leaders, suppliers, customers and many more.
- By embracing differences, eliminating biases and challenging unwanted behaviours - we can be a part of a culture where we all feel a sense of belonging.
- Whether through diversity of background, experience, opinions, or views - it's how we, together, build a sustainable business.



OUR COMMITMENT
TOWARDS SUSTAINABLE
DEVELOPMENT
**AS PART OF THE GLOBAL
SOFTWARE INDUSTRY:**
WE CONSTANTLY
STRIVE TO DEVELOP
SUSTAINABILITY POLICIES
WITH RESPECT TO OUR
PEOPLE, CLIENTS,
SUPPLIERS, AND
THE COMMUNITY
AND ENVIRONMENT
WE LIVE IN.

To us, operating in a sustainable way means creating shared value over the long term for all our stakeholders, correctly balancing financial and economic policies with environmental and social ones, thanks to a responsible and informed governance.

We believe that this is fundamental in order not to compromise the needs of future generations, respecting people, the environment, and the Group as a whole.

Therefore, we act with positive force, promoting a different way of doing business that can foster the development of a fair society and everyone's well-being.

Thanks to our team of people, that work with passion and excellence, every day we do something special by helping caregivers and health professionals to provide better care to our community.

THE SUSTAINABLE DEVELOPMENT GOALS

The United Nations 2030 Agenda for Sustainable Development identifies 17 Sustainable Development Goals (SDGs) that represent common goals for sustainable development on today's complex societal challenges. These goals are an important reference for the international community.

As part of the bigger software global industry, we are determined to positively contribute to sustainable development.

To us, sustainability means achieving the right balance between financial policies and environmental and social ones, all of this through responsible governance. That's why we are committed to contribute positively to the achievement of the goals that are most in line with our business and activities, and to promote their application in each country or context we operate in.



3. RECIPIENTS AND SCOPE

THE CODE OF ETHICS IS **INSPIRED BY** AN OPEN, HONEST AND **COLLABORATIVE** **ENVIRONMENT.**

IT IS A GUIDE TO IDENTIFY THE BEHAVIOR TO BE ADOPTED TO MAKE CONSCIOUS DECISIONS BASED ON ETHICS, TRANSPARENCY, AND RESPECT FOR THE CORPORATE CULTURE. THE CODE OF ETHICS APPLIES TO ALL GROUP COMPANIES AND IS THEREFORE BINDING ON THE CONDUCT OF ALL THE MEMBERS OF BOARD OF DIRECTORS, EMPLOYEES, EXTERNAL STAFF AND THIRD PARTIES THAT ARE LINKED TO THE GROUP BY ANY TYPE OF CONTRACT, INCLUDING OCCASIONAL AND TEMPORARY ONES.



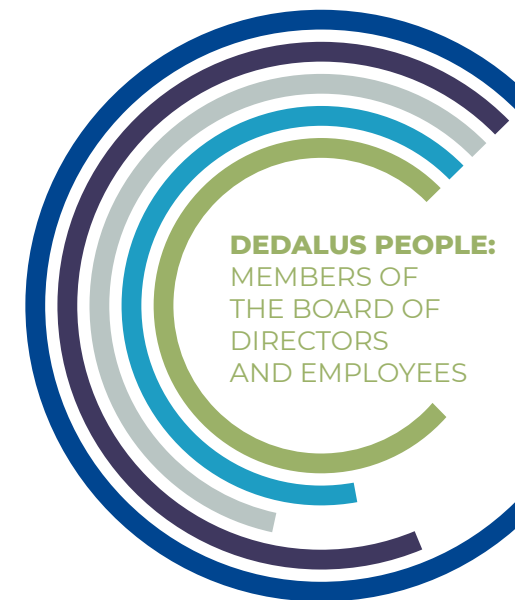
WHAT IS MEANT BY...

The term **“Addressees”** refers to members of the Board of Directors, employees, external staff and third parties (like suppliers of goods and services, business partners, etc.) and all those who, for various reasons, act in the name and on behalf of and in the interest or to the advantage of the Group, irrespective of the legal status of the relationship.

3.1 WHAT WE EXPECT FROM YOU

All the addressees of the Code of Ethics are required to act with rigor and professional commitment, to protect the Group's reputation, establishing relations based on trust and mutual collaboration with all partners, internal or external. All addressees, external and internal, are required to behave in a manner that complies with the law and this Code in the conduct of all business and activities relating to the Group.

**ALL ADDRESSEES
GUARANTEE SELF-
COMPLIANCE WITH
THE BEHAVIORAL
STANDARDS ENSHRINED
IN THE CODE OF
ETHICS IN THEIR
DAY-TO-DAY ACTIVITIES,
EMPHASIZING THE
RELIABILITY, EFFICIENCY
AND EXCELLENCE THAT
CHARACTERIZE THE
DEDALUS STYLE.**



We expect each one of you to...

- Be familiar with the Code of Ethics and company policies and apply them in the performance of your duties;
- Build and maintain relationships of trust with team members and colleagues;
- Conduct yourselves in a legally compliant manner, with honesty and integrity;
- Act with diligence and good faith in the conduct of all business and activities;
- Fulfil your training obligations;
- Seek help when faced with situations of uncertainty in the application of regulations, the Code of Ethics and company policies;
- Report any suspected, potential or actual violation of the Code of Ethics through the available channels.



We expect each one of you to...

- Be familiar with the Code of Ethics and apply it in the performance of the existing contractual relationship;
- Behave in a lawful manner, acting with honesty and integrity, promoting the principles of the Code of Ethics in your own organization;
- Seek help when faced with situations of uncertainty in applying and complying with the principles of the Code of Ethics;
- Report any suspected, potential or actual violation of the Code of Ethics through the available channels.

3.2 HOW TO DEAL WITH DOUBTS AND SEEK CLARIFICATION

THE CODE OF ETHICS AIMS TO BE A USEFUL GUIDE TO EACH OF US IN OUR DECISION-MAKING PROCESS: **TO HELP US UNDERSTAND HOW TO BEHAVE IN UNCLEAR SITUATIONS AND TO ASK THE RIGHT QUESTIONS** TO MAKE CORRECT AND INFORMED DECISIONS.

WE MUST LEARN TO ASK OURSELVES...

- Is what I am doing lawful?
- Am I respecting the values and principles of the Code of Ethics?
- Am I behaving correctly and honestly?
- Is my behavior in line with company policies?
- Am I putting Dedalus' reputation at risk?
- If my actions were made public, would I feel comfortable?

If the answer to any of these questions is negative, you should stop and seek advice using the most appropriate channel.

Expressing doubts and asking questions is never wrong and helps to resolve uncertainties and problems that may arise with respect to the application of the Code of Ethics, policies or standards of conduct in everyday life.

Q&A

WHO CAN I CONTACT IF I HAVE DOUBTS OR QUESTIONS? WHAT ARE THE INTERNAL SUPPORT CHANNELS?

You can always turn to the following internal channels for support:



4. WE RESPECT OUR PEOPLE

“WE PROMOTE
**DIVERSITY AND
INCLUSION**, BELIEVE IN
EQUAL OPPORTUNITIES
AND VALUE
ALL OUR PEOPLE”

WHAT IT MEANS FOR DEDALUS

We work every day to ensure a workplace where our people can feel safe and secure. We do our best to enhance the professionalism of our people and to promote a global and diverse culture. We promote and protect human rights through our value chain.

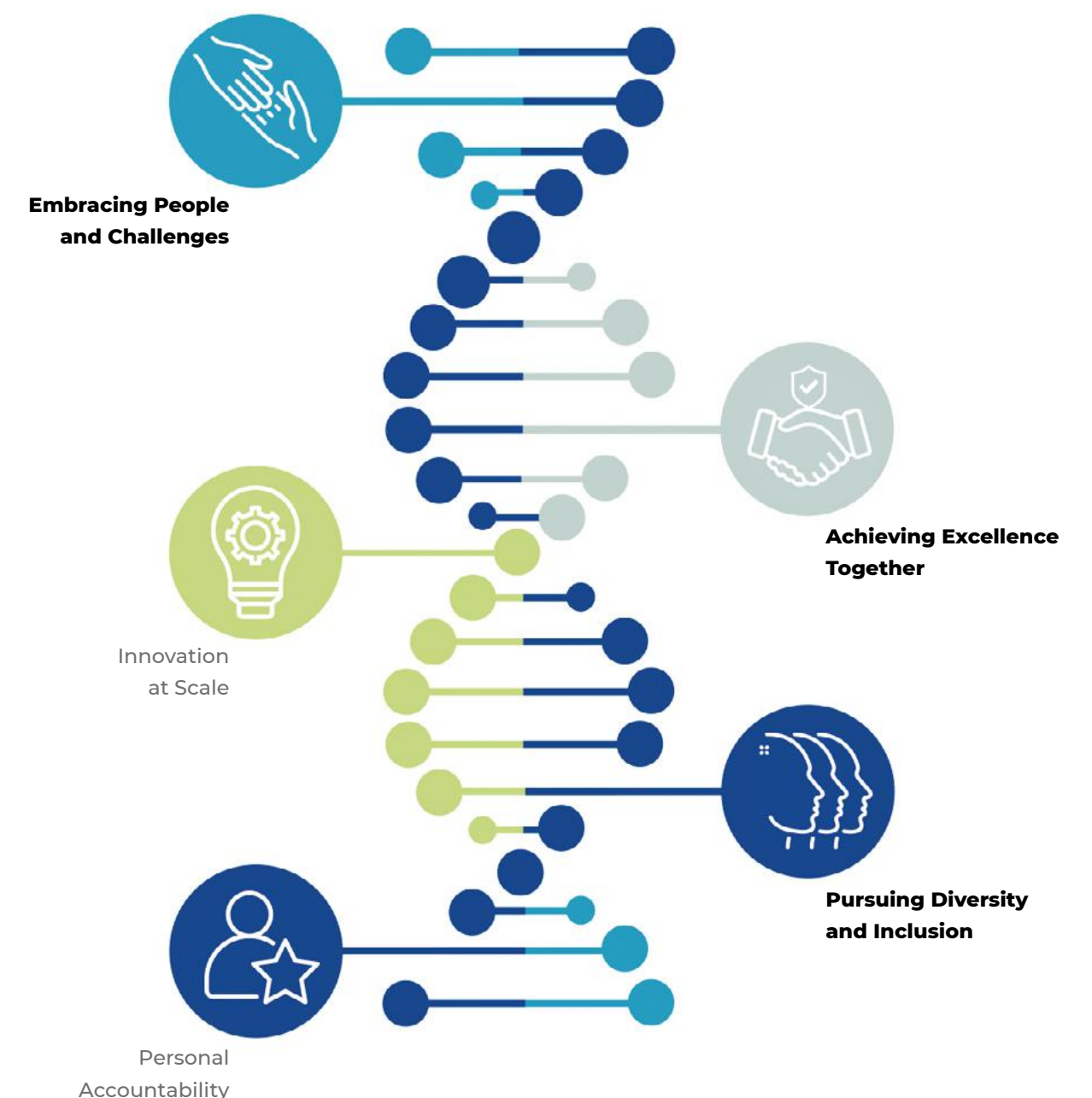
WHAT WE BELIEVE IN

We believe in protecting our people, unlocking the power of teamwork to encourage the exchange of ideas, discussion and the achievement of results of excellence, in the conviction that diversity can represent an added value for all of us.

WHAT WE EXPECT FROM YOU

That you do not, under any circumstances, engage in unlawful or dangerous behavior and that you report any situation that may represent a misconduct. That you establish working relationships characterized by fairness, equality, non-discrimination, care and respect for the dignity of the individual. That you work with passion and fulfill your training obligations to develop the skills necessary to achieve operational excellence.

OUR CORE VALUES



4.1 WE CREATE A RESPONSIBLE, HEALTHY AND SAFE WORKING ENVIRONMENT

WE AT DEDALUS, SUPPORT **THE CREATION OF A RESPONSIBLE, HEALTHY AND SAFE WORKING ENVIRONMENT.**

We want our people to work in a respectful environment, free from any form of intimidation, harassment or abuse. We take all the safety measures required for technological developments to guarantee a safe and healthy working environment, in full compliance with the regulations in force on prevention and protection.

EVERY DAY WE STRIVE TO...

- Ensure compliance with the conditions necessary for the existence of a collaborative and non-hostile working environment and prevent discriminatory behavior of any kind;
- Maintain a climate of mutual respect for each other's dignity, honor and reputation;
- Treat others with respect and avoid any form of threat or harassment: physical, verbal and non-verbal;
- Not employing human resources (employees and external staff) that are not in compliance with the provisions in force on the residence permit and/or that cannot produce a regular residence permit;
- Disseminate a culture of safety awareness by encouraging responsible behavior from all employees to preserve their health and safety, especially through preventive actions;
- Train and raise the awareness of our employees in compliance with current regulations;
- Comply with health and safety norms and rules coming from relevant legislation and business procedures;
- Avoid the use and distribution of alcoholic and narcotic substances.

WHAT IS MEANT BY...

Harassment is defined as all verbal and visual actions and expressions that are disparaging and offensive or otherwise refer to a person's characteristics (gender, ethnicity, nationality, religion, political affiliation, mental and physical diversity, sexual orientation, health condition, age and any other personal data).

Harassment of a sexual nature may include, but is not limited to:

- Verbal or written advances;
- Offering job benefits in exchange for sexual favors;
- Proposals of unwelcome appointments or physical contact;
- Retaliatory or threatening attitudes in response to refusals to make advances or complaints in this context;
- Explicit, flirtatious, gestural or disparaging remarks of a sexual nature and physical appearance;
- Jokes, mockery, images or texts of this nature.

Q&A

SOME MEMBERS OF MY TEAM OFTEN JOKE AMONG THEMSELVES USING EXPRESSIONS AND ALLUSIONS THAT MAKES ME VERY UNCOMFORTABLE. I HAVE REASON TO BE ANNOYED EVEN IF WHAT THEY SAY DOES NOT DIRECTLY AFFECT ME?



Yes, being exposed to inappropriate behavior, even indirectly, is not acceptable in our working environment. **You should talk to one of your colleagues, your manager or HR about your discomfort.** Having an honest and open discussion is often effective in solving this kind of problem.

4.2 WE PROMOTE A GLOBAL, DIVERSE AND INCLUSIVE CULTURE

INNOVATE IN HEALTH IT,
WITH A PROGRESSIVE
AND OPEN APPROACH,
AND MAKE A DIFFERENCE,
**REQUIRES CONSTANT
STIMULATION AND
A COLLABORATIVE
APPROACH,** AS WELL
AS THE ABILITY TO LISTEN
TO EVERYONE'S VOICE
AND ENSURE THAT
EVERYONE'S VOICE
IS HEARD.

We believe that the wide range of experience and skills, combined with the culturally diverse backgrounds of our Group members, **are key to meeting the needs of customers** around the world and enriching our culture.



EVERY DAY WE STRIVE TO...

- Promote inclusion by getting to know our people better and harnessing the richness of diversity to foster and spread a global, collaborative and team-oriented culture;
- Avoid any form of discrimination on grounds of age, nationality, ethnicity, race, gender identity or expression, disability, sex (including pregnancy), marital status, military or veteran status, political orientation, religious belief, sexual orientation or any other discrimination protected by law or regulation;
- Promote compliance with personnel selection policies based on equity, transparency and impartiality in the choice of the selection process and publishing of results;
- Affirm the principle of freedom from discrimination and equal opportunity in all aspects of the employment relationship, from initial contacts and recruitment to performance appraisal, remuneration and promotions, through to termination of employment;
- Adopt appropriate measures to avoid favoritism, nepotism, or forms of patronage, within the limits of available information, in the search and selection of personnel.

4.3 WE VALUE THE PROFESSIONALISM OF OUR PEOPLE

WE CONSIDER THE **SKILLS OF OUR PEOPLE,** AT ALL LEVELS, **TO BE FUNDAMENTAL TO OPERATIONAL EXCELLENCE.**

We promote the development of a culture based on the dissemination of knowledge, which enhances the behavior and contributions of everyone. We believe in the power of team work to encourage the exchange of ideas and debate, to create that fundamental synergy that brings to excellent returns.

EVERY DAY WE COMMIT TO...

- Defining corporate objectives, both general and individual, based on possible, concrete and measurable results;
- Evaluating the actions of our resources and paying them accordingly, taking into account the responsibilities and skills acquired, the services provided and the company's needs, as well as the compliance with the applicable regulatory and contractual references and the remuneration levels of the reference market;
- Promoting continuous training, both on technical and transversal topics, to develop the skills of our people and provide value to our customers and the entire Group.



4.4 WE RESPECT HUMAN RIGHTS

AS AN INTERNATIONAL GROUP, WE OPERATE WITH RESPECT FOR HUMAN DIGNITY AND HUMAN RIGHTS, THROUGH OUR OPERATIONS AND IN THE PRODUCTS AND SERVICES WE OFFER, REQUIRING THE SAME FROM OUR BUSINESS PARTNERS AND SUPPLIERS.

WHAT IS MEANT BY...

Human Rights are rights we have simply because we exist as human beings - they are not granted by any state. These universal rights are inherent to us all, regardless of nationality, sex, national or ethnic origin, race, religion, language, or any other status. They range from the most fundamental - the right to life - to those that make life worth living, such as the rights to food, education, work, health, and liberty.

The Universal Declaration of Human Rights (UDHR), adopted by the UN General Assembly in 1948, was the first legal document to set out the fundamental human rights to be universally protected. The UDHR, which turned 70 in 2018, continues to be the foundation of all international human rights law. Its 30 articles provide the principles and building blocks of current and future human rights conventions, treaties, and other legal instruments.

EVERY DAY WE STRIVE TO..

- Support and respect the protection of human rights in our offices, in our value chain and in our activities;
- Avoid involvement in human rights violations that may arise through our business actions;
- Require that slavery, child labor, prison or forced labor, punitive labor, public punishment and human trafficking are never permitted in our operations;
- Signal any behavior or action that might, even potentially, be a breach of such rights and we act to put in place appropriate corrective measures;

5. WE OPERATE WITH INTEGRITY

“WE CHOOSE TO ACT WITH **INTEGRITY, FAIRNESS AND TRANSPARENCY EVERY DAY**”

WHAT IT MEANS FOR DEDALUS

We honor our commitments and learn from our mistakes, respecting each other's dignity and rights in all circumstances.

WHAT WE BELIEVE IN

We believe that corruption is a real obstacle to business, economic development and competition.

We believe in protecting and promoting business interests, making objective decisions and acting sensibly.

We believe in respecting the laws and regulatory requirements of each country.

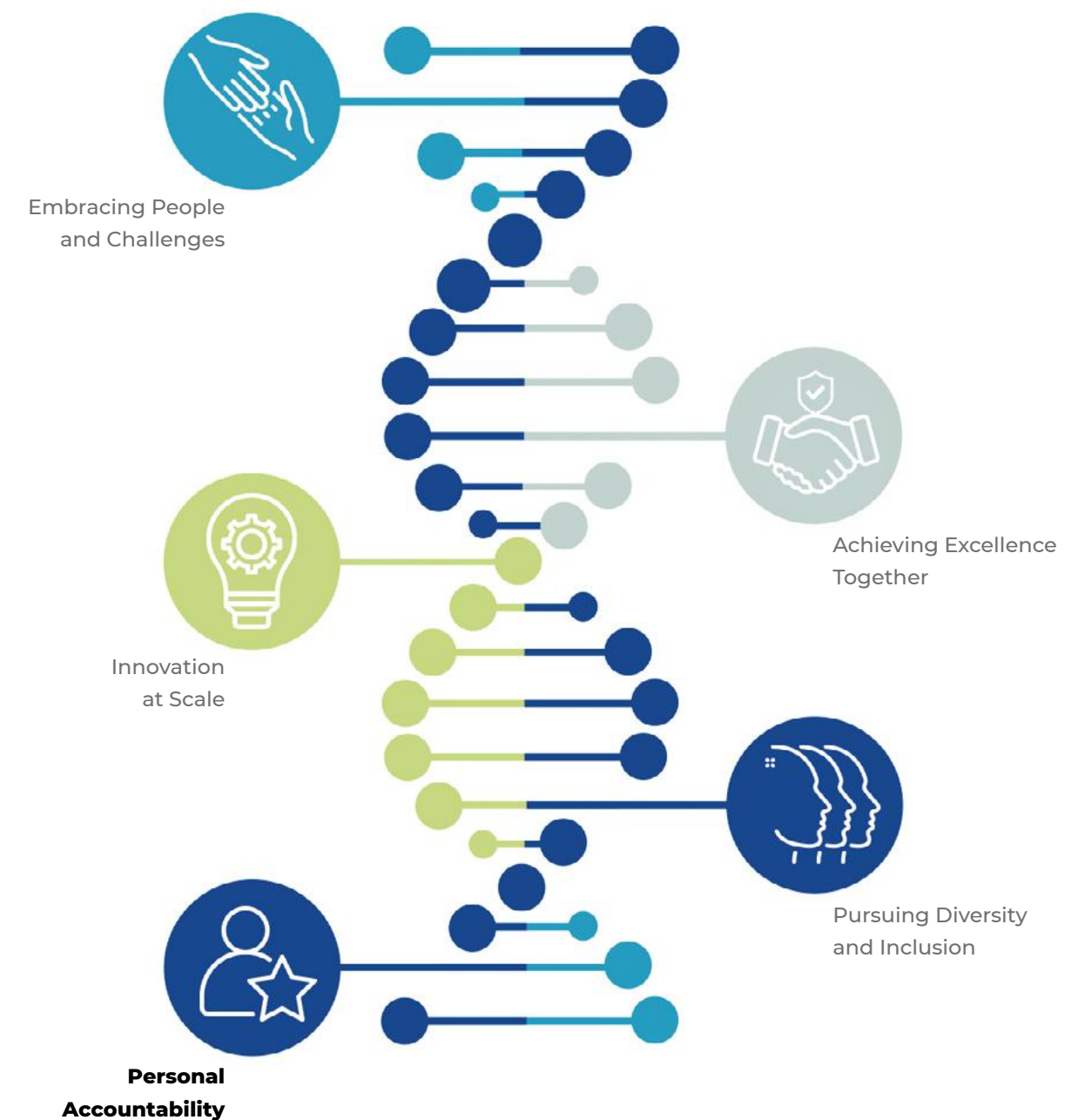
We believe in the right to privacy as a fundamental human right.

We believe in pursuing the protection of the environment for the benefit of future generations.

WHAT WE EXPECT FROM YOU

That you do not practice, tolerate or support any corrupt practices in the conduct of business operations and that you carefully check that the granting of an advantage complies with the law and our internal policies. That you act fairly and impartially in any situation where a conflict of interest may arise and, under no circumstances, engage in unlawful conduct. That you take all security measures required by applicable laws to protect the privacy of our stakeholders, ensuring the integrity of their data and information.

OUR CORE VALUES



5.1 WE FIGHT CORRUPTION

IN ADDITION TO BEING AN ILLEGAL PHENOMENON, WE BELIEVE THAT CORRUPTION IS A REAL OBSTACLE TO BUSINESS, ECONOMIC DEVELOPMENT, AND COMPETITION.

FOR THIS REASON, WE OPPOSE ALL FORMS OF CORRUPTION WITHOUT EXCEPTION. WE HAVE DEFINED RULES OF CONDUCT TO PREVENT CORRUPTION, AND WE HAVE IDENTIFIED SPECIFIC SENSITIVE ACTIVITIES WITHIN OUR BUSINESS PROCESSES THROUGH WHICH POTENTIAL CORRUPT ACTS COULD BE CARRIED OUT BY SENIOR PERSONNEL OR EMPLOYEES, AND DEFINED RULES OF CONDUCT TO PREVENT CORRUPTION.

EVERY DAY WE STRIVE TO...

- Not offer, promise or accept, under any circumstances, economic advantages or other benefits aimed at speeding up and/or facilitating the performance of an activity in an improper manner;
- Not offer or accept, under any circumstances, any form of gift or hospitality that could be interpreted by an impartial third party as exceeding normal business practices or professional courtesy, or in any case aimed at improperly influencing a decision or activity;
- Ascertain the ethical and reputational reliability of our potential business partners and suppliers, by carrying out a preliminary verification of all our counterparties and asking them to commit to sharing and complying with our internal anti-corruption policies;
- Promptly inform our line manager or the competent department (Local Legal, if present, or Group Legal) in the event of proven or suspected behavior.

Q&A

DURING A TENDER PROCEDURE FOR THE AWARD OF A SERVICE CONTRACT FOR WHICH I HAVE TO EVALUATE THE BIDS, I RECEIVED A FREE BOTTLE OF FINE WINE FROM A CONTACT PERSON OF A PARTICIPATING COMPANY. CAN I ACCEPT THE GIFT?



No, you cannot accept it. The bidder's conduct could be interpreted, by an impartial third party, as being motivated solely by a desire to exert undue influence over your position as evaluator of the bids.

5.2 WE AVOID ANY CONFLICT OF INTEREST

WE PROTECT AND PROMOTE THE COMPANY'S INTERESTS BY MAKING OBJECTIVE DECISIONS

AND ACTING WITH COMMON SENSE TO AVOID POSSIBLE SITUATIONS THAT COULD LEAD TO ACTUAL OR POTENTIAL CONFLICTS OF INTEREST.

EVERY DAY WE STRIVE TO...

- Avoid any involvement that interferes, or may interfere, with the ability to impartially evaluate decisions on behalf of Dedalus;
- Act with fairness and impartiality in any situation in which a conflict of interest could arise, respecting the principles and contents of the Code of Ethics;
- Refrain from engaging in any relationship with any person, private or public, where there is a (potential) conflict of interest;
- Maintain relations with the Public Administration exclusively through persons in charge who are not in situations of conflict of interest compared to the representatives of the institutions themselves;
- Report any situation of conflict of interest, even if potential, to our manager or competent department (Local Legal, if present, or Group Legal).

WHAT IS MEANT BY...

A **conflict of interest** is a situation that arises when employees use their position for personal gain or when personal interests conflict with the interests of the company.

By way of example, a conflict of interest is:

- Accepting money, favors or benefits from people and/or legal entities, private or public, that intend to enter into economic agreements with Dedalus;
- To carry out work activities, of any kind, with suppliers, private and public entities such as to prejudice the performance of work in favor of Dedalus;
- Making or encouraging decisions in the exercise of one's role in the company, with the aim of benefiting a relative or relative-in-law.

Q&A

MY MOTHER HAS TAKEN ON THE ROLE OF MANAGER IN A COMPETING COMPANY. WHAT SHOULD I DO? IS THERE A POTENTIAL CONFLICT OF INTEREST?



Yes, there is a potential conflict of interest, you should promptly report the situation to your line manager and wait for instructions on how to proceed.

I AM PART OF A COMMITTEE THAT SELECTS CANDIDATES TO BE EMPLOYED AT DEDALUS AND MY NEPHEW IS TAKING PART IN THE SELECTION I AM FOLLOWING. WHAT SHOULD I DO? IS THERE A POTENTIAL CONFLICT OF INTEREST?



Yes, there is a potential conflict of interest, you should promptly report the situation to the committee and to your line manager. In the meantime, refrain from any decision-making right away pending precise instructions.

5.3 WE RESPECT LAWS ALL OVER THE WORLD

WE BASE OUR CONDUCT ON THE PRINCIPLES OF LEGALITY, FAIRNESS AND TRANSPARENCY.

WE ARE PART OF AN INTERNATIONAL ENVIRONMENT, AND WE MUST ENSURE THAT THE WAY WE OPERATE IS CONSISTENT WITH THE LAWS AND REQUIREMENTS OF EACH COUNTRY. WE COMBAT THE COMMISSION OF, OR AIDING AND ABETTING THE COMMISSION OF, MONEY LAUNDERING, SELF-LAUNDERING, RECEIVING STOLEN GOODS AND THE USE OF MONEY, GOODS AND OTHER BENEFITS OF UNLAWFUL ORIGIN.

EVERY DAY WE STRIVE TO...

- Carry out our work in full compliance with the laws and regulations of reference (local and internal), combating any illegal activity that may, by way of example but not limited to, involve violations of human rights, money laundering and terrorism financing;
- Disseminate knowledge of current regulations and corporate procedures applicable to all our collaborators, to allow them to correctly identify potential risks and constraints deriving from them, adopting pondered and conscious behaviors and decisions.



Q&A

WHAT ARE THE LAWS I HAVE TO COMPLY WITH? HOW DO I KNOW WHAT THEY CONTAIN?



Dedalus policies and procedures are regularly updated to accurately reflect changes in the law. If you have any doubts or questions, please do not hesitate to contact our Legal Department or Transformation Management.

I AM AWARE OF THE COMMISSION OF AN ACT ALLEGEDLY INVOLVING MONEY LAUNDERING, WHAT SHOULD I DO?



You must immediately inform your line manager or report it the manner provided for in the paragraph “Reporting channels”.

5.4 WE GUARANTEE THE PRIVACY OF DATA AND INFORMATION, ENSURING CYBER SECURITY

WE RESPECT THE RIGHT TO PRIVACY OF OUR COLLEAGUES, CLIENTS, SUPPLIERS AND THIRD PARTIES THAT WE BUILD RELATIONSHIPS WITH.

WE TREAT DATA ACCORDING TO EXISTING LEGISLATION AND TO THE MORAL INTEGRITY OF PEOPLE. WE GUARANTEE A HIGH LEVEL OF SAFETY IN THE CHOICE AND USE OF IT SYSTEMS DESTINED TO PERSONAL DATA AND PRIVATE INFORMATION TREATMENT. OUR STRATEGY AND ACTION PLAN GUARANTEE A SECURE AND WELL-ESTABLISHED IT FRAMEWORK, FOR OUR COMPUTERS AND DEVICES TO BE PROPERLY PROTECTED FROM CYBER-ATTACKS.

EVERY DAY WE STRIVE TO...

- Adopt all security measures required by currently applicable laws to protect personal data and confidential information;
- Take the utmost care when collecting, storing, using, processing, communicating, and disclosing personal data, to preserve it and use it only for legitimate business purposes;
- Adequately inform data subjects of how the data will be used, so that they can provide us with informed consent or authorization to process the data;
- Periodically execute checks (e.g. security audits, vulnerability penetration testing etc.) to ensure effective IT security and protection.

WHAT IS MEANT BY...

Personal data means all information relating to an identified or identifiable living person. The various pieces of information which, when collected, can lead to the identification of a particular person also constitute personal data. Personal data can provide information on: characteristics, habits, lifestyle, personal relationships, economic situation, characteristic elements of a person's identity, etc., as well as those relating to criminal convictions and offences (e.g. criminal records and pending charges). Personal data include so-called "sensitive data", i.e. data concerning the most intimate sphere of the individual, such as information related to racial or ethnic origin, personal, religious, philosophical or other beliefs, political opinions and membership of parties, trade unions, associations or organizations of a religious, philosophical, political or trade-unionist character, as well as data concerning health and sex life, sexual orientation, genetic and biometric data.

Q&A

**I HAVE DOUBTS ON THE APPLICATION OF
THE LEGISLATION ON PERSONAL DATA.
WHO SHOULD I CONTACT?**



Promptly contact the Group DPO in case of a Group issue at the following email address: dpo.group@dedalus.eu.

5.5 WE PROTECT THE ENVIRONMENT AND OPTIMIZE THE USE OF ENERGY

WE MANAGE OUR
ACTIVITIES BY PURSUING
**THE PROTECTION OF
THE ENVIRONMENT** FOR
THE BENEFIT OF
COMMUNITIES AND
FUTURE GENERATIONS,
**AIMING AT IMPROVING
OUR PERFORMANCE
CONTINUOUSLY.**



EVERY DAY WE STRIVE TO...

- Respect all the legislation and environmental regulation applicable to our industry, protecting the surrounding environment and contributing to the sustainable development of the territory;
- Ensure the prior technical-professional qualification of suppliers employed in construction or maintenance activities, as well as the provision of appropriate contractual covenants requiring compliance by them with all applicable environmental regulations, the procedures envisaged and the ethical principles defined;
- Define roles and responsibilities to ensure the technical expertise and powers required for environmental risk assessment, risk management and control;
- Adopt latest versions and support the digital transformation of the healthcare ecosystem with the goal of reacting positively to environmental problems and reducing the carbon footprint of the healthcare IT industry.

6. WE MANAGE BUSINESS RESPONSIBLY

“WE EARN THE TRUST OF OUR STAKEHOLDERS EVERY DAY, **OPERATING WITH HONESTY, RESPONSIBILITY AND RESPECT**, IN A CLIMATE OF DIALOGUE AND CONTINUOUS COLLABORATION”

WHAT IT MEANS FOR DEDALUS

Work with passion to ensure safe, quality and innovative products and services. Participating in competition with fairness, ensuring clarity in dealing with authorities and institutions. Managing relationships with suppliers in an ethical and responsible manner.

WHAT WE BELIEVE IN

We believe that relationships with our customers are fundamental to ensure high standards of quality, innovation and security in our software, products and solutions.

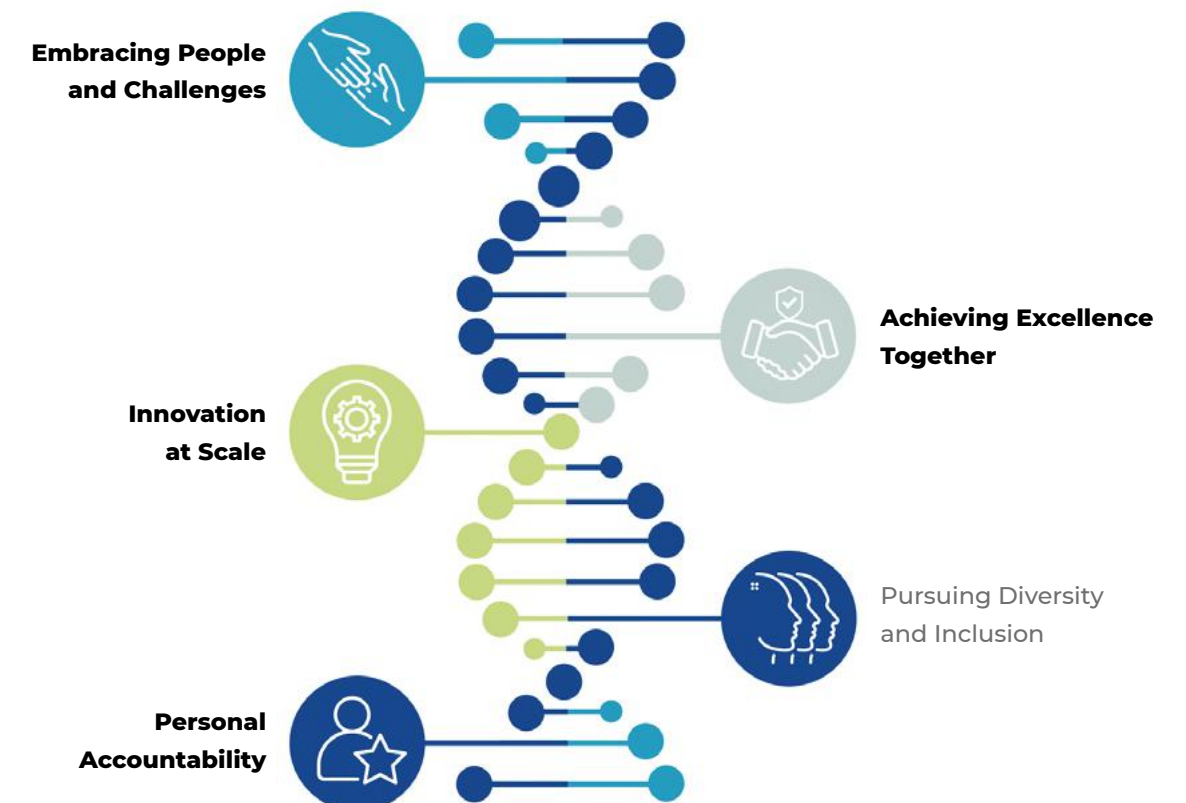
We believe in developing solid, ethical and transparent relationships based on a climate of continuous collaboration with our suppliers, business partners and external stakeholders.

We believe in the importance of improving the well-being of our community through the quality of our products.

WHAT WE EXPECT FROM YOU

That you ensure that our customers receive the best possible performance when executing your tasks and that their needs and expectations are met. That you comply with the competition laws of the countries in which we operate, refrain from collusive practices and do not abuse power where you to find yourself in a market-dominating position. That you maintain relations with authorities and institutions exclusively within the limits of the competence of your function, without ever misusing the name of our Company. That you promote long-term strategic collaborations with suppliers and business partners based on an integrated, coordinated and transparent approach, encouraging the sharing and observance of behavioral standards based on Dedalus' values.

OUR CORE VALUES



6.1 WE ENSURE SAFE, QUALITY AND INNOVATIVE PRODUCTS AND SERVICES

WE BELIEVE THAT RELATIONSHIPS WITH OUR CUSTOMERS ARE FUNDAMENTAL TO ENSURING **HIGH STANDARDS OF QUALITY, INNOVATION AND SECURITY** IN OUR SOFTWARE, PRODUCTS AND SOLUTIONS.

WE RESPOND TO THE NEEDS OF HEALTHCARE ORGANIZATIONS BY SUPPORTING THEM IN THEIR CONTINUOUS EVOLUTION TOWARDS A HEALTHCARE MODEL THAT IS CLOSER TO THE PATIENT AND, AT THE SAME TIME, ECONOMICALLY SUSTAINABLE.



EVERY DAY WE STRIVE TO...

- Ensure the best possible execution of the tasks entrusted to our clients, proposing increasingly advanced and innovative solutions, with a view to integration, quality, effectiveness, efficiency and cost-effectiveness;
- Maintain the best possible quality at all levels: from materials sourcing and product-making to marketing, selling and delivery, even recurring to business partners;
- Guarantee the continuous improvement of business, products and services processes.

6.2 WE PROTECT THE INTERESTS AND SATISFACTION OF OUR CUSTOMERS

WE WANT TO ENSURE THAT OUR CUSTOMERS' NEEDS ARE FULLY MET, TO CREATE A RELATIONSHIP BASED ON THE PRINCIPLES OF FAIRNESS, HONESTY, EFFICIENCY AND PROFESSIONALISM.

OUR CUSTOMERS MUST BE ABLE TO CHOOSE US FREELY AND CONSCIOUSLY, ALWAYS. ALL THE CONTRACTS WE ENTER WITH OUR CUSTOMERS, AND IN GENERAL ANY COMMUNICATION ADDRESSED TO THEM, ARE BASED ON CRITERIA OF SIMPLICITY, CLARITY AND COMPLETENESS, AVOIDING THE USE OF ANY MISLEADING PRACTICE.



EVERY DAY WE STRIVE TO...

- Not exploit situations of dependence or weakness of the counterparty;
- Ensure that our customers are provided with complete and transparent information;
- Ensure that the characteristics of the products and services provided correspond to the information provided;
- Offer all the support necessary for the correct continuation or completion of the contract, paying full attention to suggestions and/or complaints received.

Q&A

SHORTLY BEFORE THE LAUNCH OF A NEW PRODUCT, I RECEIVED AN UPDATE ON ITS SPECIFICATIONS. THE DIFFERENCE IS VERY SMALL, CAN I AVOID UPDATING THE PRODUCT SPECIFICATIONS?



No, information on the characteristics of a product, service, solution or software must always be true, accurate and correct. We avoid any form of commercial communication that may constitute misleading advertising and fail to satisfy our customers.

6.3 WE COMPETE FAIRLY

WE PROMOTE ECONOMIC COMPETITIVENESS AND RESPECT FOR THE PRINCIPLES OF FAIRNESS, LOYALTY AND TRANSPARENCY. **WE SAFEGUARD THE VALUE OF FAIR COMPETITION AND REFRAIN FROM COLLUSIVE BEHAVIOR,** PURSUING OUR MISSION AND OFFERING INNOVATIVE SOLUTIONS TO SUPPORT THE PROVISION OF PERSONAL HEALTH SERVICES.

**EVERY DAY WE STRIVE TO...**

- Comply with the competition laws of the countries in which we operate;
- Not abuse our power if we find ourselves in a dominant position in the market;
- Be careful when interacting with competitors and avoid discussing sensitive commercial issues (e.g. prices, terms of sale, business plans etc.).

6.4 WE WORK ETHICALLY WITH PUBLIC AUTHORITIES AND INSTITUTIONS

WE GUARANTEE THE UTMOST CLARITY IN OUR RELATIONS WITH AUTHORITIES AND INSTITUTIONS.

We base our conduct on the principles of legality, correctness, integrity and transparency. Contacts with the Public Administration are managed, in accordance with company procedures, by those specifically and formally appointed to deal with and/or maintain business relations with public officials and/or public service officers belonging to those administrations.

EVERY DAY WE STRIVE TO...

- Not to make, induce or favor false or not entirely truthful statements to authorities and institutions;
- Prohibit and condemn any conduct, by whoever, consisting in promising or offering directly or indirectly gifts and benefits (e.g. money, objects, services, favors or other utilities) to Italian or foreign public officials or public service officers, or their relatives, from which an undue or illegal interest and/or advantage may be obtained;
- Prohibit and condemn any conduct aimed at obtaining contributions, financing, subsidized loans, or other disbursements from the Public Administration by using false or altered statements and/or documents, or even through artifice or deception;
- Prohibit and condemn any conduct aimed at altering the functioning of any IT or telematic system of Public Administration or manipulating data contained in it;
- Pay the utmost attention to all confidential information of which we, as delegated parties, may become aware, as well as to the scrupulous recording and reporting of every document or work carried out and/or transmitted to the bodies of the Public Administration.

WHAT IS MEANT BY...

By **gifts and acts of courtesy**, we mean any type of promised benefit, offer or actual reception of money, objects, services, performances, favors or other benefits. Gifts or acts of courtesy and hospitality towards representatives of governments, public officials and public servants can be given, to the extent that the modest value of such gifts or acts does not compromise the integrity, independence, and reputation of either party. In any case, such types of expenditure must be authorized and adequately documented. In the course of business negotiations, requests or relations of any kind with the Public Administration, no action must be taken, directly or indirectly, that may propose employment and/or business opportunities from which advantages may arise, for oneself or for others, to employees of the Public Administration or their relatives or relatives-in-law.

Q&A

CAN I JOIN A PROFESSIONAL COLLABORATION WITH AN EMPLOYEE OF THE PUBLIC ADMINISTRATION WHO PERSONALLY INITIATED A BUSINESS NEGOTIATION WITH DEDALUS THREE YEARS AGO?



It depends. For all relations of professional collaboration, of an economic and/or financial nature that will be entered into with employees or former employees of the Public Administration, or their relatives and relatives-in-law, who in the last five years have personally participated in business negotiations or endorsed requests made by Dedalus to the Public Administration - must be brought to the attention of the HR and Legal Departments. They will carry out their own assessments in the preliminary phase of hiring them. Therefore, in these cases, always inform (in advance and promptly) the HR and Legal Departments.

6.5 WE MANAGE OUR RELATIONSHIPS WITH SUPPLIERS IN AN ETHICAL MANNER

WITH OUR SUPPLIERS OF GOODS AND SERVICES WE SHARE THE VALUES AND PRINCIPLES IN WHICH WE BELIEVE, TO ENSURE THAT OUR RELATIONSHIPS ARE MANAGED IN AN ETHICAL AND RESPONSIBLE WAY.



EVERY DAY WE STRIVE TO...

- Adopt qualification, selection and monitoring processes based on objective and documentable criteria and in compliance with internal procedures, reference legislation and the principles of fairness, cost-effectiveness and quality;
- Prohibit relationships with suppliers that do not comply with the Modern Slavery Act 2015 or similar;
- Set up contracts with our suppliers in a correct, complete and transparent manner, trying to foresee the circumstances that could significantly affect the established relationship;
- Not exploit situations of dependence or weakness of the counterparty when unforeseen events occur, expecting the same behavior from our suppliers;
- Promote strategic and lasting relations based on a coordinated, integrated and sustainable approach;

6.6 WE INVEST IN THE COMMUNITY WE LIVE IN

WE BELIEVE THAT HEALTHCARE IS AN INFRASTRUCTURAL TOOL OF THE CLINICAL ACTION OF PREVENTION AND CARE OF CITIZENS, AND **WE WANT TO CONTRIBUTE, WITH INNOVATIVE METHODOLOGIES AND TECHNOLOGIES TO THE IMPROVEMENT OF THE HEALTHCARE ECOSYSTEM AND OF COMMUNITIES.**



**EVERY DAY
WE STRIVE TO..**

- Help caregivers and health professionals to provide better care for communities;
- Support the construction of digital patient-centered healthcare systems;
- Improve access to healthcare services;
- Foster strong and lasting relationships and partnerships with the communities we operate in, with the aim of creating shared value over time;
- Provide contributions and sponsorship in accordance with established procedures and existing legislation, giving appropriate publicity;

7. WE PROTECT OUR COMPANY

“WE RESPECT AND PROTECT OUR BUSINESS AND ITS ASSETS, AND **SAFEGUARD CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY**”

WHAT IT MEANS FOR DEDALUS

We work every day to protect our business and our resources. We protect our reputation by acting in accordance with the values and principles set out in this Code.

WHAT WE BELIEVE IN

We believe that the integrity of company data, information and assets is fundamental to protecting our business and our Company. We believe in protecting the confidential information and intellectual property of Dedalus, as assets of irreplaceable value.

We believe that Dedalus' good reputation depends on its history, its actions and our behavior.

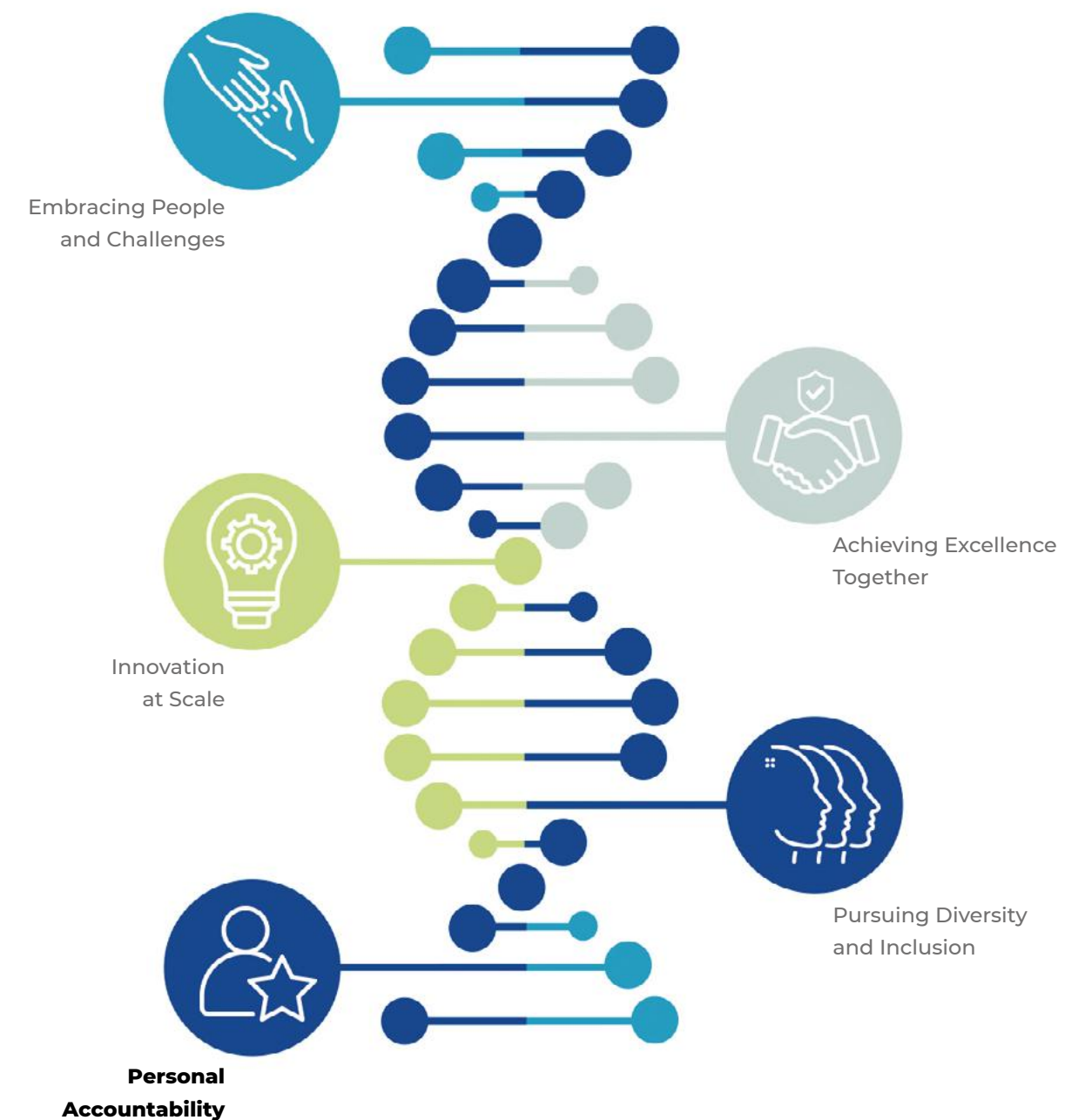
WHAT WE EXPECT FROM YOU

That you prepare and communicate data and information accurately, in a timely and transparent manner. That you use company assets correctly and responsibly.

That you ensure the confidentiality of information that is strategic, confidential or related to Dedalus' intellectual property.

That you safeguard the company's reputation and use social media responsibly, knowing that everything we do is public knowledge.

OUR CORE VALUES



7.1 WE ENSURE TRANSPARENCY AND CORRECT
COMMUNICATION OF INFORMATION

WE BELIEVE THAT THE INTEGRITY OF DATA AND INFORMATION IS KEY TO PROTECTING OUR BUSINESS AND OUR COMPANY.

WE ENSURE THAT ALL THE FINANCIAL AND NON-FINANCIAL DATA AND INFORMATION WE PREPARE AND COMMUNICATE IS ACCURATE, TIMELY AND COMPLETE, AND PROVIDES A TRUE REPRESENTATION OF THE FACTS. THIS ALSO APPLIES TO ENTITIES THAT PROVIDE FINANCIAL SUPPORT FOR OUR INVESTMENT DECISIONS.



EVERY DAY WE STRIVE TO...

- Comply with applicable laws and company procedures relating to accounting and financial and non-financial reporting;
- Ensure that the information provided to our stakeholders accurately and fairly reflects the Group's financial position, results of operations and cash flows;
- Not falsify, omit or alter any company information (statements, reports, publications or expense claims);
- Keep adequate documentary support with respect to the activities carried out, in order to allow an accurate reconstruction of the same.

7.2 WE USE COMPANY ASSETS PROPERLY

WE PROTECT AND MAKE APPROPRIATE USE OF THE COMPANY ASSETS (TANGIBLE AND INTANGIBLE) THAT THE GROUP PLACES AT OUR DISPOSAL FOR THE PERFORMANCE OF OUR WORK, ADOPTING BEHAVIOR THAT PREVENTS THEIR INAPPROPRIATE USE BY THIRD PARTIES.

EVERY DAY WE STRIVE TO...

- Work diligently to safeguard, preserve and not to misuse company assets and resources entrusted to us in the course of our work;
- Monitor the conditions of use of corporate assets and resources and report any situation that may undermine their integrity;
- Use IT and telematic systems responsibly and in compliance with the applicable regulations and the terms of license agreements;
- Prevent any behavior that could potentially lead to the commission of computer crimes or unlawful processing of data.

WHAT IS MEANT BY...

Improper use of company property and resources means any use of the same for purposes other than the work purposes for which they were assigned. If employees use a company computer, both during and outside working hours, for personal purposes or differently from what is prescribed in the existing policies, they may expose the Company to a reputational risk and loss of data.

Q&A

DURING THE HOLIDAYS I WOULD LIKE TO LEAVE MY LAPTOP WITH MY ASSISTANT TO HANDLE ANY APPROVALS IN THE VARIOUS COMPANY SYSTEMS ON MY BEHALF IF NECESSARY. HE IS A TRUSTED PERSON I HAVE KNOWN FOR MANY YEARS, CAN I SHARE MY PASSWORD WITH HIM?



No, you may not share your personal password with other people (not even colleagues). If you think an action could potentially compromise the security of company assets, check our policies and make sure you comply with them.

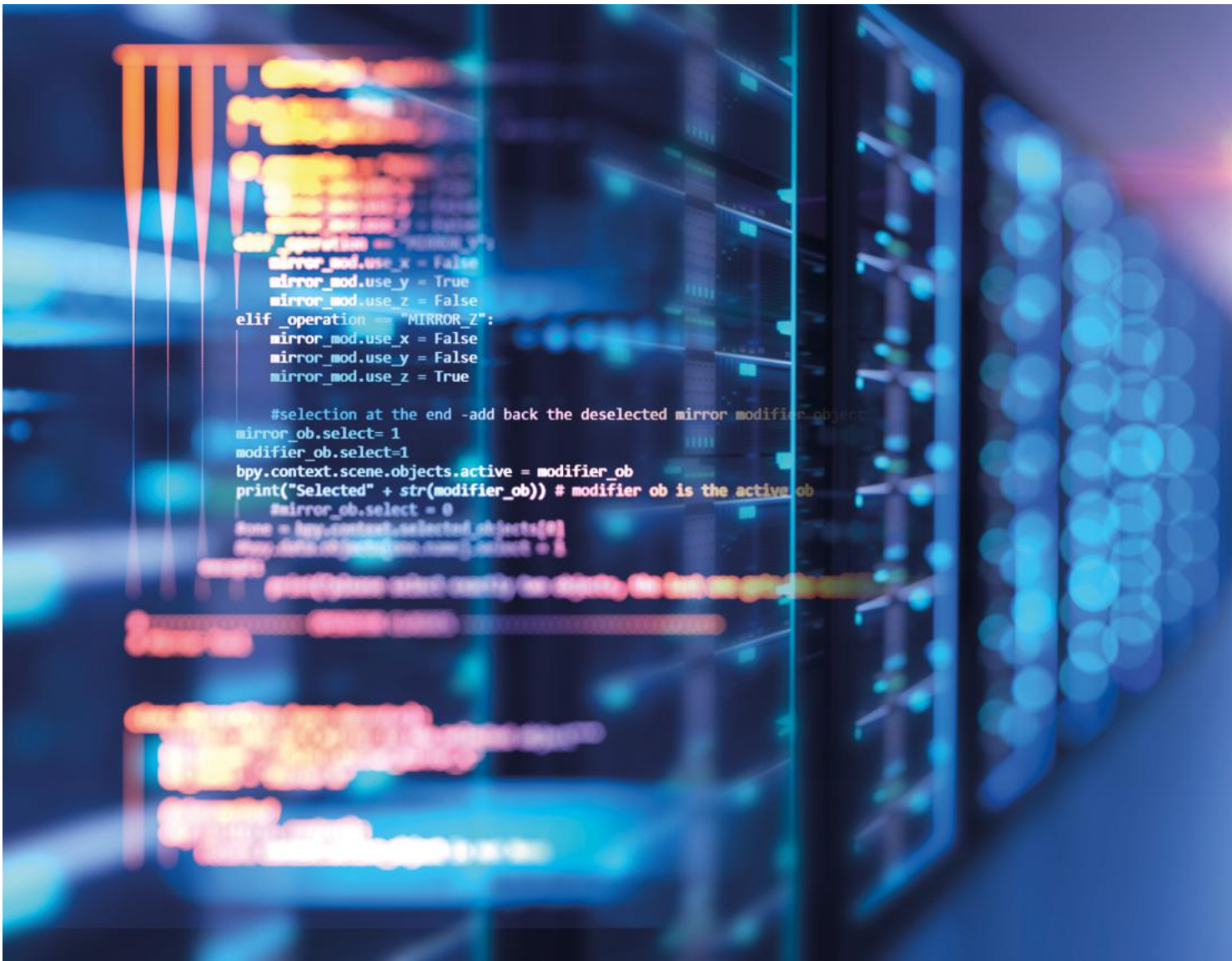
7.3 WE PROTECT CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

WE PROTECT THE CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY OF DEDALUS, AS THEY ARE ASSETS OF IRREPLACEABLE VALUE.

IN STRICT COMPLIANCE WITH THE REGULATIONS IN FORCE, WE GUARANTEE MAXIMUM CONFIDENTIALITY ON STRATEGIC, CONFIDENTIAL OR INTELLECTUAL PROPERTY INFORMATION OF THE GROUP. ALL COMPANY INFORMATION, WITHOUT PRIOR AUTHORIZATION FOR EXTERNAL DISCLOSURE, IS CLASSIFIED AS “CONFIDENTIAL”.

EVERY DAY WE STRIVE TO...

- Not disseminate information or news concerning Dedalus without prior corporate authorization;
- Ensure the correct management of corporate information, in particular privileged information, with specific reference to issues of market abuse, industrial espionage or sabotage;
- Maintain the utmost confidentiality on confidential information or information relating to the intellectual property of third parties, and when we obtain knowledge about it;
- Identify and report any infringement, even potential, of Dedalus’ intellectual property rights;
- To ensure an effective information security management system, in order to protect the information assets of the Company, of our customers and, in general, of our stakeholders;



Q&A

I AM AWARE OF ALLEGED INFRINGEMENTS BY THIRD PARTIES OF DEDALUS’ INTELLECTUAL PROPERTY RIGHTS. SHOULD I REPORT IT?



Yes, if you are aware of any behavior aimed at infringing Dedalus’ intellectual property rights, whether by third parties or internal staff, you must promptly report it to the Legal Department, which will initiate appropriate verification activities.

7.4 ENSURE PROPER USE OF SOCIAL MEDIA AND
PROTECT CORPORATE REPUTATION

COMMUNICATION OF DATA AND/OR INFORMATION RELATING TO DEDALUS TO THE MASS MEDIA MAY ONLY BE DIVULGED BY THE CORPORATE FUNCTIONS DELEGATED OR AUTHORIZED TO DO SO.

WE ALSO PAY PARTICULAR ATTENTION TO THE USE OF SOCIAL MEDIA, WHERE INTERACTIONS ARE AMPLIFIED, DYNAMIC AND VERY FAST. INCORRECT OR IMPRUDENT COMMUNICATIONS COULD SERIOUSLY JEOPARDIZE OUR IMAGE, WHICH IS WHY THE EXTERNAL CHANNELS OWNED BY DEDALUS MAY ONLY BE CREATED AND MANAGED BY THE FUNCTIONS DELEGATED TO DO SO.



EVERY DAY WE STRIVE TO...

- Protect our reputation by operating in full compliance with the principles of the Code of Ethics;
- Use our brand consistently with our mission and in compliance with our corporate values;
- Ensure adequate training with respect to the management of corporate social channels by the responsible functions;
- Use personal social media in a responsible manner, in the knowledge that all our actions are in the public domain and must not, even potentially, damage the reputation of Dedalus.

Q&A

A COLLEAGUE HAS POSTED AN OFFENSIVE COMMENT ABOUT ME ON MY PERSONAL SOCIAL PROFILE. CAN HE DO SO, IS THIS IN LINE WITH COMPANY POLICY?



No, no employee has the right to post inappropriate or defamatory content on either the Company's or personal social media channels. Employees are expected to use and manage their private social media accounts in accordance with Company policies, to safeguard the Company and its employees.

8. IMPLEMENTATION MECHANISMS

8.1 GOVERNANCE AND DISSEMINATION OF THE CODE

The Board of Directors and the top management are responsible for promoting, updating and disseminating the Code. The main objective is the knowledge of the values and principles expressed in the Code, as well as facilitating the application and use of the Code of Ethics to all stakeholders.

Supervision of the application of the Code is entrusted to the Legal and HR Departments. The latter coordinates with the competent bodies and functions and has access to the Group's information for the correct implementation and adequate control and monitoring of the contents of the Code. The Legal and HR Departments may also suggest updates and amendments to the Code of Ethics, also based on reports by the Addressees.

In order to guarantee full accessibility to all addressees and stakeholders, this Code is available to all addressees and can be consulted on the internet and intranet sites of the Dedalus Group and its subsidiaries. Each Department Manager, in the context of their activities, ensures the disclosure of the principles contained in the Code both within their own Department and to their business partners, as well as to the other subjects with whom they collaborate with, and are active in proposing amendments and/or updates with. Furthermore, to integrate the culture of the Code of Ethics as much as possible within Dedalus and clarify every aspect relating to its application, specific **training plans** are in place for all company functions.



WAYS OF COMMUNICATION

The Code is brought to the attention of all addressees through appropriate communication activities:

- **To employees** -> at the time of recruitment and in the event of changes or updates;
- **To external collaborators and third parties** -> at the time of formalization of the contract, under penalty of termination of the contract in case of violation of the principles contained in the Code;
- **To the subsidiaries** -> that receive and adopt it.

8.2 REPORTING CHANNELS AND THE PRINCIPLE OF NON-RETALIATION

In cases where we believe someone is violating, or about to violate, one of the principles of the Code of Ethics, we have a duty to report it. Reports may also be made anonymously in order to avoid retaliation. The task of verifying and ascertaining possible violations of the duties provided for in this Code is the responsibility of the Legal Department.

In the event of a breach of the Code, the competent functions, which hold disciplinary power, undertake to impose, with consistency, impartiality and uniformity, sanctions proportionate to the respective

breaches of the Code and in accordance with the current provisions on the regulation of labor relations and contractual remedies provided for under and to the effects of the applicable law.

The Legal Department ensures that the person making the report (the so-called “reporting party”), if identified or identifiable, is not subject to retaliation, discrimination or in any case penalization, and guarantees confidentiality, unless otherwise required by law.



REPORTING CHANNELS

• **E-mail** -> ethicsandcompliance@dedalus.eu

Q&A

WHAT SHOULD I DO IF I AM RETALIATED AGAINST?



Dedalus prohibits any form of retaliation or discriminatory act against a whistleblower for reasons directly or indirectly related to the report. If you have suffered retaliation of any kind, you must report it through the appropriate channels so that the Company can initiate an investigation.

