

## Medac Code of Conduct

This Code of Conduct (CoC) describes the guiding principles, the values and the resulting behaviors at the basis of the relationship of trust with customers, suppliers, employees, cooperators and other stakeholders such as trade associations and Control bodies.

The themes subject of the protocol concern:

1. General principles
2. Ethical principles in business relationship
3. Ethical principles in relationship with suppliers
4. Ethical principles in relationship with employees/collaborators
5. Ethical principles in relationship with the Community
6. Control and signaling system

Medac is committed to spread the code of ethics to all interested stakeholders and to prepare every possible instrument to favor its knowledge and full application

### 1. General Principles

Medac bases its relationship on criteria of honesty, fairness, transparency, privacy, diligence, loyalty, professionalism and mutual respect.

In its activities, Medac acts in compliance with the legislation and with all the standards in force in the territories in which it operates, as well as with the present CoC and the company procedures, applying them with honesty and fairness.

Medac ensures the confidentiality of the information and of the personal data subjected to processing and the protection of the information acquired in relation with the working activity, being conform to the privacy requirements of the UE Regulation 2016/ 679 (GDPR).

### 2. Ethical principles in business relationship

Medac is a family company, whose commercial ethical policies are based on the relationship of respect and confidence, built over the time with its own interlocutors.

Keeping values and its own history in the relationship with the customers means to overcome the concept of just selling products and services as sole purpose. The commercial development is realized through dedicated strategies adapted to the needs of the area, avoiding aggressive practices of price reduction aimed at obtaining the market shares at any cost.

Commercial policies, prices, customers, territorial areas and distribution markets are established independently without formal or informal agreements with competitors and/or other parties interested directly or indirectly.

The "partnership" with agents, distributors, wholesalers, mediators is applied by sharing the growth policies, taking advantages from the development of products and services required by the market and, meeting customers and final users needs, although not explicitly or contractually expressed.

Medac does not adopt any practices bringing personal benefits for commercial purposes, such as tributes and/or gifts to the interlocutors managing the purchases.

Medac informs agents, wholesalers, distributors and intermediaries about the ethical principles adopted and defined in the "Code of conduct of agents, distributors, wholesalers and intermediaries" governed by the following topics:

- Anti-competitive behaviour and conflicts of interest
- Privacy and data protection
- Intellectual Property
- Recycling
- Monitoring and inspections
- Reporting

### 3. Ethical principles in relationship with suppliers

Medac bases its conduct in relationship with suppliers on the principles of transparency, loyalty, free competition, efficiency and economy.

Medac staff observes and respects, in relations with suppliers:

- the provisions of applicable laws,
- the conditions provided in the contract,
- the internal procedures related to the selection and management of suppliers relationship,
- the commitment to not accept money, gifts, favors or any other kind of benefit from persons, companies who are or intend to enter into business relationship with Medac<sup>(1)</sup>.

(1) Employees may accept symbolic gifts of low entity (max €50)

Suppliers are involved in the adoption of Medac's ethical principles and they are required to respect the "Medac Supplier Code of conduct" governed by the following topics:

- Human rights
- Forced labor
- Child labour
- Free association and collective Bargaining
- Non-discrimination
- Working Conditions
- Health and safety

- Environment
- Privacy and data protection
- Intellectual Property
- Recycling
- Anti-competitive behavior and conflicts of interest
- Monitoring and inspections
- Reporting

#### **4. Ethical principles in relationship with employees/collaborators**

Medac promotes respect for the physical, moral and cultural integrity of the person, by guaranteeing working conditions respectful of the individual dignity, safe, serene and prejudice-free working environments in respect of the personality and dignity of the individual, without discrimination for reasons of nationality, language, gender, race, religious beliefs, political and union membership, physical or psychic conditions.

The staff is aware and involved in the application of measures and behaviors consistent with the principles of sustainability.

Regardless the responsibility levels assigned, Medac staff commits not to have personal benefits, economic interests, with regard to the choices connected to the company position, even through family or third parties with:

- Private Customers,
- Public customers,
- Private control bodies,
- Public control bodies,
- Suppliers
- Competitors

such as to influence any kind of decision or conduct.

Employees must avoid any kind of activity or behavior that might lead to think or suspect that type of conduct or intention.

Without prejudice to the trade union membership provided by law and by the current work contract, each employee is aware that any involvement in political activities takes place on a personal basis, outside the working contest and in conformity with the laws.

## 5. Ethical principles in relationship with the Community

Medac believes that the satisfaction of the needs of the present generation should not compromise the possibility of future generations to realize their own.

Taking into account the needs of the community and adopting the principles of sustainability, Medac conducts its own activities contributing to the economic, social, cultural, civil development of the collectivity.

The commitment to environmental sustainability is realized by planning activities balancing economic actions and environmental needs. At this purpose, Medac adopts specific actions to reduce the environmental impact and applies measures to increase awareness of environmental protection of the staff.

Medac complies with all national and international rules and regulations regarding anti-money laundering.

## 6. Control and penalty system

The Board of Directors (BOD) supervises the adoption of the Medac CoC.

Reports of non-application may be presented confidentially or through reserved anonymous communication channels, to be adequately evaluated by the BOD, with no retaliation against those who have made them in good faith, protecting at the same time the rights of the persons involved in the actions denounced.

Any violations of this CoC, having direct effects on Medac, are punishable behaviour as affecting the fiduciary relationship and the due diligence (pursuant to Artt. 2104, 2105 and 2106 of the Italian Civil Code).

In severe and/or repeated cases, violation of this CoC may determine the activation of legal action and the adoption of disciplinary sanctions against the infringers.