



CODE OF ETHICS

INTRODUCTION

OPIS S.r.l. (hereinafter also referred to as the "Company" or "OPIS") is a CRO (Contract Research Organization) that offers a wide range of services related to clinical research. OPIS provides pharmaceutical product development strategies for client companies, with particular reference to the planning, management and statistical analysis of pre-clinical and clinical studies, stability studies, market surveys and to the performance of analyses relating to pharmaco-economics, quality of life, metanalysis, pharmacodynamics, pharmacokinetics and epidemiology, which may lead to the publication of scientific and technical texts, as well as the trade of patents, technologies and innovative products in the pharmaceutical field.

OPIS S.r.l. acts as headquarters for the Group's foreign companies located in the United Kingdom, France, Spain, Germany, Belgium, Poland, Sweden and Switzerland (hereinafter the "Group").

By virtue of its background and the position it holds in various markets, the Company has always based its activities on the principles of ethics and fairness in business, with regard to both its own collaborators and third parties with whom it has had and has business relations.

In order to strengthen and codify this conduct, the Company decided to adopt an organisational, management and control model (the "Model") pursuant to Legislative Decree no. 231 of 8 June 2001 (hereinafter also "Legislative Decree 231/01" or "Decree"): on this occasion it was decided to document the ethical principles and rules of conduct adopted in business management in the code of ethics set out in Chapter 1 below (the "Code of Ethics").

The progressive internationalization of the Group's activities has made it appropriate to adopt a Protection System with a more international character by including the specific obligations of each country.

The Code of Ethics is an integral part of the Model, which is mainly aimed at identifying and preventing, in all activities carried out by the Company, the commission of specific crimes that would lead to the breach of such ethical conduct, as well as compromise the reliability and efficiency of the Company in carrying out its business activities. The main aims of the Code of Ethics are to standardize the individual conduct of the actors, avoid improper conduct, make the pursuit of profit compatible with respect for the law and maintain and develop the relationship of trust with the stakeholders of the Company, namely those categories of individuals, groups, or institutions that have an interest in the Company, including, in particular, customers, suppliers and business partners.

1. CODE OF ETHICS

I. SCOPE

This Code of Ethics expresses the ethical commitments and responsibilities in the conduct of business and corporate activities undertaken by OPIS, its subsidiaries and their respective directors and employees.

OPIS is an important Italian company in the CRO sector and has taken on an international dimension over time. The competitiveness of the Company is based on the professional skills of its staff and on extensive knowledge of the business and markets.

OPIS aims to base its conduct and that of the companies of the OPIS Group on fairness, equity, loyalty and professional rigour, both in its internal relations and in its relations with external parties, recognising that compliance with the laws and regulations of the countries in which the Group operates is an essential principle.

II. RECIPIENTS

The principles and provisions of this Code of Ethics are addressed to the members of the Board of Directors, the Board of Statutory Auditors and the other corporate bodies of OPIS and the other companies, directly or indirectly controlled by it, as well as the managers, employees and all those who, permanently or temporarily, enter into contractual relations with the Group for any reason and in all the countries in which OPIS Group operates (the "Recipients").

Inoltre, OPIS richiede a tutte le imprese collegate o partecipate e ai propri collaboratori, fornitori e partner di adottare nei rapporti con il Gruppo una condotta in linea con i principi del presente codice etico. Il codice etico ha validità sia in Italia che all'estero, pur in considerazione della diversità culturale, sociale, economica e legale in cui opera l'azienda.

In addition, OPIS requires all associated or participated companies and their collaborators, suppliers and partners to adopt a conduct in line with the principles of this Code of Ethics in their relations with the Group. The Code of Ethics is valid both in Italy and abroad, in spite of the cultural, social, economic and legal diversity in which the company operates.

All Recipients are required to know the rules of this Code of Ethics and the procedures that govern their activities within the Company. Under no circumstances does the claim to act in the interest of OPIS or of any of the companies belonging to the Group justify behaviour that is in contrast with the principles set out in this Code of Ethics.

III. DEFINITIONS

Capitalized terms in this Code of Ethics have the following meanings:

- **Public Authorities** shall have the meaning set out in section 4.2.1.
- **Collaborators**: the members of the corporate bodies, the employees of OPIS and of each company of the OPIS Group and the persons who, for various reasons, act in the name of OPIS.
- **Recipients** has the meaning set out in the first paragraph of paragraph II (Recipients) above.
- **Group or OPIS Group** has the meaning set out in the first paragraph of paragraph I (Scope) above.
- **Holders of the Group Interest** has the meaning set out in section 2.1.1.
- **Public Administrations**: all bodies and offices that exercise a function and/or activity in which the public interest prevails over the business activity, the collaborators and employees of the aforesaid bodies and offices, the public officials and the persons in charge of a public service.
- **Protection System**: the set of documentation systems and organisational methods of the Group aimed at preventing, or in any case minimising, the risk of offences being committed. With reference to OPIS, Model 231, the Code of Ethics and complementary documentation are included; at Group level, it includes the policies and systems of compliance with specific local regulations.
- **Third parties**: all persons, whether natural or legal persons, who have not established, and until they establish, a contractual relationship with any of the companies of the OPIS Group. To leave no doubt, it is specified that the above-mentioned persons will be considered for the purposes of this code as Recipients (as defined above) from the moment in which a contractual relationship is established, for any reason, and in any form, with the OPIS Group.

IV. ETHICAL VALUES AND PRINCIPLES

1. COMPLIANCE WITH LAWS

All Recipients are required to abide by the laws, internal rules and regulations in force in Italy and in all countries in which the OPIS Group operates. No violation of this principle is tolerated.

1.1. Value of human resources and fair and respectful working conditions

- 1.1.1. Human resources are a fundamental and indispensable factor for business development.
- 1.1.2. The OPIS Group, in full compliance with current legislation and international standards on human rights and working conditions, protects the growth and professional development of personnel in order to increase their wealth of skills and guarantees working conditions that respect individual dignity, the rules of good behaviour and safe and healthy working environments.
- 1.1.3. No one shall be treated unjustly, disadvantaged, favoured, harassed or discriminated against on the grounds of race, ethnicity, nationality, religion, ideology, sex, age, physical characteristics, appearance, state of health, sexual orientation or other protected classifications in a particular country.
- 1.1.4. OPIS Group rejects the exploitation of child labour and guarantees respect for workers' rights, trade union freedom and the rights of association.

1.2. Integrity of the person

- 1.2.1. OPIS Group protects individual freedom in all its forms and rejects any manifestation of violence.
- 1.2.2. OPIS Group guarantees compliance with current legislation on individual personality rights, with particular regard to the moral and physical integrity of personnel
- 1.2.3. Requests or threats aimed at inducing people to act against the law and the code of ethics or to behave in a way that is prejudicial to the moral and personal convictions and preferences of each person are not tolerated.

1.3. Privacy and Confidentiality

- 1.3.1. OPIS Group undertakes to protect the privacy of all persons with whom it enters into relations in the exercise of its activities, whether internal or external to the company, in compliance with the regulations in force in Italy and in the other countries in which it operates, with particular reference to the provisions of the General Data Protection Regulation (GDPR), Regulation 679/2016/EU and applicable local regulations.
- 1.3.2. The Group ensures the confidentiality of the information in its possession and refrains from seeking confidential data, except in the case of expressed authorisation
- 1.3.3. All Recipients of this code are required not to disclose confidential information acquired or processed during their work and not to use it for purposes not related to the conduct of their activities.

2. FAIRNESS

In carrying out its activities, the OPIS Group is inspired by the principles of loyalty, honesty, transparency, professionalism and efficiency and requires the Recipients to conduct business relations concerning the OPIS Group with the same principles and with regard to relations both within the company and with subjects outside the Group.

2.1. Conflict of Interest

- 2.1.1. The persons involved in carrying out any activity on behalf of OPIS Group, including, by way of example only, Collaborators and external consultants (hereinafter, the "Group Interest Holders"), must avoid creating or facilitating situations or activities that could lead to actual or potential conflicts of interest with the interests of the Group and/or each company of the Group. This means both the case in which a Group Interest Holder pursues an interest other than the Company's mission and the case in which he or she, or a third party, benefits personally from the Company's business opportunities.
- 2.1.2. A Group Interest Holder who has a financial, family, sentimental or other interest in a supplier, a competitor or a customer (or their employee) and has the power to make or influence, directly or indirectly, decisions relating to the business relationship between them and the Group, must comply with the provisions of Section 2.1.4 below.

- 2.1.3. Group Interest Holders may not engage in work activities that may lead to a conflict of interest. Situations or activities that could in any way interfere with the ability of Group Interest Holders to make decisions in the interest of the Group must always be avoided.
- 2.1.4. Group Interest Holders finding themselves in a situation of conflict of interest, even if only potential, are required to communicate the circumstances to their superior or to the body to which they are member and refrain from carrying out the operation with could, potentially or concretely, give rise to a conflict of interest, unless otherwise indicated by their superior or the body to which they are member.

2.2. Honesty

- 2.2.1. Recipients must be aware of the ethical significance of their actions, must act honestly, in compliance with the laws in force and the Code of Ethics, and in such a way as to protect the prestige and reputation of OPIS Group.
- 2.2.2. Corruption is contrary to fair competition and proper moral attitudes and damages the image of OPIS Group. No type of corruption, in any form or manner, in any jurisdiction, shall be tolerated, even if such activity is in practice permitted, tolerated or not prosecuted.
- 2.2.3. In the conduct of any activity that may be connected to OPIS Group, it is forbidden to offer or receive unduly gifts, favours or other benefits aimed at obtaining favourable treatment, influencing independence of judgement or granting oneself or others any advantage.
- 2.2.4. Representatives of persons outside the company (including, for example, customers, suppliers, Public Administrations) must not be induced to act in conflict with the fiduciary duties associated with their position.
- 2.2.5. The gifts offered, except those of modest value, must be managed and authorised according to Company procedures and must be adequately documented. Collaborators who receive gifts, except if of modest value, must notify their superior and/or the Supervisory Body.
- 2.2.6. Nevertheless, acts of commercial courtesy such as not to compromise the integrity and autonomy of judgment of the Recipient are permitted, provided they are of modest value. The term "modest value" refers to a value the size of which is such as to not generate the impression or expectation (perceptible or otherwise discernible) that the donor will obtain the Recipient's recognition through new business, favouritism or other gratifications.

2.3. Trasparency

- 2.3.1. The principle of transparency is based on the truth, accuracy and completeness of information. All information regarding the Company, its activities and organisation, belongs to the Company as a whole and must constitute distributed assets. All Recipients must contribute to the enrichment of the information with their own contribution, guaranteeing its flow at all Company levels and have free access to the information for which they are responsible.
- 2.3.2. All activities and actions carried out by the Recipients within the scope of their work must be carried out in full compliance with the principle of transparency and must be verifiable. In particular, it must be possible to verify every phase of the Company's decision-making process, from authorisation to execution.
- 2.3.3. For each operation, there must be adequate documentation in order to be able to proceed at any time with the controls that certify the characteristics and reasons for the operation and identify the person who authorized, executed, recorded and verified the operation itself.
- 2.3.4. The accounting records must be kept in accordance with the principles of truth, accuracy and completeness of information. Each Recipient is required to cooperate so that events are correctly and promptly represented in the relevant accounting records. Each record must accurately reflect what results from the supporting documentation of each activity and provide a true and fair view of the Company's activities and assets.
- 2.3.5. The accounting information of OPIS is accessible as required by law.

2.4. Diligence and transparency in the conduct of tasks

- 2.4.1. All activities must be carried out with diligence and professional rigour, in compliance with the duty of each individual to provide his or her professional contribution in a manner appropriate to the functions and responsibilities assigned.
- 2.4.2. Recipients must refrain from performing acts that exceed the tasks and authority assigned to them.
- 2.4.3. The Recipients must adapt their conduct, within the limits of their competences and responsibilities, to the pursuit of the corporate objectives of OPIS Group.

2.5. Protection of stakeholders' interests

- 2.5.1. OPIS Group pursues the creation of value for shareholders, protecting the interests of the Group itself and of the shareholders as a whole, without any preference for groups or categories of shareholders. All this in full compliance with the entire Code of Ethics and related applications, including regulatory ones.
- 2.5.2. OPIS Group adopts a system of corporate governance designed to ensure the effective management and control of the Company's activities.
- 2.5.3. OPIS ensures maximum transparency and timeliness of the information communicated to the shareholders in order to allow them to actively participate in the decisions for which they are responsible and to make informed choices.

2.6. Protection of Company assets

- 2.6.1. Each Recipient must protect and safeguard the assets of OPIS Group and contribute to the protection of the Group's assets by refraining from engaging in conduct that could threaten the integrity and safety of such assets.
- 2.6.2. Recipients are required to actively contribute, within the scope of their functions, competences and responsibilities, to the management of intellectual property in order to allow its development, protection and enhancement.
- 2.6.3. Recipients must scrupulously comply with the Company's security policies when using OPIS Group's IT system, applications and tools so as not to compromise their functionality and protection. Any use of IT systems that may represent a violation of the law (in particular, by way of example, in relation to IT offences, IT security, privacy and copyright) or an offence against the freedom and dignity of persons, especially minors, is prohibited. Such behaviour would expose OPIS Group to serious damage (economic, reputational and competitive) and to the application of serious criminal and administrative sanctions against Group companies.

2.7. Quality

- 2.7.1. OPIS Group focuses its activity on the satisfaction and protection of its customers, aspiring to a continuous improvement of its services.
- 2.7.2. Recipients who within the scope of their competences and responsibilities deal with customers are required to provide complete and clear information on the services offered by OPIS Group.

3. REPUDIATION OF ANTI-COMPETITIVE BEHAVIOUR

OPIS Group recognises that the value of competition is fundamental for the development of the Company and the market, and carries out its activities based on the principles of impartiality, fairness, correctness, fair competition and transparency towards the operators present in the markets in which it operates.

3.1. Infringements of antitrust law

- 3.1.1. OPIS Group manages its activities by promoting fair competition and repudiates any behaviour contrary to the regulations protecting fair competition.

- 3.1.2. Recipients must refrain from unfair commercial practices and from any conduct aimed at putting in place agreements, implicit or explicit, with competitors in violation of antitrust regulations regarding any aspect of the Company's business.

3.2. Impartiality

- 3.2.1. OPIS Group does not discriminate on the basis of gender, age, sexual orientation, state of health, ethnicity, nationality, political opinions, religious beliefs of its interlocutors in decisions that affect relations with shareholders, customers, human resource management and work organisation, in the selection and management of suppliers and its Collaborators, in relations with local communities.
- 3.2.2. The selection of suppliers and the formulation of conditions for the purchase of goods and services for OPIS Group companies are based on the search for maximum competitive and qualitative advantages for the Group. Nevertheless, the purchasing processes comply with the principles of competition, objectivity, fairness and impartiality towards any supplier who meets the requirements. Reference parameters in the choice of a supplier are the fairness of the price, the safety and quality of the goods or service offered, the punctuality of the supply, as well as the existence and effective implementation of company quality systems and compliance with regulations on health and safety in the workplace.
- 3.2.3. Recipients are required to comply with Company procedures for documenting the process of selecting suppliers and purchasing raw materials and services in order to ensure maximum transparency in the assessment and selection of the supplier.
- 3.2.4. In the area of personnel management, selection, management and personnel development processes, decisions are based on the correspondence between the expected profiles and those held by the employees and on considerations of merit.

3.3. Diligence and fairness in the negotiation and performance of contracts

- 3.3.1. In negotiating contracts, Recipients must abide by the principles of loyalty and good faith and act with fairness and transparency in order to allow their interlocutors to make informed choices. Contracts must be compliant with law, contain clear clauses and be complete in order to avoid doubts about their content.
- 3.3.2. Contracts shall be performed diligently and in good faith in accordance with the provisions of the contract.
- 3.3.3. Recipients are obliged to refrain from conduct aimed at taking advantage of contractual gaps or unforeseen events in order to renegotiate a contract for the sole purpose of exploiting the weak position in which the other party found itself.
- 3.3.4. Compliance with the principles of impartiality, fairness and transparency in relations with all contractual counterparties must be guaranteed by the Recipients even when the parties to the contract are companies of OPIS Group.

3.4. Protection of transparency in commercial transactions

- 3.4.1. OPIS Group demands maximum transparency in commercial transactions and has the appropriate instruments to combat receiving stolen goods and money laundering.
- 3.4.2. The Group intends to take all reasonable precautions to verify the reliability of the commercial operators with whom it intends to do business, as well as the legitimate origin of the capital used by them in their relations with the Group.

4. SOCIAL RESPONSIBLY

OPIS Group intends to contribute to the well-being and growth of the communities in which it operates, in Italy and in other countries, and provides support for cultural, social and educational initiatives aimed at pursuing these objectives.

4.1. Relations with Public Authorities

- 4.1.1. Relations with public bodies and corporations, public administrations or other institutional interlocutors ("Public Authorities") are reserved exclusively for the Company functions delegated to this task.
- 4.1.2. Relations with the Public Authorities must be based on the utmost transparency, clarity and fairness and must be conducted in full compliance with the laws and regulations in force, the internal procedures of each company of the Group and this Code of Ethics in order to ensure the absolute legitimacy of the Group's operations.
- 4.1.3. It is not permitted to offer money or gifts to managers, officials or employees of the Public Administration or to their relatives, whether Italian or from other countries. It is forbidden to offer or accept any service, performance or benefit to obtain more favourable treatment in relation to any relationship with the Public Administration.
- 4.1.4. In countries where it is customary to offer gifts to customers or others, it is possible to do so when these gifts are of an appropriate nature and of modest value, but always in compliance with the law and provided that this cannot be interpreted as a request for favours.
- 4.1.5. When any business negotiation, request or relationship with the Public Administration is in progress, the Recipients must not seek to improperly influence the decisions of officials who negotiate or make decisions on behalf of the Public Administration.
- 4.1.6. In the course of business negotiations, requests or commercial relations with the Public Administration, the following actions must not be taken, directly or indirectly:
 - examine or propose employment and/or commercial opportunities that may benefit employees of the Public Administration in a personal capacity,
 - offer or in any way provide gifts,
 - solicit or obtain confidential information that could compromise the integrity or reputation of both parties.
- 4.1.7. The external consultants appointed to represent the companies of OPIS Group in their relations with the Public Authorities are required to comply with the principles set out in this Code, including the prohibition on engaging in acts of conflict of interest.
- 4.1.8. In the case of investigations or inspections or requests for information by Public Authorities, the Recipients are required to ensure due cooperation.

4.2. Relations with associations, political parties and organisations

- 4.2.1. OPIS Group does not make direct or indirect contributions to finance political parties, committees, political and trade union organisations and, more generally, organisations with which the Group companies have a conflict of interest, either in Italy or abroad.
- 4.2.2. OPIS Group may support, also financially, selected projects provided that they are implemented for the pursuit of purposes in line with the purposes and values of the Group, that the allocation of economic resources is clear and documented and that the projects have been expressly authorised by the competent Company functions.

4.3. Relations with international operators

- 4.3.1. OPIS Group undertakes to ensure that all its relations, including those of a commercial nature, with subjects operating at an international level, take place in full compliance with national and foreign legislation in order to avoid the danger of the commission of transnational offences.
- 4.3.2. Within the limits of its possibilities, the Group undertakes to cooperate with the competent authorities requesting information or carrying out investigations of international operators with whom the Group has established contractual relations.

4.4. Relations with health professionals

- 4.4.1. In their relations with healthcare professionals and, in general, with subjects operating within healthcare facilities or the national healthcare system, the Recipients must refrain from any conduct that even hints at behaviour incompliant with the law, the Model or the Code of Ethics.

4.5. Action against terrorism and mafias

- 4.5.1. OPIS Group repudiates all forms of terrorism and the mafia and intends to adopt as part of its activities, appropriate measures to prevent the danger of involvement in acts of terrorism and the mafia so as to contribute to the establishment of peace between peoples, democracy and legality.
- 4.5.2. The Group undertakes not to establish any working or commercial relationship with subjects, be they natural or legal persons, involved in terrorism and mafia acts, nor to finance or in any way facilitate any of their activities.

V. EXECUTION

5. REFERENCE BODIES

5.1. Supervisory Body

- 5.1.1. With specific regard to the rules applicable to OPIS headquarters, a Supervisory Body has been appointed - in accordance with the law - to which are assigned, among other things, the tasks of supervising the effective implementation of the Code of Ethics by all Recipients, offering any clarification of interpretation of the rules contained therein, updating the Code of Ethics and performing any other task useful for the purpose. The Supervisory Board does not exercise any power over foreign affiliates or subsidiaries, but only carries out the functions assigned to it by Italian law, within the scope of the broader policy tasks assigned to OPIS.
- 5.1.2. OPIS invites all affiliated or participated companies to share and accept the values that inspire their activities and, if resident in Italy, invites them to identify or set up a body that can ensure the effective application and implementation of this code of conduct within their own companies and in consideration of the size of the individual company, as well as to equip themselves with the controls referred to in Legislative Decree no. 231/2001.

5.2. Heads of corporate functions

- 5.2.1. If there are doubts about the application of the rules set out herein or about the conduct to be adopted in specific concrete circumstances, and in any case of violation or the occurrence of any situation relevant to the application of this Code, the Recipients are invited to contact or the person in charge of their company function (where applicable) to receive clarification and indications, or the specific channels of communication and internal reporting (i.e. whistleblowing tool, anti-corruption manager, Supervisory Body).
- 5.2.2. Any form of retaliation, discrimination or penalisation against those who consult or file a report is expressly prohibited and sanctioned.
- 5.2.3. The heads of corporate functions are obliged to:
- set an example for their collaborators through their own behaviour so they respect the Code of Ethics and internal procedures,
 - ensure that the rules of the Code of Ethics, the internal safety procedures, the specific internal procedures that must be followed by employees in carrying out the work have been explained to the employees and understood by them,
 - carefully select, to the extent of their competence, the internal and external collaborators of the Company in order to prevent the assignment of tasks to persons whose commitment to observe the rules of this Code and procedures cannot be relied on,

- where within their competence, take immediate corrective measures in order to avoid the commission of acts in violation of the Code and internal procedures or the worsening of situations resulting from a violation,
- report through internal communication channels, in the ways and within the timeframes envisaged by the applicable procedures, and in any case, when they become aware of a violation of this Code or of internal procedures and where they deem it appropriate.

6. EFFECTIVENESS AND CHANGES

6.1. Implementation of the Code of Ethics

- 6.1.1. The members of the Board of Directors, the Board of Statutory Auditors and the other corporate bodies of OPIS and the other companies of the Group are required to implement this Code and to inspire, through their own behaviour, that of the other Recipients, promoting the dissemination, within OPIS Group and in relations with external parties, of the values and principles set out herein so that they may consolidate in the culture of the Group.
- 6.1.2. All Recipients are required to be aware of the content of this Code and to comply with the principles and values expressed herein and not to engage in any conduct contrary to what is set out in it.
- 6.1.3. In order to ensure the correct understanding of the Code of Ethics by its Collaborators, the Human Resources department of each OPIS Group company shall prepare a training plan aimed at promoting knowledge of the principles and rules of the Code of Ethics. The Code of Ethics is also available to all Recipients on OPIS Group's intranet and website.
- 6.1.4. The collaborators and consultants of OPIS Group, in the context of their relations with external subjects, must inform Third Parties about the commitments and obligations imposed by the Code, and where a contractual relationship is established, (i) require compliance with the obligations that directly concern the activity they perform with regard to OPIS Group, and (ii) take the appropriate internal and, if within their competence, external initiatives in the event of non-fulfilment.
- 6.1.5. This Code of Ethics and the principles set out in it are a fundamental part of the Protection System prepared by OPIS Group.

6.2. Effectiveness and Violations

- 6.2.1. The Code of Ethics is an integral part of the employment relationship of each employee of the companies belonging to OPIS Group and compliance with the rules of the Code of Ethics must be considered an essential part of the obligations of each employee of the respective companies of the Group. Violation of the rules of the Code of Ethics may constitute a breach of the primary obligations of the employment relationship or a disciplinary offence, with all legal consequences, also with regard to the preservation of the employment relationship, and may result in actions for compensation for damages caused by the breach itself, without prejudice to any other civil and criminal liability attributable to the individual.
- 6.2.2. In the event of a breach of current legislation or failure to comply with the provisions of the Code of Ethics and/or the internal procedures for its implementation by directors of OPIS Group companies or by members of the other corporate bodies of the same, the Supervisory Body of the relevant company shall inform the Board of Directors, or the corporate body of which the person who committed the breach is a member, respectively, so that it can take the appropriate initiatives provided for by current legislation.
- 6.2.3. Any behaviour adopted by Recipients other than Collaborators - by way of example but not limited to, suppliers, partners, consultants and any other person who establishes a contractual relationship with a company of OPIS Group - in violation of the rules of the Code of Ethics and more generally of the Model, may lead, in accordance with the provisions of the specific contractual clauses or even in the absence of similar clauses, to the termination of the contractual relationship, without prejudice to any claim for compensation if such behaviour causes damage

to OPIS or to any of the companies of the Group, even regardless of the termination of the contractual relationship.

- 6.2.4. This Code contains the statement of obligations relating to the conduct of the Recipients in their relations with OPIS Group and from it does not derive any contractual or other rights for the Recipients, nor any limitation or modification of any other obligations due in connection to the relations in place with the Group.

6.3. Reporting of possible breaches

- 6.3.1. Anyone who becomes aware of a fact or circumstance likely to constitute a danger of a violation, by themselves or by a Third Party, of this Code of Ethics or of the internal regulations implementing it, is obliged to report promptly to their superiors, or to the Corporate Body of which they are part, or to the specific internal communication and reporting channels specifically applicable (i.e. whistleblowing tool, anti-corruption manager, Supervisory Body). Anyone who intentionally fails to report a violation committed by others in connection with the activities carried out by them on behalf of OPIS Group is subject to the penalties provided for and applicable to the specific case.
- 6.3.2. OPIS Group activates appropriate dedicated communication channels in order to facilitate the reporting process applicable to the specific case in accordance with the Protection System.
- 6.3.3. The recipient of the report must ensure that those who have filed it is not subject to retaliation, discrimination or otherwise penalized, ensuring adequate confidentiality of such persons, except where required by law or by public authorities.

6.4. Amendments and updating

- 6.4.1. This Code of Ethics is subject to periodic updating and amendments or revisions by the Board of Directors of OPIS, also on the proposal of the Supervisory Body. This Code was adopted by resolution of the Board of Directors of OPIS on 25.07.2019 with immediate effect from that date.