
	<p style="text-align: center;">ANTI-BRIBERY POLICY</p> <p style="text-align: center;">Approved by the Board of Directors by resolution of October 21st, 2025</p>	<p>cod.: QA CORR_POL</p> <p>rev. 0</p> <p>data: 21/10/2025</p> <p>pag. 1 di 8</p>
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Index

1. Definitions.....	2
2. Introduction	3
3. Objectives of the Anti-Bribery Policy	4
3.1. Fighting Corruption at Biomedica.....	4
3.2. Objectives of the Anti-Bribery Policy	4
3.3. Prohibited Behaviors and Obligations of Recipients	4
4. Anti-Bribery Compliance Function.....	6
5. Planning.	6
6. Awareness, Training and Communication.....	7
7. Due Diligence and Additional Controls.....	7
8. Performance Evaluation of the Anti-Bribery Management System.	7
9. Improvement.....	7
10. Reporting	7
11. Disciplinary System.....	8

	<p style="text-align: center;">ANTI-BRIBERY POLICY</p> <p style="text-align: center;">Approved by the Board of Directors by resolution of October 21st, 2025</p>	<p>cod.: QA CORR_POL</p> <p>rev. 0</p> <p>data: 21/10/2025</p> <p>pag. 2 di 8</p>
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1. Definitions

- **Top Management:** as per UNI ISO 37001:2016, the person or group of people who, at the highest level, direct or control an organization.
- **Biomedica or Company:** Biomedica Italia S.r.l.
- **Code of Ethics:** the Code of Ethics adopted by the Company.
- **Conflict of Interest:** as per UNI ISO 37001:2016, a situation in which commercial, economic, family, political, or personal interests could interfere with a person's judgment in the performance of their duties within an organization.
- **Recipients:** members of the corporate bodies, employees, and all those who act on behalf of and/or in the name of Biomedica Italia S.r.l. (for example, under contract, such as consultants and agents, or by specific power of attorney, such as legal representatives in court).
- **Legislative Decree 231/2001: Legislative Decree No. 231 of June 8, 2001.**
- **Due Diligence:** as per UNI ISO 37001:2016, a process aimed at assessing the nature and extent of the corruption risk and supporting organizations in making decisions regarding specific transactions, projects, activities, business partners, and personnel.
- **Anti-bribery Compliance Function:** as per UNI ISO 37001:2016, the person or persons responsible and authorized to ensure the operation of the anti-bribery management system.
- **Guidelines:** Anti-bribery guidelines adopted by Biomedica Italia S.r.l., also for compliance with UNI ISO 37001:2016.
- **Model:** the organization, management, and control model adopted by Biomedica Italia S.r.l. pursuant to Legislative Decree 231/2001.
- **Non-Compliance:** as per UNI ISO 37001:2016, the failure to meet a prescribed requirement.
- **ISO 37001 Standard:** UNI ISO 37001:2016 ("Anti-bribery management systems"), which specifies requirements and provides guidance for establishing, implementing, maintaining, updating, and improving an anti-bribery management system.
- **Supervisory Body:** the body provided for by Article 6 of Legislative Decree 231/2001, responsible for overseeing the functioning, observance, and updating of the Model.
- **Organization:** as per ISO 37001, a person or group of people with their own functions, responsibilities, authority, and relationships to achieve their objectives.
- **Governing Body:** as per ISO 37001, the group or body that holds ultimate responsibility and authority for the activities, administration, and policies of the Organization, to which Top Management reports and which oversees Top Management's responsibilities.
- **Interested Party:** as per ISO 37001, any person or Organization that can affect, be affected by, or perceive itself to be affected by a decision or activity.
- **Policy:** the Anti-bribery Policy adopted by Biomedica.
- **Public Administration or PA:** collectively
 - ministries;
 - supervisory authorities or regulators;
 - public entities: entities created by an act of the State to meet organizational or functional needs of the State itself, such as, for example, Municipalities and Provinces, Chambers of Commerce, INPS, ASL, ARPA, the Revenue Agency, the Guardia di Finanza;
 - public officials: individuals who exercise a public legislative, judicial, or administrative function, and who can form or express the will of the PA through the exercise of authoritative or certifying powers, such as, for example, members of state and territorial administrations, supranational administrations (e.g., the European Union), Law Enforcement and the Guardia di Finanza, Chambers of Commerce, Building Commissions, judges, judicial officers, auxiliary bodies of the administration of justice (e.g., bankruptcy

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- trustees), administrators and employees of public entities, private individuals vested with powers enabling them to form or express the will of the Public Administration;
- o individuals entrusted with a public service: individuals who, in any capacity, perform a public service, to be understood as an activity regulated in the same forms as the public function, but characterized by the absence of the typical powers of the latter, excluding the performance of simple public order tasks and the provision of purely material work. Even a private individual or an employee of a private company may be qualified as entrusted with a public service when performing activities aimed at pursuing a public purpose and protecting a public interest.
- **Anti-bribery Management System:** a management system compliant with ISO 37001, aimed at preventing corrupt practices.
- **Business Partners:** as per ISO 37001, third parties with whom the Organization has or plans to establish a business relationship.

2. Introduction

In recent years, issues related to corruption have progressively gained greater international importance, due to the spread of the phenomenon in both the public and private sectors and the growing awareness of the damage it causes, such as the distortion of competition, increased costs and loss of quality in affected products and services, and diminished trust in institutions.

On the other hand, in response to corruption, there has been a progressive tightening of sanctions associated with corrupt conduct. Individuals (natural and legal persons) found responsible for acts of corruption may face custodial, financial, and disqualification penalties, as well as serious reputational and commercial consequences.


Biomedica, in full compliance with applicable regulations and all requirements set out by international standards and best practices on anti-bribery, is committed to preventing and combating unlawful and corrupt practices in the conduct of its activities, guiding these activities by values such as loyalty, fairness, transparency, honesty, and integrity.

This commitment is part of the broader virtuous policy adopted by Biomedica, pursued through the promotion of behaviors in line with the provisions of the Code of Ethics and the Model adopted by the Company.

To this end, the Company has implemented an Anti-bribery Management System compliant with ISO 37001, of which the Anti-bribery Guidelines (to which reference is made) and this Policy are an integral part.

The objective of this Policy is to identify a systematic framework of ethical and behavioral principles and rules for the prevention and fight against corruption, increasing awareness of the behaviors to be observed by Recipients.

Anyone acting on behalf of Biomedica is required to read and understand the contents of this Policy and to align their conduct with its provisions, as well as with applicable regulations.

	<p style="text-align: center;">ANTI-BRIBERY POLICY</p> <p style="text-align: center;">Approved by the Board of Directors by resolution of October 21st, 2025</p>	<p>cod.: QA CORR_POL</p> <p>rev. 0</p> <p>data: 21/10/2025</p> <p>pag. 4 di 8</p>
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3. Objectives of the Anti-Bribery Policy

3.1. Fighting Corruption at Biomedica

The Company promotes high standards of integrity through honest and ethical management of business affairs.

Under no circumstances can the pursuit of the Company's interest justify or legitimize conduct contrary to applicable legal provisions.

Therefore, practices of corruption, unlawful favors, collusive behavior, solicitation of personal advantages for oneself or others are explicitly prohibited, even if such conduct could result in a benefit, even a potential one, for the Company.

3.2. Objectives of the Anti-Bribery Policy

This Policy aims to achieve the following objectives:

- prohibit and combat corruption and ensure the highest compliance with national and international regulatory standards;
- guarantee the sustainability, honesty, and transparency of Biomedica's activities, countering any unlawful phenomenon;
- promote and develop ethics in business relationships;
- adopt the Anti-bribery Management System as an effective means of combating corrupt practices;
- increase awareness of the commitment to prevent and fight corruption among all Recipients; create an integrated, understandable, actionable, and monitorable control system; encourage the reporting of any act of corruption of which one is aware or suspects, through dedicated channels and methods that allow: i) the initiation of an investigation to assess its validity, ii) the implementation of effective countermeasures, iii) the protection of the whistleblower from any form of retaliation and discrimination, iv) the protection of individuals unjustly reported.


To achieve these aims, Biomedica promotes a corporate culture inspired by the principles of legality and ethics and undertakes to monitor compliance with anti-bribery measures adopted, as well as the conduct of internal controls.

3.3. Prohibited Behaviors and Obligations of Recipients

As previously stated, Biomedica, in line with current anti-bribery legislation, prohibits all forms of corruption, meaning the offering, promising, requesting, accepting, or payment, whether directly or indirectly, of money or any other benefit, in order to obtain or retain business or to secure an unfair advantage in connection with company activities, regardless of whether the counterparty is a public official or a private individual.

By way of example and not limitation, Biomedica prohibits:

- complying with requests or solicitations from public officials or persons entrusted with a public service to give or promise them money or other benefits;
- making undue solicitations to representatives of the Public Administration in relation to activities pertaining to their office;
- interacting with the Public Administration through third parties who are not formally authorized;
- making cash payments to public officials;

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- promising, offering, or distributing—directly or through intermediaries—gifts outside of what is provided for by company practice (that is, any form of gift exceeding normal business or courtesy practices, or otherwise aimed at obtaining favorable treatment in the conduct of any business activity). In particular, any form of gift to Italian or foreign public officials (even in countries where giving gifts is a widespread practice), or to their family members, that may influence their independence of judgment or induce them to secure any advantage for the Company is prohibited. It is also forbidden to give gifts of more than modest value and, in any case, to give gifts and acts of commercial courtesy, regardless of their value, to third parties who have expressly informed Biomedica that they cannot accept them due to company policy;
- granting other benefits of any kind (such as promises of employment, etc.) to representatives of the Public Administration, their family members and/or relatives;
- engaging in conduct towards representatives of companies such as business partners or potential clients that may be interpreted as corrupt practices, unlawful favors, collusive behavior, solicitations, direct or through third parties, aimed at obtaining undue advantages for oneself or others;
- accepting gifts or personal courtesies from third parties, whether clients, suppliers, or others, other than those due to normal courtesy and of modest value.

Furthermore, Recipients must avoid circumstances in which a Conflict of Interest may arise that could compromise their impartiality and compliance with the provisions of the Model, the Code of Ethics, the Guidelines, and this Policy.

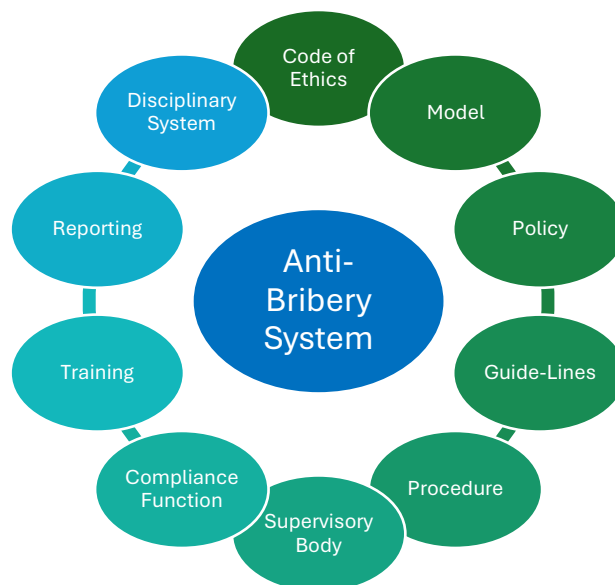
It is mandatory to report to one's function manager any information that may suggest a potential conflict with the Company's interests.

In order to counter any corrupt phenomenon, Biomedica has adopted and established a series of rules, tools, and bodies. In particular, the Company has:

- adopted and disseminated the Guidelines for the prevention of corruption;
- adopted and disseminated the Code of Ethics, which expresses the ethical and behavioral principles and values to which Recipients must be inspired;
- adopted and disseminated the Model, which defines the set of rules and control tools aimed at preventing the commission of crimes, including those of corruption;
- integrated the internal control system with specific safeguards to identify, prevent, and counter corrupt conduct;
- appointed a Supervisory Body, responsible for overseeing the observance, effectiveness, and updating of the Model;
- adopted a reporting system that allows the reporting of any act of corruption of which one is aware or suspects, and which provides measures to protect the reporting person;
- identified and appointed the Anti-bribery Compliance Function, responsible for supervising and ensuring the implementation and operation of the Anti-bribery Management System;
- carried out training, information, and communication activities regarding the measures adopted by the Company to prevent corruption and the reporting tools;
- provided for specific sanctions to be imposed in case of violation of the Anti-bribery Management System.

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Below is a graphical representation of the anti-bribery framework adopted by Biomedica:



4. Anti-Bribery Compliance Function


Biomedica has identified and appointed its own Anti-bribery Compliance Function, endowed with authority, independence, and appropriate powers, and mainly responsible for:

- supervising the design and construction of the Anti-bribery Management System;
- providing advice and guidance to staff regarding the Anti-bribery Management System and on matters relating to corruption;
- ensuring that the Anti-bribery Management System complies with the requirements of ISO 37001;
- reporting to Top Management and the Governing Body on the performance of the Anti-bribery Management System.

The Anti-bribery Compliance Function coordinates with the Supervisory Body as the recipient of reports on acts of corruption/violations of the Anti-bribery Management System and, if necessary, promotes investigations or acquires the results of investigations carried out by the Supervisory Body itself or by the person appointed for this purpose.

5. Planning

In planning its Anti-bribery Management System, Biomedica has carefully assessed its own context and the results of the corruption risk assessment activities it has conducted. The aim is to build an effective and continuously improvable Anti-bribery Management System. In this perspective, Biomedica undertakes to plan actions aimed at addressing the corruption risks to which the Organization is exposed and the opportunities for improvement.

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6. Awareness, Training and Communication

Biomedica undertakes to ensure the dissemination of this Policy to all Recipients and all Interested Parties.

The Company also undertakes to organize and deliver ongoing training activities, with the aim of raising Recipients' awareness of the fight against corruption. Biomedica also undertakes to raise awareness among its Business Partners regarding anti-bribery issues.

7. Due Diligence and Additional Controls

Biomedica implements specific control measures where the assessment carried out has identified a non-negligible risk of corruption. In such circumstances, the Company undertakes to carry out specific Due Diligence activities aimed at thoroughly assessing the nature and extent of the corruption risk identified with reference to transactions, projects, or activities, as well as to Business Partners or candidates for certain positions, to implement the necessary mitigation measures, and, where the risk exposure cannot be adequately managed, to take appropriate actions (including the termination of a business relationship).

8. Performance Evaluation of the Anti-Bribery Management System

Biomedica ensures that the Anti-bribery Management System is subject to monitoring activities aimed at evaluating its effectiveness, mainly through internal audits and through the review by the Anti-Bribery Compliance Function and by Top Management.

Based on the results of this evaluation, Biomedica will assess the opportunity to implement corrective or improvement actions in relation to any Non-Compliance identified.

9. Improvement

Through the internal audit and review activities, Biomedica undertakes to continuously improve the sustainability, adequacy, and effectiveness of its Anti-Bribery Management System.


10. Reporting

Biomedica guarantees the possibility of reporting any act of corruption of which one becomes aware or suspects, as well as any violation of the provisions of the Anti-Bribery Guidelines or this Policy, and, more generally, of the control measures adopted to counter the emergence of corrupt acts.

Reports may also be anonymous and must describe in detail the facts and persons subject to the report. The communication channels available for submitting reports are as follows:

- via the "Whistleblower Software APS" platform (including orally via the Voice Messaging System), accessible at the following link: <https://whistleblowersoftware.com/secure/biomedica-italia>
- via a direct meeting, requested through the platform.

A specific procedure governs the methods, roles, and responsibilities for managing received reports, to guarantee the confidentiality of the whistleblower's identity and compliance with the other provisions set out below.

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Conduct aimed solely at slowing down the activity of the recipient of the reports, as well as the improper use or abuse of the reporting system, is sanctioned.

The Company in any case protects whistleblowers acting in good faith against any form of retaliation, discrimination, or penalization for reasons directly or indirectly related to the report, without prejudice to the right of those concerned to protect themselves if the whistleblower is found to have criminal or civil liability for false statements and without prejudice to legal obligations. In any case, the confidentiality of the whistleblower's identity and information is ensured in any context following the report, subject to legal obligations and the protection of the rights of the Company or persons wrongly or maliciously accused. A report is considered made in good faith when it is made on the basis of a reasonable belief supported by factual elements.

That said, any form of abuse of the reporting system is expressly prohibited, such as, by way of example, the intentional submission of false accusations and the improper use of this tool. Any abuse or improper use of the reporting system will be prosecuted by the Company, considering that such conduct represents a significant risk to the integrity of the entire Anti- Bribery Management System.

11. Disciplinary System

The violation of the provisions of the Anti- Bribery Guidelines, this Policy, and, in general, the principles of the Anti- Bribery Management System, when committed by Biomedica personnel, constitutes a breach of company rules, leading to the initiation of disciplinary proceedings for the application of the sanctions provided for by the company disciplinary system, as well as possible criminal and civil consequences.

If attributable to Business Partners, the aforementioned violation constitutes a breach of contractual obligations on their part, entitling Biomedica to apply protective measures (such as, for example, termination of the contract, application of penalties, claim for damages, etc.).