



CODE OF CONDUCT

INFOMED FLUIDS S.R.L.

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FOREWORD

The present Code of Conduct is inspired by that adopted by ACS DOBFAR S.p.A. (hereinafter ACSD), an Italian multinational company to which INFOMED FLUIDS S.r.l. (hereinafter INFOMED) belongs.

The success of ACSD is based on values of transparency, credibility and legality, well-identified ethical principles that represent the Company assets and that are the basis on which the Company reputation has been built over the years.

ACSD, due to the importance of its business as well as the strategic role it plays in the chemical and pharmaceutical industry, builds its growth on a solid reputation in compliance with the values of honesty and fairness in every work process. ACSD also contributes to the civil, cultural and economic development of the territorial community in which its production plants operate. The principles that guide ACSD operations are a strict observance of the laws, fair competition, respect for the legitimate interests of customers, suppliers, employees, shareholders, institutions and, last but not least, the whole community. Furthermore, given the complexity of the situations, socio-economic interests and contexts in which ACSD operates and interacts, each corporate behavior must follow these principles and be compliant with the current legislation. For this reason, it is important to clearly define the set of values that ACSD recognizes, accepts, endorses and applies at all levels, without any distinctions or exceptions. ACSD Code of Conduct is aligned, with the utmost harmony and unity of purpose, to the Corporate Policies that are in force in all its plants.

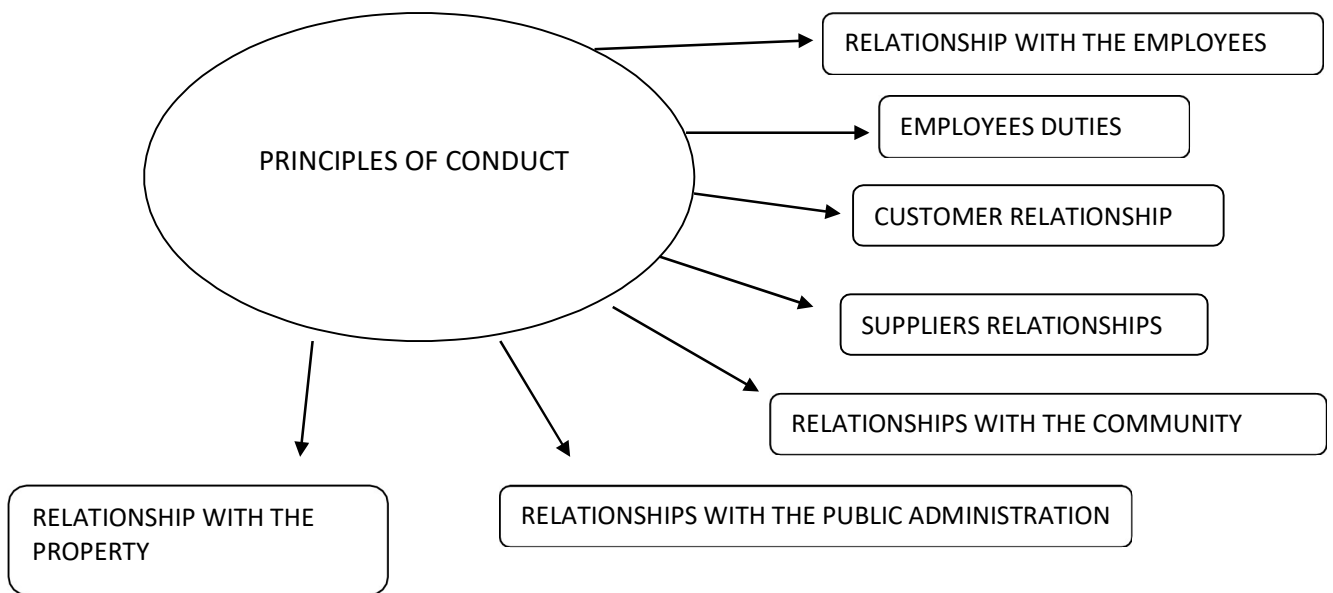
In fact, ACSD requires each employee and collaborator, the Board of Directors and Board of Auditors of each Company belonging to the Group, to address their behavior and conduct their activities in accordance with a constant and strict observance of the principles and values contained in this document. Any conduct contrary to ACSD Code of Conduct and the legislation in force is condemned since it does not respond to the pursuit of the underlying interest of the ACSD Group.

Moreover, the pursuit of the corporate interest can never justify behaviors contrary to this Code of Conduct.

ACSD Code of Conduct, which also regulates the relationship with external organizations and individuals, and that external parties are also required to respect, ensures that Companies of the Group are provided with internal rules of conduct.

ACSD Code of Conduct is approved and can be modified and/or supplemented, also based on suggestions and indications from the Control Bodies, upon resolution of its Board of Directors and subsequent approval by the INFOMED Board of Directors.

1. SCOPE OF APPLICATION OF THE CRITERIA OF CONDUCT





2. INTRODUCTION

This Code of Conduct (the *Code*) sets forth the values and principles that govern INFOMED's operations and defines the behaviors expected by all individuals and entities interacting with the Company, whether as directors, managers, employees, consultants, agents, customers, suppliers or otherwise. Any violation of the provisions of this *Code* may constitute a breach of contractual obligations and/or of the primary obligations of employment, with all legal and/or disciplinary consequences.

Furthermore, INFOMED is committed to carry out checks upon any notice of violation of the *Code* to evaluate the facts and, in the event of an ascertained violation, to implement adequate sanctions for the author of such violation, where applicable.

In this regard, procedures have been incorporated into the control system to establish clear methods for reporting potential violations. Reporting channels have been implemented and assessed for adequacy to ensure that both employees and external stakeholders can report crimes or irregularities securely. These measures guarantee absolute confidentiality for the reporter throughout the entire reporting process.

3. GENERAL PRINCIPLES

To prevent any unlawful conduct, INFOMED requests to its employees and any stakeholders (executives, administrators, collaborators, suppliers, customers and all those who collaborate with or have an interest in INFOMED) compliance with the following principles:

1. To comply with current laws and regulations, as well as the organizational and procedural rules adopted by INFOMED;
2. To operate with the utmost respect of human rights and dignity, refusing all forms of child labor and forced labor, modern slavery, human trafficking and any form of exploitation, abuse, harassment or coercion of individuals;
3. To be against any form of discrimination based on race, gender, sexual orientation, social and personal position, psychophysical condition and health, disability, age, nationality, religion, union membership, or political and/or personal beliefs. INFOMED offers equal opportunities to those who possess the required characteristics for accessing positions and roles in the company without any discrimination, solely based on meritocratic and professional competence criteria;
4. To promote a positive and collaborative working environment, where the dignity and psychophysical integrity of everyone are respected;
5. To adopt preventive measures to ensure health and safety in the workplace;
6. To acknowledge the importance of environmental protection, committing to prevent, manage and mitigate environmental impact also in compliance with the applicable legislation;
7. To prevent situations of conflict of interest, whether direct or indirect, and to mitigate their effects, wherever they may occur and regardless of the individual concerned.
8. To respect employees' privacy through the adoption of appropriate organizational measures and in compliance with applicable laws.
9. To effectively disseminating information on regulatory requirements, as well as behavioral and procedural rules, to all employees and collaborators within the company.
10. To ensure confidentiality and security of all information through the adoption and implementation of appropriate organizational and technical measures. Such information includes data, documents, know-how and works of any kind or format related to INFOMED, its activities and its Stakeholders, including confidential information (i.e., non-public or explicitly marked as "confidential"). All information is accessible exclusively to specifically authorized individuals, in compliance with the law, best practices in data security and protection, and company procedures.

INFOMED and any individuals operating on its behalf are obliged to ensure that all financial operations and transactions are conducted in accordance with the applicable law, professional standards of conduct, the principles of loyalty, transparency and verifiability. Such transactions must also be authorized and documented in accordance with company procedures.

Declarations and contributions in tax and fiscal matters must comply with the law, be truthful, consistent, and coherent;

It is essential that business negotiations and relationships with institutional and commercial counterparts are conducted in accordance with legislation. The principles of correctness, transparency, and verifiability must be always upheld. This extends particularly to representatives, officials, or employees of public administrations:

- a) The cultivation or maintenance of personal relationships that convey favor, influence, or interference in a manner that has the potential to directly or indirectly influence the outcome of the relationship are strictly prohibited;
- b) The offer of goods or other benefits, even through intermediaries, is similarly prohibited unless they are considered gifts of a modest value and are consistent with established customs.

4. EMPLOYEES, COLLABORATORS AND CONSULTANTS

The *Code* is an integral and essential part of the employment agreement for every INFOMED's employee. INFOMED requires all employees to strictly comply with the provisions of the *Code* and any violation will result in the application of appropriate sanctions.

Accordingly, employees are expected to:

- a. know the rules contained in the *Code* and relevant regulations governing the operations within their department;
- b. refrain from any conduct contrary to the principles of the Code and the aforementioned regulations;
- c. cooperate with the departments responsible for investigating potential violations and promptly report any such event when necessary;
- d. adopt behaviors consistent with the *Code* and refrain from any conduct that might damage or compromise INFOMED's honesty, impartiality or reputation.

Administrators, Directors, Managers, and all individuals in positions of responsibility are expected to serve as positive role models for all employees by aligning their actions with the principles outlined in the *Code*. INFOMED considers human resources as one of the main factors for achieving company results within a framework of mutual loyalty and trust between the employer and the personnel. Everyone engaged in work activities for INFOMED has a regular employment contract, a condition that prevents illegal forms of work such as forced labor or undeclared work. INFOMED, adhering to the principles expressed in this *Code* and in the legislation concerning child labor, does not employ minors in its workforce except as provided by the law for educational internships. The employment relationship is conducted in compliance with labor law and social security.

In particular, INFOMED:

- pursues the continuous improvement of its personnel's professionalism through regular analyses of internal training needs and the organization of training courses;
- ensures a recruiting and hiring process that respects the principles of transparency, impartiality, and professionalism;
- complies with all laws regarding equal opportunities and the National Legislation concerning the integration of protected categories and individuals with disabilities;
- encourages personnel communication with management through the Human Resources office, the Safety Office, and responsible managers;

- adopts and implements welfare initiatives to promote work-life balance and individual well-being, such as flexible work arrangements, welfare goods and services, part-time work, health insurance, solidarity time banks, leaves for same-sex families, etc.;
- Provides clear communication on employment terms, including hiring conditions, working hours, minimum wage and remuneration, leave policies, freedom of association and disciplinary measures;

5. ENVIRONMENT

All company activities comply with the current environmental regulations. INFOMED commits to disseminating and consolidating among its collaborators and subcontractors a culture of environmental protection and pollution prevention, by developing awareness of environmental risks and promoting responsible behaviors in accordance with what is outlined in INFOMED's *Environmental Policy document*. INFOMED's Environmental Management System (EMS) is certified according to ISO 14001:2015 standards.

6. HEALTH AND SAFETY

INFOMED ensures working conditions that comply with safety regulations and operates in full compliance with current legislation on incident prevention and worker protection in the workplace. INFOMED is committed to disseminating and consolidating among its employees, contractors, subcontractors and suppliers a safety culture, awareness of workplace risks and promoting responsible behavior by such individuals. INFOMED's Safety Management System (SMS) is certified according to ISO 45001:2018 standards.

7. BUSINESS MANAGEMENT

INFOMED promotes free and fair competition and directs its actions toward achieving competitive results that reward capacity, experience, and efficiency. The company's activities are conducted according to the correct economic principles and fair market rules in fair competition with competitors and in constant compliance with applicable laws and regulations. All actions, operations and transactions must be lawful, correctly recorded and authorized to enable verification and control of the implementation of expected decision-making and application models. Any action aimed at altering the conditions of fair competition is contrary to INFOMED's corporate policy and is prohibited for any party acting for it. In no case can the pursuit of INFOMED's interest justify conduct that is not respectful of current laws and compliant with the rules of this *Code*.

All INFOMED administrators, employees and collaborators involved in any capacity in the formation of the balance sheet are obliged to apply every provision concerning the truthfulness and clarity of data and evaluations. The administrative bodies must provide maximum cooperation to all control bodies.

Any information acquired or know by any individual in connection with their role or function performed within INFOMED must be considered confidential as it belongs to the company itself.

8. RELATIONS WITH EXTERNAL PARTIES

Relationships with interlocutors, whether public or private, are conducted in accordance with the law and in compliance with principles of correctness, transparency and verifiability. Furthermore, all activities are inspired by the utmost correctness and completeness of information, legitimacy under a formal and substantive profile of clarity and truthfulness in accounting controls according to current legal provisions.

INFOMED gives priority to quality in all its customer and contractor interactions. This commitment to excellence ensures that clients are consistently satisfied. INFOMED meticulously conducts business negotiations with clarity and precision, adhering to contractual obligations with diligence. INFOMED diligent and reliable fulfilment of contractual commitments is a hallmark of its business practices.

INFOMED is committed to upholding the principles of this *Code* in all its business dealings, including its relationships with suppliers, contractors and subcontractors. These parties are expected to comply with the principles outlined in this *Code*, ensuring that their operations are conducted in accordance with the highest standards of professionalism and integrity.

In particular:

- a. Money and other benefits to third parties are strictly prohibited. This includes any indirect arrangements that might favor INFOMED or other third parties unduly.
- b. It is strictly prohibited to receive or offer such benefits, either for oneself or for others, with the intention of benefiting third parties in their relationships with INFOMED.
- c. The company does not provide financial contributions, benefits or other support to political parties, workers' union organizations or their representatives, except in compliance with applicable regulations.
- d. All employees and collaborators of INFOMED who receive requests or offers of money or other benefits (either explicitly or implicitly), for any purpose, including the acquisition of company know-how, are required to report such requests or offers to the relevant bodies (for example, their supervisor or company management) without delay. They are also required to immediately suspend any ongoing relationships with the relevant individuals, pending further instructions from the Company.

9. RELATIONSHIPS WITH INSTITUTIONS / PUBLIC ADMINISTRATION

All interactions with state or international bodies must take the form of communication that is exclusively aimed at evaluating the implications of legislative and administrative operations in relation to INFOMED.. To ensure maximum clarity, any relationship with public officers will be managed exclusively through representatives who have been explicitly empowered to do so. In any case, the conduct of these representatives shall be characterized by criteria of honesty and fairness, and always in compliance with the applicable laws and INFOMED's policies..

In the course of interaction with the Public Administration, it is strictly forbidden to:

- a. consider or offer employment and/or business opportunities to any Public Officer

- and/or their relatives, which might result in personal advantages;
- b. offer gifts, in any form, to any Public Officer and/or their relatives;
- c. be induced to give or unduly promise money or other benefits.
- d. Solicit or obtain confidential information that could compromise the reputation of the parties.

10. INTERNAL CONTROL SYSTEM AND VIOLATION OF THE CODE

The internal control system of INFOMED is achieved through the set of tools and procedures necessary to direct, manage and monitor the operations, directing them to the achievement of the business objectives and risk prevention.

The internal control system is designed to ensure:

1. compliance with laws, internal procedures, strategies and company policies;
2. achievement of the objectives, safeguarding INFOMED's tangible and intangible assets, and managing the company according to criteria of efficiency and effectiveness;
3. the reliability of internal and external accounting and information management;
4. that the generation and storage of sensitive data is carried out in accordance with strict rules thereby guaranteeing its accuracy, verifiability, truthfulness, integrity and security.

For this purpose, every duly licensed and registered transaction and operation must be verifiable through adequate documentation.

The responsibility for the proper functioning of the internal control system falls on all recipients of the *Code* in their respective roles. Employees are required to promptly inform their managers of the onset of dynamics that might interfere with the management of their work.

The effectiveness and functionality of the internal control system are guaranteed by the monitoring and control activities of the competent corporate department.

Violation of this *Code* undermines the relationship of trust and may result in legal actions and adoption of measures against the individuals involved, in accordance with applicable laws and contractual provisions.

11. ANTI-CORRUPTION AND ANTI-MONEY LAUNDERING DISCIPLINE

All forms of corruption are strictly prohibited. Employees are forbidden to seek any advantage, personal and/or for the benefit of the Company, through the improper use of payments, business courtesies or any other means.

In particular, no employee of the Company is authorized to donate or offer, directly or indirectly, to any Public Official, Clients, Customers and/or Suppliers, items of value with the intent of obtaining any kind of advantage, including, but not limited to, securing or retaining commercial agreements, confidential information, or unfair commercial advantages. The term "Public Official" is used in its broadest sense and includes employees of entities owned or controlled by the State, public international organizations, political parties and candidates for public offices.

Furthermore, employees are strictly prohibited from accepting anything of value in exchange for granting unfair business advantages, disclosing confidential information, or providing any improper commercial benefit.

The anti-corruption principles set forth herein are aligned with internal Company policies and procedures, with specific reference to:

- a. offer, payment or acceptance of gifts, donations, entertainment, or free trips to, from or on behalf of public officials or suppliers, customers or competitors;
- b. acceptance of engagements with consultants, agents, lobbyists, joint venture partners or any other third party.

Finally, in compliance with the Anti-money laundering regulations, it is forbidden any conduct that constitute money laundering or self- money laundering (i.e. the use of goods or money from illegal activities).

The Company is committed to maintaining the highest standards of transparency in its commercial transactions. For this purpose, it has developed comprehensive tools to prevent money laundering and self-recycling. Accordingly, prior to stipulating any contract with its suppliers and any other business partners, INFOMED and their employees and /or collaborators must ensure the moral integrity, the reputation and good name of the Company.

12. DISCIPLINARY SYSTEM AND SANCTIONS

Compliance by the Company's employees with the *Code's* rules must be considered an essential part of the contractual obligations under the applicable Labor Law and Civil *Code*. The violation of the *Code's* rules by company employees may constitute non-fulfillment of the primary obligations of the employment relationship or a disciplinary offense according to the actual labor law.

INFOMED reserves the right to terminate contractual relationships with external parties, including collaborators, consultants, self-employed workers, clients, and suppliers, in the event of a violation of the provisions outlined in this *Code*. Such violations may also be identified as a cause of automatic contract resolution under applicable laws.

13. DISSEMINATION

INFOMED ensures wide dissemination of this Code by publishing it on the Company intranet for internal access and making it available to external individuals and entities through publication on the Company's website.

14. UPDATE

The Board of Directors may modify and integrate the *Code*, also in accordance with recommendations and indications from the Supervisory Body.

15. TRANSITIONAL PROVISIONS

This *Code* enters into force from the 1st January 2025.



16. PREVISION STATUTED BY INFOMED FLUIDS S.R.L. BOARD OF DIRECTORS

By Board of Directors' decision approved in December 2024, the Supervisory Body of INFOMED is composed as follows:

Supervisory Board

Independent President: Liliana Chita

Internal members:

- Iuliana Danet - Iuliana.danet@infomedfluids.ro;
- Antoaneta Petrache – Antoaneta.petrache@infomedfluids.ro;
- Olga Copaci – Olga.Copaci@infomedfluids.ro;
- Ani Dumitru – Ani.Dumitru@infomedfluids.ro;

Communications concerning the present Code of Conduct can be sent to:

Law Firm: Liliana Chita

Tel. +40/723 524 232

E-mail address: ethicsupervisory@infomedfluids.ro

Attention of: INFOMED SUPERVISORY BOARD

This document is part (Appendix) of INFOMED's Internal Regulation and is published on INFOMED's website.

Bucharest, 1st January 2025.