

CODE OF CONDUCT AND CORPORATE ETHICS



I OUR COMMITMENT

INTEGRITY MATTERS

Trust is at the core of everything we do. The foundation of that trust is our reputation for integrity. Just one unethical behavior is enough to destroy it.

That is why Reconice asks all its employees to carefully review the Code of Conduct and Business Ethics. The Code outlines the expectations we have for each other, indicates who to turn to for advice on complex issues, and identifies and explains how to report inappropriate behavior.

Being an important reference in Italy in the healthcare IT sector is an inspiration for the entire company; it is a satisfaction and also a responsibility that we all take on together. But not only that, we recognize, while maintaining profit objectives, wants to produce well-being for all stakeholders, namely members, directors, employees, collaborators, suppliers, customers, recipients of systems and services, and actively contribute to the well-being of the environment and the territory in which it operates. With the ambition to achieve the corporate and social objectives set, we operate with integrity and independence, adhering to and inviting others to adhere to ethical and reliable behaviors in every situation:

nothing is more important than this.

Marco Biraghi

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The version of the Code downloadable online from the website <https://www.reconice.it> may be more up-to-date and replaces any paper copy or previous version in the event of discrepancies between paper copies, previous versions and the version published online.

2 RECONICE MISSION AND VALUES

THE CODE OF CONDUCT IS FOUNDED ON OUR MISSION AND VALUES.

Our mission outlines our role, the value we provide to our customers and partners, and our commitments to all stakeholders.

Our values serve as an ethical and moral compass, describing how we should behave among our colleagues, customers, and partners.

Together, our mission and values form the foundation upon which all our decisions must rest.

Although the Code addresses many situations, it cannot cover all of them individually, which is why reconice mission and values are so important: they are general enough to cover the widest variety of circumstances.

When in doubt, ask yourself, “Does this decision help achieve its mission?” or “Does my behavior in this situation reflect our values?”.

2.1 Vision

Human-machine interaction is evolving: multi-touch, voice, and gestures are new technologies already available, requiring the application of technical expertise and new usability concepts.

The most intuitive and natural way for humans to communicate is through voice. The introduction of voice recognition on popular devices (smartphones) is making the use of this technology increasingly pervasive and familiar.

Solutions with natural, simple, and intuitive interfaces for accessing, entering, and modifying data anytime, anywhere will allow professionals to provide an even better service.

2.2 Mission

reconice applies its expertise and experience in developing integrated solutions to improve productivity in healthcare organizations and beyond (legal, insurance, financial, etc.).

It researches, analyzes, and integrates the most advanced voice recognition technologies into ergonomic solutions that allow professionals to take advantage of all the benefits of new technologies, optimizing workflows without disrupting working habits.

The solutions are integrated with the client's and partner's information systems, designed with cybersecurity in mind and to prevent business interruptions.

reconice enters the market to offer excellent products that exceed expectations. It will focus on innovation, creating simple-to-use solutions despite their high technological complexity.

reconice will constantly strive to identify the best available underlying technologies, test them, and integrate them into systems created based on real-world requirements, gathered, together with partners, from future users.

reconice will focus on solutions and markets with a strong social impact, where it can significantly contribute to their evolution. It will focus on what will drive growth and improvement for its partners and customers.

reconice believes in information sharing, the value of teamwork, and the new ideas that can only emerge from a highly collaborative environment. It will pursue excellence in every group of the company, with honesty and transparency, both through perseverance and the courage to adapt, encouraging and implementing change when necessary.

2.3 Values and Competencies

Customers come first: we exist for our customers. Our success is determined by their satisfaction and our performance.

Innovation: We are intuitive, curious, inventive, pragmatic, and decisive, allowing us to offer innovative solutions to our customers. In Reconice, new ideas and initiatives are encouraged and nurtured. We act boldly to identify new opportunities by anticipating customer needs.

Excellence: We value the skills and professionalism that underpin any decision-making process. We guarantee accuracy and comprehensiveness in the delivery of our products and services.

Teamwork: Success requires teamwork. We work synergistically with each other, clients, and industry partners. We are collaborative and value everyone's contribution to the team's success, to deliver excellent results and experiences to the market.

Performance: We achieve results by excelling in work that has a positive social impact. We are the creators of our results, we operate with alacrity, and we make things happen by reducing complexity and excelling in execution. We provide and seek timely and honest feedback on our performance, which informs decisions and initiatives.

Reliability, integrity, and honesty: We do what we promise. We have a collective responsibility to our customers, colleagues, and partners.

We operate with integrity and independence, and we know we can count on our colleagues to act ethically and reliably in everything they do.

Honesty: We always act ethically and transparently. We demonstrate consistency between what we say and what we do

More than 30 years of international experience in:

- Design and development of speech recognition systems;
- Integration of signal processing and pattern recognition technologies;
- Design of healthcare information systems;
- Delivery of solutions in clinical and hospital settings;
- Maintenance and support in mission-critical settings.

A team of technicians dedicated to research and development in speech recognition in healthcare.

Collaborations with public and private research institutions, both Italian and international.

3 Sustainability and Corporate Social Responsibility Principles

Corporate Social Responsibility (CSR) is, according to EU Communication no. 681 of 2011, "the responsibility of companies for the impacts they have on society".

A key element of CSR is therefore to combine economic responsibility with social responsibility, capable of creating winning values, tangible and intangible, for the company, for people, for the territory and for the environment.

Strongly convinced that ethics is the basis of corporate social responsibility, reconice has decided to reinterpret its Code of Ethics also in terms of sustainability, in proximity to many of the Sustainable Development Goals (SDGs) and the Targets that substantiate them, approved by the United Nations in the 2030 Agenda for Sustainable Development.

Reconice has therefore integrated the principles of corporate social responsibility throughout the organization and in its relationships with stakeholders through the adoption of good practices that directly involve employees, collaborators, partners, customers, suppliers, stakeholders and the community. To this end,

With regard to its employees and collaborators, it acknowledges:

- promotes a work-life balance policy (flexibility of hours and smart-working through specific individual agreements, health promotion);
- implements solutions aimed at promoting the comfort and quality of the working environment;
- depending on the company's results, defines a performance bonus for all collaborators;
- maintains a welfare program:

reconice, attentive to the needs of the community to which it belongs, is committed to supporting social solidarity initiatives, also evaluating possible future collaborations with institutions and organizations that

- provide assistance to people who live situations and experiences of serious hardship,
- preparing for the profession;
- environmental protection bodies and associations;
- bodies and associations that promote sport and healthy living with not only sporting, but also ethical, social, environmental and educational purposes.

Reconice's attention to environmental issues has led to the adoption of specific energy saving policies, implemented through consumption monitoring, the elimination of plastic and through waste disposal procedures that at the same time enhance the recovery and recycling of materials. The implementation and development of all these practices express reconice's desire to constantly seek, with a view to sustainable development, the balance between competitiveness, ethics, stakeholder interests and environmental protection.

4 SCOPE OF APPLICATION OF THE CODE

KEEPING RECONICE'S INTEGRITY HIGH IS PART OF THE RESPONSIBILITIES OF ALL COLLABORATORS.

This Code establishes the lines of conduct and standards of integrity and transparency, which all recognized collaborators (hereinafter collectively referred to as Collaborators) must adhere to. All the principles set out herein, to the extent that they are compatible with the nature and methods of each relationship, will be extended to the relationships between reconice and its contractors, subcontractors, partners, suppliers and consultants.

This document is to be considered, together with the Organization, Management and Control Model pursuant to Legislative Decree 231/01, as a tool also aimed at preventing the crimes envisaged by Legislative Decree 231/01.

Collaborators who have contact with third parties who operate on behalf of reconice must ensure that they are aware of the obligations set out in the Code.

A COMMITMENT FROM ALL COLLABORATORS IS REQUIRED TO COMPLY WITH THE LAWS, TO HONESTY, TO LOYALTY TO RECOGNITION AND TO TRANSPARENCY.

In the context of the employment relationship established with reconice, each Collaborator must carry out his/her duties in compliance with the laws, codes of professional ethics, internal or external regulations and the guidelines of this Code on the basis of a personal commitment to honesty, loyalty to reconice and transparency in all work activities.

Compliance with the provisions of the Code must be considered an essential part of the contractual obligations of reconice Collaborators.

Any work behavior that determines an undue personal benefit for the Collaborators or for their family members or for their partners (intended as persons who have contractual or associative relationships of an entrepreneurial nature with the Collaborator), to the detriment of the interests of reconice or of anyone who has an interest in reconice (shareholders, patients, customers, suppliers, Collaborators, the community) is considered contrary to the principles of this Code.

Everyone will have to:

- Know the laws, rules and regulations that affect the activities conducted at reconice;
- Attend mandatory compliance training courses and keep as abreast of any legislative or regulatory developments as possible;
- When in doubt, consult the manager responsible for your business area with any questions regarding the applicability, existence or interpretation of any law, rule or regulation.

When making a decision regarding employment, the following questions should be considered:

- Is this decision compliant with current laws and with the company's Organization, Management and Control Model pursuant to Legislative Decree 231/01?
- Is this decision in accordance with reconice's internal rules and regulations?
- Does this decision adhere to the letter and principles of the Code of Ethics?
- Can this decision be considered the most appropriate?
- If this decision were made public, could it in any way compromise or damage the public image of reconice?

5 APPLICATION OF THE CODE OF ETHICS

- The Reconice Management issues the rules and procedures to ensure the full implementation of the Code.
- Management must ensure that each employee is aware of the code and applies it in the workplace.
- The Supervisory Body supervises the implementation of the Code and, together with the Management, decides on any issue relating to the interpretation and application of the Code that cannot be resolved satisfactorily.
- All employees have a responsibility to comply with this Code, to hold themselves to high standards of conduct, and to expect others to do the same.

Considerations on individual issues

Decisions or situations involving legal or ethical issues are often complex. When an employee has to make a decision or face a situation and is unsure how to behave, he or she should ask the following questions:

- Do I have all the facts and information I need to make a decision?
- Have I considered and identified other options or alternatives?
- Is the action I am thinking of taking legal?
- Is this an ethically correct action?
- Does the action comply with this Code and other policies or guidelines applicable to my job?
- How will my decision impact others, including customers, shareholders, collaborators and the community in which we operate?
- What impression will my decision make on others?
- How would I feel if my decision were made public? Could the decision be explained and justified?
- I have to consult firstking or contact my manager?

6 COMPLIANCE WITH THE CODE OF ETHICS

PREVALENCE OVER OTHER REGULATIONS OR INSTRUCTIONS

THE GUIDELINES OF THE CODE PREVAIL OVER THE INSTRUCTIONS GIVEN BY THE INTERNAL HIERARCHICAL ORGANIZATION, WHERE THEY MAY CONFLICT.

Acceptance of the guidelines set forth in this Code of Ethics is a condition for establishing an employment or collaboration relationship with reconice.

All Collaborators must read the Code and undertake to follow the provisions and rules contained therein.

The application of this Code of Ethics is among the personal, non-delegable and mandatory responsibilities of each Collaborator. The latter, once informed, cannot invoke, as justification for his/her non-compliance, the lack of knowledge of the Code or having received contrary instructions from any hierarchical level.

It is hoped that staff will adopt a proactive attitude, avoiding passive tolerance in the face of possible infringements and acting on their own initiative when they detect deviations in any company process from the principles outlined in this Code and will not assume a passive conduct in the face of situations contrary to the criteria indicated in this Code.

It is also expected that each Collaborator will cooperate, where requested, in the event of internal investigations.

Hierarchical superiors must not approve or tolerate violations of the Code by their Collaborators and if they should find violations they must immediately report them to the relevant company structures.

7 VIOLATION OF THE CODE OF ETHICS AND DISCIPLINARY SYSTEM

QUESTIONS AND REPORTING CONCERNS ABOUT ALLEGED UNETHICAL OR ILLEGAL BEHAVIOUR.

Without prejudice to the provisions of the operating procedures issued by reconice aimed at regulating every area and/or process of the company, the company prohibits any conduct that is not in conformity with the law, the spirit and the provisions of this Code, even if the conduct is carried out with the intention of bringing an advantage to the company itself.

All subjects required to comply with the Code have the right/duty to report to Members any non-compliant behavior, even suspected.

The anonymity of the whistleblower will be protected.

The principles expressed in the Code are an integral part of the conditions that regulate the employment relationship with reconice.

Any violations may therefore give rise to the termination of the contractual relationship, to the application of disciplinary sanctions, where applicable (implemented in compliance with the CCNL and the Workers' Statute).

8 GUIDELINES

8.1 TRANSPARENT MANAGEMENT

Collaborators must ensure transparency of information and decisions.

For operational purposes, information is transparent when it accurately reflects reality.

A decision is considered transparent when it meets all of the following requirements:

- it was taken with the approval of an appropriate hierarchical level;
- is based on a rational risk analysis;
- leaves traces of its foundations.

8.2 PRINCIPLES OF CONDUCT IN RELATIONS WITH SUPPLIERS

In the supply of goods and/or services, reconice aims to reconcile the search for the maximum competitive advantage and the granting of the same opportunities to each supplier, in a context of mutual loyalty, clarity, correctness and impartiality. reconice adopts criteria and evaluations that are as objective as possible, according to loyalty and impartiality of judgment.

The selection of suppliers is based on professional skills, organizational solidity and sustainability and the search for the best quality/price ratio.

In particular, conflicts of interest are avoided and selection is guaranteed based on criteria of transparency and objectivity. In managing relationships with suppliers, reconice applies the principles of fairness and integrity indicated in the Code of Ethics and Corporate Conduct, requiring that the activity be carried out according to standards of conduct consistent with the same.

8.2.1 SUPPLIER SELECTION

The purchasing processes are geared towards finding suppliers with suitable professional and quality requirements and towards granting equal opportunities to each supplier. In particular, those involved in these processes are required to:

- not to preclude any individual, in possession of the required requisites, from competing for the stipulation of contracts, adopting objective and documentable criteria in the selection of the shortlist of candidates;
- ensure sufficient competition, always considering more companies in the selection of the supplier; any derogations must be authorized and documented.

reconice, while not expressing preclusions towards any supplier, category of suppliers and other counterparties, does not maintain relationships, direct or indirect, with persons known or suspected to belong to criminal organisations or in any case to those operating outside the law, such as, by way of example but not limited to, subjects linked to money laundering, drug trafficking, usury, financing of terrorism.

8.2.2 INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS

Relations with suppliers are governed by common principles and are the subject of constant monitoring.

The signing of a contract with a supplier must always be based on extremely personal relationships, clarity and properly documented contractual conditions.

8.2.3 PROTECTION IN SUPPLIES

In order to conform its procurement activities to the principles set forth in this Code of Ethics, reconice undertakes to ensure that its suppliers comply with the principles of this Code of Ethics and Business Conduct pursuant to Legislative Decree 231/2001.

Violations of the general principles of the Code of Ethics and Corporate Conduct entail sanctioning mechanisms, also aimed at avoiding crimes against public administration, corruption between private individuals, crimes of an associative nature, crimes of money laundering and receiving stolen goods or environmental crimes attributable to reconice activities.

8.3 CONFLICTS OF INTEREST

AVOID CONFLICTS OF INTEREST, ACTUAL OR POTENTIAL, IN THE PERFORMANCE OF YOUR DUTIES ON BEHALF OF RECONICE.

A conflict of interest, real or potential, exists when a relationship between a Collaborator and a third party could be detrimental to the institutional interests of the company.

Reconice Collaborators must avoid any condition in which professional judgment may be unduly influenced by a secondary interest of any kind.

All Collaborators must, in their relationships with suppliers, contractors and competitors, give priority to the interests of reconice over any other situation that could lead to a personal benefit, real or potential, for themselves or for their family members or for their partners (intended as subjects who maintain contractual or associative relationships of an entrepreneurial nature with the Collaborator).

A conflict of interest may also arise when an Employee takes an action or has an interest that makes it difficult to carry out his or her work objectively and effectively.

8.4 GIFTS AND OTHER FORMS OF HONOR

ACCEPTANCE AND GRANTING OF GIFTS ARE LIMITED

Any granting of gifts/compliments or other forms of benefit is subject to the approval of the Management. Collaborators are permitted to accept/grant gifts or other forms of freebies, only if of modest value and in any case such that they cannot be interpreted, by an impartial observer, as tools aimed at obtaining advantages in an improper manner.

Gifts or other benefits of modest value are those with a value not exceeding €150.00, in accordance with the provisions for gifts to Public Administration employees. In this regard, Law 190/2012 introduced the “Code of Ethics for Public Employees”, providing for gifts with a maximum value of €150.00, even in the form of a discount.

Collaborators who receive gifts or preferential treatment, not directly attributable to normal courtesy relations, must consult their superiors and the Supervisory Body, in order to receive instructions regarding the destination of the gifts themselves or any other more appropriate intervention. Under no circumstances may gifts in the form of money or goods easily convertible into money be accepted.

Participation by invitation in events, conferences, conventions, commercial presentations or technical courses related to work activities must be carried out with the consent of the Management.

The restrictions on receiving gifts also extend to family members of staff or partners (intended as individuals who have contractual or associative relationships of an entrepreneurial nature with the Collaborator).

You may offer and receive invitations to restaurants, other services and entertainment, but subject to certain conditions. reconice bases its purchasing decisions for products and services from suppliers,

vendors, consultants and others on criteria such as quality, price and reliability, and we expect our customers and partners to do the same.

Offering or receiving gifts and entertainment can potentially affect objectivity and judgment and, in extreme cases, may violate laws and regulations regarding bribery and corruption.

RESTAURANT INVITATIONS, HOTEL HOSPITALITY, ACCEPTABLE SERVICES AND ENTERTAINMENT

Restaurant invitations, services and entertainment are considered acceptable and compliant with this Code if:

- they are infrequent and not of excessive value;
- comply with applicable laws and regulations and are consistent with customary commercial practices;
- they do not create any obligation for the recipient towards the person making the offer;
- do not include cash payments;
- they are not such as to create embarrassment for the recipient, the person receiving or the person offering, if the matter becomes public knowledge;

Since it is not possible to define the term "not excessive" in such a way as to cover all possible cases, one relies on good faith judgment in these situations.

In any case, it should be remembered that customers and partners often have their own policies and guidelines, and therefore each is required not to offer gifts, restaurant invitations, hotel hospitality, services or entertainment that violate or could violate such policies or guidelines.

EXAMPLES OF GIFTS

Here are some examples of gifts you may be able to accept or give:

- promotional items with the company or brand logo;
- tickets to a local sporting or cultural event;
- restaurant invitations and entertainment of reasonable value during the course of business;
- modest expressions of gratitude or gifts on the occasion of special personal occasions, such as weddings and births;
- small gifts of nominal value usually given on the occasion of certain holidays.

8.5 CORRECT USE OF COMPANY ASSETS

RECONICE PROPERTY MUST BE USED TO PERFORM ITS WORK AND MUST BE PROTECTED.

reconice's assets are a valuable asset and must be used to further the company's goals. All Employees are responsible for safeguarding and protecting such assets from loss, theft, misuse, damage and waste, in order to preserve their value.

Everyone is responsible for using the assets appropriately and for legitimate and authorized business purposes.

Reconice property shall never be used to engage in illegal activities.

reconice permits and authorizes limited and occasional personal use of Company email, messaging, Internet access and telephone systems, provided that such use is not excessive, does not interfere with one's job responsibilities and otherwise does not constitute a violation of the Code.

Misappropriation of company property constitutes a breach of duty to reconice and may be considered as fraud committed against reconice. Removal of reconice property from the premises without authorization is considered as theft. Improper use of reconice property by third parties is not permitted. reconice property must be looked after with care. In addition, neglect and waste of reconice property may also be considered a breach of duty to reconice. If you become aware of a shortage, theft, misuse, damage or waste of company property or have doubts about its proper use, you should speak to your manager or the Supervisory Body.

8.5.1 RETURN OF COMPANY ASSETS

In the event of termination of the employment relationship with reconice, or upon request by reconice, each person is required to stop using all company assets in their possession and to return them.

EXAMPLES OF ASSETS OWNED BY RECONICE

Reconice assets include, but are not limited to:

- sIT systems, equipment and technologies (including laptops, tablets and mobile devices);
- telephones, photocopiers, scanners and faxes;
- books;
- business plans;
- intellectual property assets, such as software code, licenses, ideas, concepts, content, and inventions;
- lists and information on customers, suppliers and distributors;
- office supplies;
- the name reconice, various brands and logos.

The assets owned by reconice also include all circulars, notes, price lists, data, letterhead, business cards, and other documents (in paper or digital form) produced or compiled in relation to the company's activities.

8.5.2 CORRECT USE OF INFORMATION TECHNOLOGY AND COMMUNICATION SYSTEMS

To help everyone do their job, reconice provides email, messaging, Internet and intranet access, telephones, and other forms of communication. These tools help you work more productively and efficiently. At the same time, it is everyone's responsibility to help maintain the confidentiality, integrity, and availability of information, technology, and communications infrastructure.

8.5.3 CORRECT USE OF EMAIL AND RECONICE COMMUNICATION SYSTEMS

When using IT, technological and communication infrastructures, the following provisions must always be remembered.

- These systems are intended to be used for business purposes. However, reconice recognizes the need for limited and occasional use of our communication systems, such as email, Internet and telephone, for personal purposes.
- Use common sense. Before forwarding a message by clicking "Send", think carefully about its content.
- Avoid sending, downloading or accessing inappropriate content or information that may be offensive, abusive, derogatory or harassing to other people.
- Do not forward internal communications or confidential materials outside of reconice unless you are authorized to do so.
- Respect intellectual property laws. Downloading, duplicating, or redistributing copyrighted material, including music, movies, images, or software, may violate laws or regulations in many countries and may result in disciplinary or legal action. Only perform these activities if you are legally permitted to do so.
- Using collaboration tools, such as instant messaging, from your office computer is only allowed if you use reconice products or have received permission from your manager.
- Always keep your user IDs, passwords and authentication devices secret (do not disclose them to third parties).
- Be careful when opening files attached to emails, especially those that are not work-related or from a known source. If in doubt, do not open the attachment.
- You are not allowed to use personal software on your reconice computer, laptop, tablet or phone. You are not allowed to use peer-to-peer (P2P) software to share copyrighted material.
- Do not use or access reconice's information, technology and communications infrastructure beyond your authorization level.
- Do not compromise reconice's security controls.

Your business allows the use of a smartphone or other personal device. Even if you have been approved to use a company-owned device to store or access company email and other data, that device is still subject to the same security and data management procedures that apply to company-owned devices.



This may include, but is not limited to, requiring you to use a password to lock the device when it is not in use and encrypting the data. Your company will have the right to access, erase, or delete company data from that device in accordance with applicable law.

8.5.4 USE OF VIDEO CALLING OR TELECONFERENCING SYSTEMS APPROPRIATELY

Before starting a video call or conference call with an interlocutor, whether internal or external to reconice, verify that the interlocutor is recognizable and recognized and free from any impediment to address the proposed topic without incurring embarrassing situations, violation of privacy or risk of disclosure of confidential information.

Verify that the context guarantees the confidentiality and privacy rules described in this agreement.

- These systems are intended to be used for business purposes. However, reconice recognizes the need for limited and occasional personal use of our communication systems, including teleconferencing and chat software.
- Use common sense. Before addressing a topic or providing answers, think carefully about the content.
- Do not disclose any confidential information, internal communications or materials outside of reconice unless you are authorized to do so.
- Be careful what the webcam sees, that is, make sure that no confidential information or other elements that could compromise the safety or privacy of reconice and its collaborators appear in the field of view.
- Be extremely careful about screen sharing. Activate it only when strictly necessary, first closing any windows containing documents or confidential information.
- Be careful about sharing files. Respect intellectual property laws. Downloading, duplicating, or redistributing copyrighted material, including music, movies, images, or software, may violate laws or regulations in many countries and may result in disciplinary or legal action. Only perform these activities if you are legally permitted to do so.
- Instant messaging from your office computer is only allowed if you use reconice products or have received permission from your manager.
- Always keep your user IDs, passwords and authentication devices secret (do not disclose them to third parties).
- Be careful when opening attachments to messaging systems, especially those that are not work-related or from a known source. If in doubt, do not open the attachment.
- Do not compromise reconice's security controls.

Privacy and information about reconice

Messages sent and received via reconice's information, technology and communications infrastructure, including, but not limited to, email, the Internet and other forms of digital or paper-based communications may be proprietary to reconice. Where permitted by applicable law, reconice reserves the right to monitor and record the use of reconice's information, technology and communications infrastructure.

8.5.5 USE ALL COMMUNICATION SYSTEMS CORRECTLY AND APPROPRIATELY.

Be careful when accessing and using social media sites such as Facebook, Twitter and LinkedIn that allow you to upload content. In some cases, this content may be malicious, so use common sense when following links, accessing content and accepting friend or contact requests.

Before starting a telephone conversation with an interlocutor, whether internal or external to reconice, verify that the interlocutor is free from any impediments to address the proposed topic without incurring embarrassing situations, violation of privacy or risk of disclosure of confidential information. When you need to make phone calls or other communications from outside the company, make sure the context ensures the confidentiality and privacy rules described in this agreement.

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8.6 ACCESS TO CONFIDENTIAL INFORMATION

8.6.1 RECONICE INFORMATION MUST BE ACCESSIBLE ONLY TO AUTHORIZED PERSONS AND MUST BE PROTECTED FROM IMPROPER DISCLOSURE.

Only persons expressly authorised by the company may have access to reconice's internal information, whether in paper form or on magnetic, electronic or optical media, which may be used only for the purposes and for the periods specified in the relevant authorisations.

Passwords are equivalent to the signature of collaborators, can only be known by their respective owners and cannot be disclosed to third parties.

Collaborators are directly responsible for adopting all necessary measures to preserve the company information in their possession, from risks of damage or loss and must provide for their custody for the periods of time established by laws and internal regulations.

8.6.2 MAINTAIN THE STRICTEST CONFIDENTIALITY OF NON-PUBLIC INFORMATION CONCERNING RECONICE.

As part of your job or position, you may learn of or have access to non-public or inside information relating to reconice's business, operations or customers and partners.

If the information is not publicly available, it must be treated as confidential. Every officer, employee or associate of reconice must refrain from communicating confidential information to anyone, including individuals within reconice, unless there is a legitimate "need to know" and you are authorized to do so. Improper disclosure of confidential information could put reconice at a competitive disadvantage or cause harm or embarrassment to reconice or other associates.

Examples of Confidential Information - Confidential information includes some of the most valuable assets. Here are some examples:

- trade secrets;
- pricing policies and information;
- corporate or strategic operational plans and forecasts of future performance;

- non-public financial information about reconice or its customers, business partners and suppliers;
- studies, developments, plans or forecasts relating to new products, brands or marketing;
- customer data, including contact information;
- contracts and agreements, including terms such as expiration dates, exclusivity clauses and financial terms;
- data that we have a legal or contractual obligation to protect (e.g., personally identifiable information);
- computer software or programs;
- information on IT systems and infrastructures;
- merger, acquisition or divestiture plans;
- human resources information, including salaries/compensation, personnel records and/or payroll, and benefits information;
- plans relating to personnel or major management changes;
- internal communications such as webcasts, conference call audio broadcasts, staff memos, and company meeting transcripts or minutes.

8.6.3 MAINTAIN THE STRICTEST CONFIDENTIALITY OF INFORMATION CONCERNING THIRD PARTIES.

All confidential information about other organizations or people, including customers, business partners and suppliers must be treated with extreme caution and respect. In particular, with regard to the destination locations of the activities and all the actors involved in the reconice activities (including doctors and patients), each initiative must be based on discretion, completeness of information, as well as respect for confidentiality.

- patient confidentiality must be protected in every possible way;
- quality and safety of both doctors and patients are experienced by collaborators as cardinal principles of their work.

If you become aware of confidential information about another organization or person in the course of your work or as a result of your position, you are required to protect it in the same way you would protect confidential information about reconice.

Here are some recommendations:

- don't lose sight of your laptop when you're in a public place;
- when traveling by plane and checking in, do not check in your laptop with your luggage;
- don't get distracted when going through airport security;
- if you have to put your laptop on the floor, place it in front of you, not behind you or to the side;
- if you need to leave your laptop in the car, put it in the trunk, which will then be locked;
- when traveling with very sensitive information, transfer it to a removable hard disk and place the disk in another piece of luggage;
- transport and store on removable hard disk only and exclusively the information strictly necessary for the intended activity;
- lock your laptop whenever possible;
- periodically back up your laptop to the network;
- If you lose a laptop, tablet, smartphone or other storage device, notify your manager immediately.

8.6.4 COMPANY INFORMATION THAT CANNOT BE LEGALLY DISCLOSED MUST BE TREATED CONFIDENTIALLY.

Collaborators must safeguard the confidential nature of information acquired in the performance of work activities, in particular with regard to sensitive data, decisions and activities undertaken by the company. Failure to comply with the confidentiality obligation will constitute a serious breach if it implies, by any means, the disclosure or if it offers the opportunity for disclosure of information

relating to the state of health of patients who may even accidentally become aware of it, as well as information relating to the decisions and activities of the company.

Information relating to the decisions and activities of the company must be kept confidential in accordance with applicable regulations until it becomes public knowledge.

The Supervisory Body has the power to verify the company's information flows.

The Supervisory Body has the power to control the information flows, archives and any other documentation of reconice in order to verify compliance with the provisions of this Code and safeguard the protection of the interests of reconice and other interested parties.

The above shall take into account compliance with current legislation and in particular the protection of the right to privacy.

9 INTELLECTUAL PROPERTY

PROTECT ALL RECONICE INTELLECTUAL PROPERTY RIGHTS AND RESPECT THE RIGHTS OF OTHER COMPANIES.

reconice's identity and intellectual property rights are among its most valuable assets and are essential to maintaining competitive advantage. These include: reconice's name, logo, copyrights, patents, trademarks, service marks, trade secrets, processes, innovations, content, software and moral rights.

It is extremely important to protect these company assets and respect those of third parties.

Intellectual property of reconice

reconice owns the intellectual property created in the course of its employment with reconice (provided it falls within the scope of reconice's business interests) or by using reconice's resources. Publications, documentation, software, creative materials and other works of the mind are some of the types of materials developed on behalf of reconice and belong exclusively to the company.

- To the extent permitted by law, it is understood that such intellectual property rights, whether patentable or protectable by copyright, trademark or trade secret, or otherwise, are owned by reconice.
- From time to time, you may create, discover, or develop methods, processes, systems, or make other patentable inventions while performing your duties for reconice or while using information or resources made available to you as part of your employment with reconice or otherwise in the course of your employment. Because reconice may want to protect some of your inventions with patents, it is important that you promptly notify reconice. Inventions also include improvements, designs, ideas, technologies, programs, and other works.

Third party intellectual property

reconice will require permission for any use of copyrights, patents, trademarks, service marks or other intellectual property of others. If you wish or need to use intellectual property belonging to others, you may need to obtain a license to use it or purchase all rights to it.

- You should refrain from duplicating or publishing any copyrighted material until reconice has obtained written permission from the owner of the relevant rights or has determined that its duplication or publication is lawful.
- You should not copy or distribute third-party software or related documentation without first checking that the license agreement allows copying or distribution and that this does not compromise your rights as, for example, in the case of open source software.

10 EQUAL OPPORTUNITY POLICY

RECONICE PROVIDES EQUAL EMPLOYMENT OPPORTUNITIES WITHOUT DISCRIMINATION OF ANY KIND.

reconice fosters an equal work environment, where all employees are valued and given the opportunity to reach their full potential. reconice embraces diversity of thought, way of being, experience and culture to foster innovation and generate competitive advantage.

It aims to ensure equal employment opportunities for all persons regardless of:

- race;
- skin color;
- religion;
- sex/gender, including pregnancy status;
- gender identity and expression;
- age;
- marital status;
- sexual orientation;
- nationality of origin;
- citizenship status;
- disability;
- membership in any other protected category.

Management is committed to ensuring that this policy is applied in respect of hiring, termination, compensation, promotion, classification, training, apprenticeship, references for employment or other terms, conditions and privileges of employment.

11 DISCRIMINATION AND HARASSMENT

EVERYONE IS REQUIRED TO CREATE A WORK ENVIRONMENT FREE FROM ANY FORMS OF DISCRIMINATION, HARASSMENT AND INAPPROPRIATE BEHAVIOUR; REPORT ANY PROBLEMS IN THIS REGARD.

Zero tolerance policy

reconice is committed to ensuring that its employees work in a safe and respectful atmosphere, where equality, fairness, respect, courtesy and dignity are valued. reconice has adopted a "zero tolerance" policy for acts of discrimination or harassment committed by an employee, supervisor, customer, vendor, supplier, consultant, visitor or any other person, at a reconice location or while conducting business on behalf of reconice, regardless of location. "Zero tolerance" means that in the event of violations of this company policy, reconice will promptly take appropriate action, which may result in disciplinary action, up to and including termination of employment in extreme cases.

Any form of discrimination or harassment based on race, color, religious beliefs, age, sex/gender (including pregnancy), marital status, sexual orientation, gender identity or expression, nationality, citizenship status, disability, or any other protected category is a violation of this policy and may be subject to disciplinary action. In addition, in order to create a climate of respect and professionalism in the workplace, behaviors that, while not in violation of law and regulations, are inappropriate in the workplace are prohibited.

Harassment

Although it is not easy to define harassment, it includes verbal, visual or physical behaviors that:

- Have the purpose or effect of creating an intimidating, hostile, or offensive work environment or unreasonably interfering with an individual's work performance; or
- They negatively impact a person's employment opportunities in other ways.

Workplace violence and hostile attitudes

reconice has a zero-tolerance policy for acts or threats of violence, intimidation and hostility towards another employee or a member of the public. To the extent permitted by law, this prohibition extends

to activities outside of the workplace that adversely affect reconice's reputation or business interests or the safety of its employees.

No person may possess weapons of any kind or other dangerous devices or substances on reconice premises.

12 HEALTH, SAFETY, SECURITY

RECONICE IS DETERMINED TO ENSURE THE HEALTH AND SAFETY OF OUR EMPLOYEES.

reconice is committed to ensuring a healthy and safe working environment for its employees, as well as good corporate social responsibility in the communities in which it operates. In this regard, each manager, employee or collaborator of reconice is required to:

- conduct our operations in a manner consistent with the letter and spirit of applicable health and safety laws, regulations and public policies to protect the safety of our employees, customers, contractors and visitors;
- carry out operational activities in compliance with environmental laws and regulations, minimising any harmful effects on the environment;
- follow policies, guidelines and management systems to ensure human safety, pollution prevention, resource efficiency and responsible sourcing, in line with the corporate responsibility policy;
- instructions or procedures inspired by laws on health, safety and risk management at work are followed;
- training will be provided to assist in the safe performance of one's job responsibilities, and in the responsible use of company materials and equipment;
- reconice undertakes to ensure that contractors, suppliers or colleagues operate in a manner consistent with these provisions;
- Company records will include up-to-date contact information for emergency situations;
- vigilance in the workplace is required, reporting any safety concerns to your manager or the Supervisory Body.

13 ENVIRONMENT

RECONICE IS COMMITTED TO SAFEGUARDING THE ENVIRONMENT, A PRIMARY GOOD

Reconice directs its choices in such a way as to guarantee compatibility between the pursuit of its institutional goals and environmental needs. Reconice, consequently, rejects behaviors that deviate from the aforementioned principles.

Reconice in carrying out its business is committed to safeguarding the surrounding environment and contributing to the sustainable development of the territory. In this context, Reconice is committed to operating in every situation in full compliance with the regulations that govern the matter and to limit the environmental impact of its activities, also taking into account the development of scientific research in the matter.

Although the organization mainly carries out activities of supplying software and services, which are unlikely to cause environmental damage, such as, for example, water pollution, soil contamination and production of harmful waste, it is committed to raising awareness among its collaborators, suppliers, members and customers on environmental issues.

The Company also implements, to the best of its ability, simple but effective activities aimed at containing and limiting the environmental impacts produced by its business processes. Mainly, the organization has taken action to:

1. reduce paper and toner consumption by avoiding printing documents and correspondence that do not necessarily require paper archiving;
2. use of eco-friendly and recycled products wherever possible

3. carry out separate waste collection of the waste you produce (paper, plastic and toner from printers, photocopiers and fax machines) and send them for recovery and recycling;
4. correctly manage all waste produced occasionally;
5. limit the use of plastic as much as possible:
 - abolition of the purchase and use of single-use plastic products (glasses, teaspoons, cutlery, etc.);
 - abolition of the purchase and use of plastic bottles, both in the company and when travelling;
6. learn about new technologies also in relation to the possibility of energy savings and a more rational use of resources;
7. comply with environmental legislation in all its areas of application to the corporate reality;
8. update yourself on the possibilities of joining public and/or private projects for continuous improvement in the environmental field.

All employees are therefore obliged to support the company's commitment to the environment. They are also invited to participate in the environmental awareness campaign promoted by the organization, also by putting forward proposals for improvement.

14 INTERNAL CONTROLS

ALL EMPLOYEES, WITHIN THEIR RESPECTIVE ROLES, ARE RESPONSIBLE FOR THE IMPLEMENTATION AND CORRECT FUNCTIONING OF ANY INTERNAL CONTROLS.

reconice, at every level of its structure, must maintain an open mindset and culture to internal controls. A positive attitude must be maintained towards all types of controls and used for continuous improvement.

Internal controls are all those tools necessary or useful to direct, manage or verify activities; their purpose is to ensure compliance with company regulations and procedures, to protect company assets, to efficiently manage activities and to establish a precise and complete accounting system. Responsibility for implementing an effective internal control system lies at all levels of the organization.

All reconice collaborators, within their respective roles, are responsible for the definition and correct functioning of internal controls, aimed at pursuing the common objective: the reasonable guarantee regarding the effective "good governance" of the company, characterized by the presence of ethically correct behaviors.

15 EMBARGO, SANCTIONS AND EXPORT CONTROLS

COMPLY WITH SANCTIONS AND CONTROLS APPLICABLE TO EXPORTS.

Since reconice operates and has clients abroad, it is important that you do not violate any laws, rules or regulations regarding trade embargoes and sanctions, and exports.

Sanctions

Sanctions limit the ability to conduct business with specific countries, entities or individuals.

There are broad-based sanctions or bans imposed on various countries, which are politically motivated and change frequently: an up-to-date list of sanctioned countries can be found in the Trade Control section of our intranet.

You should avoid doing business with a customer, prospective customer, or other partner (e.g., agent or supplier) if you know or believe that they are located in a sanctioned country, or are owned, controlled by, or acting on behalf of a person or entity located in a sanctioned country. This principle applies even if the customer, prospective customer, or other partner operates outside the sanctioned country.

Governments and international organizations (e.g. the United Nations) also issue lists of sanctioned entities and individuals.

You must not conduct business under any circumstances with anyone you know, or believe to be, a sanctioned person, or owned, controlled, or acting on behalf of a sanctioned person.

To ensure compliance with sanctions, where possible, you are required to know your customers and partners, who owns or controls them, their reputation, what activities they carry out and where.

Export controls

This type of control imposes limitations on what can be exported, from where, to where, to whom and for what purpose.

If you have any questions regarding export controls, please contact the Administrator.

16 VIEWED

I confirm that I have received and read the reconice Code of Business Conduct and Ethics and declare that I am aware of my obligations to comply with the principles, policies and values defined in such Code. I acknowledge that my agreement to comply with this Code does not constitute a contract of employment.

Date: _____

Name and Surname (in capital letters): _____

Signature: _____