



Code of Ethics for Business Partners

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1 PREAMBLE

Founded in Florence in 1982, the Dedalus Group (hereafter also "Dedalus" or "we") is the leading provider of healthcare and diagnostic software in Europe and one of the largest in the world. Since 2016, Dedalus has embarked on an expansion strategy, focusing on the growing demand for innovative and comprehensive solutions to support the digital transformation of the healthcare ecosystem.

We support healthcare organizations, their professionals and patients with innovative end-to-end solutions, focused on clinical cooperation and process optimization, which can be activated gradually, thus protecting our customers' past investments. The person, as a complex individual with diverse needs, is the end point of our activities and the ultimate beneficiary. For this reason, we are aware and very proud to do a "special job": **Life flows in our software.**

2 BASIC PRINCIPLE OF OUR BUSINESS ACTIVITIES

For Dedalus, acting in compliance with applicable laws is a matter of principle. To safeguard and deepen trust in our management among our relevant stakeholders, employees and customers, as well as among the public, we are committed to responsible corporate governance.

Our corporate mission is to conduct our business with integrity and in compliance with applicable laws and ethical standards. This basic principle is the foundation of our activities and an essential factor when it comes to securing our long-term, sustainable success for the future. The above-noted principle is also reflected in our Code of Ethics, which serves as an internal guideline and standard for our managers and employees.

We also expect our business partners, including our suppliers ("**Suppliers**") and customers (hereinafter collectively "**Business Partners**") to follow the principles defined in this Code of Ethics for Business Partners (also "**Code**"). Our Code of Ethics and Code of Ethics for Business Partners have been published on our website (<https://www.dedalus.com/global/en/esg/code-of-ethics/>).

We consider our Code as an indispensable condition for the selection and appraisal of, and for our collaboration with, our Business Partners. Our Business Partners need to act in conformity with all applicable laws and observe ethical standards, also take this into account in selecting their suppliers and work towards realizing this basic understanding throughout Dedalus' entire value chain.

Any statutory national, supranational or international laws and regulations remain in force where applicable and take precedence over this Code wherever they set higher standards. In case of lower standards, this Code shall take precedence.

3 BEHAVING WITH INTEGRITY

3.1 Prohibition of Corruption and Bribery

Dedalus does not tolerate any form of bribery or business practices that may give rise to the impression that there is any impermissible taking of influence or manipulation among both its own employees as well as its Business Partners.

- We expect that our Business Partners refrain from offering any advantages whatsoever to third parties and receive neither any direct nor indirect advantages for themselves from others. Likewise, they shall not promise any advantages constituting an illegal action pursuant to applicable anti-corruption laws. We also expect that our Business Partners do not tolerate any form of illegal gratuities whatsoever, particularly in business contact with official dignitaries and authorities at home and abroad. Our Business Partners shall likewise ensure the integrity of their employees' conduct and procedures.
- In the handling of gratuities (e.g. gifts or invitations), our Business Partners shall avoid any appearance of impropriety or incorrectness. Dedalus expects that its Business Partners do not abuse invitations and gifts for the purpose of exerting influence. Invitations and gifts to Dedalus' employees or persons associated with them shall be granted only if the reason and value is appropriate, i.e. if they are of low value and if they can be considered as an expression of locally generally accepted business practice. In the same way, our Business Partners shall not solicit any inappropriate advantages from Dedalus' employees

3.2 Fair competition and Antitrust Law

Dedalus expects that its Business Partners act fairly in competition and observe the applicable legal regulations of antitrust and competition law. Business Partners shall neither participate in any agreements with competitors contrary to applicable antitrust regulations nor take advantage of any possibly existing market-controlling position.

3.3 Financial Responsibility

We expect our Business Partners to accurately record, maintain and report on business records, including, but not limited to, financial statements and transactions relevant to accounting. Our Business Partners must comply with accounting regulations and regularly publish information on business activities and the financial situation in accordance with applicable legal requirements.

3.4 Export Control and Trade Sanctions

We expect our Business Partners to comply with relevant import and export regulations for the movement of goods, services and information and to respect national and international restrictions on trade and monetary transactions for individual countries, regions or individuals, including relevant sanctions lists.

3.5 Money Laundering

Dedalus expects that its Business Partners observe the relevant legal requirements for the prevention of money laundering, that they do not get involved in money-laundering actions, and that they support the international fight against money laundering.

3.6 Intellectual Property and Plagiarism

We expect our Business Partners to respect know-how, inventions, patents, trademarks, copyrights and other intellectual property rights of all companies as well as individuals. Our Business Partners are committed to preventing the introduction and use of plagiarism and counterfeit materials. When plagiarism and/or counterfeit materials are detected, they are isolated and, if necessary, law enforcement authorities are informed.

3.7 Conflict of Interests

We expects that our Business Partners make their decisions regarding their business with Dedalus exclusively on the basis of objective considerations. Conflicts of interest with private or family matters or otherwise with economic or other activities, as well as those of associated persons or entities or other related persons or organizations shall be avoided.

3.8 Confidential Handling of Information

In order to protect confidential and personal information, data and plans, the Business Partner shall store these securely and protect them against access by third parties.

Business Partners may use information exclusively for authorized purposes and in an appropriate way and manner. All Business Partners undertake not to disclose any confidential data or business secrets to third parties without Dedalus written authorization and not to use these on their own for their own purposes.

3.9 Data Protection and Data Security

Dedalus expects that its Business Partners observe all relevant laws and regulations regarding data privacy and that they gather, process and use personal data only in accordance with the conditions of the applicable data protection regulations.

Further, our Business Partner shall have a high standard of data security to protect personal data from unauthorized access.

3.10 Whistleblowing System

Dedalus expects its Business Partners to promote a culture of openness and transparency and, for this purpose, to implement a whistleblower system in order to provide its own employees, as well as third parties, with the opportunity to anonymously and confidentially report legal violations and misconduct. Whistleblowers are protected from reprisals in the event of justified reports.

If the Business Partner uses workers for Dedalus, the Business Partner shall inform them about the Whistleblower Portal established at Dedalus, its purpose and functioning. The Business Partner shall refrain from any obstruction of information given to Dedalus by the workers used for Dedalus on violations of this Code. Dedalus has the right to question the workers used by the Business Partner to verify compliance with the above information obligation.

4 HUMAN RIGHTS

Dedalus expects its Business Partners and in particular its Suppliers to recognize the "Universal Charter of Human Rights" of the United Nations, the principles of the UN Global Compact, and the core work standards of the International Labor Organization (ILO), in consideration of the country-specific laws applicable at the different sites. Dedalus expects its Business Partners and in particular its Suppliers to ensure compliance with fundamental human rights in their business operations in accordance with applicable national laws and regulations.

4.1 Child Labor

Dedalus expects that its Business Partners and in particular its Suppliers prohibit and refrain from any kind of child labor at their companies.

4.2 Forced Labor

Dedalus prohibits any kind of human trafficking, slavery, forced labor or comparable practices and expects the same from its Business Partners and in particular its Suppliers.

4.3 Discrimination

Dedalus expects that its Business Partners and in particular its Suppliers treat their employees fairly and that they prevent discrimination in the hiring of employees as well as in promotions, the remuneration of work of equal value or the provision of training or continued education measures. We expect from each Business Partner and in particular each Supplier that they do not discriminate against anyone by reason of their gender, skin color, national and ethnic origin, age, citizenship, political opinion, world view, religious affiliation, social origin, sex, health status, disability, or sexual orientation.

4.4 Diversity, Equality, Inclusion

Dedalus expects its Business Partners and in particular our Suppliers to actively promote gender equality and ensure equal opportunities and equal rights for women and men in all aspects of education, personal and professional development. Our Business Partners and in particular our Suppliers are expected to actively promote diversity and inclusion.

4.5 Rights of minorities and indigenous people

The rights of minorities and indigenous peoples shall be respected and protected by our Business Partners and in particular our Suppliers.

4.6 Occupational Health and Safety

Dedalus expects that its Business Partners and in particular our Suppliers observe the applicable legislation on health protection and work safety. The Business Partner shall support the protection of its employees' safety and health through appropriate measures, such as preventive and consistent work protection, appropriate instruction and training as well as a safe and healthy work environment.

4.7 Compensation and Working Hours

Dedalus expects that its Business Partners and in particular our Suppliers observe the respectively applicable legislation on working hours and minimum wage. It is expected that the employees of our Business Partners and in particular our Suppliers receive compensation that is consistent with applicable laws.

4.8 Freedom of association

Dedalus expects that its Business Partners and in particular our Suppliers respect the freedom of association as well as the right to form interest groups. Thus, they shall grant the right to their employees under applicable national laws and regulations to represent their interests collectively.

4.9 Security Forces

Dedalus expects that its Business Partners and in particular our Suppliers, when hiring or using private or public security forces for business purposes, will discourage the use of extensive violence and interference with freedom of association and freedom of labor by providing adequate instruction and supervision of the security forces.

4.10 Land acquisition

Dedalus expects that when acquiring land, its Business Partners and in particular our Suppliers will not engage in unlawful evictions or other forms of unlawful deprivation of land, forests, and waters whose use provides a person's livelihood.

5 ENVIRONMENT

5.1 Efficient Dealing with Resources

The Business Partner and in particular the Supplier shall, within the scope of its capabilities, advocate for the efficient use of energy, water and raw materials, the use of renewable resources, the decarbonization and the minimization of environmental and health damage. Non-renewable resources in particular should be used as sparingly as possible. Dedalus expects the Supplier to continuously identify and implement potential improvements as part of its environmental policy.

5.2 Avoidance and Mitigation of Environmental Impacts

CO₂ Reduction and air quality

Dedalus develops its climate targets in line with the Paris Climate Agreement and in collaboration with its Business Partners and in particular our Suppliers, contributing to the reduction of CO₂/greenhouse gas emissions and improvement of air quality along the value chain. As such, Dedalus expects its Business Partners in particular our Suppliers to record and monitor direct and indirect CO₂/greenhouse gas emissions, including the upstream supply chain. The Business Partner shall strive to continuously improve air quality and reduce such CO₂/greenhouse gas emissions in line with the Paris Climate Agreement and within the scope of its capabilities.

Water Quality and Consumption

Dedalus expects targeted prevention from its Business Partners and in particular our Suppliers, particularly in areas where environmental pollution can have a damaging effect on the basis of food production, access to sanitary facilities and safe drinking water, or the health of individuals. Water consumption is to be recorded completely and transparently and continuously reviewed for reduction potential.

Soil quality and noise emission

Business Partners shall ensure that they do not cause harmful soil changes or harmful noise emissions that may lead to a significant impact on the natural basis for food or human health.

5.3 Hazardous Substances and Waste

The Business Partner shall observe the guidelines set by applicable laws and international agreements (e.g. REACH, the Minamata Convention on Mercury of October 10, 2013, the Stockholm Convention on Persistent Organic Pollutants of May 6, 2005, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of March 22, 1989 the Regulation (EC) No 1013/2006 of the European Parliament and of the Council of June 14, 2006 on shipments of waste) in the use, production and trade of hazardous substances, other chemicals and wastes.

5.4 Sustainable Products and Recycling

In developing products and services, the Business Partner shall ensure that their use is economical in terms of consumption of energy and natural resources. This includes that reuse, recycling and safe environmentally friendly disposal are taken into account, and that waste is reduced as much as possible. Dedalus expects its Business Partners and in particular our Suppliers to comply with the applicable environmental laws, regulations and standards.

5.5 Biodiversity, land use and animal welfare

We expect our Business Partners and in particular our Suppliers to ensure the protection of natural ecosystems, in particular the protection of endangered wildlife habitats, and the sustainable use of natural resources. Within the framework of applicable law and international regulations on biodiversity, Suppliers shall strive for supply chains that are free of deforestation and degradation, as well as careful land use. Our Business Partners and in particular our Suppliers shall support and promote the ethical and species-appropriate treatment of animals.

6 COMPLIANCE WITH THE CODE

6.1 Reporting of Violations and Risks; Inspection

The Supplier is obligated to report any violations of this Code or associated risks. The same applies to violations or risks of violations of human rights or environmental rights in the Supplier's further supply chain.

Reports may be sent via e-mail to Dedalus' Compliance Department humanrights.de@dedalus.com or may be submitted via the Dedalus Whistleblowing Portal: <https://dedalus.integrityline.com>

If Dedalus identifies a risk in relation to the Supplier's business, Dedalus or a third party may carry out appropriate checks at any operating site of the Supplier which might be affected by the risk and that they may inspect any documents of the Supplier that are relevant to the risk.

Alternatively, Dedalus may require the Supplier to submit to any recognised certification or audit system that ensures the implementation of independent and appropriate controls.

6.2 Information Obligations; Training

The Supplier must inform its employees about the contents of this Code and, if necessary, provide training. General training about human rights and environmental protection is equivalent to this.

If the Supplier is of the opinion that it cannot fulfil a requirement of this Code without violating applicable law, it shall inform Dedalus thereof without delay.

Dedalus may, at any time, request that the Supplier supports Dedalus by providing information about the further supply chain (supply chain mapping) to facilitate the assessment of risks and/or implementation of preventive or remedial measures regarding human rights and environmental rights in the supply chain.

6.3 Supplier Relations

The Supplier undertakes to address the principles of this Code and the resulting obligations towards its subcontractors and suppliers in an appropriate manner to prevent violations of human and environmental rights in the further supply chain.

6.4 Non-Compliance

In case of non-compliance with the standards described in this Code, Dedalus reserves the right to review the business relationship with each Business Partner and in particular with each Supplier. In doing so, Dedalus will adhere to the principle of appropriateness, such that Dedalus will review carefully which consequences are appropriate, suitable and required in each individual case. This may lead to an immediate termination of the business relationship with the Business Partner and in particular the Supplier as well as to claims being brought for damage compensation.

We, the undersigned, hereby confirm that

- we have received the Dedalus Code of Ethics for Business Partners and we acknowledge and accept it;
- we know all the applicable laws and regulations of the countries in which our company operates;
- we conduct our business based on ethical principles, applicable laws, and social responsibility

Company's full name

Stamp/ Seal of the company

First and last name

Title

Signature

Commercial Register, place

Commercial Register No. or VAT ID

Place, date