

*The Code of Ethics*

# The Code of Ethics

# 1. Introduction

## 1.1 Who Copan is

“Innovating Together” is not just a motto, but a mission and a challenge embraced every day, one that has led the Copan Group (hereinafter “Copan”) to gain global recognition and leadership in the field of laboratory preanalytics.

Founded by the Triva’s family in Mantova, in 1979, and relocated a few years later to Brescia - the company’s current headquarters - Copan can now claim a truly global presence. The opening of branch offices, together with partnerships with major distribution companies, has enabled deeper market penetration.

Curiosity, a constant theme throughout Copan’s history, combined with a continuous drive for improvement, has enabled the development of a wide range of products covering the entire preanalytical phase in the fields of clinical microbiology and diagnostics.

Over the years, numerous new products and devices have been developed, revolutionizing the preanalytics sector. Thanks to flocked swab’s patented technology (FLOQSwabs®), it is

now possible to effectively collect samples, transport them using liquid microbiological media (LBM®), and complete the cycle with the development of Wasp® and WaspLab® systems, which automate the sample analysis phase.

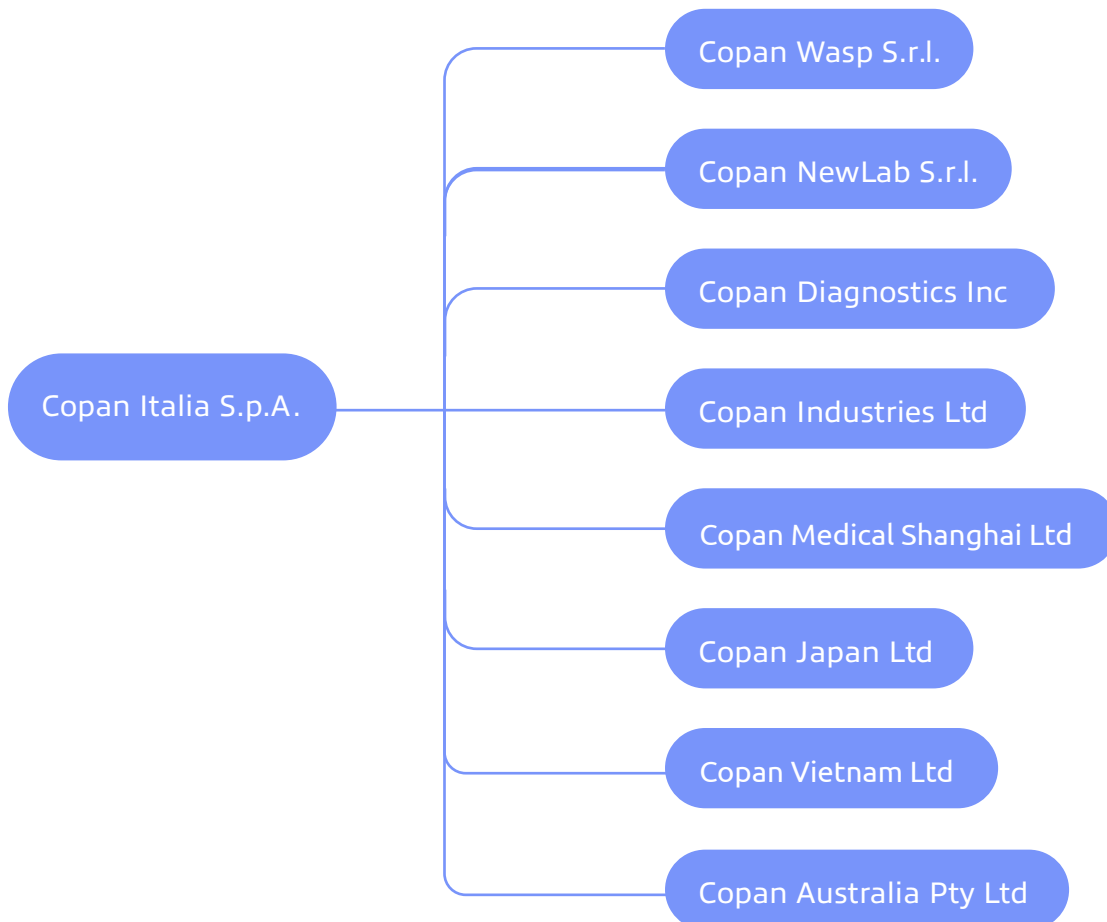
The efficiency and functionality of flocked devices have quickly led to their use in forensic science and quality control, where important collaborations have enabled the development of innovative products such as MicroFLOQ™ swab, used in DNA investigations.

Beyond the clinical sector, the Cyclone™ instrument allows automation of quality control processes in the production of pharmaceuticals, beverages, and food.

An essential contribution to this ongoing evolution has come from Copan’s corporate vision: the strong sense of identity and belonging it has instilled, the motivation to pursue goals, and a culture of collaboration have, since its beginnings, generated competitiveness and an excellent reputation.

This Code of Ethics is therefore intended to be a vehicle for all those values that have always been considered essential cornerstones of Copan’s success.

## 1.2. Corporate Structure



## 2. Code of ethics

### 2.1. Scope and recipients

This Code of Ethics aims to formalize the set of values and principles that inspire and guide Copan's daily actions.

Its purpose is to establish a code of conduct that applies equally to all individuals who work for the Copan's Group: from top management and employees to all collaborators and third parties acting on behalf of the company.

Specifically, the Code of Ethics is addressed, without limitation, to the following subjects ("Recipients"):

- Directors;
- Statutory Auditors;
- Employees;
- Collaborators or consultants;
- Suppliers;
- Customers, business partners, and other third parties with whom Copan interacts on a daily basis, all of whom are expected to embrace Copan's ethical vision.

The principles outlined in this Code of Ethics are non-negotiable and represent the foundation for the decision-making and conduct of anyone working with or for Copan, within a framework of loyalty, transparency, and integrity.

Compliance with the principles set out herein is not intended to restrict the freedom of expression of the Recipients.

Recipients are required to be familiar with, respect, and implement the values stated in this Code while performing their duties. Any violation of one or more of these provisions shall subject the violator to the remedies provided by the applicable local laws.

### 2.2 Communication and dissemination

This Code of Ethics contains the criteria and principles of conduct that all Recipients must adhere to in order to better achieve Copan's business objectives. For this reason, the Board of Directors is committed to periodically reviewing the Code and communicating any changes made. The Board of Directors also undertakes to ensure the widest possible dissemination of the Code of Ethics through circulars, by posting the document on the company notice board (both in paper and digital form), and by providing training to the Recipients. Furthermore, the Board reserves the right to carry out checks to verify the actual implementation and compliance with the rules of good conduct.

### 2.3 Reporting violations

All Recipients must uphold and promote the values and principles outlined in this Code of Ethics. For this reason, Copan encourages any Recipient who becomes aware of a violation of the Code to submit a report to: [confidential@copangroup.com](mailto:confidential@copangroup.com) Copan in compliance with current regulations, is committed to ensuring the utmost protection of the anonymity of individuals reporting misconduct, in order to prevent them from being subjected to any form of retaliation and/or discrimina-

tion. Anyone engaging in retaliatory actions will face disciplinary measures and/or may be subject to civil or criminal penalties.

### 2.4 Disciplinary sanctions

Any behavior that is non-compliant and/or contrary to the provisions of this Code of Ethics will be sanctioned in proportion to the seriousness of the violation committed, in accordance with the applicable labor laws or contractual provisions.

## 3. Our values

The results that Copan can boast today are the outcome of an organization built on strong principles, fundamental pillars for the company's growth and success. These achievements have been made possible thanks to the commitment and passion shown every day by all employees and collaborators in pursuing the company's business objectives.

### 1) PEOPLE

Our employees are our strength; for this reason, we place their well-being first and foremost. Empowering our staff to express their attitudes and interests, we promote their personal and professional growth. We are committed to maintaining a family-like work environment, where cooperation and understanding are the basis of everyday life.

### 2) INNOVATION

Since our birth, we have been forerunners in preanalytics. We are resolute to redefine with passion the standard of excellence in everything we do. Hence, we promote the development of ideas, technologies, and products that drive innovation, to deliver the best solutions to our customers.

### 3) TRUST

We are dedicated to providing the best experience possible for our clients and distributors ensuring them superior and professional service. Through dedication and commitment, we nurture solid bonds of trust with our partners.

### 4) SUSTAINABILITY

Over the years, we have generated resources that allowed us to reinvest and be financially independent. That is how we became a reliable, far-sighted company with great operating freedom. By doing everything possible to limit our environmental footprint, we strive to achieve our community's social, environmental, and cultural enrichment every day.

### 5)GROWTH

Growth is not our goal but is the natural result of doing things the right way. We moulded our business to face internal logistics and market challenges by revolutionizing the company structure and processes. Our continuous growth has been

made possible by our scientific reliability, outspoken attitude, and human touch, which safeguarded our vision, our dreams and built our future.

## 4. Principles and criteria for proper business conduct

### 4.1 Compliance with laws and regulations

Copan operates in compliance with applicable Italian, European, and international laws in the countries where it conducts business. All directors, statutory auditors, employees, and third parties collaborating with Copan, as well as all other Recipients of this Code of Ethics, are required to observe this fundamental principle and to carry out their activities with integrity, transparency, and fairness. They must refrain from any action or omission, while performing their duties, that may violate applicable laws or the ethical standards outlined in this Code of Ethics.

#### 4.1.1 Adoption of the Organization, Management, and Control Model

Legislative Decree 231/2001 introduced into the Italian legal system a regime of administrative liability for entities, in cases where a natural person employed by the entity commits one of the predicate offenses to the advantage or interest of the company. In compliance with the legislation, it is considered good practice to establish an organizational model that includes a set of rules and procedures adopted by the company aimed at preventing the commission of offenses in relation to business activities. The correct adoption of such a model constitutes grounds for exclusion or limitation of the entity's liability and any consequent sanctions, should one of the offenses provided for by the legislation be committed. Within Copan Group, Copan Italia S.p.A. e Copan Wasp S.r.l. have formally adopted the Model 231, integrating it into their corporate management systems as a demonstration of their concrete commitment to preventing unlawful conduct. Furthermore, Copan Group has decided to enclose all good conduct practices to be followed within the scope of work activities in this Code of Ethics, in order to prevent behaviors that could constitute offenses covered by the legislation.

#### 4.1.2 Whistleblowing

In compliance with Legislative Decree 24/2023, Copan Italia S.p.A. and Copan Wasp S.r.l. have implemented a digital platform that allows for the effective and anonymous reporting of violations of national or European Union regulations that come to light in the workplace, and that may harm the public interest or the integrity of a public administration or private entity.

### 4.2 Transparency and Legality in Business

Copan conducts its activities with the utmost transparency and in full compliance with the law. For this reason, Copan strongly condemns any act that could constitute corruption, extortion, and/or any form of conflict of interest. All Recipients are prohibited from offering money to obtain a direct or

indirect advantage for Copan, as well as from accepting gifts or favors that exceed normal standards of courtesy and hospitality. Each Recipient is required to report any situation of potential conflict of interest that could compromise a party's ability to make impartial decisions, in order to safeguard the company's interests..

#### 4.2.1 Fair competition

All market actions and strategies are guided by the principle of fair competition. Copan refrains from engaging in any unlawful conduct aimed at gaining an advantage over competitors or causing them harm.

#### 4.2.2 Accounting and financial reporting

All accounting and financial reporting operations are transparent, accurate, and comply with legal requirements and industry best practices.

### 4.3 Information security and protection of personal data

Copan believes in the value of information and is committed to safeguarding its integrity, availability, and confidentiality. In this regard, the Italian offices of the Copan Group have obtained ISO 27001 certification, demonstrating that information security is a core value for Copan. The Group requires all employees, upon hiring, to sign a specific non-disclosure agreement to protect company information and know-how they may become aware of through their roles, as well as to comply with an IT policy on the proper use of technological tools. Finally, Copan declares that it operates in full compliance with the applicable privacy and personal data protection regulations of the countries in which it operates.

### 4.4 Management of intellectual property

Copan has always invested in research and development. Over the years, this approach has enabled the company to accumulate a wealth of knowledge and develop specific know-how that represents a competitive advantage. Intellectual property is a unique asset and an essential resource for supporting business activities and maintaining the trust that customers place in Copan and its products. For this reason, Copan safeguards and protects its intellectual property in accordance with applicable laws. Copan is also committed to respecting and not infringing upon the intellectual property rights of third parties.

### 4.5 Quality management system

Thanks to continuous technical research and the careful selection of raw materials used in product manufacturing, Copan ensures the highest standards of safety and quality. The quality management system is currently certified and compliant with the following standards:

- ISO 13485:2016;
- ISO 9001:2015;
- cGMP

#### **4.6 Health and safety in the workplace**

All company facilities and work environments comply with current occupational health and safety regulations. All personnel are trained and educated, according to their roles, on workplace safety and the proper use of equipment. Where required, they are also provided with the personal protective equipment mandated by applicable laws.

#### **4.7 Environmental Protection**

Copan ensures compliance with all applicable regulations concerning the protection and preservation of both internal and external environments, including through the adoption of an Environmental Management System certified to ISO 14001. In general, the Group is committed to maintaining high environmental performance standards across all of its legal entities. In line with the Sustainable Development Goals, Copan promotes a proactive approach to environmental protection and prevention, as well as the sustainable management of natural resources.

### **5. Principles and criteria for the proper management of human resources**

#### **5.1 Personnel selection**

Personnel are selected based on the profile and professional characteristics required for each specific role. The selection process aims to integrate the candidate into a collaborative environment that fosters both professional and personal growth, respecting the individual and always upholding equal opportunities. Selection is based on competence, professionalism, and alignment with Copan's values. During the selection process, candidates receive comprehensive information about the organization, its mission, core values, and the position for which they are being considered. Copan refrains from any form of discrimination, whether based on nationality, disability, political orientation, religion, sex, gender identity, or any other condition.

#### **5.2 Establishment of the employment relationship**

Copan rejects any form of irregular employment. Every employee is regularly hired under a formal employment contract and appropriately classified according to their skills. Any external collaboration is properly compensated and contextualized.

#### **5.3 Respect for human rights**

Copan considers it fundamental that human rights and individual dignity are respected in the workplace. The Group's companies, both in Italy and abroad, prohibit all forms of labor exploitation, particularly child labor.

#### **5.4 Inclusivity and prohibition of discrimination**

In conducting its business activities, Copan rejects any form of discrimination based on sex, nationality, age, disability, health status, sexual orientation, political or union opinions, philosophical beliefs, or religion.

#### **5.5 Prohibition of harassment**

Copan promotes initiatives aimed at improving organizational well-being and is committed to ensuring a work environment free from mistreatment and harassment, whether sexual or otherwise. Copan rejects any form of harassment or behaviors related to mobbing. Any form of sexual harassment or violence related to cultural and personal differences is strictly prohibited. Upon receiving any report of harassment or abuse, Copan will conduct appropriate investigations and take necessary remedial actions when appropriate.

#### **5.6 Enhancement of human resources**

Human resources are the strength of a company. Copan strives to ensure a work environment that values professional skills, creativity, and commitment through continuous employee training, attention to their well-being, and protection of individuality. It is well-established that a stimulating and welcoming environment fosters greater collaboration among people and consequently higher productivity. For this reason, Copan organizes and promotes meetings outside normal working hours, partnerships, and activities that meet the needs and preferences of all employees.

### **6. Relationship with customers**

#### **6.1 Transparency and fairness in customer relations**

Copan's objective is to build a relationship of trust and collaboration with both direct and indirect customers. This goal is pursued on one hand by offering a unique and excellent product, and on the other by maintaining transparent relationships through clear and truthful information that enables customers to make informed choices. Commercial relations are guided by principles of fairness, in full compliance with the commitments made and applicable laws. Copan refrains from engaging in commercial relationships with parties that do not adhere to this Code of Ethics or do not operate within a lawful framework.

##### **6.1.1 Transparency in relations with healthcare professionals and organizations**

Copan ensures that interactions with healthcare organizations and professionals in the countries where it operates comply with current national, European, and local laws and regulations, applicable codes, and professional standards. At the same time, Copan respects the obligation of healthcare professionals to make independent decisions concerning clinical and diagnostic practices.

## 7. Relationship with suppliers

Suppliers are all parties that sell goods and/or provide services to Copan in exchange for payment. Suppliers include:

- Raw material suppliers
- Consultants and/or professionals
- Employment agencies and recruitment firms
- Banks and insurance companies

The selection of suppliers is a key step in ensuring the effective execution of Copan's activities. When identifying a new supplier, the company's internal procedures must be followed, and suppliers must be selected based on their expertise and professionalism. Relationships with suppliers must be conducted with transparency, fairness, and in compliance with the law.

Receiving favors and/or gifts from a supplier or potential supplier is strictly prohibited. Employees may not accept gifts or benefits for themselves or others, except for customary gifts of modest value given occasionally within the normal framework of courtesy and international customs. Should an employee find themselves in a potential conflict of interest, they must immediately report the situation through the appropriate channels described above. Payments to suppliers must be made within the agreed terms and conditions and carried out by authorized personnel.

## 8. Relationship with public administration

Relations with public bodies, whether domestic or foreign, that Copan must engage with in order to comply with legal obligations, are conducted based on principles of legality and transparency. Copan is committed to offering full cooperation to public authorities by providing complete and truthful information and by not hindering audits or inspections. In fulfilling activities mandated by public authorities, Copan complies with all applicable legislative and regulatory requirements. None of the Recipients may offer advantages and/or gifts that go beyond customary business courtesies, whether for personal benefit or on behalf of Copan.



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