



# CODE OF ETHICS

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## Table of Contents

<b>Introduction</b> .....	2
The Mission and Vision of I.M.D. Generators S.r.l.....	4
Corporate Values .....	4
Recipients of the Code of Ethics .....	6
.....	8
<b>The General Principles of Conduct</b> .....	9
Full compliance with the Law .....	9
Anti-corruption .....	9
Conflict of Interest .....	9
Fair Competition .....	10
Intellectual Property .....	10
Protection of Privacy and Confidentiality of Sensitive Information .....	11
Protection of human resources .....	12
Protection of the Environment .....	13
<b>Gender Equality Policy</b> .....	15
<b>Violation of the Code of Ethics, Reports and Disciplinary Measures</b> .....	15
Means of Disseminating and Amending the Code of Ethics.....	16
<b>Revision Register</b> .....	18

## Introduction

I.M.D. Generators S.r.l. (hereinafter also referred to as “I.M.D.” or the “Company”) specialises in the design, manufacture and marketing of customised monoblocs and generators for high-voltage X-ray systems, being essential for the operation of medical devices. The Company is part of the IMD International Medical Devices S.p.A. Group, based in Grassobbio in the province of Bergamo.

The Company has decided to draw up this Code of Ethics with the aim of disseminating the duties and responsibilities, as well as the rights and principles on which it bases its business activities.

To this end, all stakeholders are required to observe and respect the content of this document whilst the organisation undertakes to prevent any type of activity that may directly or indirectly violate the Law, values and principles of I.M.D.

The adoption of this Code is an expression of a corporate context where the primary objective is to satisfy the needs and expectations of I.M.D.'s interlocutors, aiming to recommend and promote a high standard of professionalism and to prohibit conduct that is in contrast not only with the regulatory provisions relevant at the time but also with the values that I.M.D. intends to promote.

The Code of Ethics of I.M.D. Generators S.r.l. was approved by the Board of Directors on 27/08/2024.



## The Mission and Vision of I.M.D. Generators S.r.l.

I.M.D. Generators S.r.l. is committed to making a contribution in the field of diagnostic imaging, in particular by disseminating the use of the radiogenic monobloc in X-ray machines. One of the goals is to enable the production of increasingly compact, inexpensive and easy-to-assemble systems, always striving to benefit the global community.

The business model is an alternative to that of multinationals. Indeed, the organisation believes that customisation, empathy and human proximity are the watchwords for a fairer and more sustainable world. I.M.D. Generators S.r.l. is amongst the few players in the world to design and manufacture X-ray emission components for medical and veterinary use.

Working with heterogeneous customers with profoundly different needs and maintaining a project approach renders the Company an attentive, flexible and creative interlocutor.

The Company profoundly believes in the value of human relations, forging relationships with customers, suppliers and contractors based on loyalty and transparency.

## Corporate Values

In carrying out its activities, the Company is inspired by eight corporate values, which must be respected and adopted by all those who administer, control, work and collaborate with the Group.

The values of I.M.D. Generators S.r.l. are:

- **Respect**

Respect is an inescapable principle at the basis of any relationship entered into by the Company, be it towards contractors, employees, customers, suppliers, the community or in general towards any parties that come into contact with the Company.

Respect must be the basis on which all relationships inside and outside the Company are founded.

- **Transparency**

Relationships within and outside the Company must ensure an exchange of clear, complete, timely and truthful information.

- **Open-minded Vision**

In order to meet new challenges and trends, the Company adopts an open-minded vision. This involves having a dynamic organisation that operates without bias and is open to change.

- **Determination**

The management, managers and employees have a clear and defined objective. All parties are committed to completing their work as effectively and efficiently as possible on a daily basis.

- **Collaboration**

The Company encourages collaboration between members of the same team and between different teams.

I.M.D. strongly believes that collaboration is the basis for innovation. This value applies inside the Company as much as it does outside. Relationships with customers, suppliers and trade associations create a virtuous and stimulating network for business development.

- **Communication**

Communication is the basis of every relationship. For this reason, the Company is committed to active and clear communication at all levels of the organisation and towards the outside world.

- **Health**

The Company strongly believes in the value of the health of its employees and in the importance of employee well-being. For this reason, it puts people at the centre of every decision, with their safety being the essential point of every activity.

- **Appearances**

The Company curates its corporate image and as a technological, dynamic Company led by a young management team, I.M.D. strives to ensure that its image always represents the Company's soul.

The culture of beauty, savoir-faire and Made in Italy represent three pillars that inspire the Company, which is committed to transmitting such culture not only through the quality of its products but also in its corporate presence.

## **Recipients of the Code of Ethics**

I.M.D. Generators S.r.l.'s Code of Ethics is addressed to all persons inside and outside the Company with whom collaborative relations are entered into, even on an occasional and/or temporary basis, in order to ensure the correct and ethical conduct of activities, the full sharing of the Company culture and compliance with all principles contained in this document.

The Code of Ethics is binding and applies to the following parties (“Recipients”) with whom the Company most frequently establishes relations:

- Employees and contractors;
- Clients;
- Public bodies, regulators and legislators;
- Universities and research centres;
- Community and civil society;
- Trade associations;
- Suppliers and business partners;
- Holdings and subsidiaries.

However, this Code of Ethics is addressed to anyone who decides to come into contact with I.M.D. A crucial role is played by the directors and management, who are required not only to observe the values described in the Company's Code of Ethics but also to promote them externally.



## The General Principles of Conduct

### Full compliance with the Law

Respect for the law, national and international regulations, practices and this Code form a mandatory principle that no person working in any capacity with I.M.D. may fail to observe.

Company personnel are required to be familiar with Company documents (such as policies and procedures), respect their contents and follow Company directives to ensure full compliance.

The Company does not tolerate any behaviour that violates the law or personal dignity. As such, I.M.D. employees must refrain from any unlawful behaviour.

### Anti-corruption

The Company repudiates all forms of corruption and money laundering. All members of I.M.D., as well as its contractors, are prohibited from accepting, giving or promising money and/or gifts aimed at securing an advantage for themselves or for the Company.

I.M.D. requires its employees to act in good faith and in the best interests of the Company, carrying out their activities in compliance with all laws, regulations, standards and guidelines. Violations of anti-corruption laws may result in civil and criminal penalties, thus appropriate contractual remedies shall be put in place by I.M.D., as appropriate.

### Conflict of Interest

Conflicts of interest may arise in cases where employees and contractors of I.M.D. carry out activities or further their own personal interests. Such situations could arise with customers, suppliers, business partners and competitors.

Therefore, all Recipients of I.M.D. Generators S.r.l. are required to operate solely and exclusively in the best interests of the Company. For this reason, it is forbidden to make decisions or direct

one's choices in accordance with personal interests that do not reflect – in whole or in part – the Company's interests.

If you identify a situation that could generate a conflict of interest, you should report such to your manager within the Company so that they can promptly respond with the most appropriate action to restore an optimal situation.

## Fair Competition

I.M.D. Generators S.r.l. operates in a market where competition, guided by the principle of fairness and honesty, enables the Company to develop healthy relationships with competing companies, to benefit from them and to foster market growth by operating in full compliance with the laws and regulations.

The Company refrains from creating any situation that could restrict free competition (such as through the creation of cartels) and be contrary to current legislation.

All products manufactured by the Company are accompanied by a description that allows the buyer to know the technical information.

## Intellectual Property

I.M.D. Generators S.r.l. possesses a great deal of sensitive information on aspects concerning the performance of its business activities and the market of reference. Indeed, I.M.D.'s proprietary information that has not been disclosed to the public must be kept confidential so as to not damage the Company and relations with third parties.

Employees and all other persons inside and outside the organisation who have access to such information are responsible for protecting the Company's intellectual property and undertake to respect its confidentiality by signing a specific document (Non-Disclosure Agreement).

More specifically, Authorised Persons undertake to:

- Ensure the utmost confidentiality and discretion with regard to the general characteristics and particular details of the tasks entrusted to them and not to disclose, not even after the termination of the Authorised Person's assignment, any information of which they have become aware in execution of the tasks assigned to them, either due to being related to such activities or by chance (Article 28(3)(b) of EU Regulation 2016/679);
- Keep strictly confidential all information of which they become aware as a Data Processor within the organisational structure to which they are assigned, pursuant to EU Regulation 679:2016.

## Protection of Privacy and Confidentiality of Sensitive Information

The information acquired by I.M.D. Generators S.r.l. forms a valuable source which the Company guarantees to protect and keep confidentiality, preventing any possibility of loss, unlawful appropriation, data leakage or unauthorised disclosure.

In this regard, the management of personnel information is entrusted to an external firm, with the exception of medical records, which are retained within the Company in a sealed envelope. The only Authorised Person who may inspect such is the doctor appointed to conduct the statutory medical examination.

According to the corporate privacy guidelines, in application of the European Data Protection Regulation 679/2016 (GDPR), all employees sign the Policy and the acquisition of consent for the processing, communication and dissemination of data, within the framework of the employment relationship. This information is processed in accordance with the laws in force and the confidentiality obligations that govern the organisation's activities.

The data is retained only for the period necessary for the purposes for which it is processed, even after termination of the employment relationship, for the fulfilment of all obligations connected with or arising from the relationship itself, or within the terms set out under national and EU

laws, rules and regulations with which the organisation must comply (such as accounting and tax regulations, relating to the management of the employment relationship and so on).

I.M.D. is aware that it is liable in the event of any wrongdoing that results in the loss, damage or disclosure of information without prior authorisation from the owner.

Again in order to guarantee the privacy of third parties, the Company requires authorisation for the use and publication of images and/or video footage. Only once written consent has been obtained from the Data Subject will it be possible to use the data as agreed. In fact, as required, such images and/or video footage may be published on the Company Website, disseminated through printed media or any other means useful for the creation of Company catalogues and videos for advertising and publicising the Company's products and those of the Group's affiliated companies.

## Protection of human resources

People are an indispensable resource for the sustainable growth and success of I.M.D. The Company has always considered it essential to create a serene working climate and, over the years, has strived to build a healthy, inclusive and safe environment where people have respect for each other and share their knowledge in order to do their best work.

Respect for people and human rights is a fundamental pillar for I.M.D.. In fact, behaviour aimed at discriminating against people on the basis of gender, origin, sexual orientation, religion or politics is not tolerated nor are actions such as harassment, bullying or physical and/or verbal threats.

A further crucial aspect concerns occupational health and safety. Ultimately, I.M.D. is committed to ensuring the most appropriate safety measures for each working condition, enabling its employees and contractors to work peacefully in a place that takes into account the health and physical and mental well-being of its people.

In compliance with applicable laws and its employees, the Company is committed to maintaining the highest standards of hygiene and safety at work, taking all necessary measures to prevent

accidents and illness. All I.M.D. employees and partners must thus put the culture of well-being and safety of those involved first.

## Protection of the Environment

I.M.D. Generators S.r.l. believes that it is essential to pay due attention to the impact generated on the environment through its activities and production processes in order to continuously improve its environmental performance by minimising negative impacts that may damage the ecosystem.

The Company is committed to ensuring that its activities generate growth that is as sustainable as possible, along with being environmentally-friendly and protecting the planet's resources.

All I.M.D. employees are expected to contribute to the pursuit of these objectives through their conduct.



## Gender Equality Policy

Politica per la Parità di Genere

IMD Generators si impegna a promuovere una cultura inclusiva basata sul rispetto e sulla valorizzazione delle diversità, in conformità con la UNI/PdR 125:2022.

Riconosce la parità di genere, l'inclusione e la valorizzazione delle diversità come leve strategiche per la crescita e la sostenibilità.

Si impegna a garantire pari opportunità in tutte le fasi del rapporto di lavoro – dalla selezione allo sviluppo professionale – assicurando equità retributiva, accesso meritocratico ai ruoli tecnici e di responsabilità e condizioni di lavoro rispettose della dignità di ogni persona, anche nei contesti produttivi.

Promuove politiche di conciliazione vita-lavoro, sostiene la genitorialità e adotta una tolleranza zero verso qualsiasi forma di discriminazione, molestia o comportamento inappropriato.

## Violation of the Code of Ethics, Reports and Disciplinary Measures

I.M.D. does not tolerate conduct that violates the Code of Ethics, even in the belief that they are acting in the best interests of the Company. Any violations of the Code of Ethics by I.M.D. employees or contractors may give rise to the application of disciplinary sanctions against the Recipient to have committed the violation, in accordance with the law. Any I.M.D. employee or contractor who suspects that a third party has violated the Code of Ethics has the right and duty to report this to their Company person of reference. In particular, with regard to suppliers and customers, failure to comply with the precepts contained in this Code may lead, in the most serious of cases, to termination of the contractual relationship, on the basis of an explicit contractual provision.

The Company plans to develop a dedicated channel through which any reports can be submitted, aimed at guaranteeing the anonymity of the persons sending their reports.

## Means of Disseminating and Amending the Code of Ethics

The Code of Ethics is available in Italian and English under the Quality section of the I.M.D. Website (<https://www.imdxray.com/>) for anyone to view.

The Company undertakes to update this document through periodic reviews in order to ensure that it always complies with legal provisions and regulations. Any changes to the Code will be communicated by the Company via the Website.

In particular, with regard to suppliers and customers, non-compliance with the precepts contained in this Code may, in the most serious cases, lead to the termination of the contractual relationship, on the basis of an explicit contractual provision.



## Revision Register

Versions	Description of changes/Reasons for changes	Chapters affected by revisions
1 (06.2024)	First version - Approved by the Chief Executive Officer Laura Bresciani on 27/08/2024	All
2 (04.2026)	Added a paragraph about Gender Equality Policy	