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Addendum to the Orthofix Group Code of Business Conduct

INTRODUCTION

Orthofix Medical Inc. and all its subsidiaries, including Orthofix S.r.l. (the "Company" or "Orthofix") have adopted a *Corporate Code of Conduct* (the "**Code of Conduct**"), the principles of which are set out in full herein and compliance with which is mandatory for all recipients of the Company's organization, management, and control model (the "Model").

In addition to the aforementioned Corporate Code of Conduct, the Company has decided to adopt this Addendum, which contains a series of principles and duties of conduct that the Company considers essential for the proper management of activities by all Recipients of the Model, also in relation to the provisions of Legislative Decree 231/01 and the guidelines issued by trade associations, referred to in the General Part of the Model.

The Orthofix Medical Inc. Code of Conduct and this Addendum therefore constitute a comprehensive system of principles, values, and ethical rules that Orthofix considers fundamental and indispensable for the conduct of all business activities, and which it requires to be strictly observed by the members of the corporate bodies and management, employees of the Company, as well as all those who work, even de facto, for the Company, including third parties such as, by way of example and without limitation, agents, collaborators, consultants, etc. (the "Recipients").

The Company considers the need to comply with (and ensure compliance by anyone who interacts with it) the highest ethical and transparency standards to be paramount to any commercial requirement.

Orthofix therefore requires that all those who have or intend to have legal relations with the Company adopt conduct that complies with the provisions of the Orthofix Medical Inc. Code of Business Conduct and this Addendum.

PRINCIPLES OF CONDUCT

FINANCIAL FLOWS, FINANCIAL STATEMENTS, AND ACCOUNTING RECORDS

- Incoming and, in particular, outgoing financial flows must be supported by an appropriate approval process and must also be traceable and documentable at all times. In this regard, **it is strictly forbidden** to make any type of payment without appropriate supporting documentation and/or without providing for the relevant accounting entry, and to agree to pay compensation or provide services to third parties, consultants, suppliers, etc. that are not adequately justified in the context of the existing relationship.
- The Company's accounting is strictly based on the general principles of truth, accuracy,

completeness, clarity, and transparency of the data recorded.

- Management events must be represented correctly, completely, and in a timely manner in the accounts and company databases.
- Every accounting transaction must be legitimate, authorized, consistent, appropriate, ly recorded, traced, and adequately documented, in formal and substantive compliance with the regulations and procedures in force at the time, so as to allow for its complete reconstruction at any time.
- To this end, any Recipient who carries out operations and/or transactions involving sums of money, goods, or other economically assessable benefits belonging to the Company must act with specific authorization and provide, upon request, any evidence for verification at any time. Delegated persons must act in accordance with the powers of representation, delegations, and powers of attorney conferred upon them.
- All tax returns must be based on true accounting records representing legitimate, existing, and correctly recorded transactions.
- Taxes due must be paid with the utmost punctuality. Furthermore, taxes due must be calculated in strict compliance with applicable regulations and paid promptly.
- The Company ensures compliance with the principles of conduct aimed at guaranteeing (i) the integrity of the share capital, (ii) the protection of creditors and third parties who establish relationships with the Company, (iii) the regular functioning of the market, (iv) the exercise of the functions of public supervisory authorities and, in general, (v) the transparency and fairness of the activities carried out by the Company from both an economic and financial point of view.
- In particular, the Recipients of the Model are expressly required to:
 - scrupulously comply with the rules governing the preparation of financial statements and the keeping of accounting records, including the relevant accounting standards;
 - behave in a correct, transparent, and cooperative manner, in compliance with the law and company procedures, in all activities aimed at preparing the financial statements, the balance sheets and income statements for the period, and corporate communications in general, in order to provide the recipients of such communications (shareholders, creditors, and third parties in general) with true and accurate information on the economic, financial, and capital position of the Company. More specifically, in this context, **it is strictly forbidden** to prepare, draw up, transmit and/or communicate, in any manner or form, inaccurate, incorrect, incomplete, incomplete and/or false data and information concerning the Company's accounting situation, its financial position, results of operations or financial position, or to make any omission in the preparation, drafting, transmission and/or communication of such data and/or information. Furthermore, all Recipients are required to report any illegal, incorrect or false records or records corresponding to suspicious transactions or conflicts of interest;
 - observe with the utmost diligence and rigor all legislative provisions designed to protect the integrity and preservation of the share capital; all this with the aim of not in any way damaging the legitimate expectations of creditors and third parties in general;
 - ensure the proper functioning of the corporate bodies and, more generally, of the Company, allowing the Board of Statutory Auditors and the Independent Auditors to carry out their activities. In this context, **it is strictly forbidden** to conceal, in any way or form, documents or engage in conduct that would prevent the Board of Statutory Auditors and the Independent Auditors from carrying out their respective activities, including accounting control.
- The Board of Statutory Auditors, the Independent Auditors, and other entities responsible for controls have free access to data, documentation, and information useful for carrying

out their respective activities.

MARKET AND COMPETITION PROTECTION

All Recipients of the Model are required to comply with the laws governing competition and unfair competition, avoiding any agreement or behavior undertaken in the name and/or on behalf of the Company that may constitute an unlawful restriction of competition.

The Company undertakes, for the proper development of business competition, (i) not to exploit any dominant positions, (ii) to monitor the quality of products and services provided to customers.

All Recipients of the Model **are also prohibited** from:

- damaging, in any way, the image of competing companies and their products;
- disturb the freedom of persons engaged in industrial or commercial activities;
- violating the principles of free competition in any way;
- defrauding or misleading customers, competitors, or public administrations.

It is also prohibited to receive and/or request gifts or favorable treatment that cannot be attributed to normal courtesy relations and, should this occur, the competent manager must be informed.

RELATIONS WITH SUPPLIERS

In its purchasing policies, the Company aims to procure products and/or services by selecting suppliers based on objective and transparent assessments of quality, price, and compliance with the highest standards of *compliance* by the supplier with applicable regulations and the ethical standards set out in the Company's Model.

Company personnel are therefore **required** to:

- behave in a correct, transparent, and cooperative manner, in compliance with the law and internal company procedures, in the selection and management of suppliers;
- verify that business partners and suppliers of goods and/or services have the legal, integrity, and professional requirements necessary to carry out their activities;
- not to hinder any supplier who meets the requirements from competing for the award of a supply contract, adopting objective evaluation criteria in the selection process, in accordance with declared and transparent procedures;
- Furthermore, it is expressly prohibited:
 - granting compensation to third parties, partners, consultants, suppliers, etc. that is not adequately justified in the context of the existing relationship with those third parties;
 - proceeding with the certification of regularity upon receipt of goods/services without careful assessment of merit and suitability in relation to the goods/services received, as well as authorizing payment for goods/services without verifying the suitability of the supply/service in relation to the contractual terms.

RELATIONS WITH EXTERNAL COLLABORATORS

External collaborators are required to comply with the ethical principles set out in this Code of Ethics.

Company personnel, in relation to their duties, must:

- comply with internal principles and procedures for selecting and managing relationships with external collaborators, ensuring that selection is based on objective assessments focusing, among other things, on the external collaborator's compliance with the highest standards of compliance with applicable regulations and the ethical standards set out in the Company's Model;

- only work with qualified individuals and companies of adequate standing.

RELATIONS WITH STAFF

The Company recognizes the central importance of human resources, believing that the main factor in the success of any business is the professional contribution of the people who work there. In managing its personnel, the Company ensures equal opportunities for all, guaranteeing fair treatment based on merit, without discrimination of any kind.

The search and selection of personnel is carried out by the Company based on criteria of objectivity, competence, and professionalism, guaranteeing equal opportunities and aiming to ensure the best skills available on the job market.

All hiring must be based solely on the personal and professional abilities of the candidate, on proven needs, and after verification of compliance with all legal requirements, including the existence of a valid residence permit.

It is prohibited to hire personnel recommended by representatives of the public administration or by persons who have the power to influence the activities of the Company.

Staff are hired under regular employment contracts and no form of irregular work is tolerated, nor is the hiring of foreign nationals whose residence in Italy is irregular. The Company also undertakes to protect the moral integrity of its staff, preventing them from being subjected to unlawful influence or undue hardship. For this reason, any act of psychological violence, as well as any attitude or behavior that is discriminatory or harmful to the person, their beliefs, and their preferences, is strictly prohibited.

In this regard, sexual harassment or intimidating and hostile behavior in internal or external working relationships is not permitted, nor is working under the influence of drugs or consuming or supplying drugs in the workplace tolerated.

RELATIONS WITH INSTITUTIONS AND PUBLIC ADMINISTRATION

In full compliance with their respective roles and functions, the Company maintains relations with public bodies, state and local administrations, public law organizations, etc. In maintaining such relations on behalf of the Company, the Recipients, including consultants, agents, and collaborators of the Company, must strictly comply with the following provisions.

The reports referred to in this point must always be based on the criteria of transparency and professionalism and on recognition of the respective roles and organizational structures.

In this regard:

- it is **strictly forbidden** to offer or promise, directly or through intermediaries, cash gifts or concessions of goods in kind to promote the Company's business or to defend its market positions;
- it is **strictly forbidden** to pay and/or promise, directly or indirectly, money or other benefits to third parties, public officials, public service employees or private individuals, in order to influence or remunerate the performance of their duties or, in any case, to obtain favorable treatment.

Consultants, agents, and all Recipients who may have dealings with the Public Administration on behalf of the Company are required to promptly and transparently disclose any relationship with representatives of the Public Administration, including relatives, so that the Company can assess whether the existence of such a relationship is such as to constitute a conflict of interest that could unduly influence the activity of the Recipient.

The Company expressly prohibits any conduct aimed at circumventing the provisions of this article through the use of different forms of compensation which, under the guise of assignments, consultancies, hires, etc., pursue unlawful purposes.

In particular, and by way of example, in relations with representatives of public institutions and the

public administration in general, whether Italian or foreign, **it is prohibited** to:

- make cash donations to public officials or public service employees belonging to the Public Administration, public bodies, and/or similar entities;
- granting advantages of any kind, including promises of employment, to representatives of the Public Administration or their family members;
- produce false or altered documents and/or data or omit information that should be provided, including for the purpose of obtaining contributions/subsidies/financing or other payments from the State or public bodies or the European Community;
- allocate contributions/subsidies/public funding for purposes other than those for which they were obtained;
- accessing the information systems of the Public Administration in an unauthorized manner to obtain and/or modify information for the benefit of the Company.

All Recipients are required to cooperate loyally with representatives of the Judicial Authority and with any other investigating/inspecting/supervisory body, providing all documentation and information requested by them in a complete, adequate, and timely manner. **It is strictly forbidden** to engage in conduct that could in any way hinder the proper functioning of the Justice system. In this regard, it is strictly forbidden to make false statements to the Judicial Authority and/or any other investigating/inspecting/supervisory body or to engage in conduct (e.g., characterized by violence, threats, offers or promises of money or other benefits) that could induce others to make untrue or false statements in the interest or to the advantage of the Company.

Consultants authorized to interact with public administrations on behalf of the Company must strictly comply with the provisions of Legislative Decree 231/01 and the Model, including this Addendum to the Code of Ethics, by signing specific contractual clauses of commitment to this effect.

SALES AND MARKETING

The commercial and professional integrity and reliability of customers must always be verified.

Furthermore, the Recipients **are expressly prohibited** from:

- making cash or other gifts to customer representatives (including through intermediaries, suppliers, and/or third parties in general), especially where the customer is a public entity/belongs to the Public Administration, in order to influence their actions;
- distributing gifts and presents to improperly influence a Company activity (including through intermediaries, suppliers, and/or third parties in general).

Sales agents and representatives must be selected on the basis of transparency and merit, verifying their reputation and agreeing commissions in line with market standards.

Any gifts may be given to customers, suppliers, and other third parties exclusively on the occasion of holidays or events and in any case in line with the commercial, promotional, and communication purposes and policies established by the Company.

Any sponsorship may be carried out for the sole purpose of positively associating the Company's image with initiatives that reflect its corporate values. Direct sponsorship of Healthcare Professionals for participation in events organized by third parties is prohibited, with the exception of events classified as "Third Party Organized Procedure Trainings" by the Code of Conduct of the MedTech Europe industry association, subject to approval by the Compliance Department.

The Company may not make the financial support offered to any third party (entities, associations, etc.) contingent upon the volume or value of any purchases made by the recipient or by parties related to the recipient (or in anticipation of future purchases).

External communication materials such as images, texts, graphics, and music that the Company

uses for its own communication initiatives must be acquired and used in accordance with copyright laws, if necessary through an external agency.

Information disseminated about the company (e.g., advertising information, news posted on the website, press releases, etc.) must always be true and accurate.

HEALTH, SAFETY, AND THE ENVIRONMENT

The Company pays particular attention to the creation and management of work environments and places that are adequate from the point of view of employee health and safety, in accordance with national and international directives on the subject.

Another primary objective of the Company is to protect and safeguard the health of its human resources in every workplace and under all working conditions. Medical/health prevention activities are carried out in full compliance with the regulations governing workplace safety.

All Company personnel, within the scope of their duties, participate in the process of risk prevention, environmental protection, and health and safety protection for themselves, their colleagues, and third parties.

The Company requires that the Recipients comply with and ensure compliance with (including by their employees and collaborators, with regard to consultants, suppliers, contractors, and external collaborators of the Company) all regulations established by law for the protection of health and safety at work, always acting in accordance with the procedures based on such regulations.

The Company shall take all measures aimed at reducing the environmental impact of its activities, ensuring at all times the availability of adequate financial resources to meet this obligation.

The Company also undertakes to implement measures aimed at raising awareness and respect for the environment among all Recipients, who in turn are required to comply with environmental legislation and applicable internal procedures, as well as the authorizations and requirements laid down by the competent authorities.

USE OF COMPANY ASSETS AND IT SYSTEMS

All personnel are required to work to protect company assets through responsible behavior and in accordance with company regulations. In particular, all personnel are required to

- strictly comply with company safety procedures;
- always use professional language, both in writing and verbally, that is free from elements that could cause offense to individuals and/or damage the company's image.

With particular reference to IT applications, all employees and collaborators of the Company are required to use the hardware and software made available to them, including their company email account, exclusively for purposes related to the performance of their work duties and, in any case, in compliance with the Company's policy.

In particular, each employee and collaborator is required to:

- refrain from using, duplicating, reproducing, transmitting, publishing, importing, distributing, selling, marketing, leasing or in any other way making use of programs, applications, logos, images or other video, audio, computer or other material without a license or authorization or, in any case, in violation of copyright or industrial property laws;
- refrain from providing means to remove or circumvent protection devices on web or computer programs;
- not to browse websites with indecent or offensive content;
- not to disclose to other employees or third parties their login credentials for the network, company IT systems, management system, and other software;

Recipients who hold smart cards and other electronic signature or online transaction validation

devices (e.g., bank tokens) are required to use them strictly for personal use, except in the case of specific written authorizations.

It is expressly prohibited:

- engaging in any conduct that alters the functioning of computer or telecommunications systems and/or manipulates the data contained therein, which is likely to cause unjust damage to others, as well as any conduct aimed at gaining unauthorized access to or remaining within a computer or telecommunications system belonging to others or, in any case, against the will of the owner;
- downloading unlicensed software or, in any case, using software or other tools for work purposes in violation of the industrial property rights of third parties;
- entering other people's computer networks against the owner's will and damaging other people's computer networks, as well as downloading software or acquiring hardware for such purposes.

COMPLIANCE WITH THE LAW AND RELATIONS WITH THIRD PARTIES

The Company, in compliance with the law and democratic values underlying the Italian legal system, undertakes not to provide any form of direct or indirect financing, nor to facilitate in any way groups, associations, or individuals pursuing illegal aims (e.g., terrorist aims) or operating in violation of human rights or regulations protecting the individual personality.

It is mandatory to observe internal precautions and procedures aimed at preventing the risk of the Company becoming involved, in any form, in the activities of criminal organizations, whether national or international, established for any purpose. In particular, it is prohibited to establish any working or commercial relationship with natural or legal persons who participate in any form in criminal organizations, whether national or international.

PREVENTION OF MONEY LAUNDERING

The Company carries out its activities in full compliance, both formally and substantially, with current anti-money laundering legislation and the provisions issued by the competent authorities, undertaking to refuse to carry out transactions that are suspicious in terms of correctness and transparency.

The Recipients are therefore required to:

- to verify in advance the information available on commercial counterparties, customers, suppliers, partners, and consultants in order to ascertain their respectability and the legitimacy of their activities before establishing business relationships with them;
- operate in such a way as to avoid any involvement in transactions that are likely, even potentially, to facilitate the laundering of money derived from illegal or criminal activities, acting in full compliance with primary and secondary anti-money laundering legislation and internal control procedures.

RESPONSIBILITY OF THE RECIPIENTS

All employees and collaborators of the Company are required to conduct their work in accordance with the principles of professionalism, transparency, fairness, and honesty, contributing with colleagues, superiors, and subordinates to the pursuit of the Company's mission, in compliance with the provisions of the Code of Conduct and this Addendum.

All employees and collaborators of the Company must always work within the Company in full compliance with company regulations and procedures, observing the rules established by law and by their employment or service contract.

Each employee and collaborator of the Company is responsible for the actions taken in the

performance of their work. In particular, all those who perform managerial functions, as well as managers with personnel management functions, will also be responsible for the activities carried out by the personnel under their direction and control.

CONFIDENTIALITY

All Orthofix employees and collaborators are required to maintain strict confidentiality regarding information, documents, studies, initiatives, projects, contracts, plans, etc., which they become aware of as a result of their work, with particular reference to those that may compromise the image or interests of customers and the Company.

Orthofix implements appropriate measures to protect the information it manages and prevent it from being accessed by unauthorized personnel.

All information, in particular that acquired in the course of activities carried out for customers, must be considered confidential and may not be disclosed to third parties or used to obtain direct or indirect personal gain.

IMPLEMENTATION

COMMUNICATION AND TRAINING

The Orthofix Medical Inc. Code of Business Conduct and this Addendum, also as an integral part of the Company Model, are brought to the attention of the Company's corporate bodies, employees, collaborators, and *business partners* in the most effective and widespread manner possible, in accordance with the procedures set out in the Model.

REPORTING

Any representative of the Company who becomes aware of possible violations of this Addendum or of conduct that does not comply with the rules of conduct adopted by the Company **is required to report it immediately** using the following channels:

1. Email address ODV@orthofix.it, access to which is restricted to members of the SB; or
2. Ordinary mail to the Company's registered office in Bussolengo (VR), 37012, Via delle Nazioni, 9, marked "*confidential and confidential*";

as well as through the Group channels available, such as, in particular:

- the [Ethics Point](#) IT platform;
- the Corporate Hotline, at the toll-free number 800-786907 (for calls from Italy);
- the dedicated email address of the Compliance department: compliance@orthofix.com

Anyone who reports a violation in good faith will be protected from any retaliation. Any report made in bad faith will be treated as a disciplinary offense.

VIOLATIONS AND SANCTIONS

The obligation to comply with and observe the rules contained in the Code of Conduct and this Addendum is to be considered an essential and constituent part of the contractual obligations provided for all internal and external parties working for the company.

In line with its rigorous approach to this matter, the Company will treat any violation as a disciplinary offense in relation to employees and as a breach of contract in relation to collaborators and other third parties.

The type and severity of the sanctions to be imposed shall be proportionate to the following general criteria:

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- the seriousness of the breach;
- level of hierarchical and/or technical responsibility of the perpetrator of the violation;
- subjective element of the conduct (distinction between intent and negligence);
- the significance of the obligations breached;
- consequences for the Company;
- possible involvement of other parties in the liability;
- aggravating or mitigating circumstances, with particular regard to professionalism, previous work performance, previous disciplinary measures, and the circumstances in which the act was committed.

The seriousness of the infringement will be assessed on the basis of the following circumstances:

- the timing and specific manner in which the violation was committed;
- the presence and intensity of intent;
- the extent of the damage or danger resulting from the infringement for the company and its employees;
- the foreseeability of the consequences;
- the circumstances in which the violation took place.

Violation by the Recipients of the provisions contained in the Code of Conduct and this Addendum will result in the application of the sanctions provided for in Chapter 7 of the General Section of the Company Model.



Corporate Code of Conduct



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Our Vision

The unrivaled partner in Med Tech, delivering exceptional experiences and life-changing solutions

Our Mission

We provide medical technologies that heal musculoskeletal pathologies. We enable our teams through opportunities for growth, ownership of responsibilities, and empowerment to execute. We do this for patients and the healthcare professionals who treat them. We collaborate with world-class surgeons and other partners to bring to market highly innovative, cost-effective, and user-friendly medical technologies through excellent customer service. We do this to improve people's quality of life, and in doing so, create exceptional value for our customers, employees, and stockholders.

Scope

This Code of Business Conduct ("**Code**") defines the standard for corporate conduct for Orthofix Medical, Inc., its subsidiaries and worldwide affiliates ("**Orthofix**" or the "**Company**"), and outlines the expectations for ethical conduct applicable to Orthofix directors, officers, and employees ("**Orthofix Personnel**"), as well as anyone acting on Orthofix's behalf, Orthofix suppliers, and those who provide manufacturing goods and services to Orthofix ("**Associates**").

The Code covers a wide spectrum of topics but cannot cover every issue that may arise. Company policies, procedures, and Employee Handbooks serve as supplements to this Code. Orthofix Personnel and Associates must always use good judgment and common sense when acting on behalf of the Company. Orthofix Personnel should ask their supervisors or the Compliance and Legal Departments when unsure about any aspect of the Code or its application in any situation.

What to Know

- ✓ Read and review the Code as well as policies, procedures, and work instructions related to your role.
- ✓ If you have questions, ask.
- ✓ Use common sense and sound judgment when you perform your job.
- ✓ Promptly report potential violations of the law or the Code to your supervisor, Legal, or Compliance Department personnel.
- ✓ If you are a supervisor, ensure your direct reports know they can come to you for questions or concerns and that you are committed to the values and obligations outlined in this Code.
- ✓ Failure to comply with this Code, Company policies, or applicable laws might result in disciplinary action, up to termination of employment for Orthofix Personnel, and contract termination for Associates.
- ✓ You have a responsibility to speak up when you are in a situation or aware of something you believe may violate this Code, the Company's Compliance Program, Orthofix policies and procedures, or the law (collectively, "**Misconduct**").

Purpose

Integrity and personal accountability are core principles that drive Company interactions with customers, patients, shareholders, employees, regulators, and others with whom Orthofix does business. These principles, along with compliance with this Code, other Company policies and applicable laws and regulations, must be top priority among Orthofix Personnel and Associates to preserve the Company's reputation and ensure our long-term success.

The goals of our Code are to prevent and detect wrongdoing by emphasizing the obligation of Orthofix Personnel and Associates to:

- Comply with the law
- Be honest and ethical
- Be respectful, treat others fairly, and protect Company resources
- Be responsible
- Promptly report misconduct
- Be vigilant and speak up

Comply with the Law

Accurate Financial Reporting

Orthofix requires honest and accurate record keeping and reporting of information and data to make responsible business decisions. Orthofix Personnel and Associates must ensure that all documentation, including financial documents, records, quality controls, expense reports, and certifications accurately reflect the true nature of a fact or event and are completed, retained and destroyed in accordance with the Company's document retention and destruction standards.

Internal Controls

It is Orthofix's policy to maintain books, records, and accounts that accurately and fairly reflect all transactions, dispositions of assets and other events that are subject to regulatory record keeping requirements, including generally accepted accounting principles and other applicable rules, regulations, and criteria for preparing financial statements, and for preparing periodic reports filed with the United States Securities Exchange Commission ("**SEC**"). Unrecorded liabilities or funds, regardless of their purpose are not permitted. Likewise, no improper or inaccurate entry may be made on books or records.

Retention of Financial Records

We maintain accurate and complete financial records. These records serve as the basis for managing our business and measuring and fulfilling our obligations to customers, patients, employees, suppliers, and shareholders. These records are also used to demonstrate compliance with tax, regulatory, and financial reporting requirements. No relevant documents may be destroyed during an investigation initiated by authorities or the Company.

Accuracy in Filing Patient Claims

For our Bone Growth Therapies business, accurate billing and submission of claims to third party payers is a top priority. We ensure:

- Accurate billing and submission of claims for only those medically necessary products and services that are provided by eligible Personnel;
- Corrective actions in the event of erroneous claim or bill submissions; and
- Compliance with all applicable laws, regulations, and guidelines.

What to Know

- ✓ Follow all Company accounting, reporting, and control procedures.
- ✓ Never falsify, backdate, intentionally destroy, or otherwise tamper with any records.
- ✓ Accurately and clearly represent the relevant facts and the true nature of a transaction on all documents.
- ✓ Never approve any payments on behalf of Orthofix used for any purpose other than as described by the the documentation supporting the payment.
- ✓ Never misclassify accounts or improperly accelerate or defer expenses or revenues.

Global Compliance

Regardless of where we do business, following applicable local laws, regulations, and Company policies is not only our obligation, but also a precursor to our success. Global laws and regulations can be complex, ever-changing, and vastly different from one country to the next. This is why each of us must be held accountable for knowing the laws, regulations, and Company policies that apply to our individual roles. While it may sound simple to “follow the rules”, it can be difficult in practice – especially in our highly regulated and complex industry. Orthofix Personnel are encouraged to seek guidance from supervisors and other trusted leaders when they encounter situations that seem unclear or difficult to navigate. Likewise, Associates should ask an Orthofix business contact if questions or concerns arise.

Anti-Bribery and Anti-Corruption

We understand that our actions directly impact the communities we serve and the life sciences industry at large. In alignment with this commitment, we strictly adhere to a zero-tolerance policy for bribery and corruption. All Orthofix Personnel and Associates, regardless of position or geographic location, are expected to conduct business in a fair, transparent, and lawful manner. This includes avoiding any direct or indirect actions that could be perceived as offering, promising, giving, accepting, or soliciting anything of value as an attempt to influence a decision or gain an unfair advantage. Our anti-bribery and anti-corruption policies are designed to comply with the laws and regulations of the countries where we operate.

Government Officials

Orthofix interacts with government employees and other officials around the world. You should not do anything that could be viewed as an attempt to improperly influence the decisions of a government, its officials, or its employees, or that could be seen as encouraging government employees or public officials to violate applicable laws, rules, and/or regulations. Never offer or accept gifts or anything of value that could be seen as a bribe or a kickback. If a government employee, or public official requests or demands any such benefit, report this immediately to your supervisor, the Compliance Department, or via the anonymous Compliance Hotline.

Antitrust and Competition

We are committed to fostering healthy competition and complying with all applicable antitrust and competition laws globally. It is fundamental to our mission to innovate and serve our communities ethically and responsibly. We recognize that compliance with these laws is critical to maintain trust and integrity in our highly competitive industry. Therefore, Orthofix Personnel and Associates, regardless of position or location, are required to conduct business in a manner that supports free and fair competition. This includes avoiding any activities that could be viewed as monopolistic, engaging in price fixing, bid rigging, or any other practices that unfairly distort market dynamics. We provide education and resources to our Personnel and Associates to promote understanding and implementation of these requirements in all of our business dealings.

Insider Trading

It is against the law to engage in insider trading. Non-public, material information gained through employment or association with Orthofix cannot be used to buy or sell Orthofix stock or other securities. Likewise, you cannot provide an insider “tip” to others who might use it to make a trade in Orthofix securities or otherwise. Information is considered “material” if a reasonable investor would consider it important in making an investment decision.

Trade Restrictions and Export Controls

Certain countries have laws that regulate the import and export of medical devices, as well as personal information. All Company activities must be conducted in strict compliance with the applicable trade laws of the countries in which we operate. This includes adherence to laws related to sanctions, embargoes, and other trade restrictions. Make sure you are aware of and understand all Orthofix import and export policies and procedures that apply to your job and contact a member of the Legal Department should any questions arise.

Anti-Money Laundering

All financial transactions must be transparent, legal, and comply with both local and international anti-money laundering (“AML”) laws and regulations. Orthofix Personnel and Associates must exercise due diligence in verifying the legitimacy of their dealings, preventing any engagement in or facilitation of money laundering activities.

Compliance with Laws and Regulations

We conduct our business, medical, scientific, and patient activities in compliance with applicable federal, state, local and international laws, rules and regulations that govern the Company, including Orthofix’s participation in federal healthcare programs, United States Food and Drug Administration (“FDA”) requirements, and transparency tracking and reporting requirements. We have established a Compliance program to ensure compliance with such laws and to prevent, detect, and correct violations. If a specific area or topic is not addressed in this Code, Orthofix Personnel or Associates should review Orthofix policies and procedures for additional requirements and guidance, or contact their supervisor or the Compliance Department. If you have any questions or would like to discuss anything relating to the Compliance program, please contact the Compliance Department at compliance@orthofix.com.

On-label Product Promotion

The promotion of medical devices is highly regulated by the FDA and various other regulatory bodies in the countries where we do business. The applicable laws and regulations governing product promotion are designed to make certain that the information that manufacturers provide to health care professionals and patients about the uses, benefits, and risks of medical devices is truthful, not misleading, and based on comprehensive scientific evidence and clinical medicine. Among other things, these laws and regulations generally limit the promotion of medical devices to the cleared or approved uses of the device by the governing regulatory bodies. Accordingly, Orthofix Personnel and Associates must only promote our products for on-label uses. All Orthofix sales and marketing Personnel must be familiar with and understand the on-label uses of products for which they are responsible. They must also ensure that Associates engaged to promote Orthofix products are familiar with and understand the on-label uses of our products.

Approval of Promotional Materials

Only materials that have been approved in accordance with Company policy may be used in connection with the promotion of our products. Both the alteration of approved materials and the use of home-made materials are strictly prohibited.

What to Know

- ✓ Be familiar with and understand the on-label uses of the products you sell or market.
- ✓ Only promote products for on-label uses.
- ✓ Respond to questions from HCPs concerning unapproved or uncleared uses of our products only in accordance with Orthofix policies and procedures.
- ✓ Refer all off-label use requests for information to Regulatory Personnel.
- ✓ Only use Company-approved materials in connection with the promotion of our products.
- ✓ Do not make your own materials or alter any Orthofix-approved promotional materials.

Be Honest and Ethical

Ethical Conduct

All business dealings must be conducted with a high level of integrity, honestly, and free of fraud and deception.

Conflicts of Interest

Orthofix Personnel and Associates must avoid situations where personal interests could conflict with the interests of the Company. In dealing with current or potential customers, suppliers, contractors, and competitors, each employee and contracted Orthofix Associate must act in the best interests of Orthofix to the exclusion of personal advantage. **Any potential conflicts of interest must be immediately disclosed to your supervisor, who will contact the Compliance Department.** In addition, the Audit Committee of the Board of Directors will review and approve all related party transactions, as required by the SEC, the Nasdaq Stock Market, and other regulatory bodies to which Orthofix is subject.

It is the obligation of all Orthofix Personnel and Associates to ensure that they remain free of conflicts of interest in the performance of their responsibilities for the Company. A conflict of interest may occur if your personal interests or activities influence (or appear to influence) your ability to remain objective when performing your job. A conflict of interest may also exist if the demands of any outside activities interfere with your job, or you divert Orthofix resources for your own personal gain.

Orthofix Personnel must not accept or permit any member of their immediate family to accept, any gifts, gratuities, or other favors from any customer, third party, or other person doing or seeking to do business with Orthofix, other than items of nominal value and received for a legitimate business purpose. Any gifts that are not of nominal value should be returned immediately and reported to their supervisor or Human Resources.

Political Contributions

Orthofix encourages employees to participate in the political process. However, in doing so, you may not create the impression that you are speaking or acting on Orthofix's behalf. You may not contribute or donate Orthofix funds, products, services, or other resources to any political cause, party, or candidate. You may make voluntary personal contributions to lawful political causes, parties, or candidates, but it is your responsibility to obey all laws relating to political contributions. If you have questions about making a political contribution, you should contact Orthofix's Compliance Department for further guidance.

Compliance with Labor Laws and Anti-Human Trafficking

We support and protect human rights in all operations. Orthofix complies with applicable labor and employment laws prohibiting any form of child labor or other exploitation of children in the manufacturing and delivery of medical devices, consistent with provisions of the International Labor Organization's Minimum Age Convention of 1973. We promote a safe and healthy working environment free from any form of abuse. Likewise, our contracted Associates must not engage in any forced, indentured, slave, or child labor, nor should they treat employees harshly or inhumanely.

Conflict Minerals

Orthofix understands the importance of ethically sourcing the materials used in manufacturing our medical devices. We acknowledge the significant environmental and human hardships associated with the mining of certain minerals, often called "conflict minerals" which are mined in conditions of armed conflict and human rights abuses. As part of our dedication to corporate

What to Know

- ✓ Promptly report any financial, business, romantic, or family relationship with an Orthofix competitor, customer, or supplier to your supervisor or Compliance personnel.
- ✓ Obtain prior approval from Compliance personnel for any actual or potential conflict of interest with any Orthofix competitor, customer, or supplier.
- ✓ Do not accept gifts that are not of nominal value from third parties seeking to do business with Orthofix.

responsibility, Orthofix is committed to ensuring that our products do not directly or indirectly finance groups engaged in armed conflict and human rights abuses. To that end, we have implemented standards that align with the Dodd-Frank Wall Street Reform and Consumer Protection Act and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Through these standards, we aim to contribute to the global efforts to eradicate the exploitation associated with conflict minerals.

Industry Standards

In addition to adhering to applicable laws and regulations, this Code and Orthofix's policies and procedures include guidance provided by the Advanced Medical Technology Association ("**AdvaMed**"), MedTech Europe ("**MTE**"), and the Medical Device Manufacturers Association ("**MDMA**"). The AdvaMed Code of Ethics on Interactions with Health Care Professionals, the MTE Code of Ethical Business Practice, and the MDMA Code of Conduct outline appropriate and inappropriate interactions with Health Care Professionals, referred to as Health Care Professionals ("**HCPs**").

Gifts and Avoiding the Appearance of Impropriety

The receipt and provision of gifts, meals, or entertainment can be considered normal practice in other industries. However, because the healthcare industry is highly regulated, interactions with HCPs and patients are heavily scrutinized. Accordingly, Orthofix does not use improper business courtesies, relationships, or gifts to conduct or obtain business. All business relationships will be entered into on the basis of a fair market exchange, including factors such as price, quality, performance, service, delivery, and reputation.

We do not provide entertainment or gifts to HCPs. Provision of items could be viewed as an exchange for favorable treatment or advantage. Orthofix Personnel and Associates may provide occasional and modest meals or refreshments in connection with education programs or business meetings in accordance with Orthofix policies and procedures. More detailed information on appropriate interactions with HCPs is included in our policies and procedures. Associates should reference the Orthofix Compliance Manual for more information. Similarly, it is against Orthofix policy to give payments, gifts, or gratuities to patients, whether existing or prospective.

Be Respectful, Treat Others Fairly, and Protect Our Resources

Diversity and Inclusion

Orthofix is committed to creating a workplace where diversity is celebrated, recognizing that our strength lies in our differences. All Orthofix Personnel and Associates must be treated with respect and dignity, regardless of gender identity or expression, sex, color, race, religion, age, sexual orientation, disability, ancestry, marital status, national origin, veteran status, pregnancy, or other characteristic. We strive to create a workplace that reflects the diverse communities we serve, where every employee has the opportunity to thrive, contribute, and grow. Our policies and practices are designed to ensure equity in hiring, promotion, training, and compensation, eliminating barriers to full participation. We actively seek diverse perspectives, believing that innovation flourishes in an inclusive culture

What to Know

- ✓ Do not give any business courtesy that could be viewed as an attempt to gain favorable treatment or advantage.
- ✓ We provide HCP travel and lodging for certain educational and business meetings and in accordance with Orthofix policies.
- ✓ Do not waive a patient's financial obligation unless the patient has a financial hardship that complies with Company policy.

What to Know

- ✓ Do not treat Orthofix Personnel or Associates differently because of their gender identity or expression, sex, color, race, religion, age, sexual orientation, disability, ancestry, marital status, national origin, veteran status, pregnancy, or any other protected characteristic.
- ✓ Ensure your actions and words toward Orthofix Personnel and Associates are respectful and not harassing or discriminatory in violation of policy or law.

where varied viewpoints are welcomed and embraced. Discrimination or harassment of any kind will not be tolerated. This dedication to diversity and inclusion is not just a moral imperative but a strategic advantage that drives our success and innovation in the global marketplace. Orthofix Personnel and Associates must follow all applicable laws related to the prevention of discrimination or harassment at work. If you see, suspect, or experience any form of discrimination or harassment, speak up right away by contacting the Human Resources, Legal, or Compliance Departments, or the Compliance Hotline.

Privacy and Confidentiality

Data Privacy and Data Protection

At Orthofix, we recognize the significance of data belonging to our patients, customers, employees, and others. We understand that data protection plays an integral role in fostering trust and integrity in all of our business endeavors. We are steadfast in our commitment to safeguarding the privacy and security of our stakeholders' data, ensuring it is collected, used, and stored with the utmost respect and confidentiality. To uphold these principles, we adhere to stringent data protection policies, aligned with international best practices and regulatory compliance requirements. Our employees receive continuous training on data privacy laws and ethical handling procedures, emphasizing the importance of individual accountability and proactive data security measures. We work to maintain transparent communication with our patients and customers regarding data usage, obtaining clear authorization, and providing mechanisms for data access and correction, as necessary.

Patient Privacy

All Orthofix Personnel and contracted Orthofix Associates must protect and secure information concerning the treatment, payment, care, and condition of all patients and may not disclose patient information to any unauthorized person. Employees and contracted Orthofix Associates must adhere to all Orthofix policies and procedures regarding compliance with the regulations promulgated under the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") including the Privacy, Security, and Breach Notification Rules, as applicable, and the General Data Protection Regulation ("GDPR"), and similar laws in countries and jurisdictions where Orthofix operates. Orthofix Personnel and Associates are expected to avoid patient care conversations and discussions in areas where visitors and the public may overhear them. Written and electronic-protected health information of patients must never be removed from Orthofix property without proper approval, and must be destroyed in accordance with applicable Orthofix policies and procedures.

Employee Confidentiality

All Orthofix Personnel have an obligation to respect and protect the confidentiality of records regarding the personal information of other employees. Information such as employee name, address, benefits, performance evaluations, credit information, medical information, and employment history is considered confidential and must not be discussed with anyone, including any Orthofix employees (except as required to perform one's job and then only in accordance with applicable Orthofix policies).

Confidential Information

We provide Orthofix Personnel, and at times our Associates, with confidential information with the understanding that such information is to be held in confidence and not communicated to anyone who is not authorized to know it, except as may be required by law. Confidential information includes all non-public information that might be of use to competitors, or harmful to Orthofix or its customers, if disclosed, such as Orthofix's business plans and business strategy documents, product pricing information, merger and acquisition targets and strategy, unannounced product information, contracts, sales data, significant

What to Know

- ✓ Do not discuss or provide Orthofix's confidential business information to anyone outside the Company without approval from the Legal Department.
- ✓ Never remove Orthofix property without prior approval from the Legal or IT Departments, as applicable.
- ✓ Safeguard access to employee and confidential business information.
- ✓ Only share information with fellow employees who have a legitimate need to know the information.

projects, customer and supplier lists, patents, patent applications, trade secrets, manufacturing techniques, marketing plans and strategies, clinical data, non-public financial or other sensitive information. All of these types of information are valuable resources, developed for Orthofix's exclusive benefit. No employee may disclose Orthofix's confidential information to any unauthorized third party or use Orthofix's confidential information for their own personal benefit. Contact the Legal Department if you have any questions about the proper use of confidential information, including licensed property, trademarks, copyright, or other similar topics.

Protect Company Assets

Orthofix property and services must be used for Company business and not for personal benefit. Theft, carelessness, and waste of corporate assets and resources, including paid employment time, have a direct impact on Orthofix's success. Orthofix Personnel and Associates must ensure the Company's assets are utilized efficiently and appropriately for legitimate business purposes.

Proprietary Information

Information, ideas, and intellectual property rights are valuable assets. Information obtained, developed, or produced by Orthofix and Orthofix Personnel and information supplied by others for the benefit of Orthofix are confidential. Information pertaining to Orthofix's competitive position or business strategies, and payment and reimbursement information is confidential. This information should not be shared with anyone outside of Orthofix and should be shared only with employees who have a legitimate need to know such information to perform their job responsibilities and who have agreed to maintain the confidentiality of the information.

Be Responsible

Environmental Protection and Responsibility

Orthofix cares about our planet and our communities, and we are committed to embedding sustainability throughout our business. We strive to maintain a clean and healthy environment, and to this end, we comply with all federal, state, local, and international environmental protection laws.

Orthofix Personnel are expected to support the Company's efforts to reduce our global environmental impact.

Occupational Safety and Health

Orthofix seeks to maintain a safe and healthy workplace. This includes compliance with applicable environmental, health, and safety requirements. To protect safety, Orthofix Personnel must safely manage hazardous materials and waste from point of entry to the point of final disposal. All hazardous material and other waste products must be identified, handled, labeled, and disposed of according to Orthofix policies and procedures.

What to Know

- ✓ Dispose of regulated medical waste or other waste according to Orthofix policies and procedures.
- ✓ Comply with Orthofix policies and procedures on waste and disposal recycling.
- ✓ Report any spills, leaks, or unsafe storage of hazardous materials or waste.
- ✓ Wear the proper personal protective equipment and clothing designed to safely handle materials.
- ✓ Caution anyone else handling hazardous materials improperly and report violations of policies and procedures accordingly.

Substance Abuse

The possession, consumption, sale or purchase of recreational drugs or alcohol on Orthofix property or during Company events is prohibited. Orthofix prohibits the use of recreational drugs or alcohol before or during the workday. The use of prescription or over-the-counter medications that may impair abilities to perform job functions must be taken in accordance with medical and prescription instructions and with precaution. The Company may occasionally approve limited alcohol availability for specific Company-sponsored functions, such as business dinners and events.

What to Know

- ✓ Never drink alcohol before or during work hours or have possession of or use illegal drugs.
- ✓ Help to maintain a safe and healthy working environment.

Product Quality

Above all, we are dedicated to improving patients' lives through high-quality products, procedures, and services. This includes making products that are safe and effective, and raising concerns related to product quality or safety. We also must report certain adverse events, product complaints, or medical device reports to applicable regulatory authorities, such as the FDA. It is every employee's responsibility to implement our quality management system and to comply with all Company quality system policies and procedures.

Communications

Marketing and Advertising Activities

Orthofix is committed to ensuring that communications and interactions on our products are truthful, accurate, non-misleading, balanced, substantiated by legitimate evidence, advance patient care, and otherwise comply with applicable federal healthcare program and FDA requirements, and the rules and regulations of the countries where we sell our products. In jurisdictions where marketing medical devices is permissible, in conducting marketing and advertising activities, Orthofix Personnel and Associates may offer factual information and documented evidence to the general public about our products. Marketing and advertising should not distort the truth or make false claims intended to attack or disparage our competitors. Orthofix Personnel and Associates must also abide by our policies and procedures when using social media, especially when referring to our Company and our products.

Public Statements

Because we are a publicly-traded company, we are subject to securities laws. This means that any public statements that could possibly be attributed to Orthofix should be carefully considered. Orthofix Personnel may not speak publicly for Orthofix unless specifically authorized to do so by appropriate members of management. Orthofix Personnel may not associate Orthofix with, or imply a Company endorsement of, any personal or social political activity, unless authorized by Orthofix to do so. Orthofix Personnel may not use Company letterhead or titles in personal communications or communications involving non-Orthofix business.

Be Vigilant and Speak Up

Seeking Guidance and Reporting Potential Compliance Violations

If you have questions about or need help with any legal, compliance, or ethics-related issue, you should contact your supervisor or a member of leadership with whom you feel comfortable. Discussions will be kept confidential, as appropriate. If you are not comfortable speaking with your direct supervisor, you may also reach out to the Legal or Compliance Departments for guidance.

Orthofix maintains a confidential Hotline for Orthofix Personnel and Associates who have legal or compliance questions, concerns, or problems. The Hotline may also be used for reporting suspected violations of this Code, the Compliance Program, Orthofix policies and procedures, and applicable laws and regulations.

Orthofix Personnel and Associates have an obligation to immediately report any suspected violations of the Code or other irregularities to their supervisor, the confidential Hotline, or the Compliance Department.

Compliance Hotline

In the United States, you may contact the Compliance Hotline at **1-855-603-6985** or via the internet at www.orthofix.ethicspoint.com and follow the on-screen instructions. International toll-free numbers are also listed on the Hotline website. The Hotline is available in several languages, including in all the languages where we have operations. You may ask your questions or report suspected violations anonymously as long as doing so is permissible under local laws.

The Compliance Hotline is managed by an unrelated third party – meaning other Orthofix Employees do not intake reports. You can be assured the Hotline is independent, secure, and confidential.

Non-retaliation

Orthofix Personnel will not be disciplined or terminated for merely reporting a suspected violation in good faith. However, please note that if you self-report misconduct, you may be subject to disciplinary action depending on the outcome of any follow up investigation into your misconduct. In such instances, voluntary disclosure of misconduct may result in a lesser penalty.

What to Know

- ✓ Contact your supervisor or the Compliance Department about any questions you have regarding the Code.
- ✓ Promptly report violations of any law, regulations, this Code, the Compliance Program, or Orthofix's policies and procedures to your supervisor or the Compliance Department, or call the Compliance Hotline.
- ✓ Include in your report all information necessary to ensure that the Compliance Department can complete an accurate and thorough review.



MOGC 231/01 di Orthofix S.r.l. V.8, 2025

Allegato 1 | Addendum al Codice di Condotta Aziendale del Gruppo Orthofix

<https://orthofix.com/about/compliance/>

Addendum al Codice di Condotta Aziendale del Gruppo Orthofix

PREMESSA

Orthofix Medical Inc. e tutte le sue consociate, inclusa Orthofix S.r.l. (la “**Società**” o “**Orthofix**”) hanno adottato un *Corporate Code of Conduct* (il “**Codice di Condotta Aziendale**”), i cui principi sono qui integralmente richiamati ed il cui rispetto è obbligatorio per tutti i destinatari del modello di organizzazione, gestione e controllo della Società (il “**Modello**”).

In aggiunta al predetto Codice di Condotta Aziendale, la Società ha inteso adottare il presente Addendum, che contiene una serie di principi e doveri di condotta che la Società ritiene imprescindibili per una corretta gestione delle attività da parte di tutti i Destinatari del Modello, anche in relazione a quanto disposto dal D. Lgs. 231/01 e dalle linee guida emanate dalle associazioni di categoria, richiamate nella Parte Generale del Modello.

Il Codice di Condotta Aziendale di Orthofix Medical Inc. e il presente Addendum costituiscono, dunque, un sistema organico di principi, valori, e regole etiche che Orthofix ritiene fondamentali ed irrinunciabili per la conduzione di ogni attività aziendale, e di cui richiede la più attenta osservanza ai componenti degli organi sociali e del management, ai dipendenti della Società, nonché a tutti coloro che operano, anche di fatto, per la Società, ivi compresi i soggetti terzi quali, a titolo meramente esemplificativo e non esaustivo, agenti, collaboratori, consulenti, etc. (i “**Destinatari**”).

La Società, infatti, ritiene preminente rispetto a qualunque esigenza commerciale la necessità di rispettare (e far rispettare a chiunque si interfacci con essa) i più elevati standard etici e di trasparenza.

Orthofix, pertanto, pretende che tutti coloro che hanno ed intendono avere rapporti giuridici con la Società adottino una condotta conforme alle disposizioni di cui al Codice di Condotta Aziendale di Orthofix Medical Inc. e di cui al presente Addendum.

PRINCIPI DI COMPORTAMENTO

FLUSSI FINANZIARI, BILANCIO E SCRITTURE CONTABILI

- I flussi finanziari in entrata e, in particolare, in uscita devono essere supportati da idoneo processo approvativo e devono altresì essere sempre tracciabili e documentabili. Al proposito, **è assolutamente vietato** effettuare qualsiasi tipo di pagamento senza idonea documentazione giustificativa e/o senza provvedere alla relativa contabilizzazione ed accordare compensi o effettuare prestazioni in favore di terzi, consulenti, fornitori, etc. che non trovino adeguata giustificazione nel contesto del rapporto in essere.
- La contabilità della Società è rigorosamente improntata ai principi generali di verità, accuratezza, completezza, chiarezza e trasparenza del dato registrato.
- I fatti di gestione devono essere rappresentati in modo corretto, completo e tempestivo nella contabilità e nelle basi dati aziendali.
- Ogni transazione contabile deve essere legittima, autorizzata, coerente, congrua,

registrata, tracciata e adeguatamente documentata, nel rispetto, formale e sostanziale, della normativa e delle procedure tempo per tempo in vigore, al fine di consentirne in qualsiasi momento la completa ricostruzione.

- A tal fine, ogni Destinatario che effettui operazioni e/o transazioni aventi ad oggetto somme di denaro, beni, o altre utilità economicamente valutabili, appartenenti alla Società, deve agire su specifica autorizzazione e fornire a richiesta ogni evidenza per la sua verifica in ogni tempo. I soggetti delegati devono operare nel rispetto dei poteri di rappresentanza, delle deleghe e delle procure loro conferite.
- Ogni dichiarazione fiscale deve basarsi su risultanze contabili veritiere e rappresentanti operazioni legittime, esistenti e correttamente registrate.
- Le imposte dovute devono essere pagate con la massima puntualità. Inoltre, **è fatto obbligo** di calcolare le imposte dovute nel più rigoroso rispetto della normativa applicabile e di provvedere tempestivamente al loro versamento.
- La Società assicura il rispetto dei principi di comportamento tesi a garantire (i) l'integrità del capitale sociale, (ii) la tutela dei creditori e dei terzi che instaurano rapporti con la Società, (iii) il regolare andamento del mercato, (iv) l'esercizio delle funzioni delle Autorità pubbliche di vigilanza e, in genere, (v) la trasparenza e la correttezza delle attività condotte dalla Società sia sotto il profilo economico e che finanziario.
- In particolare, ai Destinatari del Modello è fatto **espresso obbligo** di:
 - rispettare scrupolosamente le norme che presiedono la predisposizione del bilancio e la tenuta delle scritture contabili, inclusi i principi contabili di riferimento;
 - tenere un comportamento corretto, trasparente e collaborativo, nel rispetto delle norme di legge e delle procedure aziendali, in tutte le attività finalizzate alla formazione del bilancio, delle situazioni patrimoniali e contabili di periodo e delle comunicazioni sociali in genere, al fine di fornire ai destinatari di tali comunicazioni (soci, creditori e terzi in genere) un'informazione rispondente al vero e corretta sullo stato economico, patrimoniale e finanziario in cui versa la Società. Più precisamente, in questo contesto, **è assolutamente vietato** predisporre, redigere, trasmettere e/o comunicare, in qualsivoglia modo e forma, dati e informazioni inesatti, errati, incompleti, lacunosi e/o falsi aventi ad oggetto la situazione contabile della Società, il suo stato patrimoniale, economico e finanziario, ovvero compiere qualsivoglia omissione nella predisposizione, redazione, trasmissione e/o comunicazione di tali dati e/o informazioni. Inoltre, tutti i Destinatari sono tenuti a segnalare eventuali registrazioni illegittime, non corrette, false o che corrispondano ad operazioni sospette o in conflitto di interessi;
 - osservare con la massima diligenza e rigore tutte le disposizioni legislativamente previste a tutela dell'integrità e conservazione del capitale sociale; tutto ciò allo scopo di non ledere in alcun modo il legittimo affidamento riposto dei creditori e dei terzi in genere;
 - garantire il corretto funzionamento degli organi sociali e più in generale della Società, consentendo lo svolgimento delle attività del Collegio Sindacale e della Società di Revisione. In questo ambito, **è assolutamente vietato** occultare, in qualsiasi modo e forma, documenti o porre in essere comportamenti tali da impedire al Collegio Sindacale e alla Società di Revisione di svolgere le attività di rispettiva competenza, ivi incluso il controllo contabile.
- Il Collegio Sindacale, la Società di Revisione e gli altri soggetti incaricati dei controlli hanno libero accesso ai dati, alla documentazione e alle informazioni utili per lo svolgimento delle rispettive attività.

TUTELA DEL MERCATO E DELLA CONCORRENZA

Tutti i Destinatari del Modello sono tenuti a rispettare le leggi dettate in materia di concorrenza

evitando che qualsiasi accordo o comportamento assunto in nome e/o per conto della Società possa costituire una illecita limitazione della concorrenza.

La Società si impegna, per un corretto sviluppo della concorrenza imprenditoriale, (i) a non sfruttare eventuali posizioni risultanti dominanti, (ii) a vigilare sulla qualità dei prodotti e servizi forniti ai clienti.

A tutti i Destinatari del Modello **è altresì vietato**:

- danneggiare, in qualsiasi modo, l'immagine delle aziende concorrenti e dei loro prodotti;
- turbare la libertà dei soggetti che svolgono attività industriali o commerciali;
- violare in qualunque modo i principi della libera concorrenza;
- frodare o trarre in inganno clienti, concorrenti o Pubbliche Amministrazioni.

È altresì vietato ricevere e/o richiedere omaggi o trattamenti di favore non attribuibili a normali relazioni di cortesia e, nell'ipotesi in cui questo si verifichi, dovrà essere informato il responsabile competente.

RAPPORTI CON I FORNITORI

La Società, nelle sue politiche di acquisto, ha l'obiettivo di approvvigionarsi di prodotti e/o servizi selezionando i fornitori in base a valutazioni obiettive e trasparenti aventi ad oggetto la qualità, il prezzo e il rispetto dei più elevati standard di *compliance* da parte del fornitore alle normative applicabili ed agli standard etici di cui al Modello della Società.

È fatto quindi **obbligo** al personale della Società di:

- di tenere un comportamento corretto, trasparente e collaborativo, nel rispetto delle norme di legge e delle procedure aziendali interne, nella selezione e nella gestione dei fornitori;
- di verificare che i partner commerciali e di fornitori di beni e/o servizi abbiano i requisiti legali, di onorabilità e professionalità necessari per svolgere l'attività;
- non ostacolare ad alcun fornitore in possesso dei requisiti richiesti la possibilità di concorrere per l'assegnazione di una fornitura, adottando nella selezione criteri di valutazione oggettivi, secondo modalità dichiarate e trasparenti;
- Inoltre, è espressamente vietato:
- accordare compensi a terzi, partner, consulenti, fornitori, ecc. che non trovino adeguata giustificazione nel contesto del rapporto in essere con i terzi medesimi;
- procedere all'attestazione di regolarità in fase di ricezione di beni/servizi in assenza di un'attenta valutazione di merito e di congruità in relazione al bene/servizio ricevuto, nonché di procedere all'autorizzazione al pagamento di beni/servizi in assenza di una verifica circa la congruità della fornitura/prestazione rispetto ai termini contrattuali.

RAPPORTI CON I COLLABORATORI ESTERNI

Ai collaboratori esterni è richiesto di attenersi ai principi etici di cui al presente Codice Etico.

Il personale della Società, in rapporto alle proprie funzioni, dovrà:

- rispettare i principi e le procedure interne per la selezione e la gestione del rapporto con collaboratori esterni, assicurandosi che la selezione avvenga in base a valutazioni obiettive aventi ad oggetto, tra l'altro, il rispetto dei più elevati standard di compliance da parte del collaboratore esterno alle normative applicabili ed agli standard etici di cui al Modello della Società;
- operare solo con persone e imprese qualificate e di adeguato standing.

RAPPORTI CON IL PERSONALE

La Società riconosce la centralità delle risorse umane nella convinzione che il principale fattore di successo di ogni impresa sia costituito dal contributo professionale delle persone che vi operano. Nella gestione del personale, la Società assicura a tutti le medesime opportunità, garantendo un trattamento equo basato su criteri di merito, senza discriminazione alcuna.

La ricerca e la selezione del personale è effettuata dalla Società in base a criteri di oggettività, competenza e professionalità, garantendo pari opportunità e mirando ad assicurare le migliori competenze esistenti sul mercato del lavoro.

Ogni assunzione deve essere effettuata esclusivamente sulla base delle capacità personali e professionali del candidato, sulla base di comprovate esigenze e previa verifica del rispetto di tutti i requisiti di legge, inclusa la sussistenza di valido permesso di soggiorno.

È vietato assumere personale segnalato da rappresentanti della P.A. o comunque da persone che abbiano potere di influenzare le attività della Società.

Il personale è assunto con regolare contratto di lavoro e non è tollerata alcuna forma di lavoro irregolare, né di assunzione di cittadini stranieri il cui soggiorno in Italia è irregolare. La Società si impegna inoltre a tutelare l'integrità morale del personale, evitando che questo subisca illeciti condizionamenti o indebiti disagi. Per tale ragione è severamente vietato ogni atto di violenza psicologica, nonché qualsiasi atteggiamento o comportamento discriminatorio o lesivo della persona, delle sue convinzioni e delle sue preferenze.

In tale ottica, non sono permesse molestie sessuali o atteggiamenti intimidatori e ostili nelle relazioni di lavoro interne o esterne, così come non viene tollerato, nel corso dell'attività lavorativa e nei luoghi di lavoro, prestare servizio sotto l'effetto di sostanze stupefacenti o consumare o cedere sostanze stupefacenti.

I RAPPORTI CON LE ISTITUZIONI E LA PUBBLICA AMMINISTRAZIONE

Nel pieno rispetto dei rispettivi ruoli e funzioni, la Società intrattiene rapporti con enti pubblici, amministrazioni dello Stato e locali, organizzazioni di diritto pubblico etc. Nell'intrattenere tali rapporti per conto della Società, i Destinatari, inclusi consulenti, agenti e collaboratori della Società, devono rispettare rigorosamente le disposizioni che seguono.

I rapporti di cui al presente punto devono essere sempre improntati ai criteri di trasparenza e professionalità e al riconoscimento dei rispettivi ruoli e strutture organizzative.

In tale ottica:

- è **severamente vietato** offrire o promettere, direttamente o attraverso intermediari, elargizioni in denaro o concessioni di beni in natura per promuovere l'attività della Società o per difendere le proprie posizioni di mercato;
- è **severamente vietato** corrispondere e/o promettere, direttamente o indirettamente, denaro o altra utilità a terzi, pubblici ufficiali, incaricati di pubblico servizio o privati, per condizionare o remunerare l'operato del loro ufficio o, comunque, per acquisire trattamenti di favore.

I consulenti, gli agenti e tutti i Destinatari che possano intrattenere rapporti con la Pubblica Amministrazione per conto della Società sono tenuti a comunicare tempestivamente e con la massima trasparenza qualunque rapporto con esponenti della Pubblica Amministrazione, anche di parentela, proprio o di dipendenti/collaboratori, in modo che la Società possa valutare se l'esistenza di tale rapporto sia tale da costituire un conflitto di interessi idoneo a condizionare indebitamente l'attività del Destinatario.

La Società vieta espressamente ogni comportamento volto a eludere le prescrizioni di cui al presente articolo mediante il ricorso a forme diverse di compensi che, sotto veste di incarichi, consulenze, assunzioni, etc., perseguano finalità illecite.

In particolare, e in via esemplificativa, nei rapporti con rappresentanti delle istituzioni pubbliche e della Pubblica Amministrazione in genere, italiana od estera, **è vietato**:

- effettuare elargizioni in denaro a pubblici ufficiali o incaricati di un pubblico servizio appartenenti alla Pubblica Amministrazione agli enti pubblici e/o dei soggetti ad essi assimilati;
- accordare vantaggi di qualsiasi natura, incluse promesse di assunzione, in favore di rappresentanti della P.A. o a loro familiari;
- produrre documenti e/o dati falsi o alterati od omettere informazioni dovute, anche al fine di ottenere contributi/sovvenzioni/finanziamenti o altre erogazioni da parte dello Stato o di enti pubblici o della Comunità Europea;
- destinare contributi/sovvenzioni/finanziamenti pubblici a finalità diverse da quelle per le quali sono stati ottenuti;
- accedere in maniera non autorizzata ai sistemi informativi della Pubblica Amministrazione per ottenere e/o modificare informazioni a vantaggio della Società.

È fatto obbligo a tutti i Destinatari di collaborare lealmente con i rappresentanti dell'Autorità Giudiziaria e con qualsivoglia altro organo inquirente/ispettivo/di vigilanza, fornendo tutta la documentazione e le informazioni richieste dai medesimi in maniera completa, adeguata e tempestiva. **È tassativamente vietato** tenere comportamenti che possano in qualunque modo ostacolare il regolare funzionamento della Giustizia. In ordine a tale punto, è fatto particolare divieto di rendere dichiarazioni mendaci all'Autorità Giudiziaria e/o a qualsivoglia altro organo inquirente/ispettivo/di vigilanza o tenere comportamenti (ad es. caratterizzati da violenza, minaccia, offerta o promessa di denaro o altra utilità) che possano indurre altri a rendere dichiarazioni non veritiere o mendaci nell'interesse o a vantaggio della Società.

I consulenti autorizzati a interloquire con le Pubbliche Amministrazioni per conto della Società devono attenersi scrupolosamente a quanto previsto nel D.lgs. 231/01 e nel Modello, incluso il presente Addendum al Codice Etico, sottoscrivendo apposite clausole contrattuali di impegno in tal senso.

VENDITE E MARKETING

Deve essere sempre verificata la rispettabilità e l'attendibilità commerciale e professionale dei clienti.

Ai Destinatari, inoltre, **è espressamente vietato**:

- effettuare elargizioni in denaro o altra utilità a favore di rappresentanti di clienti (anche attraverso intermediari, fornitori e/o terzi in generale), specie laddove il cliente sia un soggetto di diritto pubblico / appartenente alla Pubblica Amministrazione, al fine di influenzarne l'operato;
- distribuire omaggi e regali, per influenzare impropriamente un'attività della Società (anche attraverso intermediari, fornitori e/o terzi in generale).

Gli agenti e rappresentanti di vendita devono essere selezionati con criteri di trasparenza e merito, verificando la reputazione dei medesimi ed accordando provvigioni in linea con gli standard di mercato.

Eventuali omaggi possono essere erogati a clienti, fornitori ed altri terzi esclusivamente in occasione di festività o eventi e comunque in linea con gli scopi e le politiche commerciali, di promozione e di comunicazione stabilite dalla Società.

Eventuali sponsorizzazioni possono essere effettuate al solo fine di associare positivamente l'immagine della Società ad iniziative che riflettano i valori aziendali. Sono comunque vietate le sponsorizzazioni dirette nei confronti di Operatori Sanitari per la partecipazione ad eventi organizzati da soggetti terzi, ad eccezione – e previa approvazione da parte del Dipartimento Compliance – degli eventi qualificati come "Third Party Organized Procedure Trainings" dal Codice

di condotta dell'associazione industriale MedTech Europe.

La Società non può commisurare il sostegno finanziario offerto a qualsiasi soggetto terzo (enti, associazioni, ecc.) al volume o al valore di eventuali acquisti fatti dal destinatario o da soggetti collegati a quest'ultimo (o in previsione di acquisti futuri).

I materiali di comunicazione di provenienza esterna quali ad esempio immagini, testi, grafica, brani musicali, che l'Azienda utilizzi per proprie iniziative di comunicazione devono essere acquisiti e utilizzati in conformità alle norme sui diritti d'autore, se del caso tramite incarico ad agenzia esterna;

Le informazioni diffuse inerenti all'azienda (ad esempio le informazioni pubblicitarie, le notizie inserite nel sito internet, i comunicati stampa, ecc.) devono essere sempre vere e corrette.

SALUTE, SICUREZZA E AMBIENTE

La Società pone particolare attenzione alla creazione ed alla gestione di ambienti e luoghi di lavoro adeguati dal punto di vista della sicurezza e della salute dei dipendenti, in conformità alle direttive nazionali ed internazionali in materia.

Atro obiettivo primario della Società è quello di proteggere e tutelare la salute delle proprie risorse umane in ogni luogo e condizione di lavoro. L'attività di prevenzione medico/sanitaria avviene nel pieno rispetto delle norme dettate in tema di sicurezza degli ambienti.

Tutto il personale della Società, nell'ambito delle proprie mansioni, partecipa al processo di prevenzione dei rischi, di salvaguardia dell'ambiente e di tutela della salute e della sicurezza nei confronti di sé stessi, dei colleghi e dei terzi.

La Società esige che i Destinatari osservino e facciano osservare scrupolosamente (anche ai propri dipendenti e collaboratori, per ciò che riguarda consulenti, fornitori, appaltatori e collaboratori esterni della Società) tutte le norme poste dalla legge a tutela della sicurezza ed igiene sul lavoro, agendo sempre nel rispetto delle procedure che su tali norme si fondano.

La Società adotta tutte le misure finalizzate a ridurre l'impatto ambientale delle proprie attività, garantendo in ogni momento la disponibilità di adeguati mezzi finanziari per far fronte a tale obbligo.

La Società si impegna, inoltre, a porre in essere misure volte a sensibilizzare l'attenzione ed il rispetto verso l'ambiente da parte di tutti i Destinatari, i quali a loro volta sono tenuti ad osservare la normativa ambientale e le procedure interne applicabili in materia, nonché le autorizzazioni e le prescrizioni dettate dalle autorità competenti.

UTILIZZO DEI BENI E DEI SISTEMI INFORMATICI AZIENDALI

Tutto il personale è tenuto ad operare per la tutela dei beni aziendali, attraverso comportamenti responsabili ed in accordo con le disposizioni aziendali, ed in particolare tutto il personale è tenuto a

- rispettare scrupolosamente quanto previsto dalle procedure di sicurezza aziendali;
- usare sempre, in forma scritta e verbale, un linguaggio professionale e privo di elementi che possano recare offesa alla persona e/o danno all'immagine aziendale.

Con particolare riferimento alle applicazioni informatiche, ogni dipendente e collaboratore della Società ha l'obbligo di utilizzare le dotazioni hardware e software messe a sua disposizione, inclusa la casella email aziendale, esclusivamente per finalità connesse allo svolgimento delle proprie mansioni lavorative e, comunque, nel rispetto della policy della Società.

In particolare, ciascun dipendente e collaboratore è tenuto:

- ad astenersi dall'utilizzare, duplicare, riprodurre, trasmettere, pubblicare, importare, distribuire, vendere, commercializzare, concedere in locazione ovvero, in qualunque altro modo, fare uso di programmi, applicazioni, loghi, immagini o altro materiale video, audio, informatico o di altro genere, senza licenza o autorizzazione o, comunque, in violazione della normativa a tutela del diritto d'autore o della proprietà industriale;
- ad astenersi dal predisporre mezzi per rimuovere o eludere dispositivi di protezione dei

programmi per elaboratore;

- a non navigare su siti web caratterizzati da contenuti indecorosi ed offensivi;
- a non comunicare ad altri dipendenti o a terzi le proprie credenziali di accesso alla rete, ai sistemi informatici aziendali, al sistema gestionale e ad altri software;

I Destinatari titolari di smart card e di altri dispositivi di firma elettronica o di validazione di transazioni online (e.g. token bancari) sono tenuti ad un uso strettamente personale dei medesimi, salvo il caso di apposite deleghe scritte.

È espressamente vietato:

- porre in essere qualsivoglia condotta di alterazione del funzionamento di sistemi informatici o telematici e/o di manipolazione dei dati in essi contenuti, che sia idonea ad arrecare ad altri un danno ingiusto, nonché ogni condotta volta ad introdursi o permanere all'interno di un sistema informatico o telematico altrui abusivamente o, comunque, contro la volontà del proprietario;
- scaricare software privi di licenza o, in ogni caso, utilizzare per fini lavorativi software o altri strumenti in violazione dei diritti di privativa industriale di terzi;
- introdursi in reti informatiche altrui contro la volontà del titolare e di danneggiare reti informatiche altrui, nonché di scaricare software o dotarsi di hardware finalizzato a tali scopi.

RISPETTO DELLA LEGALITÀ E RAPPORTI CON SOGGETTI TERZI

La Società, nel rispetto della legalità e dei valori democratici alla base dell'ordinamento italiano, si impegna a non operare alcuna forma di finanziamento, diretto o indiretto, e a non agevolare in alcun modo gruppi, associazioni o singoli che perseguano finalità illecite (ad es. finalità terroristiche) o che operino in violazione dei diritti umani o delle norme poste a tutela della personalità individuale.

È fatto obbligo di osservare le cautele e le procedure interne volte a prevenire il pericolo di un coinvolgimento della Società, in qualsiasi forma, nelle attività di organizzazioni criminali, nazionali o internazionali, a qualsiasi fine costituite. In particolare, è fatto divieto di instaurare alcun rapporto di natura lavorativa o commerciale con persone fisiche o giuridiche, che partecipino in qualsiasi forma ad organizzazioni criminali, nazionali o internazionali.

PREVENZIONE DEL RICICLAGGIO DI DENARO

La Società esercita la propria attività nel pieno rispetto, formale e sostanziale, della vigente normativa antiriciclaggio e delle disposizioni emanate dalle competenti Autorità, a tal fine impegnandosi a rifiutare di porre in essere operazioni sospette sotto il profilo della correttezza e della trasparenza.

I Destinatari, pertanto, sono tenuti:

- a verificare in via preventiva le informazioni disponibili sulle controparti commerciali, clienti, fornitori, partner e consulenti, al fine di appurare la loro rispettabilità e la legittimità della loro attività prima di instaurare con questi rapporti d'affari;
- a operare in maniera tale da evitare qualsiasi implicazione in operazioni idonee, anche potenzialmente, a favorire il riciclaggio di denaro proveniente da attività illecite o criminali, agendo nel pieno rispetto della normativa antiriciclaggio primaria e secondaria e delle procedure interne di controllo.

RESPONSABILITÀ DEI DESTINATARI

Tutti i dipendenti e collaboratori della Società sono tenuti ad orientare il proprio operato ai principi di professionalità, trasparenza, correttezza e onestà, contribuendo con colleghi, superiori e subordinati, al perseguimento della missione della Società, nel rispetto di quanto previsto nel Codice di Condotta Aziendale e nel presente Addendum.

Ciascun dipendente e collaboratore della Società deve sempre operare all'interno della Società nel pieno rispetto delle disposizioni e delle procedure aziendali, osservando le regole stabilite dalla legge e dal contratto di lavoro o di prestazione d'opera.

Ciascun dipendente e collaboratore della Società è responsabile delle azioni poste in essere nello svolgimento della propria attività lavorativa. In particolare, tutti coloro che svolgono funzioni direttive, nonché i manager con funzione di gestione del personale saranno anche responsabili per l'attività svolta dal personale soggetto alla loro direzione e controllo.

RISERVATEZZA

Tutti i dipendenti e i collaboratori di Orthofix sono tenuti ad osservare la massima riservatezza in merito a informazioni, documenti, studi, iniziative, progetti, contratti, piani, etc., di cui siano venuti a conoscenza in conseguenza delle prestazioni svolte, con particolare riferimento a quelli che possono compromettere l'immagine o gli interessi dei clienti e della Società.

Orthofix pone in atto misure adeguate per tutelare le informazioni gestite ed evitare che esse siano accessibili a personale non autorizzato.

Tutte le informazioni, in particolare quelle apprese nell'ambito delle attività svolte per i clienti, devono considerarsi riservate e non possono essere divulgate a terzi, né utilizzate per ottenere vantaggi personali, diretti e indiretti.

MODALITÀ DI ATTUAZIONE

COMUNICAZIONE E FORMAZIONE

Il Codice di Condotta Aziendale di Orthofix Medical Inc. e il presente Addendum, anche in quanto parte integrante del Modello della Società, sono portati a conoscenza di organi sociali, dipendenti, collaboratori e *business partner* della Società nella maniera più efficace e capillare possibile, con le modalità previste dal Modello.

SEGNALAZIONE

Ogni esponente della Società, qualora venga a conoscenza di possibili violazioni del presente Addendum o di comportamenti non conformi alle regole di condotta adottate dalla Società, **è tenuto a segnalarlo immediatamente** utilizzando i seguenti canali:

1. Casella di posta elettronica all'indirizzo ODV@orthofix.it, il cui accesso è riservato ai membri dell'OdV; oppure
2. Posta ordinaria all'indirizzo presso la sede della Società, in Bussolengo (VR), 37012, Via delle Nazioni, 9 con dicitura "*riservato e confidenziale*";

nonché attraverso i canali di Gruppo disponibili, quali, in particolare:

- la piattaforma informatica cd. [Ethics Point](#);
- la linea telefonica cd. Corporate Hotline, al numero gratuito 800-786907 (per chiamate dall'Italia);
- la posta elettronica dedicata del dipartimento Compliance, all'indirizzo e-mail: compliance@orthofix.com

Chiunque dovesse segnalare in buona fede una violazione, sarà tutelato da ogni ritorsione. Ogni segnalazione effettuata in malafede sarà trattata come illecito disciplinare.

VIOLAZIONE E SANZIONI

L'obbligo di rispetto e osservanza delle norme contenute nel Codice di Condotta Aziendale e presente Addendum è da considerarsi parte essenziale e costituente delle obbligazioni contrattuali

previste per tutti soggetti, interni ed esterni, che lavorino per la società.

Coerentemente con il proprio approccio rigoroso in materia, la Società tratterà ogni violazione alla stregua di infrazione disciplinare in relazione ai dipendenti e quale inadempimento contrattuale con relazione a collaboratori ed altri soggetti terzi.

Il tipo e l'entità delle sanzioni da irrogare sono proporzionate ai seguenti criteri generali:

- gravità della inosservanza;
- livello di responsabilità gerarchica e/o tecnica dell'autore della violazione;
- elemento soggettivo della condotta (distinzione tra dolo e colpa);
- rilevanza degli obblighi violati;
- conseguenze in capo alla Società;
- eventuale concorso di altri soggetti nella responsabilità;
- circostanze aggravanti o attenuanti con particolare riguardo alla professionalità, alle precedenti prestazioni lavorative, ai precedenti disciplinari, alle circostanze in cui è stato commesso il fatto.

La gravità dell'infrazione sarà valutata sulla base delle seguenti circostanze:

- i tempi e le modalità concrete di realizzazione dell'infrazione;
- la presenza e l'intensità dell'elemento intenzionale;
- l'entità del danno o del pericolo come conseguenze dell'infrazione per la società e per i dipendenti;
- la prevedibilità delle conseguenze;
- le circostanze nelle quali l'infrazione ha avuto luogo.

La violazione da parte dei Destinatari delle previsioni contenute nel Codice di Condotta Aziendale e presente Addendum comporta l'applicazione delle sanzioni previste nel Capitolo 7 della Parte Generale del Modello della Società.