

Message from our CEO

At WiQo, our values guide everything we do: Excellence, Trust, Collaboration, and Passion.

They reflect who we are and how we work with each other, with healthcare professionals and with customers who rely on our products.

This Code of Conduct is an essential part of our culture. It supports ethical decision-making in complex situations, reinforces our commitment to integrity, and ensures that our actions always align with our responsibilities to customers, partners, and society.

Please read this Code carefully. Use it as a reference in your day-to-day work. If you face uncertainty, seek guidance early. Together, even when we make mistakes, we will address them transparently and grow stronger as an organization.

Cristian Dufeu
Chief Executive Officer, WiQo

1. Purpose, Scope, and Use of This Code

1.1 Purpose

This Code sets out the principles that govern conduct across WiQo. It helps employees and stakeholders to make ethical decisions and prevents violations of law, policy, or our values.

It also forms an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001.

1.2 Scope

This Code applies to:

1. All employees, officers, and directors
2. All consultants, agents, distributors, and third parties acting for WiQo

WiQo expects all business partners to adhere to the spirit of this Code.

1.3 Conflicts between Law and the Code

If local law is stricter than the Code, it applies.

If the Code is stricter than local custom, the Code prevails.

1.4 Ethical Decision-Making

If unsure, ask:

- Is it lawful?
- Is it consistent with WiQo's values?
- Would I be comfortable if this were made public?

2. Our Culture and Workplace

2.1 Respect, Dignity, and Inclusion

WiQo promotes a respectful, inclusive environment.

We prohibit discrimination, harassment, intimidation, and retaliation.

By virtue of its commitment to ethics and social responsibility, WiQo categorically condemns and prohibits any form of child labor, direct or indirect, in all its operations.

2.2 Diversity and Equal Opportunity

All employment-related decisions must be based on qualifications, performance, and merit.

2.3 Health, Safety, and Well-Being

We are committed to a safe and healthy workplace.

Employees must follow safety procedures and report hazards or incidents promptly.

2.4 Professional Conduct

Employees must act with integrity, courtesy, and professionalism at all times, internally and externally.

2.5 Sustainability and Environmental Responsibility

WiQo is committed to operating in a responsible and sustainable manner.

We recognize that protecting the environment and using resources efficiently are essential to the long-term success of our business and to the well-being of the communities in which we operate.

Accordingly, WiQo is committed to:

- complying with all applicable environmental laws and regulations
- minimizing waste, emissions, and environmental impact
- promoting responsible use of energy, water, and raw materials
- ensuring proper handling and disposal of chemicals and laboratory materials
- selecting partners who share our commitment to sustainability
- integrating environmental considerations into operational decisions

Every employee has a role in protecting the environment by reporting unsafe conditions, improper disposal practices, or any conduct that may harm the environment or violate regulation.

3. Protecting WiQo's Assets

3.1 Confidential Information

Employees must protect confidential information, including:

- scientific data
- trade secrets
- customer, partner, and employee information
- strategic and financial information

Such information may only be shared on a need-to-know basis and with appropriate safeguards.

3.2 Intellectual Property

WiQo's intellectual property, including formulas, trademarks, research and clinical data, technical documentation, product specifications, and all other proprietary or commercially sensitive information, must be safeguarded at all times. Employees are required to:

- use IP exclusively for company business and within the scope of their role;
- prevent unauthorized copying, alteration, destruction, or transmission;
- immediately report any suspected breach, loss, or unauthorized access;
- ensure IP is shared only with authorized persons under adequate contractual or technical safeguards.

Any misuse or unauthorized disclosure may expose WiQo to legal, regulatory, and competitive risks and will be treated as a serious violation of this Code.

3.3 Company Resources

Company assets (systems, data, equipment, funds) must be used responsibly and only for legitimate business purposes.

3.4 Accurate Records

All records and reports must be accurate, complete, and maintained in accordance with applicable laws and internal controls.

In managing accounting and tax obligations, the Company is committed to ensuring the transparency and accuracy of the information included in tax-relevant filings, working to guarantee the objective and subjective truthfulness of the transactions

carried out and reported therein, as well as the completeness and correctness of all tax documentation.

4. Interactions with Healthcare Professionals (HCPs)

4.1 Guiding Principles

Interactions with HCPs must always be:

- ethical
- appropriate
- transparent
- compliant with applicable laws and industry codes

4.2 Legitimate Engagements

WiQo engages HCPs to:

- improve product safety and performance
- support legitimate scientific or clinical needs
- conduct documented, necessary services

4.3 Prohibited Conduct

WiQo does not allow:

- engaging HCPs to drive sales
- offering benefits to influence referrals
- disguised promotional activity in clinical or educational programs

4.4 Transparency and Documentation

HCP interactions require:

- written contracts
- fair market value compensation

- documented rationale
- appropriate internal approvals
- accurate recordkeeping

5. Research, Clinical Integrity, and Product Safety

5.1 Scientific Integrity

All research and testing must be conducted ethically, using approved methodologies, and documented accurately.

The Company does not conduct, commission, or support any form of animal testing.

5.2 Product Safety and Vigilance

WiQo maintains systems for:

- identifying and reporting adverse events
- processing product complaints
- monitoring product safety

All employees must report safety concerns immediately.

5.3 Anti-Manipulation

Scientific or clinical data must never be falsified, misrepresented, or selectively reported.

5.4 Customer Focus and Product Responsibility

WiQo is committed to earning and maintaining the trust of customers, healthcare professionals, and end users of our products. Customer satisfaction is central to our mission and reflects our commitment to quality, safety, and service.

We achieve this by:

- ensuring that all products meet high standards of quality, safety, and performance

- responding promptly and professionally to customer needs
- providing accurate, truthful, and clear information about our products
- acting transparently in all commercial communications
- continuously improving products and services based on customer feedback
- never engaging in deceptive, misleading, or unethical marketing practices

Our responsibility extends beyond compliance: we strive to deliver products and customer interactions that reflect WiQo's integrity and high ethical standards.

6. Business Partners and Third Parties

6.1 Due Diligence

WiQo conducts due diligence before engaging business partners to ensure they meet ethical, legal, and operational standards.

6.2 Expectations

Business partners must:

- comply with relevant laws and WiQo standards
- cooperate in audits and monitoring
- uphold integrity in all interactions

6.3 Red Flags

Employees must report concerns such as:

- refusal to provide documentation
- unusual payment requests
- connections with public officials
- a history of compliance issues

7. Anti-Bribery, Anti-Corruption, and Gifts

7.1 Zero Tolerance

WiQo prohibits all forms of bribery, corruption, and improper influence.

7.2 Gifts and Hospitality

Permitted only if:

- modest
- infrequent
- lawful
- not intended to influence business decisions

Never acceptable:

- money or equivalents
- lavish gifts or entertainment
- items prohibited by local law or industry codes
- benefits to public officials without appropriate approvals

7.3 Approval and Documentation

Employees must follow internal approval workflows and, when required, record gifts and hospitality.

7.4 Fair Competition and Antitrust Compliance

WiQo competes vigorously but fairly, and in full compliance with competition and antitrust laws in all jurisdictions where we operate.

Employees and third parties acting on behalf of WiQo must not:

- enter into agreements or understandings with competitors regarding prices, markets, territories, or customers
- exchange sensitive commercial information with competitors
- engage in bid-rigging, market allocation, or other anti-competitive behavior
- misuse confidential information to gain unfair advantage
- disparage competitors or spread misleading information

Employees involved in sales, marketing, distribution, procurement, and strategic planning must be particularly aware of antitrust risks and seek guidance when unsure.

Violations of competition law carry severe consequences for both WiQo and individuals and will not be tolerated.

7.5 Anti-Money Laundering and Prevention of Illicit Financial Activities

WiQo is committed to preventing money laundering, terrorist financing, and any activity involving the handling of illicit funds.

Employees must ensure that:

- transactions have a legitimate business purpose
- payments are made and received only through traceable, authorized channels
- no payments are made in cash where prohibited
- the identity and integrity of business partners are verified
- any suspicious behavior or transactions are reported immediately to Compliance

Examples of red flags include:

- requests for unusual payment routes
- refusal to provide identification or documentation
- transactions inconsistent with the counterparty's business

WiQo will not tolerate participation in or facilitation of money laundering activities, directly or indirectly.

8. Conflicts of Interest

8.1 Definition

A conflict of interest arises when personal interests interfere, or appear to interfere, with professional responsibilities.

8.3 Disclosure

Employees must disclose any potential conflict to the Whistleblowing Committee promptly.

8.2 Examples

- close personal or romantic relationships in reporting lines
- financial interests in suppliers or competitors
- outside work that overlaps with WiQo business
- exploiting business opportunities for personal gain

9. Trade Compliance

WiQo complies with all applicable import/export control laws and sanctions regimes.

Employees must:

- ensure proper classification and documentation
- seek prior approval for high-risk transactions
- Violations may result in severe penalties for both WiQo and individuals.

9.1 Prevention of Smuggling and Illicit Trafficking

WiQo strictly prohibits any form of smuggling, illicit import/export, or circumvention of customs and trade regulations.

Employees must:

- comply with all customs, trade, and border-control laws
- ensure the truthful declaration of goods, value, and origin
- avoid mislabeling, misclassification, or falsification of customs documents
- refrain from engaging suppliers or distributors involved in illicit transport
- immediately report any suspected irregularities in import/export activities

Violations may lead to civil, administrative, and criminal penalties.

Compliance with lawful, transparent, and ethical trade practices is essential to protecting WiQo's reputation and legal standing.

10. Data Protection and Privacy

10.1 Confidential Data

Personal data must be processed lawfully, securely, and only for legitimate business purposes.

10.2 GDPR Compliance

We respect the rights of all data subjects and ensure proper safeguards when transferring or processing personal data.

10.3 IT Security

Employees must protect the integrity of WiQo's systems and report any suspected breaches immediately.

11. Speaking Up and Non-Retaliation

Employees are encouraged to first consider speaking with their manager or HR representative. If that is not possible or comfortable, alternative reporting channels include:

1. Ethics Hotline: the Channel is managed through the My Governance platform and is accessible through the corporate website and the intranet at this link [My Governance - v4.0](#)

2. Direct reporting to the Board of Directors

Anonymous reporting will be available in jurisdictions where permitted by law.

WiQo strictly prohibits retaliation against anyone who raises a concern in good faith.

All reports are investigated confidentially and objectively.

12. Governance and Oversight

12.1 Ownership

The BoDs is responsible for maintaining and updating this Code.

12.3 Consequences of Violations

Violations may result in disciplinary measures, up to and including termination, and legal consequences where applicable.

12.4 Review Cycle

The Code is reviewed at least annually and updated as needed.