

DEONTOLOGICAL ETHICS CODE



Your Software Medical Device Partner

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1. Premise

This Code aims to establish ethical and deontological principles of Kelyon srl underlying the links with all stakeholders (customers, suppliers, partners, social partners), while providing a guideline for all internal and external partners to the Organization.

The ethical code of conduct has been issued by the CEO in cooperation with the Head of the Integrated Management System and seeks to identify the main reference values to which all employees must comply Organization in conducting business and in managing their daily activities, in the belief that ethics in the conduct of business is a prerequisite for the success of the Organization.

To encourage the dissemination and systematic application of ethical principles, the Management is committed to disclose the code, implementing appropriate information / training programs. In addition, at least once a year, on the occasion of the formal management meetings, they shall assess the suitability for evolution and current regulations.

The Management, with the aim of ensuring the proper application of the provisions of the Code, has established special procedures for reporting any possible violations management, ensuring confidentiality and privacy of the identity of anyone who reports and establishing a system of sanctions. In addition, on the occasion of internal audits, performs or instructs to carry out checks on compliance with the principles defined.

Each employee must promote the dissemination of the principles set forth and be an example of the code.

2. Employee responsibilities

To work in Kelyon each employee must act responsibly, diligently respecting the laws in force, the ethical-deontological principles, internal regulations, and policies issued by the Management.

In case of doubt about the ethics of a certain behavior, employees shall seek clarification from the Management.

The breach of ethical standards of conduct Kelyon will result in disciplinary action, including possible dismissal or termination of contracts and legal actions against violators.

Employees individual behavior must be aimed at:

- performing assigned tasks with absolute integrity, taking into account that in no event shall the company's interest justify dishonest conduct;
- Avoiding situations in which personal interests are, or may be in conflict with, corporate interests;
- protecting and properly using company information, assets, and resources;
- not using confidential information for purposes not related to the exercise of its business;
- maintaining the confidentiality of reserved information and not gaining personal advantages from these, in compliance with existing privacy statements;
- complying with security policies issued by the Management.

Any employee who becomes aware or suspected of violations of official duties, illegal activities, fraud, abuse of company property or violation of the standards outlined here or in the security and policies required to report such activities (also anonymously) to the Management (to direzione@kelyon.it or by post to Gaetano Cafiero RESERVED STAFF c / o Kelyon Srl Via dei Mille n. 16, 80121 Napoli) the content of each report will be reviewed and, if necessary, the company will take appropriate corrective measures.

There will be no retaliation against employees who will report the violations and will do all they can to protect their identity.

They will not be asked to identify themselves and their communications will be treated confidentially.

3. Observance of regulations

Given the international environment in which it operates, Kelyon must respect all the many and complex applicable legal requirements. In this regard, the Organization has a legal advisory service which is responsible for answering any related questions.

4. Quality, Health & Safety, Environment

Kelyon adopted a quality management system in accordance to UNI EN ISO 9001 international standards, supplemented by a system in accordance to the UNI CEI EN ISO 13485; in addition, it complies with national regulations on health and safety in the workplace and is sensitive to environmental issues. The basis of compliance with the complex system of national and international standards arises an ethical and behavioral code, whose basic contents are described as follows:

- orientare le attività aziendali alla soddisfazione ed alla tutela dei clienti dando ascolto alle richieste che possono favorire un miglioramento della qualità dei prodotti e dei servizi;
- migliorare continuamente le performances di efficienza fissando obiettivi quantificabili e monitorabili;
- minimizzare i rischi per la salute e la sicurezza dei lavoratori legati alla propria attività lavorativa e migliorare la qualità degli ambienti di lavoro;
- promuovere la cultura e la responsabilità dei dipendenti a ogni livello verso la salute, la sicurezza sul lavoro e l'ambiente anche attraverso la formazione e l'informazione e attraverso il coinvolgimento di tutto il personale nell'individuazione di azioni di miglioramento;

5. Relations with clients and suppliers

Essential Kelyon policy, in relations with clients and suppliers, regards the absolute prohibition of profiting from incorrect use of professional favors or other incentives.

In every relation, it is mandatory to exercise moderation and common sense in order to avoid misunderstandings and damaging the company reputation and image or its employees.

It is expressly forbidden to offer, promise, give, demand or received - directly or indirectly - payments, gifts and other benefits of any kind from or to third parties, public or private entities, which exceed a reasonable practice courtesy and are likely to be interpreted as faces

to unduly influence an act which falls within the respective jurisdiction or to obtain an unfair advantage.

6. Professional favors

Any business courtesies, such as gifts or favors are always possible that approved by the management, provided that:

- Are compliant with business customs;
- They do not have an excessive value and cannot be interpreted as a "bribe" or "bribe";
- They do not conflict with existing laws or standards of ethical conduct;
- They will not embarrass Kelyon or its employees if made public.

Employees may not accept gifts, favors, entertainment or other incentives from individuals or organizations that seek to enter or are already in business with Kelyon, or that are competitors, except in the case of common business courtesies associated with normal practice in business.

It is never permissible to accept a gift, other than of modest value, cash or anything equivalent.

7. Conflict of interest

Employees must avoid any situation that could put the personal interests in conflict with the interests of the Organization.

Every employee is required to notify immediately and completely in writing to management any situation that may give rise to a conflict of interest.

8. Protection and use of company goods

All employees must protect and properly use the goods of Kelyon, including confidential information, as required by security policies issued and accepted.

These corporate assets, which are functional to employees' work, and to a greater degree of efficiency of their overall role, are available to the employee under the following conditions:

- They are used only for professional purposes (in relation to assigned duties), avoiding uses for personal purposes, outside of authorized cases;
- they are to be kept with care by the employees to whom they are assigned, avoiding tampering, damage, or use, even by other people, for purposes not permitted.

9. Internal audits

Kelyon can set internal accounting auditing procedures to ensure that the assets are protected and used correctly and that the accounting documentation and the financial reports are accurate and reliable.

Employees share the responsibility to observe and comply with required internal controls.

10. Documentation integrity

From the elaborated documentation (accounting reports, project progress reports, time sheets, etc.) it must be possible to detect moment by moment the real nature of each

operation. Any manipulation of documents in order to highlight incorrect or fraudulent data, as well as representing a possible crime, it is absolutely contrary to company policy.

11. Electronic information

Given the nature of the activities and technologies used, most of data managed in Kelyon are processed, stored, and transmitted electronically; such data therefore require special protection. Each user has therefore the responsibility to comply with the standards, procedures and security policies issued and delivered.

Improper use of electronic communication resources, regardless of the means, is considered a serious example of improper conduct and will be operated on a par with other violations of rules of conduct.

12. Business trips

I viaggi di lavoro a carico di Kelyon devono essere utilizzati per soddisfare unicamente esigenze di lavoro. L'intento della Kelyon è far sì che i collaboratori non ottengano vantaggi né subiscano perdite finanziarie a seguito di viaggi di lavoro.

I collaboratori sono tenuti a utilizzare il denaro della Kelyon con la stessa cura e cautela con cui spenderebbero il proprio.

I collaboratori che redigono note spese di viaggio hanno la responsabilità di accertare la correttezza e ragionevolezza delle spese e di verificare che le ricevute e la documentazione giustificativa presentate suffraghino correttamente le spese elencate.

13. Reserved information

Kelyon's Confidential information (including strategies, contracts in progress, products not yet launched on the market, research results, financial projections, and customer lists) cannot be communicated or diffused without proper authorization, to persons outside the organization or to collaborators who have no reason to obtain such information.

Any confidential information gained as collaborators (including information on clients, suppliers and competitors, research activities, etc.) cannot be used to the personal advantage of employees or others associated with them in any way.

14. Laws on secrecy and industrial property

The intangible assets of its Kelyon consists of intellectual property, including trade secrets.

Kelyon's policy provides to protect such property and to preserve its competitive edge in compliance with the law. In order to collect data relating to competitors, employees must comply with all the legal and ethical rules to prevent Kelyon from being damaged in any way from misuse of information by third parties.

15. Antitrust / competition laws

Kelyon is committed to free and fair competition in markets around the world and all collaborators must abide by the rules in antitrust or competition of the countries in which it operates.

Employees should exercise due care in those situations in which competitors could be present, in order to prevent violations of such laws.

In particular, they must not discuss with competitors of future prices, procurement, margins, costs, discounts, rebates, sales conditions, production capacity, supply level, customers, business plans or distribution strategies for competing products or services.

16. Respect of individual differences

In conducting business for Kelyon, employees must respect the rights of individuals and cultural differences, not exercising any discrimination and observing the principle of equal employment opportunity without regard to age, race, religion, color, gender, physical handicap, origin national, race, political opinion, marital status, sexual orientation, or status as a disabled. No mobbing will be tolerated.

Kelyon has adopted zero-tolerance against any violation of business values or of business policies such as sexual harassment, racial discrimination, and other forms of mobbing materiali pornografici o altrimenti inaccettabili.