


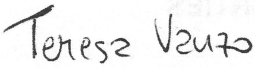

COMPANY POLICY


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REVIEW	DATE	DESCRIPTION
00	07/01/2025	First issue

ISSUED by RSG		VERIFIED AND APPROVED by AD
Name: Teresa Vanzo	signature 	signature Name: Enrico Fiorini  <p>PREBIOMICS Via della Cooperazione 38123 TRENTO (TN) P. IVA e C.F. 024817111</p>

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1. PURPOSE AND SCOPE

PreBiomics Srl combines the high-level experience and scientific knowledge of its founders to provide innovative tools and services for personalized wellness strategies in the clinical field of the human microbiome. At PreBiomics, our team is composed of experts from multidisciplinary fields who bring together a wealth of experience and innovative thinking. With a shared dedication to unlocking the secrets of the world of the microbiome, we collaborate harmoniously, leveraging cutting-edge technologies and scientific rigor to translate our discoveries into tangible, high-impact solutions that positively shape the world of health and wellness.

PreBiomics NGS is a high-throughput microbial sequencing laboratory designed to sequence up to 20,000 samples per month using a semi-automated processing pipeline focused on human microbiome samples.

Harnessing the power of cutting-edge science, we decode the human body's unique microbial fingerprint to pave the way for personalized treatments and wellness strategies. These microbiome testing services are the key to a tailored approach to personalized health and wellness plans.

Confirming the continuous improvement of the company structure and procedures, it was decided to implement a Social Management System in compliance with SA 8000.

In recent years, the theme of social responsibility has established itself as an increasingly strong and central need. The ethical aspects of correctness, responsibility, transparency, respect for human rights, respect for the environment, sustainable development, innovation and product quality are becoming increasingly important in the management of business activities and, more generally, in society.

2. SCOPE OF APPLICATION

PreBiomics's ethical commitment is demonstrated in:


- Drafting of a Social Responsibility Policy
- Construction and implementation of a SA 8000 Management System.

The importance of drafting a Social Responsibility Policy is based on the awareness that the integrity, reputation, and profitability of the company primarily depend on the individual behaviour of its directors, employees, collaborators, third parties, and suppliers. This document is not drafted in accordance with Legislative Decree 231/01 (Organizational Models 231). The Social Responsibility Policy aims to define the principles, values, and behaviours that must daily inspire the conduct of PREBIOMICS's activities. Therefore, this document is an expression of the company's core values and serves as a point of reference for every decision-making process.

The Policy must be used as a guide and consequently:

- Every employee and associate is strictly responsible for the respect of the indications available in the Social Responsibility Policy and is accountable for it.
- The suppliers and third parties of PreBiomics Srl are invited to acknowledge it and comply with social commitment of the products defined in this document and to sign a commitment letter.
- Every other stakeholder is invited to read the Policy carefully and always keep its content in mind.

Ethics and compliance with the standards relevant to the company, in line with its activities, processes, and products, are responsibilities that PREBIOMICS SRL aims to share with its business partners and all interested parties. Anyone who becomes aware of situations that may appear inconsistent with the ethical values and behavioural standards outlined in the Policy is required to inform the Management, the Social Responsibility Management Representative, or the Workers' Representative for Social Responsibility

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3. PRINCIPLES AND VALUES

PreBiomics Srl is committed to respecting the standards of ethical and professional conduct towards employees, collaborators and all other company interlocutors: customers, suppliers, associations, institutions, local communities. This commitment and the responsibility it entails are summarized below.

4. TEAM MEMBERS

With regard to its collaborators (employees, temporary workers, etc.), PreBiomics Srl is committed, through the implementation, maintenance and continuous improvement of its Company Management System in compliance with SA 8000, to respecting the following ethical principles:

- ensure quality products in compliance with customer requests and applicable product regulations;
- not use or encourage the use of child labour;
- not to make use of or encourage the use of forced labour;
- ensure all employees have a safe and healthy workplace;
- respect the right of workers to join and form trade unions;
- do not discriminate in any way;
- do not use or encourage corporal punishment, mental or physical coercion, or verbal abuse;
- ensure compliance with the minimum wage levels provided for by current legislation and the National Collective Labour Agreement;
- operate in compliance with international and national laws on the product of the National Collective Labor Agreement.

PreBiomics Srl is required to behave fairly in mutual relations and to apply an employment policy based on equal opportunities for all employees and collaborators, on dialogue, on listening to the possible needs and requirements of each individual in order to create a pleasant working environment, an atmosphere in which the frank and fair exchange of opinions is encouraged, and to promote the pursuit of staff well-being.

PreBiomics Srl recognizes everyone's right to privacy in their private life, and gives priority to employee care, their health and safety in the workplace, professional growth and personal satisfaction and motivation.


5. ENVIRONMENT

PreBiomics's commitment to planet Earth is aimed at safeguarding its abundance and beauty for present and future generations, with the aim of transmitting to them the values and traditions that support the long-term development of human and environmental communities.

PreBiomics Srl is committed at every stage of its actions to apply a preventive approach towards the environment and its biodiversity, to promote initiatives for greater corporate environmental responsibility, to develop the use of means and technologies that do not damage the environment and to the exploitation of energy from renewable sources.

6. ASSOCIATIONS AND NGOS

Towards all the associations and NGOs with which PreBiomics Srl dialogues and collaborates in various capacities, the company is committed to promoting the exchange of information, dialogue and transparency.

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7. PRODUCTS AND SERVICES

Products and services are at the heart of every daily activity and commitment. PreBiomics Srl focuses and will always focus its efforts on innovation to generate products and services of ever-increasing quality and in compliance with applicable technical and sector laws and regulations.

8. CUSTOMERS

Customers are the subjects who, by entrusting us with their projects and needs, allow us to carry out our business. The company is required to provide all customers with high quality, professionalism, excellence and honest behaviour, in order to pursue their satisfaction continuously. Relationships must always be based on principles of legality, morality, transparency and professional correctness.

9. SUPPLIERS

Suppliers are partners in achieving business success. The company is required to treat suppliers fairly. Fair competition must be encouraged, without discriminatory or unfair practices, aimed at stimulating the creation of lasting business relationships based on fairness and transparency.

10. COMPETITORS

Competitors are the positive stimulus to improve and remain competitive. PreBiomics Srl is driven by a strong and correct competitive spirit aimed at the continuous improvement of what it does.

11. OTHER INTERESTED PARTIES

PreBiomics Srl is required to behave responsibly in the local community in which it operates, in compliance with all national and local laws, committing to improve the quality of life through the promotion of awareness-raising initiatives on issues related to the protection of human rights as well as growth, professional development of young people and respect for the environment.


12. INSTITUTIONS

PreBiomics Srl is committed to maintaining an open and transparent dialogue with all national, regional and local institutions with which it interacts on a daily basis.

13. COMMITMENT TO EMPLOYEES AND COLLABORATORS

PreBiomics Srl:

- does not use and does not intend to support in any way the use of child labour;
- does not use and does not intend to support in any way the use of forced labour. It is committed to ensuring that all workers are fully aware of their rights and duties arising from the employment contract;
- guarantees all workers a safe and healthy workplace through compliance with relevant legislation, training, information and continuous education on the subject of health and safety, the willingness to undergo checks and audits by the control authorities and to implement all necessary actions to minimize the causes of danger attributable to the work environment;

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- respects the right of workers to join trade unions of their choice and the right to participate in collective bargaining;
- is committed to following a policy aimed at not promoting discriminatory practices in hiring, remuneration, access to training, promotion, dismissal or retirement, based on race, class, national origin, religion, disability, sex, sexual orientation, union membership, political affiliation, age. It is committed to offering equal opportunities to all workers and equal employment opportunities to new qualified candidates. It intends to operate with the utmost respect for the privacy and dignity of workers;
- does not use and does not intend to support in any way the use of corporal punishment, mental or physical coercion, verbal abuse. Any disciplinary sanctions applied to employees are implemented in full compliance with the Workers' Statute and the National Collective Agreement applied;
- is required to fully comply, in the employment relationship, with international and national legislation on employment;
- is required to operate in compliance with the confidentiality and dignity of employees and collaborators. It requests and records only those personal data that are necessary for efficient personnel management or that are required by law. Access to such data must be limited only to those who have an objective need to know them (supervisory authority). The company is required to comply with all applicable laws regarding the disclosure of personal data of employees. Compliance by PreBiomics Srl prohibits any interference in the conduct of employees and collaborators outside the workplace, as long as such conduct is not harmful to performance at work or detrimental to the company's reputation;
- undertakes to promptly provide employees and collaborators with relevant information on the company's progress, performance, customer relations and results achieved by employees and collaborators. It has set up an anonymous and non-anonymous communication channel, which allows employees and collaborators to openly express opinions, attitudes and concerns;
- undertakes to ensure an adequate response to anonymous and non-anonymous reports/complaints received. No sanctions will be imposed on those employees and collaborators who provide any reports or express any problems or complaints;
- It is committed to stimulating the training and professional growth of employees and collaborators, encouraging them to improve and increase their professional skills.

14. COMMITMENT TO SUPPLIERS AND THIRD PARTIES

The Company Policy of PreBiomics Srl in purchasing equipment, materials, services, raw materials etc. is based on their intrinsic value. Suppliers, service providers and subcontractors of PreBiomics Srl must be treated with fairness, justice and without discrimination.

PreBiomics Srl:

- undertakes to guarantee payments for supplies within the timeframes established by the contract or purchase order;
- is committed to promoting a collaborative relationship based on trust, exchange of information, transparency and professional correctness;
- is required to respect the confidential information and trade secrets of Suppliers and Third Parties;
- undertakes to follow a policy of informing Suppliers and Subcontractors of any accounting or administrative errors and to promptly correct any errors with credits, refunds or other measures acceptable to both parties.

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15. COMMITMENT TOWARDS CUSTOMERS

PreBiomics Srl:

- is committed to designing and producing articles seeking the best quality and professionalism;
- is required to understand the needs of customers and satisfy them by offering quality products at competitive prices and conditions;
- is required to sell the products honestly, on the basis of their intrinsic qualities and to refrain from any sale whose successful outcome requires illegal action or the contravention of regulations in general;
- is required to respect confidential information and customer data of which it is aware;
- undertakes to follow a policy of informing customers of any accounting or administrative errors and to promptly correct any errors with credits, refunds or other measures acceptable to both parties.

16. COMMITMENT TO OTHER STAKEHOLDERS

PreBiomics Srl is a socially committed "actor" and follows a policy aimed at communicating its ethical performance to all external interested parties. -social through direct dialogue and through:

- active commitment to supporting organizations and social activities in the community in which it operates. It encourages employees and collaborators to participate in public life.
- the commitment to promote the issue of respect for human rights, with particular attention to the protection of children and young workers employed in dangerous work activities.

17. THE COMMITMENT OF EMPLOYEES AND COLLABORATORS TOWARDS PREBIOMICS SRL

Child labour

All workers are required to report any information they have about cases of child labour at suppliers or subcontractors of PreBiomics Srl.

Health and safety in the workplace

In order to protect the health and safety of workers and customers of PreBiomics Srl, all workers are required to:


- respect and scrupulously follow all safety procedures in carrying out one's work;
- do not smoke in company premises, especially in the bathrooms and in any case outside the spaces permitted and made available by the company;
- communicate to the Prevention and Protection Service Manager any information that could prevent the occurrence of an event harmful to the health of workers and customers.

Discrimination

Workers are required not to implement discriminatory practices of any nature towards their work colleagues, any new employees or any other-assumed, as well as to have behaviours contrary to a constructive attitude. Relationships between people must be inspired by the principles of mutual respect and the dignity of people.

Drug and alcohol abuse

All personnel are required to comply with applicable laws and regulations regarding the possession or use of alcohol or narcotics. PreBiomics Srl prohibits the illegal use, sale, purchase, transfer, possession or presence of narcotics on company premises and property, except for medications prescribed by a physician. The company also prohibits the use, sale, purchase, transfer or possession of alcoholic beverages by employees within the

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company's facilities and surrounding areas.

Protection of tangible and intangible assets of PREBIOMICS SRL

The heritage of PreBiomics Srl is made up of physical assets, such as computers, printers, work equipment, systems, etc. and intangible assets, such as confidential information, know-how knowledge. The protection and preservation of these assets and information constitutes a fundamental value for the protection of the interests of the company, and it is the responsibility of the personnel (in carrying out their work), not only to protect such assets and information, but also to prevent their fraudulent or improper use. The use of these assets by employees must be functional and exclusive to the performance of their activities.

Behaviours to be observed in the premises and work areas

All collaborators and employees are required to:

- provide truthful and correct information about your professional experience;
- carry out their business with the utmost professionalism and seriousness;
- always work with the aim of stimulating learning and knowledge;
- be available to continuously update and improve one's professional training, maintaining and increasing it;
- not to discriminate of any kind against customers, suppliers and colleagues, nor to create situations of ambiguity with them;
- maintain a conduct that is morally consistent with the ethical and social principles of PreBiomics Srl.

18. CUSTOMER'S COMMITMENT

All customers must undertake to:

- behave in a polite and correct manner towards all employees;
- preserve the quality of the products received;
- communicate to PreBiomics Srl any improper behaviour by collaborators or employees.


19. COMMITMENT OF SUPPLIERS AND THIRD PARTIES

All suppliers and contractors must undertake to:

- respect the commitments made towards PreBiomics Srl in terms of punctuality, safety standards, quality of products and services provided;
- establish supply relationships with companies that also guarantee compliance with the requirements of the SA8000 standard (they do not need to be certified).

Current and new suppliers and subcontractors must therefore commit to:

- comply with current legislation and respect the rights of its collaborators;
- subscribe to the Policy PreBiomics Srl;
- share the values and principles of PreBiomics Srl and formally commit to respecting the rules of conduct;
- fill out the information questionnaire, if requested;
- make themselves available to be subjected to any inspections by PreBiomics Srl.

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20. COMPLIANCE WITH STANDARDS

PreBiomics Srl is required to ensure compliance with the principles, values and commitments set out in this Social Policy.

All employees and collaborators, all suppliers and subcontractors, as well as all customers are required to comply with the rules of conduct defined in this Social Policy.

PreBiomics Srl will sanction any behaviour of personnel that is not consistent and respectful of the values and principles that constitute the Social Policy, according to the seriousness of the violations committed and the behaviours assumed. As with all disciplinary matters, it will be inspired by principles of justice and fairness, as well as compliance with the relevant regulations, including the CCNL.

PreBiomics Srl will also take action against suppliers and third parties who do not comply with the rules of the Social Policy, according to the methods established by the procedures of the Company Management System.

21. REFERENCES FOR THE INTERPRETATION AND APPLICATION OF SOCIAL POLICY

For full compliance and interpretation of the Social Policy, staff may contact the Head of the Social Responsibility Management System or the Workers' Representative for Social Responsibility.

The following tasks are assigned to the Social Responsibility Management System Manager:

- disseminate the Social Policy with the utmost incisiveness and effectiveness among employees, customers, suppliers and in general among all interested third parties;
- manage, implement, study and verify the legislation covered by the Social Policy in order to adapt it to the evolution of the laws;
- operationally support the interpretation, implementation and evaluation of the Social Policy, as a constant reference tool for the correct behaviour to be maintained during the performance of one's activity;
- verify, control and evaluate cases of violation of the written rules, providing in the event of infringements for the adoption of appropriate measures, in collaboration with the Management, in compliance with the laws, regulations and the applied CCNL;
- promote and prepare employee communication and training programs, aimed at improving knowledge of the objectives and behavioural methods to achieve them.


The following tasks are assigned to the Workers' Representative for Social Responsibility:

- protect and assist employees who report behaviour that does not comply with the Social Policy, protecting them from pressure, interference, intimidation and retaliation;
- collaborate in the dissemination of the Social Policy among employees and all interested third parties.

22. REPORTING VIOLATIONS

Each individual is required to bring to the attention of the Social Performance Team, or anonymously through the appropriate complaint/reporting mechanism, any actual or suspected violations of the rules of conduct of PreBiomics Srl undertakes not to take any action against anyone who has reported a violation. It is also possible to report violations through official channels such as:

- by post, sending the complaint to: PreBiomics Srl Via Della Cooperazione 53, 38123 – Trento (TN) (for the attention of the RLSA);
- by inserting the complaint form into the boxes made available at the organization's headquarters:

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Headquarters Via Della Cooperazione 53, 38123 – Trento (TN);

- by email to the following address (with restricted access): segnalazioniSA8000@prebiomics.com;
- verbally, by communicating the complaint to a member of the SPT;
- by contacting SGS Italia Spa - Via Caldera, 21 - 20153 Milan (Certificazioni Body) e-mail: sa8000@sgs.com- Fax: +39 051 6389926;
- by contacting the Accreditation Body for SA8000: SAI - Social Accountability International - Social Accountability Accreditation Services (SAAS NYC Headquarters 9 East 37th Street; 10th Floor New York, NY 10016 United States of America; Phone: 212-684-1414 - Fax.: 212-684-1515 - Email: saas@saasaccreditation.org