



# **Declaration of impartiality and commitment to confidentiality**



## **Impartiality**

Prebiomics S.r.l. ("Prebiomics") recognizes impartiality, independence, and confidentiality as fundamental values in the conduct of its activities. All activities are conducted in a manner that guarantees independence, integrity, and objectivity of results, avoiding any conflict of interest or undue influence of a commercial, financial, or personal nature.

Prebiomics adopts the following conditions to guarantee the impartiality and independence of its activities:

- operates according to a Quality Management System compliant with the UNI CEI EN ISO/IEC 15189:2024 standard, periodically reviewed by the Management;
- ensures that staff are not subject to incentives linked to the number or outcome of tests performed and do not carry out activities in conflict of interest;
- requires staff to adhere to principles formalized in specific commitments;
- adopt an organizational structure that separates technical responsibilities from economic and commercial responsibilities;
- performs tests and analyses independently of any consultancy activities, ensuring that personnel involved in consultancy do not interfere with testing activities;
- uses anonymous identification systems for the samples analyzed in order to prevent direct or indirect influence on operators;
- applies transparent and non-discriminatory criteria in setting prices and contractual conditions;
- guarantees equal access to its services in compliance with security and confidentiality requirements;
- promotes the reporting of any situation that may constitute a threat to impartiality;
- periodically conducts risk and opportunity analyses related to its activities, adopting preventive and continuous improvement measures.

## **Confidentiality**

Prebiomics protects the confidentiality of all information acquired in the course of its activities, including that relating to customers, samples, analysis results, and technical and scientific data.

The confidentiality commitment binds all Prebiomics personnel, external collaborators, and any person who, for any reason, has access to confidential information of the client or related third parties, including inspectors of certification and accreditation bodies. These persons are required to sign specific confidentiality commitments.

Prebiomics adopts appropriate technical and organizational measures to ensure the security, integrity, and protection of the information and data processed, in compliance with applicable data protection legislation.

In particular, Prebiomics:

- processes all information in compliance with current legislation regarding the protection of personal data and professional secrecy;
- restrict access to information to authorized and adequately trained personnel;



- adopts technical and organizational measures to guarantee the security of data and information;
- does not disclose information to third parties without the customer's consent, except as required by law or by request of the competent authorities;
- requires specific confidentiality commitments from staff and external collaborators.

### **Disclosure of confidential information**

Confidential information may be disclosed to third parties only in the following cases:

- in the presence of a legal obligation or a provision of the competent authority;
- when this is necessary for the fulfillment of contractual or organizational obligations strictly connected to the provision of the service;
- subject to the customer's explicit authorization.

In such cases, Prebiomics undertakes, where permitted by law, to inform the customer in advance of the information being communicated.

### **Information acquired from different sources**

If Prebiomics acquires customer information from sources other than the customer (for example, competent authorities or reports), such information is treated as confidential. Prebiomics also protects the identity of the source, unless otherwise agreed with the source or required by law.

Trento, 31 January 2026

**Prebiomics S.r.l.**  
The CEO  
Enrico Fiorini