



CODE OF ETHICS

GENERAL PRINCIPLES

Medial International is one of Italy's leading companies operating in the professional cleaning supplies sector. Our commitment is constantly focused on developing products that contribute to improving the quality of living, working and leisure environments, enhancing the well-being and health of all those who use them.

Medial International began its journey in 1985 as an important and strategic Italian branch of a well-established French company operating in the professional hygiene and cleaning products sector. Since 2008, Medial International has continued its entrepreneurial path independently and, with the aim of strengthening its manufacturing capabilities, acquired Metalnova®, the renowned Italian company specialized in the production of steel waste containers. Over the years, the Company has increasingly specialized in Made in Italy manufacturing expertise, developed through experience, in-house production and a strong project-oriented culture.

In 2015, on the occasion of its thirtieth anniversary, Medial carried out a corporate rebranding that integrated Metalnova into the Medial International identity, making the Company an important point of reference for professionals in the sector. Today, Medial International operates two manufacturing sites in Italy, an internal development and production center, and a warehouse exceeding 10,000 square meters, storing more than 350,000 items distributed in over 20 countries.

In 2026, a new corporate rebranding was undertaken, positioning Medial International as a generalist company built upon a combination of specialized expertise in the cleaning, horeca and urban furniture sectors, supported by two dedicated manufacturing divisions.

The Metalnova brand represents the strengthening of the Company's industrial steel evolution journey, offering solutions that are increasingly recognizable, reliable and consistent with its manufacturing culture.

The Dosico brand, founded in 1969 and boasting a long-standing tradition in the hygiene sector, stands out for its fully Spanish manufacturing process, from mold design to injection molding and dispenser assembly. Dosico, a Spanish company specialized for more than 50 years in the design and manufacture of dispensers and professional hygiene solutions, has become part of Medial Dosico Higiene, the Spanish subsidiary of Medial International.

The mission of Medial International is to continue developing coordinated solutions for environmental aesthetics and personal care, while expanding its range of waste management solutions proudly manufactured under the Italian flag. The Company is committed to researching innovative solutions that emphasize environmental sustainability and support the green transition, with the goal of fully satisfying customer needs.

This Code, approved by the Board of Directors of Medial International, establishes the obligations of loyalty, fairness and diligence that must be observed by all persons who maintain any form of working relationship with the Company.



ARTICLE I – RESPONSIBILITY

Each director, employee and collaborator who has a working relationship with Medial International – MEDIAL brand (hereinafter also referred to as the “Company”) – shall act with loyalty, diligence and fairness, taking responsibility for their actions in accordance with applicable laws and regulations.

They shall refrain from any conduct inconsistent with the principles set forth in this Code and in the Company Procedures in force and shall promptly report any violation thereof.

Each director, employee or collaborator is responsible for the materials, assets and equipment made available by the Company, as well as for their proper use and maintenance in an efficient condition.

Each director, employee or collaborator shall be personally responsible for any conduct that, in violation of this Code or the Company Procedures in force, may cause damage or inconvenience to the Company or to third parties. They acknowledge that such conduct may give rise to all actions necessary to protect the Company’s interests and seek compensation for any resulting damages.

Each director, employee or collaborator shall undertake to comply with the laws and regulations of all countries in which they operate on behalf of Medial International.

ARTICLE II – CORPORATE LOYALTY

No director, employee or collaborator shall use for personal purposes or gain any information, assets or equipment made available by Medial International for the performance of their work.

Each director, employee or collaborator shall refrain from any activity that could jeopardize the Company’s image, financial stability, moral integrity or legal standing. They shall also avoid engaging in activities that compete with or create a conflict of interest with Medial International’s business, including through the involvement of third parties.

Each director, employee or collaborator shall avoid accepting promises of favors, personal privileges, gifts or money intended to improperly benefit third parties in their dealings with Medial International and shall promptly inform Management should such circumstances arise.

Within the scope of their respective activities, employees, collaborators, suppliers and all persons acting in the name, on behalf of, or representing the Company shall diligently comply with applicable laws, this Code, Company regulations and procedures and, where applicable, professional ethical standards.

Under no circumstances may the pursuit of corporate interests or personal interests justify conduct in violation of these principles and rules.



ARTICLE III – CONFIDENTIALITY

Each director, employee and collaborator shall maintain the utmost confidentiality regarding information, technology, contractual arrangements, customer and supplier lists, procedures, and any other assets constituting the proprietary know-how and intellectual capital of Medial International, the disclosure of which could result in financial loss or reputational damage to the Company.

Each director, employee and collaborator shall process personal data, sensitive information and confidential information belonging to the Company or to third parties in full compliance with all applicable laws and regulations concerning confidentiality and privacy, avoiding any improper use thereof. The Company operates in strict compliance with Regulation (EU) 2016/679 (GDPR), ensuring the protection of personal data and the privacy rights of individuals and other parties.

No director, employee or collaborator may allow unauthorized persons to access Company offices or operational departments without prior authorization from Management.

ARTICLE IV – WORKING ENVIRONMENT

Directors, employees and collaborators shall not tolerate any form of harassment or inappropriate conduct, whether based on sexual grounds, social or racial discrimination, or any behavior that may undermine the dignity of the individual.

Each director, employee, consortium member, collaborator or worker shall refrain from:

- Performing duties while under the influence of alcohol or narcotic substances;
- Using language that is disrespectful toward religious beliefs or otherwise offensive or vulgar;
- Engaging in conduct that may intimidate external stakeholders or colleagues;
- Displaying offensive attitudes toward external stakeholders or colleagues;
- Behaving in a manner intended to discredit the work, professionalism or reputation of external stakeholders, competitors or colleagues;
- Engaging in conduct that may endanger the health, safety or well-being of others;
- Allowing unauthorized persons to access offices or operational departments without first informing Management and making such persons aware of any potential safety risks.

Each director, employee and collaborator shall carry out their activities in full compliance with all applicable occupational health and safety laws and regulations.



Medial International is committed to ensuring the utmost respect for human dignity, guaranteeing all employees, collaborators and stakeholders appropriate personal and professional consideration, fair remuneration paid within the agreed terms, and the proper payment of all social security contributions and related obligations. Furthermore, the Company undertakes not to employ child labor under any circumstances, in accordance with the principles established by the Conventions of the International Labour Organization (ILO).

ARTICLE V – RELATIONS WITH EMPLOYEES AND COLLABORATORS

The selection of employees is carried out on the basis of the candidates' qualifications and their suitability for the Company's needs, in compliance with applicable laws and National Collective Labour Agreements.

Upon the establishment of any employment or collaboration relationship, each selected individual shall receive adequate information regarding the applicable legal provisions, economic treatment and remuneration related to the role, so that acceptance of the assignment is based on full awareness and understanding of its terms.

The Company rejects all forms of discrimination against its employees and collaborators and actively promotes the protection of health and safety in the workplace through preventive measures. Furthermore, the Company safeguards the privacy of employees and collaborators by adopting all measures and protections required by applicable legislation for the processing, storage and protection of personal data and information.

The Company prohibits and rejects any investigation into the ideas, preferences, personal tastes or private life of its employees and collaborators and undertakes to protect their moral integrity and their right to working conditions that respect human dignity.

Employees and collaborators may not engage in activities that are detrimental to Medial International or incompatible with their duties and contractual obligations. Company assets shall be used exclusively for the performance of assigned tasks, duties, projects and corporate programs. Such assets may not be used for personal purposes or made available to third parties unless expressly authorized by the Company.

Without prejudice to the obligations established by applicable laws and collective or individual employment agreements, each employee and collaborator shall avoid conduct that is inconsistent with the ethical principles set forth in this Code of Ethics and that could adversely affect the reputation or image of Medial International.

Conflict of Interest

Each employee and collaborator shall avoid situations that may give rise to a conflict of interest and shall refrain from taking personal advantage of business opportunities discovered through the performance of their duties within the Company. Any employee or collaborator who finds themselves in a situation of actual, potential or perceived conflict of interest shall promptly inform the Directors and Legal Representatives of Medial International, or any appointed manager or supervisor, and shall refrain from undertaking any related activity. Employees and collaborators are also



required to promptly report any actual or potential conflicts of interest involving other individuals of which they become aware.

ARTICLE VI – RELATIONS WITH PUBLIC ADMINISTRATION

Certain practices that may be considered part of ordinary commercial activities can be deemed unacceptable or even constitute violations of laws and regulations when carried out in dealings with employees, representatives or officials of Public Administration bodies.

Therefore:

- No person is permitted to offer or accept money, promises of employment or other benefits to directors, representatives, executives, officials, managers or employees of Public Administration bodies, or to their relatives, where such conduct may be interpreted as intended to obtain improper advantages of any kind. This restriction does not apply to gifts or courtesies of nominal value that do not compromise the integrity or reputation of either party.
- No person is permitted, in dealings with public officials, public service officers or actual or potential customers, to offer or promise money or any other benefit in any form, whether such conduct is intended solely for the benefit of the individual involved or for the benefit or interest of the Company.
- Likewise, any form of gift, hospitality or benefit granted to individuals or entities maintaining commercial and/or business relationships with Medial International is prohibited, except where such gifts, hospitality or benefits are of modest value and consistent with normal business practices and customs.
- In all cases, employees and collaborators must obtain prior authorization from the relevant internal managers before providing any gift, hospitality or benefit exceeding a nominal value.
- Anyone acting in the name and/or on behalf of Medial International must refrain from practices that are prohibited by law, commercial customs, this Code of Ethics, or, where known, by the ethical rules applicable to the public entities with whom they interact.
- Employees and collaborators who, in the course of their activities, receive gifts, hospitality or benefits of any kind shall promptly report them to the appropriate internal managers whenever their value exceeds what may reasonably be considered nominal according to common business practice and custom.

ARTICLE VII – ANTI-MONEY LAUNDERING

Directors, employees and collaborators of Medial International shall not accept, participate in, facilitate or tolerate any activity that could constitute money laundering or involve the use, concealment, transfer or conversion of proceeds derived from unlawful activities. The Company is committed to conducting its business in full compliance with all applicable anti-money laundering laws and regulations and expects the same commitment from all individuals acting on its behalf.



ARTICLE VIII – RELATIONS WITH SUPPLIERS

In selecting suppliers, Medial International acts with the objective of achieving the highest competitive advantage while avoiding discrimination and pursuing economic convenience only in conjunction with the technical and economic capabilities of its contracting partners, evaluated on the basis of their overall reliability and suitability for the specific services or products to be provided.

In supplier selection and management, the Company always operates in full compliance with applicable laws and the contractual provisions governing the relevant business relationships.

Should Medial International identify any violation of the principles set forth in this Code by its key suppliers, the Company shall formally notify the parties concerned of the relevant facts and may exercise its right to terminate the contractual relationship where the contract contains an express termination clause for such circumstances.

For this purpose, the provisions of this Code of Ethics shall be made known to all relevant suppliers and business partners.

ARTICLE IX – RELATIONS WITH CUSTOMERS

All persons subject to the provisions of this Code shall conduct their relationships with customers in accordance with the principles set forth herein, acting with professionalism, courtesy and a spirit of cooperation.

They shall strictly comply with the procedures established under the Company's Quality Management System, carrying out their activities in accordance with the principles of effectiveness and efficiency, and always providing information that is truthful, accurate, complete and clear, while avoiding any form of communication that may be misleading or deceptive.

The Company's objective is to achieve the highest possible level of customer satisfaction while fully respecting its own business and operational requirements.

ARTICLE X – RECIPIENTS

The provisions of this Code are addressed to and apply to all persons who, in any capacity, operate within or on behalf of the Company and contribute to its business activities.

Management and the Company's legal representatives are responsible for implementing and ensuring compliance with the provisions contained herein and for promoting their dissemination among employees and collaborators.

In particular, the following are recipients of this Code:

- Directors and/or shareholders of Medial International;



- Employees, collaborators, consultants and all persons vested with powers of representation, decision-making and/or control;
- Suppliers of goods and services and, more generally, all persons who carry out activities in the name and on behalf of Medial International;
- Customers;
- Business partners.

All recipients are required to observe and comply with the principles contained in this Code. Compliance constitutes a fundamental condition for the establishment, maintenance and continuation of any relationship with the Company, including employment, collaboration, consultancy, supply of goods and services, customer relationships and any other form of business relationship.

Failure to comply with these rules of conduct may result, depending on the seriousness of the violation, in disciplinary measures up to and including the termination of the existing relationship with the Company.

ARTICLE XI – EFFECTIVENESS

This Code of Ethics shall apply to all conduct undertaken by the relevant parties following its adoption by the Board of Directors.

Following its approval, this Code shall be displayed in a location accessible to all employees and collaborators, distributed to them in copy form, and attached to all contracts entered into with suppliers.

ARTICLE XII – APPROVAL AND ENTRY INTO FORCE OF THIS CODE

This Code of Ethics has been approved by the Board of Directors of Medial International and shall enter into force on the date of its approval.

ARTICLE XIII – AMENDMENTS

Any amendment to this Code must be approved by the Company's Board of Directors and communicated to all recipients identified in Article X (Recipients).

ARTICLE XIV – SANCTIONS

Compliance with this Code of Ethics constitutes a contractual obligation for all directors, employees and collaborators of Medial International and forms an integral part of their duties under applicable laws and regulations.

Any violation of the provisions contained herein may result in disciplinary measures, the termination of any existing contractual relationship with the Company and, where applicable, claims for compensation for any damages suffered by the Company as a consequence of such violation.

ARTICLE XV – SPECIFIC PROVISIONS ADOPTED IN COMPLIANCE WITH THE ADMINISTRATIVE LIABILITY OF LEGAL ENTITIES PURSUANT TO ITALIAN LEGISLATIVE DECREE NO. 231/2001

I. ILLEGAL PAYMENTS AND CORRUPTION

Medial International S.p.A prohibits payments of any kind to any person, promises of favors of any nature, or any form of prior arrangement between Company personnel and public officials or employees of Public Administration bodies, when such actions are intended to obtain advantages in the sale of goods and/or services or to promote the interests of the Company before Public Administration bodies or any other governmental authority.

Any payment, promise of favor, subsidy or arrangement of this nature, made in any country worldwide, constitutes a violation of the Company's internal regulations and procedures.

Any form of payment, gift or service, even if only apparently intended to influence the actions of a Public Official, is strictly prohibited.

The Company also prohibits any form of so-called "commercial bribery" that violates national laws or the laws of other countries.

For the purposes of this Code, "commercial bribery" means providing anything of value to an intermediary (for example, an employee of a Medial International customer) with the aim of improperly influencing that customer's business decisions or conduct.

Accordingly, Medial International prohibits any:

- Employee;
- Consultant;
- Collaborator;
- Intermediary;
- Or any other person acting on behalf of intermediaries, agents, consultants or collaborators of Medial International, or otherwise acting directly on behalf of the Company, from participating, directly or indirectly, in any activity that may constitute commercial bribery.

II. CONFLICTS OF INTEREST – GIFTS AND HOSPITALITY

Employees of Medial International may neither offer nor accept gifts intended to influence business decisions or commercial relationships, whether involving private parties or public entities.

The offering or acceptance of gifts that could be considered bribes is strictly prohibited.

Gifts of symbolic value may be offered or accepted solely for legitimate promotional purposes.

A gift shall be considered of modest value if its value does not exceed €50.00. In any event, the nature and value of the gift must not be such as to make the recipient feel obliged to reciprocate, nor should it be perceived as an attempt at bribery or an indirect request for favors or preferential treatment.

Prior authorization from the relevant Medial International manager is always required before offering gifts or hospitality of modest value.



The related expense must be recorded under the accounting category “customer gift” and must always be properly documented and traceable.

Where local customs or business practices require exceeding the above threshold, Medial International requires a written justification in order to evaluate and grant a specific authorization. Any such expense must be documented and recorded in accordance with Company procedures so as to remain fully transparent and traceable.

The giving or receiving of goods, services or payments not authorized by the Company may compromise business relationships and may be considered unlawful.

III. PROTECTION OF MEDIAL INTERNATIONAL’S ASSETS – ACCURACY OF ACCOUNTING RECORDS, REGISTRATIONS AND PUBLIC REPORTING

Every transaction and operation must be properly recorded, authorized, verifiable, lawful, consistent and appropriate. All Company actions and transactions must be supported by adequate documentation, and it must always be possible to verify the related decision-making, authorization and execution process.

For every transaction, sufficient documentary evidence must be maintained to enable the performance of audits and controls capable of verifying the characteristics, rationale and legitimacy of the transaction and identifying the individuals who authorized, executed, recorded and reviewed it.

IV. INFORMATION SECURITY

Internet access systems and all other electronic communication systems (including e-mail and voicemail) represent valuable business tools but also create additional security risks for both employees and the Company.

Accordingly, appropriate precautions must be adopted to preserve the integrity of the Company’s technology infrastructure and data assets.

Since Internet access may expose both individual devices and the corporate network to security risks, employees are required to use only approved tools, systems and procedures when carrying out such activities.

Employees of Medial International may not use non-corporate e-mail accounts to send or receive business-related information concerning the Company.

Although limited personal use of Company electronic equipment may be permitted, no expectation of privacy exists with respect to communications transmitted through, stored on, or received by Company communication systems.

Access to and use of such systems are governed by the Company’s IT Policy, Annex “A”.

Furthermore, all documents, including electronic communications, are the property of the Company and may be reviewed by the Company at any time.

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