

Code of Ethics and Professional Conduct

Introduction

1. Società Italiana Brevetti S.p.A. (hereinafter “SIB”), founded in 1882, is a European leader in industrial and intellectual property consultancy. Our advisory services are dedicated exclusively to the protection of innovation, trademarks and domain names, patents, utility models, designs, denominations and geographical indications, copyright, software, and intellectual property in general, both nationally and internationally.

Our services cover all technical and legal aspects of intellectual property: from worldwide filings to advisory services, including the enforcement of exclusive rights as well as legal assistance through collaboration with the attorneys at law of the law firm SIB LEX.

For SIB, to deliver high-quality services means to understand clients’ needs and objectives in order to identify the best solutions for the protection and enhancement of their intangible assets.

The SIB team consists of Italian and European qualified attorneys authorized to represent clients before the Italian Patent and Trademark Office (UIBM), the European Union Intellectual Property Office (EUIPO), the European Patent Office (EPO), the World Intellectual Property Organization (WIPO), and the State Patent and Trademark Office of the Republic of San Marino (USBM).

2. SIB recognizes that integrity, competence, and compliance with professional ethical rules form the basis of client trust and professional reputation. This Code of Ethics (hereinafter “Code”) sets forth the principles and rules of conduct to be observed by directors, shareholders, professionals, collaborators, employees, and trainees in the performance of their activities, as well as the modes of interaction with our partners and suppliers.

Art. 1 — Purpose

To promote professional conduct consistent with the principles of legality, honesty, independence, diligence, and fairness. To provide practical guidelines for managing conflicts of interest, safeguarding confidentiality (in compliance with the GDPR, the Italian Privacy Code, and internal policies), ensuring transparency towards clients, and respecting the rights of collaborators.

Art. 2 — Scope of Application

The Code applies, where compatible, to all individuals who, in any capacity – directors, partners, professionals, collaborators, employees, and trainees – operate within or on behalf of SIB.

Art. 3 — Fundamental Principles

All parties concerned must observe the principles of diligence, integrity, independence, competence, confidentiality, fairness, impartiality, and non-discrimination.

Art. 4 — Confidentiality and Data Protection

Information and documentation acquired during professional activities are to be considered confidential and may not be disclosed without the client's consent, except where required by law. SIB complies with Regulation (EU) 2016/679 (GDPR) on data protection, with reference to Article 90 recognizing professional secrecy, and with Legislative Decree 196/2003 as amended, Article 206 of Legislative Decree 30/2005 concerning the duty of professional secrecy of Industrial Property Consultants, and Article 4a of the Code of Conduct of the Italian Industrial Property Consultants Institute. Any breach of confidentiality must be reported immediately.

Art. 5 — Conflicts of Interest

Members of SIB's Board of Directors, as well as all professionals, must avoid situations in which personal or third-party interests may conflict with those of clients. Before accepting a new assignment, the existence of any potential conflicts must be verified in accordance with the rules of the Italian Industrial Property Consultants Institute.

Art. 6 — Relationship with Clients

Obligations toward clients include: clear information about activities, risk assessment, time estimates, transparency regarding fees, and periodic updates. Acceptance of an assignment, where not already governed by prior general or specific agreements with the client, requires written agreements defining the scope of work and fees.

Art. 7 — Transparency of Fees

Fees must be proportionate to the nature, complexity, and value of the assignment and must comply with the parameters for determining the remuneration of Industrial Property Consultants set forth in Ministerial Decree No. 194 of November 4, 2024. Fee estimates and calculation criteria must be clearly communicated to the client in writing.

Art. 8 — Advertising and Communication

Public information about the firm must be truthful and compliant with the Code of Conduct adopted by the Italian Industrial Property Consultants Institute. The use of social media and of the website must respect the dignity of the profession and confidentiality obligations.

Art. 9 — Relations Among Colleagues and Work Environment

SIB promotes a respectful, inclusive work environment free from harassment or discrimination. The firm encourages collaboration, training, and the professional growth of trainees.

Art. 10 — Anti-Corruption and Crime Prevention

1. Purpose

Shareholders, professionals, collaborators, employees, and trainees of SIB must refrain from any conduct that may constitute bribery, extortion, undue inducement, embezzlement, influence peddling, abuse of office, or other offenses provided for by the Criminal Code to the detriment or advantage of the Public Administration (hereinafter "PA"), or in dealings with persons acting on its behalf.

2. *Applicable Legislation*

Law No. 190 of November 6, 2012 (“Anti-Corruption Law”).

Law No. 3 of January 9, 2019 (“Anti-Corruption Reform”).

Legislative Decree No. 231 of June 8, 2001, concerning the administrative liability of entities.

3. *Internal Preventive Measures*

a) Identification of activities with public and private entities and companies to which SIB provides services, as well as with the PA, and assessment of potential risks.

b) Definition of operational procedures with such entities, companies, and the PA in general.

c) Periodic updates on preventive measures.

d) Transparency and traceability of documents and decisions relating to relationships with such entities, companies, and the PA.

4. *Reporting and Disciplinary System*

A secure and confidential reporting channel is established for the reporting of suspicious conducts through a dedicated platform accessible only to a person appointed by the Chief Executive Officer. Reports will be verified impartially, ensuring protection for the reporting party. In the event of confirmed violations, SIB will adopt sanctions proportionate to the severity of the breach.

5. *Cooperation with Competent Authorities*

SIB cooperates with the judicial and administrative authorities, providing support and information within the limits permitted by law (see Art. 12).

Art. 11 — Professional Diligence

Professionals shall carry out their assignments with competence and diligence. Any errors must be communicated transparently.

Art. 12 — Relations with the Authorities and the Judiciary

SIB cooperates with the authorities and complies with procedural rules. No actions shall be taken that obstruct investigations or proceedings.

Art. 13 — Social and Environmental Responsibility, Diversity, Equity, and Inclusion, Human Rights

SIB promotes Social and Environmental Responsibility and adopts policies regarding Diversity, Equity, and Inclusion. These policies are available on the company website. SIB, in line with the Universal Declaration of Human Rights of the United Nations, upholds and respects human rights as a fundamental value for every individual to be treated with respect, fairness and dignity. SIB requests its partners and suppliers to share the same commitment towards the protection of the environment, the respect of the dignity of persons and of Human Rights.

Art. 14 — Monitoring and Sanctions

The Head of Human Resources or a person appointed by the Chief Executive Officer, where designated, shall monitor compliance with the Code. Violations may result in disciplinary measures issued and signed by the Chief Executive Officer or by another person appointed by him or by the Board of Administrators.

Art. 15 — Updating of the Code

The Code is subject to periodic review to ensure compliance with regulatory or organizational changes.

Art. 16 — Communication to Staff

This Code shall be communicated to all personnel and to the individuals referred to in Art. 2.

Approved by the Board of Administration on 25 September 2025 with revisions of 14 April 2026.