



CODE OF BUSINESS ETHICS



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Premise

“

Act only in accordance with that maxim through which you can at the same time will that it become a universal law.

Kant.I, Critique of Practical Reason 1788

”

VALUE-BASED ACTIONS

Our Code of Business Ethics comes from the desire to affirm that at ComfTech, for ten years now, all our decisions and actions have been based on solid values and principles.

With this Code of Business Ethics we want to share the idea that our values have the task of reducing, also for the future, our uncertainties, of guiding our behaviour, but also of offering answers to all the people who have relations, in various capacities and levels, with our company.



Today we need to confirm our ethical vision, to clearly express our principles, values and common responsibilities in which we have always believed and which always guide us in our choices. These principles take into account the interests and rights of others and guide our behaviour in our relations with the market and in particular with the consumer, with the communities in which we operate, with the territory in which we operate, with the people who work with us and with the stakeholders with whom we deal. Every action is carried out under the culture of responsibility, legality, transparency and the creation of long-term value.





Introduction

“

We have always focused on product research, a product that is an expression of our passion for excellence and reliability.

”

THE COMPANY

Our company was founded in Monza in 2010 as a start-up in the field of wearable medical devices (Wearable Biomedical System - WBS). Our commitment has always been focused on product research, a product that is an expression of our passion for excellence and reliability: wearable medical devices for monitoring personal physiological parameters. ComfTech has grown thanks to the commitment of its people, a commitment that translates into

pursuing our entrepreneurial goals without ever losing sight of our reference points: respect and responsibility, integrity and loyalty, trust and passion for research and innovation. These points of reference have enabled us to devote all our attention to the individual, who is always at the centre of our activities, since satisfying his or her needs and requirements is the basis of our company's success. Reliability and safety are some of the fundamental principles underlying our work.

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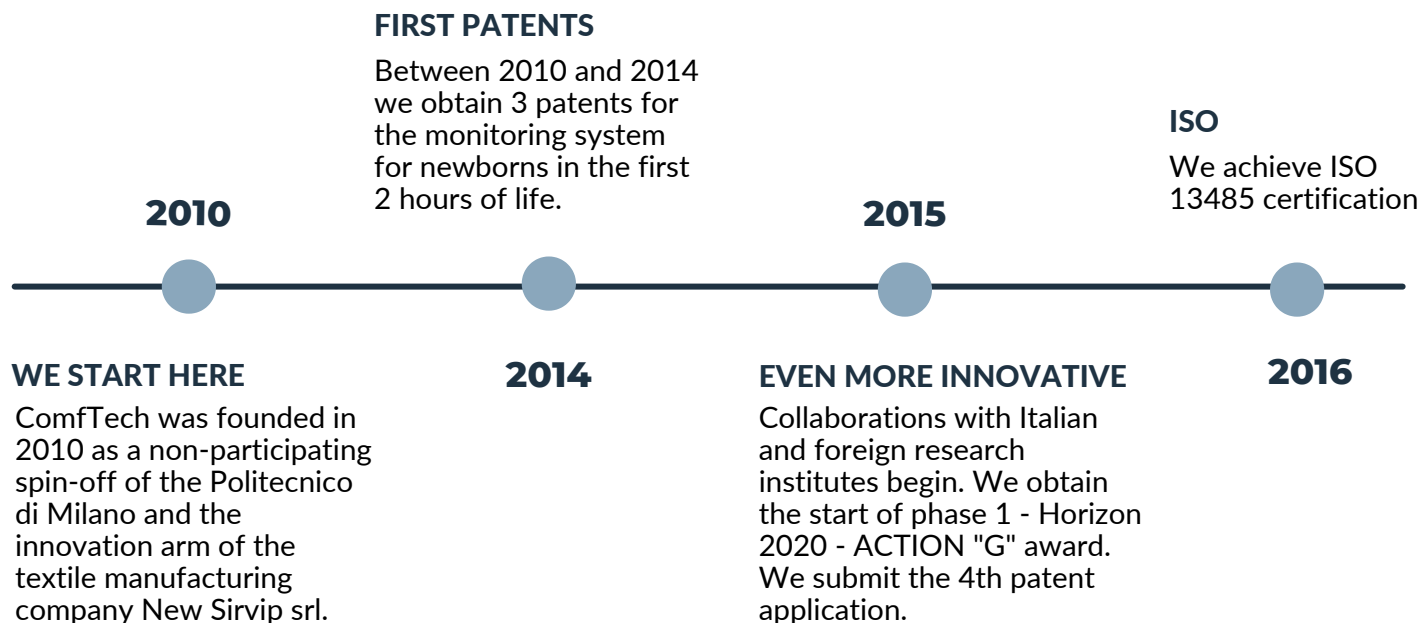
1 Consumer products

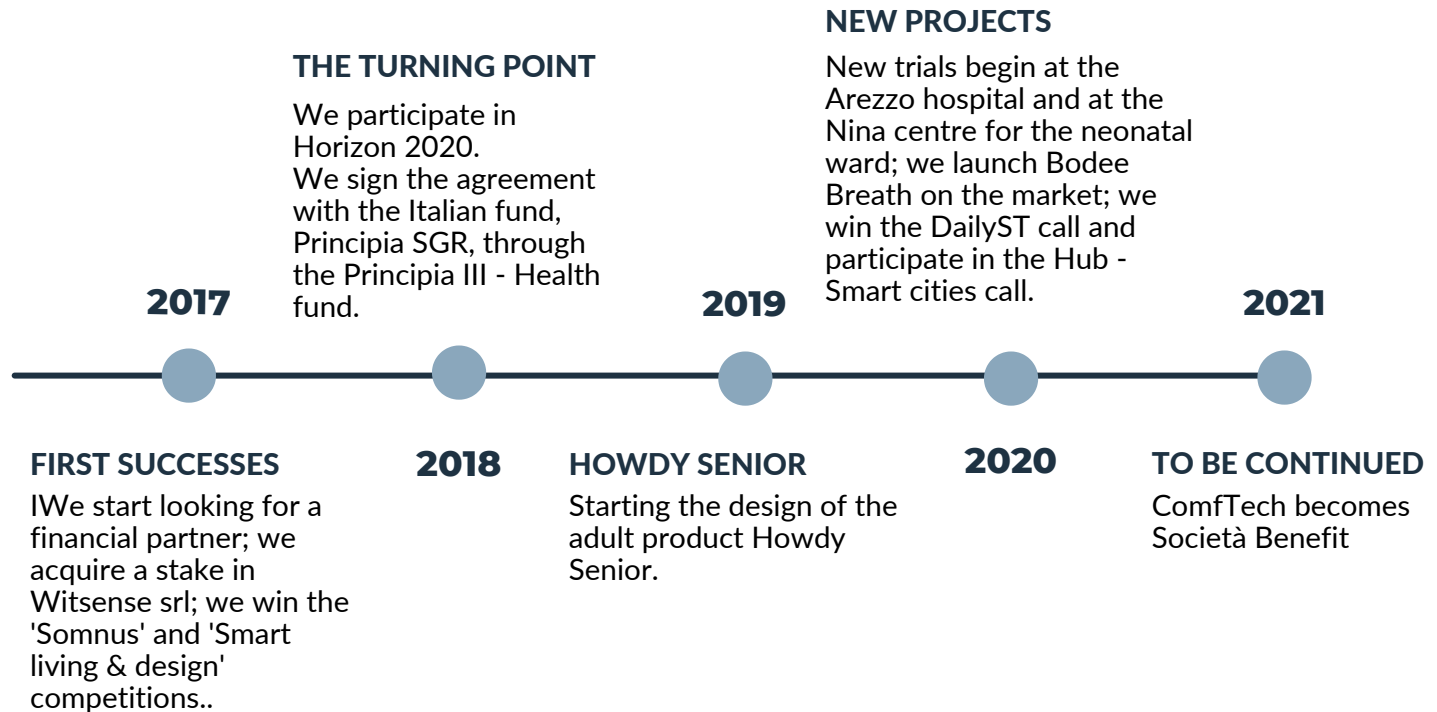
This is why our products are certified and why we as a company have obtained the UNI EN ISO 13485:2016 Quality Certification, which pays particular attention to the organisational and managerial aspects of the company, as well as to production and distribution processes, with specific reference to internal resources, customers and suppliers. With this Code of Business Ethics we wanted to give ourselves a guideline for the future to guide our behaviour and offer our suppliers and consumers valid and sustainable answers to their needs.

NATIONAL COLLECTIVE AGREEMENT

Workers employed in the design and production of Wearable Devices, which are ComfTech's core business, and in company administration in general, are subject to the CCNL related to CLOTHING AND GARMENTS-Industrial companies, signed by SMI, Sistema Moda Italia-Federazione Tessile e Moda.

Our story







Ethical business values

At ComfTech we strongly believe in and implement ethical values such as:

IMPARTIALITY SUSTAINABILITY
INCLUSION DEVELOPMENT
 HONESTY
RESPECT RESPONSIBILITY
INNOVATION RELIABILITY
SAFETY CONFIDENTIALITY



CENTRALITY OF THE INDIVIDUAL

One of the principles in which we believe most is the recognition of human value. Respecting human rights and promoting the well-being of our customers and employees are the pillars of our company. ComfTech recognises the diversity of cultures and talents as a fundamental value, embracing and supporting a culture of plurality.

IMPARTIALITY

We offer equal employment opportunities to all our employees and collaborators based solely on their professional qualifications and performance capabilities, without discrimination based on ethnicity, religion, opinion, nationality, gender, age, physical and social conditions.

RELIABILITY

We ask everyone to respect working hours, unless justified, and to limit absences from the workplace to those that are strictly necessary; to devote the appropriate resources in terms of time and dedication to the tasks assigned in pursuit of the relevant objectives.

“ *At ComfTech we embrace
and support a culture of
plurality* **”**

DEVELOPMENT

We are committed to developing the skills and competences of each employee and collaborator through training and further education.

SAFETY

All our monitoring systems are certified, safe and reliable, based on our decades of experience.

CONFIDENTIALITY

All our employees and contractors are required to exercise extreme caution and care when using non-public information obtained in the course of their work. Information and any other material obtained in the course of their work is the property of the Company. Employees undertake not to disclose, use or communicate information and/or any other kind of news, documents, data, etc., related to the acts and operations of each job or responsibility that are confidential without specific authorisation; it is forbidden to spread false information both inside and outside the company.

RESPECT

We adopt a respectful and sensitive behaviour towards others in all circumstances. During working hours it is forbidden to work under the influence of alcohol, drugs or similar substances, or to consume or dispose of such substances in any way.

INNOVATION

For us at ComfTech, innovation means thinking creatively in research, in the selection of ideas and their implementation, in the materials used, in problem solving, right up to the final product, and last but not least in packaging and user communication. If consumers distinguish our products by their excellent quality, then innovation and research towards continuous improvement will be possible thanks to the daily commitment and passion of our people.

HONESTY

All employees and collaborators undertake to use the assets and resources made available by ComfTech according to their intended use, in such a way as to safeguard their preservation and functionality. All employees are asked to scrupulously comply with the provisions of the company's Regulations for the use of the computer system, the Internet and e-mail; they are asked not to use company vehicles to carry out personal tasks and not to transport people who are not part of the company, unless expressly authorised by the company itself.

PRIVACY

ComfTech undertakes to safeguard and protect information relating to employees and collaborators generated or acquired inside and outside the Company and to take all useful measures to avoid improper use of such information.

RESPONSIBILITY

At ComfTech, we are committed to providing the contracted service, consistent with the tasks, objectives and responsibilities assigned, without delegating the performance of activities to other employees or collaborators.

INCLUSION

Our way of working and designing revolves around the needs of those who need extra help in their daily lives: from newborns to the elderly, our textile technology is committed to effectively supporting whoever wears it and, at the same time, helping the user to feel safer and to know their body better. We have a special focus on the most vulnerable groups that we want to support with our products.

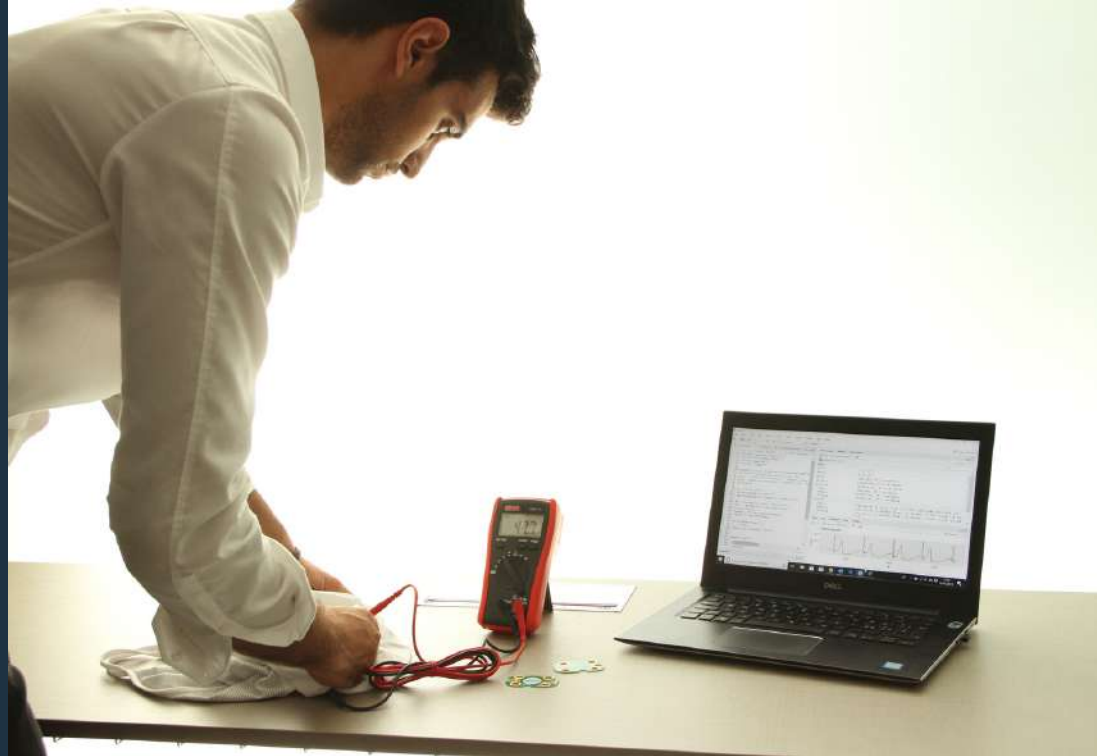


WORKPLACE

We promote a working environment where the dignity of each individual is guaranteed and we take care to avoid stress and discomfort at work. We believe in team spirit and recognise that collaboration is the key to building solid and lasting relationships, through which we can express our potential and achieve operational excellence.

At ComfTech we condemn all forms of bullying and labour exploitation, both direct and indirect. Every day we work in synergy to maintain a relaxed and collaborative atmosphere, based on continuous and constructive dialogue in which everyone feels involved and inspired to pursue the company's objectives.





Our commitment

Our goal is to satisfy our customers; create value for our shareholders; and encourage the professional growth of our employees. We are strongly oriented towards growth and continuous improvement, in order to be able to effectively identify customer needs, define the requirements of the products to be proposed in such a way that they meet those needs and increase end-user satisfaction. We are committed to offering highly innovative products that meet specific needs not met by our competitors or that anticipate market trends as far as possible.

Product

Our aim is to provide the highest quality product that meets and exceeds customer expectations. All our products are designed and manufactured entirely in Italy.

“We focus our efforts on innovation”

Adaptability, flexibility, quality and a totally user-centred approach are the basic requirements for the design of all our products.



Social sustainability

When the reflection on ethics moves from individual action to a larger organisational and business context, the concept of responsibility and awareness of the individual is linked to that of Corporate Social Sustainability: it is the ability to effectively integrate one's own business activities with the respect and protection of the interests of all partners and individuals with whom the company relates.



At ComfTech we pursue production models that respect and safeguard human rights, the Earth's regenerative capacities and community well-being, promoting human development in an equitable and sustainable manner.

Environmental sustainability

At ComfTech we are committed, within the limits of our possibilities and capabilities, to disseminating and raising awareness of sustainable development, using sustainable materials of proven and certified origin. We operate with respect for the environment and people's health, aware of our social and ethical responsibilities.



Our smart textiles are designed with sustainability in mind.

PATENTED TECHNOLOGY

Electronic circuits and sensors can be easily separated from the fabrics, ensuring that individual components can be properly replaced and recycled.

POLIPROPILENE

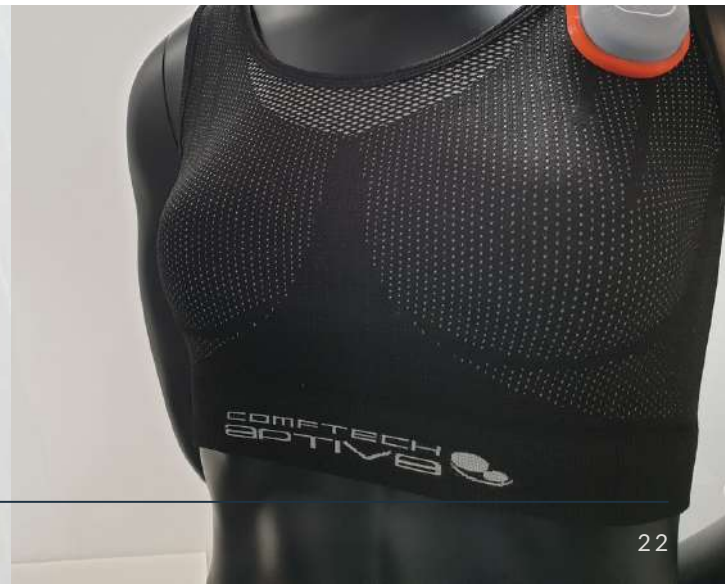
The main textile component is polypropylene: antibacterial, fully recyclable and reusable.

PRODUCTION IN THE REGION

All production takes place in Lombardy, reducing transport in the production chain.

SEAMLESS

We use seamless technology, which not only ensures excellent fit and maximum freedom of movement, but also minimises fabric waste.





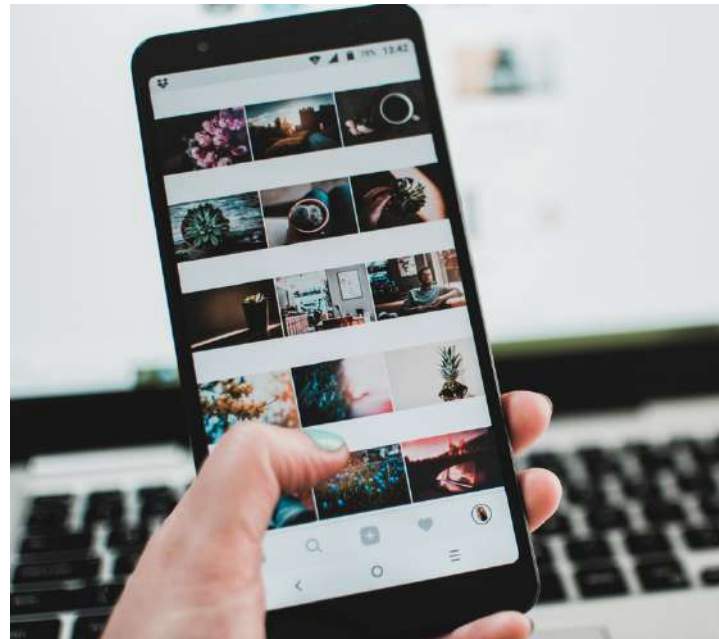
Corporate security

Our company is committed to protecting its employees, collaborators and external consultants by enforcing current regulations on the safety of the working environment and the health of workers, including occupational risk prevention activities, information and training, as well as the use within the company of the necessary means for this purpose. We are diligently committed to complying with Legislative Decree 81/80 on safety, making the workplace as safe as possible for our workers.

Marketing and Communication

Consumers have the right to receive all the information they need to make an informed choice when making a purchase. Our task is to establish a relationship with people and potential customers based on trust and loyalty.

All activities to promote ComfTech products have as their founding principle respect for the person, which includes the system of physical, psychological and cultural needs of each individual.




“ *Market logic should never stand in the way of full transparency of information on the content and correct use of products.* **”**



Stakeholder relation

Relations at all levels must be based on fairness, loyalty, mutual respect and cooperation. Relations with customers must be based on courtesy. Every collaborator, employee or consultant, supplier is required to perform their duties with the aim of achieving maximum customer satisfaction, and is required to provide assistance and information in a courteous, polite, correct and comprehensive manner.

The selection of suppliers and the determination of purchasing conditions must be based on an objective assessment of: the quality of the goods and services requested; the price of the goods and services requested; the counterparty's ability to provide and promptly guarantee goods and services of a level appropriate to the Company's needs; the supplier's compliance with ethical principles regarding the use of human resources and environmental sustainability.



Violation of the rules of the Code of Business Ethics

The rules contained in the Code of Business Ethics integrate the behaviour that the employee is required to observe, by virtue of the civil and criminal laws in force and the obligations set out in the collective bargaining agreement. Violation of the rules of the Code of Ethics damages the relationship of trust established with the Company and, insofar as it is assessed as a breach of contractual obligations of the employment relationship or professional collaboration, pursuant to Article 2104 of the Civil Code, may lead to disciplinary, legal or criminal action; in the most serious cases, the violation may lead to the termination of the employment relationship, if carried out by the employee, or to the interruption of the relationship, if carried out by a collaborator or third party (supplier, etc.).

“ *Violation of the rules of the Code of Business Ethics damages the relationship of trust established with the Company* **”**



Implementation tools

The Administrator is responsible for applying the Code of Business Ethics.

The Administrator undertakes the following tasks to ensure that the Code of Business Ethics is disseminated as widely as possible to all recipients; to inform the Shareholders on the status of implementation of the Code at least once a year; to ensure that the Code of Business Ethics and the concrete behaviour of employees and collaborators are consistent and therefore to investigate any notice of violation, involving the recipients and the functions concerned in the appropriate measures; verify the suitability of the Code and of the rules introduced with it to prevent unwanted behaviour by the Company; carry out analyses on the maintenance over time of the requirements of solidity and functionality of the Code of Business Ethics and of the behavioural rules introduced with it; update the Code to keep it always in line with the Company's reality.



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