



ASSOBIOMEDICA

CODE OF ETHICS

JUNE 2015

FOREWORD

With this Code of Ethics, Assobiomedica and its Member Companies wish to express their clear intention of directing their behaviour not only to the compliance with laws, regulations and the Articles of Association, but also to the observance of the moral principles that, in a democratic Country such as Italy, should govern all aspects of our community life, as well as all relations and interactions between individuals, associations, private companies, public bodies and institutions.

In fact, while law is the rule of our 'outward' behaviour, ethics is the law of our conscience, it is the rule of the intents and motivations that are at the basis of our behaviours and enrich them with psychological contents that go beyond the strict observance of regulations and qualify our conduct according to value-based standards.

As a result, the "positive" law passed by governments meets justice - it is, namely, a just law - only when it is consistent with Ethics and finds its deep root in ethical principles, a sublimation that, in a sense, turns the positive law into a sort of "natural" law, as may be "read" and inferred from our very human nature.

Hence, the Code of Ethics is the expression of a nobler and loftier concept of private enterprise, since it harmonically joins the irrenounceable demand for productivity and profit to a moral dimension, to an idea of competitiveness and competition that are free and yet governed by transparency and correctness in relations with anybody, i.e. by the same fairness that – ultimately - is the other side of self-respect.

As a matter of fact, the market is really "free" only where and insofar as it rules out any favouritism, pressures or conflicting interests, and profit is proportionate to merit exclusively.

Moreover, Assobiomedica and its associated Companies are aware of the special delicacy and importance of their field of activity, the Health Care sector, and are gratified to significantly contribute, with their efforts, to the protection of a prime human need such as the health of the citizens and, hence, to the improvement of the Health Care System and the development of our Community.

The compliance with laws and ethical values directs the relations of Assobiomedica and its associated Companies with their in-house and free-lance collaborators, as well as with Public Administrations, the Professionals of the Health Care sector, customers and suppliers.

Within the framework of this entrepreneurial commitment ennobled by ethical values, public spending for health care becomes more an investment than a cost; similarly, it is more an ambition than it is a duty to provide, for the benefit of patients' well-being and safety, high quality medical technologies and relevant services that are constantly in step with the steady progress brought about by an accurate, balanced, correct, objective, disinterested and documented scientific knowledge and information.

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INTRODUCTION

All Assobiomedica member companies (hereinafter referred to as Assobiomedica Member/s) working in the Health Care field are aware of the importance of and of the responsibility that this activity implies, since it is an indispensable element for the satisfaction of a basic human need, such as the health of the citizens, and for the improvement of the Health Care System and, hence, a key factor for the development of the Human Society. This is why, public spending for health care is an investment, not a cost.

The contribution of Assobiomedica Members to the health of the citizens is essential, as testified by the improvements, innovations and targets achieved in the diagnosis and treatment of patients thanks to medical technologies: it is a determining contribution for the treatment of patients and for the improvement of their quality of life, as well as, more in general, for the lengthening of anybody's lifespan.

Assobiomedica Members acknowledge that the compliance with any applicable laws and regulations and the observance of ethical principles are both an obligation and a critical step for the achievement of the aforementioned aims and may increase the reputation and success of the medical device sector.

This Code of Ethics intends to provide a guide on the minimum standards of conduct (business practices) that all Assobiomedica Members must abide by in Italy and, in general, elsewhere. It does not intend to replace or supersede national and European laws and regulations or any other professional or commercial codes (including corporate or business codes) that may concern any Assobiomedica Members.

The Code of Ethics is the element that acts as a catalyst of the moral condition of the Association Members and testifies the effort of giving shape to the ethical dimension so that it is recognised by the society.

This Code of Ethics is consistent with the Eucomed and EDMA Code of Business Practices. Eucomed and EDMA are associations that represent the interests of the European manufacturers of medical devices.

This Code of Ethics is part and parcel of the Articles of Association of Assobiomedica.

1. PRINCIPLES

1.1 ETHICS IN BUSINESS PRACTICE AND IN THE RUNNING & MANAGEMENT OF COMPANY AND ASSOCIATION ACTIVITIES

Assobiomedica Members undertake to manufacture and provide high quality medical technologies and relevant services in the interest of the safety and well-being of the patient.

Assobiomedica Members undertake to observe any laws, regulations as well as the Articles of Association. Ethical behaviour is not only characterised by the strict observance of laws and regulations. It goes well beyond, and it is based on the will – commitment - to adopt the highest standards of behaviour and the most ethical line of conduct in different situations.

The compliance with applicable laws and the observance of the ethical standards are crucial for the close cooperation requirement between the medical equipment/technologies industry and health care professionals. This collaboration can occur in the following ways:

- a) development of medical technologies;
- b) supply of training, service and support so as to allow an efficient and safe use of medical technologies and
- c) support of medical research, training and improvement of professional competences.

These activities are required for the progress of medical science and for the improvement of the treatment of patients, but they must occur through interactions characterized by utmost transparency, correctness and ethicality.

Fairness, correctness and transparency must characterise the activities and conduct of each single Assobiomedica Member, that must undertake to avoid any misleading information and behaviours such as to obtain an undue advantage of or from other people's positions of weakness and lack of knowledge.

In compliance with free enterprise and private property, once the Social function of free market is confirmed, the maximisation of the economic and financial results of the companies passes through fair business relations with customers and suppliers, as well as through an appropriate acknowledgment of the contribution given by their collaborators.

In particular, when relations are established with the Public Administration, it is considered appropriate to take more specific measures, as shown later. To this end, transparent and objective internal procedures governing the

behaviour of Assobiomedica Members represent a protection also with reference to the provisions of Lgs. Decree 231/2001 on administrative liability of the bodies.

1.2 WORK ETHICS, PROTECTION AND ENHANCEMENT OF COLLABORATORS

The internal (in-house) and external (free-lance) collaborators of Assobiomedica Members are a main resource for the development of the companies.

The wealth of knowledge, experience, intelligence and culture of the Collaborators must be enhanced and improved in order to contribute to their professional growth and well-being. Professional training, update and growth are carried out through specific and institutional training initiatives.

All Collaborators assure that each *business* decision is taken in the interest of the structure to which they belong, and they shall avoid any situation which might bring about conflict of interest between personal or family business activities and positions held that could compromise their independence of decision and choice.

Professional development and management of Collaborators are based on the equal opportunities principle: recognition of the achieved results, of professional potentials and of competences expressed by the individuals are the main criteria for the rating of Collaborators.

Free-lance Collaborators (consultants, agents, representatives, resellers, etc.) are required to observe the principles contained in this Code of Ethics, also through explicit commitment, included in the relevant contracts.

1.3 INFORMATION ETHICS

The communication of Assobiomedica Members is mainly stated in scientific information, which must be accurate, balanced, correct, objective, without ambiguity or misleading contents, supported with documentary evidence and verifiable.

Information must be carried out and made known in compliance with the provisions of the law in this regard.

2. BEHAVIOUR GUIDELINES: ETHICS IN BUSINESS PRACTICE AND IN THE RUNNING & MANAGEMENT OF COMPANY AND ASSOCIATION ACTIVITIES

The implementation of the ethical principles must be translated into guidelines that must act as a specific reference as to the correct behaviour and must be extended to one's own employees, agents or representatives, in general. Assobiomedica Members must implement efficient performance programs by drawing up and publishing written policies and procedures and, in the case of corporate body Members, by carrying out training programs and implementing clear procedures, inspections and enforcement mechanisms.

Assobiomedica reserves the right, in the last resort, to expel from the Association - by means of its Bodies - any Member that does not observe the guidelines of this Code of Ethics.

The regulations that must be observed by Assobiomedica Member Companies are listed and described here below.

2.1 COMPETITION

The free market presumes the autonomy of its actors in determining and pursuing business purposes.

Assobiomedica Members firmly believe in competition and free market, a wealth that must be defended against any possible and improper pressure both internal, coming from the same actors of the markets concerned, and external, from third parties, whatever the role carried out.

Assobiomedica Members must run their own business in compliance with law requirements on competition and supply contracts. The anti-trust law establishes specific rules in this regard and, in particular, affects severely those who adopt agreements limiting competition or abuse their prevailing role.

However, all this does not prevent the Association from pursuing to the end the institutional aims, sanctioned by the Articles of Association, in order to protect the requests expressed by its Members in full compliance with the principles governing competition.

Assobiomedica Members condemn any behaviours that are against the principles of competition – i.e. that may be contrary to fair competition - and undertake to observe said principles by taking appropriate measures in order to prevent the Association meetings from causing, also unintentionally, anti-competitive behaviours.

In this perspective, Assobiomedica Members and their Collaborators must not be involved both personally and through third parties in initiatives or

contacts among competitors (by way of example but not limited to: discussions on prices or quantity, subdivision and sharing of markets, limitations on production or sales, agreements for sharing customers, exchange of information on prices and pricings, etc.), that may appear as a violation of the regulations protecting competition and the market.

2.2 EXPORT CONTROLS AND SANCTIONS

Assobiomedica Members must guarantee the observance of the applicable laws on export controls and other regulations that limit or restrict commerce (trade) in some countries.

2.3 PAYMENTS AND ILLICIT COMMERCIAL PRACTICES

Assobiomedica Members must not offer, perform or authorise, directly or indirectly, the payment of sums or of anything having a significant value, for the illicit purpose of:

- a) influencing the judgement or behaviour of any subject, customer or Company;
- b) obtaining or maintaining commercial businesses;
- c) influencing any action or decision of any functionary/governmental officer; or
- d) gaining whatever advantage.

This requirement extends to direct and indirect incentives (inducements) offered by a Member, under any manner, through agents, consultants or other third parties. All Members must take into special account the laws and regulations that prohibit or limit incentives aimed at influencing medical staffs or customers.

2.4 DATA CONFIDENTIALITY

Assobiomedica Members shall have to guarantee that the data concerning patients and other type of confidential or personal information is kept and used in compliance with applicable law requirements.

2.5 COMPANIES IMAGE

The conduct of Assobiomedica Members on the market and towards competitors shall be characterized by utmost fairness and correctness; in particular, Assobiomedica Members may not adopt a dishonest line of conduct or behaviours that are detrimental to the image of the competitors.

2.6 SUSTAINABLE DEVELOPMENT AND RESPONSIBILITIES TOWARDS THE SOCIETY

The role played by Assobiomedica Members within the connective tissue of the Community implies the obligation to take into account in their development programs the requirements and needs of the community in whose territory the company is based, with the purpose of contributing towards its economic, social and civil development.

Assobiomedica Members have to run their business (perform their activity) by using the best technologies available, promoting and fostering the development of activities directed to enhance natural resources and make their best possible use, and protect the environment in accordance with all environmental protection laws and regulations.

2.7 RELATIONS WITH HEALTH CARE PROFESSIONALS AND WITH PUBLIC ADMINISTRATION. THE MODERATION PRINCIPLE ('SOBRIETY').

Assobiomedica Members acknowledge that the observance of the ethical standards and the compliance with applicable laws are essential so that the medical technologies sectors may develop and support collaboration relations with the Professionals of the Health Care Sector. All Assobiomedica Members must adopt and carry out ethical business practices and maintain a socially responsible behaviour in relation to interactions with the Professionals of the Health Care Sector. All Assobiomedica Members must also respect the mandate of the Professionals of the Health Care Sector to take independent decisions as to the therapies to be administered.

These Guidelines establish the appropriate standards for the different types of relations with the Professionals of the Health Care Sector, but they do not intend to replace or supersede any applicable national or European laws or regulations nor any professional codes (including company codes) that impose special conditions to Assobiomedica Members or to the Professionals of the Health Care Sector when carrying on their activity. Therefore, all Members shall have to guarantee autonomously that the respective interactions with the Professionals of the Health Care Sector observe the

current national, European and local laws, standards, regulations and professional codes

As a general rule, in the course of any business negotiation, request or relation with the Public Administration, both the Companies and their Collaborators must not try to improperly influence the decisions of the counterpart, including those of the functionaries who are dealing or have a power to decide on behalf of the Public Administration.

In the case of a tender with the Public Administration, the behaviour must be in compliance with the law and with the correct business practice.

Any relations that Assobiomedica Members start or have, at all levels - international, national, regional and local - with civil servants, including the operators of Public Health, must be characterised by utmost transparency and correctness.

Collaborators must not promise or pay amounts, promise or grant goods in kind or other benefits to civil servants personally with the aim of promoting or favouring the interests of Assobiomedica Members, also as a result of unlawful pressures.

During a business negotiation, request or relation with the Public Administration the following actions must not be taken (directly or indirectly):

- a) take into consideration or offer job and/or commercial opportunities that may favour civil servants personally; take on as employees of any associated companies former civil servants (or their close relations) who have participated personally and actively in business negotiations, tenders or backing requests made by the company to the Public Administration, in the year following their conclusion or settlement;
- b) offer or in any way give free gifts that are not of low value. It is appropriate to centralise in a single central service (e.g.: purchase department) the purchase of free gifts and any way guarantee the traceability of free gifts by means of appropriate documents (e.g.: transport document);
- c) press for or obtain confidential information beyond what is required and allowed by the law.

There are several forms of interaction between Assobiomedica Members and the Professionals of the Health Care sector that contribute towards the progress of medical science or improve the diagnosis and the treatment of the patient, including:

- a) The progress of medical technology: research and development of innovative medical technologies and the improvement of existing

- products are often the result of collaboration processes between Assobiomedica Members and the Professionals of the Health Care Sector. Innovation and creativeness are essential for the development and evolution of medical technologies, and they often occur with the collaboration of Bodies, Institutions, Persons, outside the structures of the Manufacturing Companies;
- b) The efficient and safe utilisation of medical technology: this very often requires Assobiomedica Members to offer & provide proper instructions, training, service and technical support to the Professionals of the Health Care Sector. The regulatory bodies may also request this type of training as a condition for approving the products;
 - c) Research and training: support by Assobiomedica Members to medical research carried out in good faith, training for the best and most appropriate utilisation of the supplied technologies and, more in general, improvement of professional competences are some of the elements that contribute towards the safety of the patient and increase the access to the new technology and hence to the most advanced and efficient therapies.

However, it is considered appropriate for Assobiomedica Members to prepare a special procedure, as described below - in compliance with the regulations in force – and to observe it when showing their availability to bear the expense related to the subscription and/or participation in a certain event of a sanitary or health care operator employed by the Public Administration:

The Assobiomedica Member prepares and sends an informative announcement to the Public Administration (ASL - local health centre -, AO, etc.), showing its own availability to bear the expenses related to the subscription and/or participation in a certain conference of a sanitary/health care operator. The Assobiomedica Member has the right to suggest one or more names of sanitary/health care operators concerning the theme of interest of the conference; the Administration shall decide in full and total independence on their participation.

The participation of the sanitary/health care operator in the conference, supposing a paid assignment, shall be allowed only against a written authorisation issued by the Administration to the requesting Assobiomedica Member and, any way, always according to correct and verifiable procedures.

For the events organised exclusively by Assobiomedica Members, the sending of the invitation report and covering of expenses may indicate the name of the sanitary/health care operator and not just a simple availability as a candidate/supporting party for the invitation.

Assobiomedica Members undertake, answering in this regard also for what is carried out by their Parent Companies and by their agents and distributors, if any, not to organise directly or indirectly, or not to participate under any manner in conferences, meetings, workshops and similar events in which:

- a) tourist and recreational aspects prevail over technical and scientific ones;
- b) hospitality and travel expenses are extended to the persons accompanying the invited persons;
- c) hospitality and travel expenses are extended to a period of time preceding the beginning and/or following the end of the event exceeding 24 hours (i.e.: a lapse of time exceeding 24 hours before the opening and/or after the end of the event).

Moreover, Assobiomedica Members undertake, answering in this regard also for what is carried out by their Parent Companies and by their agents and distributors, if any, not to organise directly or indirectly, or not to participate under any manner in conferences, meetings, workshops and similar events that do not comply with the moderation principle ('sobriety'), as specified in Articles 2.7.1., 2.7.2. e 2.7.3 here below.

The applicability range of the present paragraph is limited to the Italian territory, referring to formative and educational events, of any nature, organized by third parties. Therefore it's not applicable on European or extra-European territory. The dispositions illustrated in this paragraph are instead binding on any territory, in case of activities organized by member corporations.

2.7.1 TRAINING AND INSTRUCTIONS ON PRODUCTS SPONSORED BY ASSOBIOMEDICA MEMBERS

Where appropriate, Assobiomedica Members shall have to put at the disposal of the Professionals of the Health Care Sector instructions and training programs related to products and to technical/administration and managerial activities, in order to facilitate a safe and efficient utilisation of the medical and diagnostic technology. Such training programs must be held in appropriate places.

The selected place must not become the main attraction of the event.

The quality of the event must be assessed on the basis of strictly scientific criteria that must be devoid of any concession to comfort and splendour and



are rather directed, instead, to the protection of the sector and to the compliance with the main purpose: the health of patients and the improvement of their treatment and care.

When selecting an appropriate place it is advisable to take into consideration any possible repercussion in terms of image potentially produced by the event on public opinion.

More precisely:

1. Programs and events must be held in premises used for clinics, laboratory, training centres, conference venues or other appropriate facilities, including premises owned by Assobiomedica Members or venues for meetings available for business activities, provided that they are fit for an efficient conveyance of knowledge and practical training. Events must be held in places and facilities easily reachable by the invited participants, whose choice is based on logistic, scientific, organisational and economic reasons.
 2. It is strictly forbidden to organize, attend and support events from June 15 to September 30 for seaside resorts and from December 15 to March 30, as well as from June 15 to September 30 for mountain resorts.
 3. Events, conferences, meetings, programs and the likes held within venues classified as five-star are absolutely excluded, regardless of whatever tariff, price or reductions and special conditions may be offered, except for the dispositions illustrated in the Protocols signed by Assobiomedica and the associations representing the hotels and the congressional venues, according to the plan approved as an essential part of the present Code of Ethic by the ordinary Assembly on the 9th of June 2014.
- Assobiomedica Members may offer low-cost meals to the participants in the programs and, for the training programs requiring a night stay, additional hotel services may be appropriate. Hotel services must have a moderate price, and must be any way classified as not higher than a four-star hotel; they must be subject to the duration and functional to the educational purpose of the training course, as well as comply with all applicable regulations.
 - Assobiomedica Members may pay the reasonable travel and lodging expenses borne by the participating Professionals of the Health Care Sector, in compliance with all applicable regulations. Flights shall have to be exclusively in economy class except for intercontinental flights.



- Nevertheless, Assobiomedica Members shall not pay any travel expenses or other expenses for spouses, guests of the Professionals of the Health Care Sector, or for any other subject that does not have in good faith a legitimate professional interest in the themes that shall be dealt with during the meeting. Spouses or guests are allowed to use the hotel service of the group, providing that they bear the additional portion of the expenses.
- Assobiomedica Members may not share in or bear fully or partially any expense covering activities that are not strictly training activities of the event itself (by way of example but not limited to: concerts, shows, social programs, etc).

The applicability range of the present paragraph is limited to the Italian territory, referring to formative and educational events, of any nature, organized by third parties. Therefore it's not applicable on European or extra-European territory. The dispositions illustrated in this paragraph are instead binding on any territory, in case of activities organized by member corporations.

2.7.2 SUPPORT OF TRAINING CONFERENCES HELD BY THIRD PARTIES

Assobiomedica Members may give their support at independent, training, scientific conferences or conferences supporting policies that promote scientific knowledge, medical progress and an efficient sanitary service and health care. These generally include conferences organised by international, national, local or specialised medical associations or by accredited bodies for ongoing medical training. The support of Assobiomedica Members to such conferences may occur if the events are organised in appropriate places and facilities easily reachable by the invited participants, whose choice is based on logistic, scientific, organisational and economic reasons.

The selected place must not become the main attraction of the event.

The quality of the event must be assessed on the basis of strictly scientific criteria that must be devoid of any concession to comfort and splendour and are rather directed, instead, to the protection of the sector and to the compliance with the main purpose: the health of patients and the improvement of their treatment and care.

When selecting an appropriate place it is advisable to take into consideration any possible repercussion in terms of image potentially produced by the event on public opinion.



1. From June 15 to September 30 for seaside resorts and from December 15 to March 30, as well as from June 15 to September 30 for mountain resorts.
2. Any support and sponsoring of or participation and collaboration in events, conferences, meetings, programs or the likes held within venues classified as five-star, regardless of whatever tariff, price or reductions and special conditions may be offered are absolutely excluded, except for the dispositions illustrated in the Protocols signed by Assobiomedica and the associations representing the hotels and the congressional venues, according to the plan approved as an essential part of the present Code of Ethic by the ordinary Assembly on the 9th of June 2014.

Conversely, Assobiomedica Members may offer financial assistance to cover the costs of the conferences and the reasonable travel and lodging expenses borne by the Professionals of the Health Care Sector (and by medical students, honorary members and other subjects who are studying to become Professionals of the Health Care Sector), if the conference is based on the promotion of objective scientific and training activities. This support shall have to conform to any applicable regulation. The organisers of the conference shall be responsible for it (the conference) and shall control the choice of contents, teaching staff, training methods and didactic resources. The sponsoring of the conference by a Member of Assobiomedica must be clearly stated in advance and during the meeting.

Assobiomedica Members may provide financial support to the conference organisers and to the teaching staff as low-cost meals and hotel service offered to those taking part in the program. Reasonable contributions may be donated to the teaching staff as a fee. Any meal and hotel service must be subject to the duration and must be functional to the purpose of the conference. Hotel service must occur in maximum four-star hotels and all flights must be in economy class, except for intercontinental flights.

Within the limits referred to in the paragraphs here above, Assobiomedica Members may purchase advertising and lease areas for exhibition stands for their products and/or services during the conferences.

The applicability range of the present paragraph is limited to the Italian territory, referring to formative and educational events, of any nature, organized by third parties. Therefore it's not applicable on European or extra-European territory. The dispositions illustrated in this paragraph are instead binding on any territory, in case of activities organized by member corporations.

2.7.3 MEETINGS FOR INFORMATION AND/OR PROMOTIONAL PURPOSES

Assobiomedica Members that meet with the Professionals of the Health Care Sector in order to show the characteristics of a product, as a general rule, must hold such meetings near the place where the Professionals of the Health Care Sector work. Events must be held in places and venues or facilities easily reachable by the invited participants, whose choice is based on logistic, scientific, organisational and economic reasons.

The selected place must not become the main attraction of the event.

The quality of the event must be assessed on the basis of strictly scientific criteria that must be devoid of any concession to comfort and splendour and are rather directed, instead, to the protection of the sector and to the compliance with the main purpose: the health of patients and the improvement of their treatment and care.

When selecting an appropriate place it is advisable to take into consideration any possible repercussion in terms of image potentially produced by the event on public opinion.

1. From June 15 to September 30 for seaside resorts and from December 15 to March 30, as well as from June 15 to September 30 for mountain resorts.
2. Any support and sponsoring of or participation and collaboration in events, conferences, meetings, programs or the likes held within venues classified as five-star, regardless of whatever tariff, price or reductions and special conditions may be offered are absolutely excluded, except for the dispositions illustrated in the Protocols signed by Assobiomedica and the associations representing the hotels and the congressional venues, according to the plan approved as an essential part of the present Code of Ethic by the ordinary Assembly on the 9th of June 2014.

Assobiomedica Members may offer meals and hotel services to the participating Professionals of the Health Care Sector. The hotel service must occur in maximum four-star hotels. Assobiomedica Members may also pay reasonable travel expenses borne by the participants, where necessary (e.g. for visits to the relevant factories or Centres of reference). Flights shall have to be exclusively in economy class except for intercontinental flights. Any type of hospitality, payment of meals, travels and other hotel services cannot be offered to the guests of the professionals or to any other subject who does not have in good faith a legitimate professional interest in the themes dealt with during the meeting.

The spouse or the guests of the Professionals are allowed to use the hotel service of the group, providing that they bear the additional portion of expenses.

The organisation of any side activities of the information and/or promotional event is allowed to Assobiomedica Members provided that such activities – by nature, cost, visibility – do not misrepresent the information and/or scientific purpose of the event.

The applicability range of the present paragraph is limited to the Italian territory, referring to formative and educational events, of any nature, organized by third parties. Therefore it's not applicable on European or extra-European territory. The dispositions illustrated in this paragraph are instead binding on any territory, in case of activities organized by member corporations.

2.8 CHARITY OR PHILANTHROPIC DONATIONS TO PUBLIC ADMINISTRATION

Assobiomedica Members may make donations (including financial assistance) for charity purposes or other philanthropic purposes, such as support of a really independent medical research for the progress of science or of medical training, treatment of poor persons, patient training, public training or sponsoring of events whose proceeds will be donated to charity. Donations must be made only to organisations and bodies that have the right to receive them pursuant to the applicable law and regulations. All the donations must be properly documented and supported by documentary evidence. Examples of appropriate donations and related financial assistance are set below:

- Progress of medical training. Assobiomedica Members may donate financial contributions (money) in order to support a real medical training for medical students, members taking part in programs of associations that have charity purposes or academic affiliations or, if consistent with the previous point 2.7, for other medical personnel. (For further specifications concerning financial assistance for training, see previous point 2.7.2 - *Support of training conferences held by third parties*).
- Support of scientific research. Assobiomedica Members may donate money in order to support medical research. The purpose of the financial assistance must be clearly documented and supported by documentary evidence.



- Public training. Assobiomedica Members may donate money in order to support the training of patients and of the public on important sanitary topics.

Donations of money, goods, equipment etc. to Public Administrations must be carried out in compliance with the regulations in force.

With regard to the relations with Public Administrations, it is appropriate to formalise a specific procedure whose main characteristics are indicated below:

the donor Assobiomedica Member must prepare and send to the Public Administration (ASL, AO, etc.) a communication in which it indicates the intention of donating a sum or a special equipment, or the public Body concerned sends to the donor Assobiomedica Member the request of donation;

the beneficiary Public Administration (ASL, AO, etc.) shall follow the regulations in force in order to implement the donation;

the donor Assobiomedica Member, after taking due note of the acceptance, shall provide all the details of the donation and shall prepare the obligations *ex lege*.

2.9 SCHOLARSHIPS

In compliance with the provisions in force on the matter, scholarships must be assigned according to candidates screening and evaluation procedures that must be transparent, objective and based on recognised scientific principles.

2.10 OFFICES, CONSULTANCY, STUDIES ENTRUSTED TO CIVIL SERVANTS

Professionals of the Health Care Sector may supply in good faith, and in compliance with the regulations in force, consultancy and significant services, introductory speeches to training courses organised or sponsored by Assobiomedica Members and collaboration for the development and application of products of any Assobiomedica Members. It is deemed advisable to pay the Professionals of the Health Care Sector reasonable fees for the performance of such services.

A consultancy agreement between Assobiomedica Members and Professionals of the Health Care Sector can be deemed and defined in good faith if supported by the following elements:



- Consultancy agreements with the Professionals of the Health Care Sector must occur in writing, must be signed by the parties and must specify all the services to be supplied. These agreements must be in compliance with laws and regulations of the country in which the Professionals of the Health Care Sector have a profession and practise their activity.
- The fee paid to the Professionals of the Health Care Sector who shall supply consultancy services must be reasonable, based on the nature of and in proportion to the services actually supplied, in compliance with tax requirements and other applicable law requirements. Assobiomedica Members may pay the reasonable expenses borne by the consultants when carrying out what is provided in the consultancy agreement.
- Consultancy agreements must be drawn up only if a lawful purpose for such services is identified in advance.

It's not possible to draw up contracts with and/or to assign duties to individuals that are no longer employed by Public Authorities after they have had authoritative or negotiation power, unless three years have passed since the cessation of public service.

- The place and circumstances for the meetings between Assobiomedica Members and consultants must be appropriate to the subject-matter of the consultancy. The maximum four-star hotel service financed by Assobiomedica Members and supplied with reference to a meeting with the consultants must have low costs, must be subject to the duration and functional to the main purpose of the meeting.
- If a Member of Assobiomedica draws up a contract with a Professional of the Health Care Sector who works as a consultant for research services, a research protocol must be drawn up, all required authorisations and approvals must be obtained and, in any case, it must be characterised by the utmost transparency towards the Administration to which the Professional belongs.

2.11 DONATIONS TO CIVIL SERVANTS

Assobiomedica Members may now and then make moderate donations to the Professionals of the Health Care Sector, but these must be of low value and in compliance with the laws and regulations in force. As a general rule, donations must be to the benefit of patients or must be essentially training by nature.

Assobiomedica Members may also provide, now and then, products for promotional purposes; these products must be with a moderate value and

related to the work of the Professional of the Health Care Sector or for the benefit of patients. Donations must not be made as cash or equivalent.

This section is not directed to the lawful practice of providing appropriate product samples and opportunity for their valuation.

2.12 QUALITY GUARANTEE

The reputation of Assobiomedica Members is based on the highest quality of their products, generally medical devices, as well as of services and therapies, so that health care operators are able to provide the patient with the best possible result.

The commitment of all Assobiomedica Members is not limited to the compliance with quality and safety standards prescribed by the laws; where possible, it goes beyond in order to assure more and more efficient products, services and therapies.

3. THE COMMITMENT OF ASSOBIOMEDICA MEMBERS

This Code of Ethics is an integral part of the Articles of Association of Assobiomedica: by joining the Association, all Members undertake to observe and promote the principles and rules established herein, e.g. in the Code itself.

All Assobiomedica Members undertake to observe and enforce their Parent Companies, agents and distributors to observe this Code of Ethics including any agreements or guidelines that Assobiomedica shall adopt with the different scientific Associations or Societies on how to participate in the conferences organised by the latter.

Members of the Policy-making Bodies of the Association undertake to spread and promote the association resolutions exclusively through the official documents drawn up by the Association. All Members of the Policy-making Bodies also undertake to maintain the utmost reserve (confidentiality) on the subject-matters being treated and dealt with.

Assobiomedica Members undertake to insert clauses of compliance with the principles contained in the Code of Ethics in the contracts drawn up with their resellers.

4. SUPERVISORY BODIES OF THE CODE OF ETHICS

The Control Commission and the Jury are the bodies in charge of the control and of the implementation procedures of the Code of Ethics.

They reside with the Association.

4.1 CONTROL COMMISSION

The Control Commission consists of eight members including the Chairman. The Chairman, chosen among legal experts and subjects highly experienced in the legal field, in any case outside the Association, and the seven members, including at least one chosen among persons of special merit and competence outside the Association, are appointed by the Meeting on proposal of the Executive Committee. Each Field Association must be represented by at least one member.

The Chairman of the Control Commission appoints a Secretary.

Members of the Commission hold office two years and could be eligible for re-election.

The Commission shall be able to use consultants chosen according to the necessary requirements in order to carry out its functions.

Any reports with reference to presumed violations to the Code of Ethics must be sent in writing and in a closed envelope to the Secretary's office of the Control Commission.

4.1.1 FUNCTIONS OF THE CONTROL COMMISSION

The Control Commission:

- a) prepares the cases related to the presumed violation of the Code of Ethics;
- b) submits to the Jury the cases for which it considers the presumed violations of the Code of Ethics grounded;
- c) carries on, with reference to the expert assessments to be carried out, a supervisory role also by means of an auditing Company appointed from time to time. Should the intervention of the auditing Company be necessary following disputes among Assobiomedica Members, all the costs borne for the audit or consultancy must be divided in this way: two thirds to the charge of the losing party and one third to the charge of the reporting party;



- d) can adopt all the measures required for protecting the confidentiality of its work.

When executing its functions, the Commission may:

- request information and explanations to the Assobiomedica Members concerned through confidential communication;
- if necessary, see to the hearing of the Assobiomedica Member concerned, without prejudice to the right to defence and the principle of cross-examination.

- e) sends, on request of the Management Committee, a report on the activity carried out.

However, it's prohibited to communicate the names of the reporting companies to the reported companies.

4.1.2 CONVOCAZIONE OF THE CONTROL COMMISSION

The Chairman convenes the Commission when he/she deems it advisable or, at any moment, on the joint request of at least two members.

The Control Commission is convened by its Chairman in writing, also by e-mail, to be sent to the members at least five days before the date of the meeting.

The Control Commission is effectively (validly) convened with the presence of the majority of its members.

The decisions of the Control Commission are taken by majority of those present: in case of a tie, the person chairing the meeting has the casting vote.

In the case of serious grounds of expediency, the member concerned is obliged to abstain from voting.

4.2 JURY

The cases of violation of the Code of Ethics are submitted to the Jury.

The Jury consists of the President and two members.

They are appointed by the Meeting and chosen, one among the representatives of Assobiomedica Members or among persons of special merit and competence outside the Association, and two among legal experts.

Members of the Jury hold office two years and are eligible for re-election.

The external members of the Jury, when accepting the office, must expressly declare that they do not have any existing professional relations nor any relations of interest with Assobiomedica Members and that they undertake not to set up such relations for the entire office.

4.2.1 CONVOCAZIONE OF THE JURY

The Jury is convened by its President when it is deemed advisable, in writing, also by e-mail, to be sent to the members at least five days before the date of the meeting.

In urgent cases, it is possible not to observe this term.

The meetings of the Jury are not public.

The Jury is effectively (validly) convened with the presence of all its members and its decisions are taken by majority of those present.

One of the members of the Jury appointed by its President acts as a Secretary.

4.2.2 PROCEEDINGS BEFORE THE JURY

Upon receiving the preliminary investigation from the Control Commission, the President appoints a speaker, notifies the start of the proceedings to the Assobiomedica Member concerned, assigning a term not less than a fortnight for depositing inferences and briefs, extracting a copy of the documents and producing new documents.

The Assobiomedica Member concerned is summoned before the Jury within the shortest time possible for the hearing that is carried out orally.

A specifically delegated representative of the Control Commission takes part in the hearing.

After the hearing is fully treated, the Jury:

- formulates its own decision proposal if the case is sufficiently prepared;
- acquires additional elements of pre-trial investigation by means of the Control Commission, by fixing the date of the new hearing, if it deems it necessary.

At any moment of the proceedings, the Jury may request for the opinions of the Control Commission.

Before the Jury, the Assobiomedica Member concerned may ask the presence of its own lawyers.

4.2.3 DECISION OF THE JURY

The Jury, no later than ten days from the date of the hearing, issues its decision, whose purview is immediately notified to the Chairman of the Association and to the parties.

Within the following ten days, the Jury files the announcement with the Secretary's office that sends a copy to the parties.

The decisions of the Jury are final.

4.2.4 CONTENTS OF THE DECISION

The Jury can impose on Assobiomedica Members, in the case of proved violation of the Code of Ethics, the following sanctions:

- a) written official reprimand;
- b) suspension of the right of the Assobiomedica Member to take part in the Meeting of the Association or in the meeting of the belonging Associations;
- c) forfeiture of the representatives of the adhering Assobiomedica Members who hold executive offices in the Association or in the Associations;
- d) suspension of the right to vote and/or right to stand as a candidate;
- e) expulsion from the Association.

The Jury may inflict, together with the aforementioned disciplinary sanctions, also monetary penalties graded according to the seriousness of the violation.

The Jury may disclose the decisions, with the means that shall be considered most appropriate, if it discovers that the behaviours carried out in violation of the ethical (deontological) principles compromise the honour and reputation of the Association.

4.2.5 CARRYING OUT AND EXECUTION OF THE DECISION

After depositing the decision, the Chairman of the Association is responsible for its execution. With the infliction of the sanctions and imposition of the penalties, legal expenses advanced by the Association are to the charge of the relevant Association Member concerned.

PROTOCOL OF UNDERSTANDING

between

Assobiomedica with registered offices at V.le Pasteur 10, Rome, Tax Code 97123730158, in the person of its Chairman and legal representative, Stefano Rimondi

and

Associazione Italiana Confindustria Alberghi, with registered offices at Viale Pasteur 10, Rome, Tax Code 97717030585, in the person of its Chairman and legal representative, Giorgio Palmucci

given that

- Assobiomedica is the national association for firms operating in the sector of biomedical devices and technologies;
- Associazione Italiana Confindustria Alberghi is the national association for firms operating in the tourism-hotels sector;
- by joining Assobiomedica firms agree to comply strictly with the association's Code of Ethics, which are an integral part of the Statute and govern the minimum standards of business practice to be followed in Italy and abroad (attachment A);
- in view of the need for interaction and close collaboration between the medical equipment/medical technologies sector and professionals in the healthcare sector, art. 2.7 of the Code of Ethics specifically governs the relations between professionals in the healthcare sector and the public administration, with a view to guaranteeing the absolute sobriety of the organisation of and/or participation at events organised by the firms and by third parties;
- by mere and incomplete way of example, the instructions governing frugality contained in the Code of Ethics are summarised below:
 - prevalence of the technical-scientific aspects of events over the recreational-tourism aspects
 - no coverage of the hospitality and travel expenses of companions

- hospitality and travel expenses limited to the 24-hour periods before and after an event

- no sponsorship and/or organisation of events in the period from 15 June to 30 September at seaside locations and from 15 December to 30 March, as well as from 15 June - 15 September, at mountain locations

- organisation of events at five-star facilities, regardless of the rates or promotional offers made

- air travel solely in economy class, except for intercontinental flights

- easily reachable event locations

- moderate cost of meals;

- it is of paramount importance for Assobiomedica to safeguard the image of the sector and the primary goals represented by the good of patients and progress in their treatment and care;

- in order to secure the use of suitable facilities for sector events, having regard for their capacity and other factors, by signing this Protocol of Understanding Assobiomedica and Associazione Italiana Confindustria Alberghi intend to define certain required parameters for facilities signing the Protocol, so that they may be recognised as compliant with the principle of sobriety required by the Code of Ethics of Assobiomedica;

Given all of the above inclusive of chance and other factors,

it is agreed and set down as follows:

- 1) The recitals are an integral and essential part of this Protocol, which is valid and effective for all member firms of Assobiomedica and binding on all facilities that are members or signatories of Associazione Italiana Confindustria Alberghi, as indicated in attachment B.

- 2) Signature of this Protocol of Understanding, with the agreed parameters of sobriety, is intended to overcome the restrictions on the classification of hotel/conference facilities, solely for those that are signatories, without prejudice to the period-of-use restrictions (at seaside and/or mountain locations), which always apply.

- 3) Facilities signing this agreement will be deemed compliant with the Code of Ethics of Assobiomedica. For this purpose, Associazione Italiana Confindustria Alberghi agrees to send Assobiomedica a list, and subsequent updates, of firms that have signed this Protocol.

4) By signing this Protocol, the Parties agree to comply with the following parameters:

- exclusion of services not strictly associated with the conference event (well-being centres, saunas, swimming pools, golf, spas, beaches, sports equipment, etc.). These services may be used by event participants at their own expense.

- definition of packages with suitable maximum tariffs, with particular emphasis on shuttle, bar and restaurant services (use of ID badges to obtain discounts), as well as wi-fi, without exceeding current market prices.

5) By signing this Protocol, the Parties agree on the following indicative tariffs, given by way of example, which represent reference parameters for the definition of offers:

- coffee break: 8 euro

- lunch break: 22-30 euro

- working lunch: 30-40 euro

- dinner: 35-50 euro (drinks included)

- gala dinner: separate negotiations

- lodging (including breakfast): up to 180 euro in double room for single use

- wi-fi: free basic access. Tariffs for any special services requested not to exceed current market prices.

The Parties will meet once each year to review the above tariffs, which may be negotiated on a reasonable basis directly by the signatory firms.

6) The Parties agree to determine together how this Protocol will be communicated and the texts of any press releases. For this purpose, the following contact persons are appointed:

for Assobiomedica: Fernanda Gellona

for Associazione Italiana Confindustria Alberghi: Barbara Casillo

Failure to comply with this provision will result in immediate termination of this Protocol.

7) Should Assobiomedica or Associazione Italiana Confindustria Alberghi receive formal notification from their members of behaviour inconsistent with that agreed in the Protocol, the General Managers of the respective associations shall meet within 15 days of receipt to consider the adoption of appropriate measures. If the Parties fail to agree on the measures to be taken, or if the inconsistent behaviour is repeated, the Parties shall be free to withdraw from this Protocol by sending a formal withdrawal notice by registered letter with proof of receipt.

8) This Protocol is valid and effective from the date of signature. During January each year, the General Managers of the Parties shall meet to consider the renewal of this Protocol and any amendments to the conditions set down herein.

Read, confirmed and signed

Rome, 9 June 2014

Assobiomedica

Associazione Italiana Confindustria Alberghi

PROTOCOL OF UNDERSTANDING

between

Assobiomedica with registered offices at V.le Pasteur 10, Rome, Tax Code 97123730158, in the person of its Chairman and legal representative, Stefano Rimondi

and

FEDERALBERGHI, Federazione delle Associazioni Italiane Alberghi e Turismo, with registered offices at Via Toscana 1, Rome, Tax Code 80091930588, in the person of its Chairman and legal representative, Bernabò Bocca (hereinafter called "FEDERALBERGHI")

given that

- Assobiomedica is the national association for firms operating in the sector of biomedical devices and technologies;
- FEDERALBERGHI is the union organization more representative of firms operating in the tourism-hotels sector;
- by joining Assobiomedica firms agree to comply strictly with the association's Code of Ethics, which are an integral part of the Statute and govern the minimum standards of business practice to be followed in Italy and abroad (attachment A);
- in view of the need for interaction and close collaboration between the medical equipment/medical technologies sector and professionals in the healthcare sector, art. 2.7 of the Code of Ethics specifically governs the relations between professionals in the healthcare sector and the public administration, with a view to guaranteeing the absolute sobriety of the organisation of and/or participation at events organised by the firms and by third parties;
- by mere and incomplete way of example, the instructions governing frugality contained in the Code of Ethics are summarised below:
 - prevalence of the technical-scientific aspects of events over the recreational-tourism aspects
 - no coverage of the hospitality and travel expenses of companions
 - hospitality and travel expenses limited to the 24-hour periods before and after an event
 - no sponsorship and/or organisation of events in the period from 15 June to 30 September at seaside locations and from 15 December to 30 March, as well as from 15 June - 15 September, at mountain locations
 - organisation of events at five-star facilities, regardless of the rates or promotional offers made
 - air travel solely in economy class, except for intercontinental flights
 - easily reachable event locations
 - moderate cost of meals;

- it is of paramount importance for Assobiomedica to safeguard the image of the sector and the primary goals represented by the good of patients and progress in their treatment and care;

- in order to secure the use of suitable facilities for sector events, having regard for their capacity and other factors, by signing this Protocol of Understanding Assobiomedica and FEDERALBERGHI intend to define certain required parameters for facilities signing the Protocol, so that they may be recognised as compliant with the principle of sobriety required by the Code of Ethics of Assobiomedica;

Given all of the above inclusive of chance and other factors,

it is agreed and set down as follows:

1) The recitals are an integral and essential part of this Protocol, which is valid and effective for all member firms of Assobiomedica and binding on all facilities that are members or signatories of FEDERALBERGHI.

2) Signature of this Protocol of Understanding, with the agreed parameters of sobriety, is intended to overcome the restrictions on the classification of hotel/conference facilities, solely for those that are signatories, without prejudice to the period-of-use restrictions (at seaside and/or mountain locations), which always apply.

3) Facilities signing this agreement will be deemed compliant with the Code of Ethics of Assobiomedica. For this purpose, FEDERALBERGHI agrees to send Assobiomedica a list, and subsequent updates, of firms that have signed this protocol, filling out the attached form, that constitutes an integral and fundamental part of this protocol. The communication can happen through the publication on a web site of the list of said hotels, and information about the services supplied by them.

4) By signing this Protocol, the Parties agree to comply with the following parameters:

- exclusion of services not strictly associated with the conference event (well-being centres, saunas, swimming pools, golf, spas, beaches, sports equipment, etc.). These services may be used by event participants at their own expense.

- definition of packages with suitable maximum tariffs, with particular emphasis on shuttle, bar and restaurant services (use of ID badges to obtain discounts), as well as wi-fi, without exceeding current market prices.

5) By signing this Protocol, the Parties agree on the following indicative tariffs, given by way of example, which represent reference parameters for the definition of offers:

- coffee break: 8 euro
- lunch break: 22-30 euro
- working lunch: 30-40 euro
- dinner: 35-50 euro (drinks included)
- gala dinner: separate negotiations
- lodging (including breakfast): up to 180 euro in double room for single use
- wi-fi: free basic access. Tariffs for any special services requested not to exceed current market prices.

The Parties will meet once each year to review the above tariffs, which may be negotiated on a reasonable basis directly by the signatory firms.

- 6) The Parties agree to determine together how this Protocol will be communicated and the texts of any press releases. For this purpose, the following contact persons are appointed:

for Assobiomedica: Fernanda Gellona

for FEDERALBERGHI: Alessandro Massimo Nucara

Failure to comply with this provision will result in immediate termination of this Protocol.

- 7) Should Assobiomedica or FEDERALBERGHI receive formal notification from their members of behaviour inconsistent with that agreed in the Protocol, the General Managers of the respective associations shall meet within 15 days of receipt to consider the adoption of appropriate measures. If the Parties fail to agree on the measures to be taken, or if the inconsistent behaviour is repeated, the Parties shall be free to withdraw from this Protocol by sending a formal withdrawal notice by registered letter with proof of receipt.

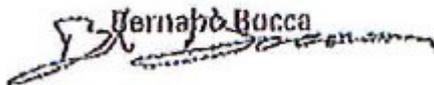
- 8) This Protocol is valid and effective from the date of signature. During January each year, the General Managers of the Parties shall meet to consider the renewal of this Protocol and any amendments to the conditions set down herein.

Read, confirmed and signed

Rome, 14 July 2014

ASSOBIOMEDICA
Stefano Rimondi



FEDERALBERGHI

Fernanda Gellona

PROTOCOL OF UNDERSTANDING

between

Assobiomedica with registered offices at V.le Pasteur 10, Rome, Tax Code 97123730158, in the person of its Chairman and legal representative, Stefano Rimondi

and

ASSOHOTEL-Associazione Nazionale imprenditori d'Albergo, with registered offices at Via Nazionale 60, Rome, Tax Code 80186510584, in the person of its Chairman and legal representative, Filippo Donati (hereinafter called "ASSOHOTEL")

given that

- Assobiomedica is the national association for firms operating in the sector of biomedical devices and technologies;
- ASSOHOTEL is a union organization representative of firms operating in the tourism-hotels sector;
- by joining Assobiomedica firms agree to comply strictly with the association's Code of Ethics, which are an integral part of the Statute and govern the minimum standards of business practice to be followed in Italy and abroad (attachment A);
- in view of the need for interaction and close collaboration between the medical equipment/medical technologies sector and professionals in the healthcare sector, art. 2.7 of the Code of Ethics specifically governs the relations between professionals in the healthcare sector and the public administration, with a view to guaranteeing the absolute sobriety of the organisation of and/or participation at events organised by the firms and by third parties;
- by mere and incomplete way of example, the instructions governing frugality contained in the Code of Ethics are summarised below:
 - prevalence of the technical-scientific aspects of events over the recreational-tourism aspects
 - no coverage of the hospitality and travel expenses of companions
 - hospitality and travel expenses limited to the 24-hour periods before and after an event
 - no sponsorship and/or organisation of events in the period from 15 June to 30 September at seaside locations and from 15 December to 30 March, as well as from 15 June - 15 September, at mountain locations
 - organisation of events at five-star facilities, regardless of the rates or promotional offers made
 - air travel solely in economy class, except for intercontinental flights
 - easily reachable event locations
 - moderate cost of meals;

- it is of paramount importance for Assobiomedica to safeguard the image of the sector and the primary goals represented by the good of patients and progress in their treatment and care;
- in order to secure the use of suitable facilities for sector events, having regard for their capacity and other factors, by signing this Protocol of Understanding Assobiomedica and ASSOHOTEL intend to define certain required parameters for facilities signing the Protocol, so that they may be recognised as compliant with the principle of sobriety required by the Code of Ethics of Assobiomedica;

Given all of the above inclusive of chance and other factors,

it is agreed and set down as follows:

- 1) The recitals are an integral and essential part of this Protocol, which is valid and effective for all member firms of Assobiomedica and binding on all facilities that are members or signatories of ASSOHOTEL.
- 2) Signature of this Protocol of Understanding, with the agreed parameters of sobriety, is intended to overcome the restrictions on the classification of hotel/conference facilities, solely for those that are signatories, without prejudice to the period-of-use restrictions (at seaside and/or mountain locations), which always apply.
- 3) Facilities signing this agreement will be deemed compliant with the Code of Ethics of Assobiomedica. For this purpose, ASSOHOTEL agrees to send Assobiomedica a list, and subsequent updates, of firms that have signed this protocol, filling out the attached form, that constitutes an integral and fundamental part of this protocol. The communication can happen through the publication on a web site of the list of said hotels, and information about the services supplied by them.
- 4) By signing this Protocol, the Parties agree to comply with the following parameters:
 - exclusion of services not strictly associated with the conference event (well-being centres, saunas, swimming pools, golf, spas, beaches, sports equipment, etc.). These services may be used by event participants at their own expense.
 - definition of packages with suitable maximum tariffs, with particular emphasis on shuttle, bar and restaurant services (use of ID badges to obtain discounts), as well as wi-fi, without exceeding current market prices.
- 5) By signing this Protocol, the Parties agree on the following indicative tariffs, given by way of example, which represent reference parameters for the definition of offers:
 - coffee break: 8 euro
 - lunch break: 22-30 euro
 - working lunch: 30-40 euro
 - dinner: 35-50 euro (drinks included)
 - gala dinner: separate negotiations
 - lodging (including breakfast): up to 180 euro in double room for single use
 - wi-fi: free basic access. Tariffs for any special services requested not to exceed current market prices.

The Parties will meet once each year to review the above tariffs, which may be negotiated on a reasonable basis directly by the signatory firms.

- 6) The Parties agree to determine together how this Protocol will be communicated and the texts of any press releases. For this purpose, the following contact persons are appointed:

for Assobiomedica: Fernanda Gellona

for ASSOHOTEL: Tullio Galli

Failure to comply with this provision will result in immediate termination of this Protocol.

- 7) Should Assobiomedica or ASSOHOTEL receive formal notification from their members of behaviour inconsistent with that agreed in the Protocol, the General Managers of the respective associations shall meet within 15 days of receipt to consider the adoption of appropriate measures. If the Parties fail to agree on the measures to be taken, or if the inconsistent behaviour is repeated, the Parties shall be free to withdraw from this Protocol by sending a formal withdrawal notice by registered letter with proof of receipt.

- 8) This Protocol is valid and effective from the date of signature. During January each year, the General Managers of the Parties shall meet to consider the renewal of this Protocol and any amendments to the conditions set down herein.

Read, confirmed and signed

Rome, 24 July 2014

ASSOBIO MEDICA
Stefano Rimondi



ASSOHOTEL
Filippo Donati



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Attachments:

- Protocol of understanding between Assobiomedica and Associazione Italiana Confindustria Alberghi
- Protocol of understanding between Assobiomedica and Federalberghi
- Protocol of understanding between Assobiomedica and AssoHotel