



CODE OF ETHICS

GB PHARMA S.r.l.

Rev. 4 of 09/11/2023

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1. Foreword

Following the entry into force of Legislative Decree No. 231 of 2001 (as amended and supplemented), which introduced into our judicial system the administrative/criminal liability of legal persons in the event their members of staff (subordinates) or the members of the senior management should commit the criminal offences laid down under said Decree, GB Pharma Srl compiled an “Organisation, Management, and Control Model” in accordance with Legislative Decree 231/2001 (hereinafter, simply referred to as “OGM”), which compliance is fundamental to ensure the Company's legal compliance, proper running, reliability, and propriety in operations, and to prevent or in any case exempt the Company from any form of liability ascribable to the perpetration of actions covered by criminal law by its members of staff and/or senior management.

Said OGM also includes, as a complimentary and essential parts thereof, a Code of Ethics, a Disciplinary Code, the appointment and activation of a Supervisory Body, and specific measures within procedures or other internal documents being communicated and assimilated by members of staff and third parties involved.

The Code of Ethics (hereinafter, the “Code”) has the purpose of introducing and making the principles and rules of conduct that are relevant to the purpose of an appropriate and effective prevention of the criminal offences (known as “predicate offences”) established in Legislative Decree No. 231 of 8 June 2001 (hereinafter, the “Decree” or “Legislative Decree 231/01”) binding within the Company.

The Code, approved by Resolution of the Board of Directors of the Company, is an official document, and is published, in its up-to-date version, on the Company's website.

The Code applies to all Employees, Advisers, Collaborators, Suppliers, or Third Parties (“Recipients”) who, on behalf of the Company, have contacts with the Public Administration and/or with Public Officials/Persons in Charge of a Public Service (hereinafter, “PA”), or otherwise carry out activities in the interest and/or for the benefit of the Company.

The Code of Ethics addresses the need to prevent, as much as possible, the commission of the crimes established in the Decree, by identifying general rules and principles of conduct.

The Code is aimed at recommending, promoting, or prohibiting certain conducts, irrespective of what is established in terms of statutory provisions, and it represents the expression of the principles that have always been at the heart of the activities of the Company.

Even the conduct of those who act in the capacity of advisers, or who have the power to represent the Company and the Company's other contracting parties, including partners in joint ventures, in Temporary Association of Companies, etc., must also act in harmony with the rules of conduct - including general and specific - set out in the Model and related documents, including this Code of Ethics.

2. Abbreviations and Definitions

Within the scope of this Code, the following expressions shall have the meaning shown below:

| Expressions | Meaning |
|---|--|
| Code | It means this document ; |
| CRO | Contract Research Organisation; |
| Recipient | Employees, Advisers, Collaborators, Suppliers, Third Parties subject to the application of this Code of Ethics; |
| Employees | The term Employees refers to all the employed members of staff of the Company, irrespective of where they operate or are located ; |
| Company | GB Pharma S.r.l. |
| Person in Charge of a Public Service | Anyone who, on any capacity, carries out a public service, meaning an activity regulated in the same manner as a public office, but without the exercise of authorisation, authoritative, or certifying powers; |
| OGM | Organisation, Management, and Control Model, issued in compliance with the requirements set out under Legislative Decree 231/01; |
| Ethical Rules | The rules contained in this Code; |
| Supervisory Body | A supervisory and control body, tasked with the duty to check on the proper operation and compliance with this Code, the OGM, and internal procedures, for the purpose of preventing the carrying out of the criminal offences laid down in Legislative Decree 231/01, as amended and supplemented; |
| PA | The Public Administration, Public Officials, and Person in Charge of a Public Service, whether Italian or foreign, intended in the widest sense of the term; |
| Internal Procedure | This term indicates the set of procedures that regulate the activities of the Company; |
| Public Official' | An individual who carries out a public legislative, judicial, or administrative function. An administrative function regulated under public law and by authoritative instruments, and is characterised by the shaping of the will of the PA through authorisation or certifying powers; |
| Supervisors | Any individual who has senior management and coordination responsibilities within the scope of the Company's structures (management, functions, and areas); |
| Internal Disciplinary System | Description of relevant inappropriate conducts from a disciplinary point of view, and the relative sanctions; |
| Third Parties | Any parties which are not bound to the Company under an employment relationship, and who, in any capacity, carry out a professional activity, including on an occasional basis, for the benefit of the Company, including interns, advisers, and other independent collaborators, and any parties who enter into agreements with the Company (e.g., service or supply agreements, etc.). |

3. Recipients of the Code of Ethics

3.1 *Members of Staff*

The ethical principles contained in this Code apply, without exception, to all the members of staff, irrespective of where they operate and/or are located. The Code is provided to members of staff via e-mail in an attachment, and through a link to the document in an on-line shared file.

3.2 *Third Parties*

The Company expects all third parties to also comply with the Code. The management and in general all the members of staff, based on their respective competences, are expected to

- inform third parties of the commitments and obligations imposed under the Code, by adding an appropriate contractual clause or an express note in all orders, and conducting an effective monitoring activities;
- exercise the contractual termination clause with third parties who, in the performance of their activities, failed to comply with the rules contained in the Code.

4. Values

The Company is keenly aware of the need to ensure propriety and transparency in the carrying out of its activities, and of the relevance of the service it provides in its capacity as CRO. Because of this, the Company has adopted this Code with the intention of expressing and making known the ethical commitments and responsibility of all the individuals who act within the Company or on its behalf, in their dealings with any person it interacts with, and particularly with the recipients of the services it provides.

To this end, the Company decided to adopt this Code, aimed at introducing a system of principles, which must guide the conduct of all the individuals who work within the Company or on its behalf.

The Code of Ethics is an element of the wider context of its corporate ethical culture, and it expresses the values it wishes to be adopted by its members in every instance of behaviour.

On the strength of this project, the Company wishes to stress that propriety, confidentiality, and lawfulness in conducting the Company's activities are and will always be a key value of the professional activity it carries out.

5. Principles

5.1 General Principles

One of the Company's fundamental principles is compliance with the laws and regulations that apply to the activities it carries out; this leads to its commitment not to enter into or maintain any relationship with anyone who shows not to share the content thereof.

The Recipients of the Code must therefore consistently and effectively abide by the laws and regulations applicable, and to the content and the rules dictated by the Principles set out below.

PRINCIPLE 1

Compliance with and respect for the Law

An essential requirement for all Recipients is to act in manners that comply with all laws, standards, and regulations.

Every Recipient must be committed to comply with all the applicable laws and regulations.

No personal and/or corporate objective may be pursued and attained in violation of the applicable laws and regulations in force.

Every Recipient must be aware of the laws, appropriate conduct, and implications concerning their activities; when in doubt, they must immediately request clarifications from their Managers or other contact person, who shall provide them with the appropriate information.

If Recipients should become aware of violations of any laws and regulations, which may lead to the risk of GB Pharma S.r.l.'s involvement, they must immediately report the incident to their line managers, or, where the circumstances would make this step ineffective or inopportune, directly to the Supervisory Body.

PRINCIPLE 2

Compliance with the provisions contained in this Code

The activities of GB Pharma S.r.l. are guided by the rules contained in this Code, by which all Recipients must abide.

PRINCIPLE 3

Compliance with procedures

Recipients must comply with the Company's internal operating procedures, which are made known to them through the tools established by the organisation.

5.2 Principles of the Organisation

PRINCIPLE 4***Impartiality, non-discrimination, and equality***

GB Pharma S.r.l. avoids any discrimination based on age, sex, health conditions, race, nationality, political opinions and religious beliefs, and it operates by being guided by criteria of objectivity, transparency, and impartiality.

The rules concerning dealings between the Company and its counterparties are, as applicable based on the specific capacity of said counterparties, the same for everyone.

PRINCIPLE 5***Confidentiality***

GB Pharma S.r.l. ensures the confidentiality of the information in its possession and abstains from seeking confidential data, unless it is with the express and informed authorisation of the interested parties; in this case, GB Pharma S.r.l. shall scrupulously abide by the applicable laws and regulations.

Collaborators are expected never to use confidential information for purposes that are not proven to be connected with the exercise of their activities.

PRINCIPLE 6***Value of resources***

GB Pharma S.r.l. is committed to adding value to its economic-financial and human resources, which are considered absolutely vital for the attainment of its corporate mission. Based on this purpose, the Company promotes the constant advancement of their skills, to increase its know-how and intangible corporate assets as well as its competitiveness on the market.

An objective that is closely connected to the growth of the corporate value of its human resources consists in the concurrent positive growth in terms of behavioural and relational skills.

PRINCIPLE 7***Protection of individuals***

GB Pharma S.r.l. guarantees, in all aspects under its responsibility and within its control, the physical and moral safety of its collaborators, working conditions that ensure

individual dignity, appropriate occupational health and safety parameters, and protection of the environment.

PRINCIPLE 8***Transparency and completeness of information***

All collaborators are expected to provide complete, transparent, understandable, and accurate information, so that when establishing relations with the Company all counterparties may be able to take independent and informed decisions with respect to the interests involved, alternative choices, and relevant consequences.

GB Pharma S.r.l. requires anyone who uses the financial resources of the Company to act in accordance with criteria built on lawfulness and propriety, and, where such is not the case, to inform the Supervisory Body when necessary on the use of such resources.

PRINCIPLE 9***Quality of services***

GB Pharma S.r.l.'s activities are geared towards ensuring the satisfaction and protection of the recipients of its services, giving attention to requests that could foster an improvement in the quality of the services it provides. To this end, the Company collects information, reports, complaints, and suggestions, for the purpose of improving and activating services and assistance consistently of the highest quality, efficiency, and efficacy.

**PRINCIPLE
10*****Fair competition***

GB Pharma S.r.l. intends to protect the value of fair competition, abstaining from collusive conduct and abuse of dominant market position. GB Pharma S.r.l. is committed to reporting to the competent bodies any practices aimed at distorting or restricting free market competition.

**PRINCIPLE
11*****Operations and transactions***

Every operation and/or transaction, intended in the broadest sense of the term, must be lawful, authorised, consistent, appropriate, documented, registered, and verifiable at all times.

- All the procedures regulating operations must enable the performance of checks

on the characteristics of each transaction, the reasons that led to the execution thereof, the authorisations for its taking place, and the performance of the operation itself.

- Every person carrying out operations and/or transactions entailing sums of money, assets, or other benefits, economically valuable and owned by the Company, must act under authorisation and provide, when requested, any valid proof to enable a verification thereof within specified time-limits.
- Each internal function is responsible for the truth, authenticity, and originality of the documentation submitted and of the information provided in the performance of the activities within their scope of competence.

PRINCIPLE 12

Purchasing goods and services and engaging external consultants

Any members of staff and parties who make any purchase of goods and/or services, including engaging external consultants, on behalf of the Company, must act in compliance with principles of confidentiality, cost-effectiveness, quality, and pertinence, and act with diligence.

PRINCIPLE 13

Collections and payments

Collections and payments should preferably be made using traceable payment methods, at all times and without exception in accordance with all provisions of law.

PRINCIPLE 14

Activities for the purpose of terrorism and for the subversion of democratic rule

GB Pharma S.r.l. condemns the use of its resources for financing and carrying out, including indirectly, any activity aimed at attaining terrorist objectives or at the subversion of democratic rule.

PRINCIPLE 15

Protection of Individuals

Within the scope of applicable law, GB Pharma S.r.l. undertakes to adopt the most opportune control and supervisory measures for the purpose of preventing any possible instance of behaviour aimed at the commission of crimes against individuals.

5.3 *Principles of Relations with Employed Members of Staff*

PRINCIPLE 16***Staff Recruitment***

Staff is recruited with respect for equal opportunities and based on how a candidate's professional and psychological-attitudinal profile matches the Company's real and substantiated requirements, whether current or future, and based on the high quality of the services provided.

PRINCIPLE 17***Establishing employment relationships***

Staff is hired under a regular employment agreement. The Company does not tolerate any form of illegal employment or any form of employment not provided for by applicable law.

PRINCIPLE 18***Human resource Management***

GB Pharma S.r.l. avoids all forms of discrimination against its human resources.

Within the scope of the staff management and development processes, in line with the same principles used in the recruitment phase, decisions are based on how the desired profiles match the profiles of members of staff, and/or on demonstrable considerations of merit.

In this regard, please also see Principles 4 and 27.

PRINCIPLE 19***Human resource development and training***

The persons in charge utilise and fully valorise all the professional skills within the Company's structure by putting to use all available mechanisms, including training, to promote the development and growth of its human resources.

PRINCIPLE 20***Management of human resources working hours***

Every person in charge is expected to make the most the working hours of human resources, expecting results consistent with the performance of their tasks, with work

organisation plans, with the Company's objectives, and with the skills, conditions, and competences of each.

PRINCIPLE 21

Health, safety, and environmental protection

GB Pharma S.r.l. undertakes to comply with applicable law with respect to occupational health and safety and environmental protection. To attain this objective, the Company is committed to spreading and consolidating a culture of environmental and occupational safety by increasing risk awareness and by promoting the adoption of competent and responsible behaviour by all human resources. In addition, the Company operates with continuity, professionalism, and appropriate investments to preserve, especially by taking preventive action, the health and safety of workers and the protection of the environment, and to protect the interest of all counterparties in these areas.

PRINCIPLE 22

Duties of human resources

Human resources must act with loyalty for the purpose of complying with the obligations undertaken under their employment agreement and established in the Model, assuring the requested services in line with applicable contractual and legal rules.

PRINCIPLE 23

Conflict of Interests

All human resources must avoid situations where conflicts of interest may emerge, and must not take personal advantage of opportunities ascribable to business dealings, transactions, data, or information which have come to their knowledge in the performance of their tasks.

PRINCIPLE 24

Using the Company's assets

Every member of staff must use the assets provided or entrusted to them with caution, diligence, care, professionalism, and efficiency, paying careful attention to the management of the resources in their possession. Each member of staff is responsible for the protection of the resources entrusted to them, and has the duty to promptly inform

the responsible bodies, whether internal or external to the Company, of any threats or harmful events for GB Pharma S.r.l. or for any interested counterparties of the same.

5.4 Principles of conduct

PRINCIPLE 25

Dealings with clients

All dealings with clients are regulated by applicable law and this Code.

The conduct of any Recipient who deals with clients must be ethical, proper, transparent, and confidential.

Recipients must not, either for their own or for the Company's interest,

- make any non-ethical compromise of any kind;
- offer/accept money and/or other benefit for the purpose of obtaining advantages and/or interest, whether real and/or perceived, of any nature, and/or of entering into agreements, whether implied or express, to such end;
- offer/accept gifts other than gift of modest value (as established under internal procedures, guidelines, or industrial codes of ethics applicable, or Company procedures relating to medical doctors, pharmacists, and/or veterinaries);
- make any entertainment expenses not in line with the Company's procedures.

Such rules of conduct must not be eluded by using the assistance of third parties for whose actions a Recipient is responsible.

Recipients must immediately suspend any dealing/negotiation with a client who does not intend to abide by this Code, after informing their own direct Supervisor.

PRINCIPLE 26

Dealings with providers of goods and services

Recipients must act towards providers with honesty, transparency, confidentiality, in compliance with the applicable laws and with this Code, to build with them a relationship of mutual collaboration and trust, guided by and based on the principles contained in this Code.

Recipients must avoid any inappropriate situation that puts the integrity of the Company's name at risk.

In addition, Recipients must never

- accept any gifts, presents (unless they are of modest value and in line with internal procedures), services, or promises of any kind from providers;
- offer any gifts, presents (unless they are of modest value and in line with internal procedures), services, or promises of any kind to providers.

The Company delegates the selection of providers to the functionally competent parties, who make such selection in accordance with demonstrable and objective criteria considering technical abilities, professionalism, quality, cost-effectiveness, and integrity; any exception must be appropriately justified and documented.

Recipients must inform GB Pharma S.r.l. when a provider does not intend to abide by the Code, so that the same may take any appropriate action in such regard, which may include the termination of an existing agreement or not entering into a new agreement.

PRINCIPLE 27

Dealings with employed members of staff (see also Principles 4 and 18)

Dealings with employed members of staff are regulated under express agreements stipulated in accordance with applicable law and in line with the national collective bargaining agreements applicable to their respective category.

GB Pharma S.r.l. encourages equal opportunities. The Company prohibits any discrimination on the basis of race, sex, nationality, religion, age, status, physical condition, language, trade union or political affiliation, and any form of favouritism in the recruitment, management, remuneration, promotion, or dismissal of employed members of staff.

PRINCIPLE 28

Dealings with external collaborators/consultants

GB Pharma S.r.l. may decline to enter into or immediately suspend any work relationship, whether to be established or already established, with external collaborators/consultants who fail to formally accept to abide by the Code.

If a Recipient identifies that the behaviour of an external collaborator/consultant is not in line with the Code, they must immediately inform their line managers, and, when necessary for the purpose of compliance with the Code, the Supervisory Body.

PRINCIPLE 29

Dealings with the Public Administration, including via information technology tools

The expression “Public Administration” means the set of authorities entrusted with the care of public interest, including, but not limited to,

- public municipal, provincial, regional, national, European, and international institutions;
- public officials and persons in charge of public functions or services of any Government, whether inside or outside of the European Community;
- individuals who work for the Local Health Authority;
- employees of Ministries and Ministerial Agencies (e.g., Ministry of Health, Italian Medicines Agency (AIFA), etc.);
- employees of public companies, when vested with authorisation and certifying powers.

Unless they fall under one of the above categories or other equivalent categories, the following are not part of the Public Administration, but are nonetheless Recipients of this Code:

- pharmacists;
- veterinaries;
- medical doctors;
- sales representatives, including pharmaceutical sales representatives;
- political institutions, etc.

Only the Functions in charge may have dealings with the Public Administration and the Third Parties listed above, in compliance with ethical principles, propriety, honesty, and transparency.

Recipients must avoid any behaviour in violation of the law and of the Code, and abstain from creating, favouring, or allowing situations of conflict of interest.

Therefore, they are strictly prohibited from

- i) giving any individuals who are part of the Public Administration (or operating in the public sector), both Italian and foreign, and to their family members, both Italian or foreign, and/or to any individuals identified by the same, for the purpose of receiving any interest or benefit from them,
 - promises of money and/or benefits of any kind;
 - gifts or presents of non-modest value or falling outside corporate customary practice, or such as to compromise the integrity and the

PRINCIPLE 29

reputation of the parties, or be perceived as connected to the improper and unjustified acquisition of advantages for themselves, for others, or for the Company;

- attempting to bribe and/or influence a public counterparty;
- defraud the Public Administration for the purpose of reaching personal and/or company objectives;
- improperly and/or unlawfully exploit acquaintances, and, in general, privileged channels to attain professional objectives, whether personal or for the Company;
- accepting money, gifts, or presents (unless they are of modest value), promises, pressures, preferential treatment, services, favours (unless they fall within the scope of lawful contractual activities) or conditions that are in conflict with the values and the principles expressed in the Code from members of the Public Administration, whether Italian or foreign, their family members, both Italian or foreign, and/or from individuals identified by or linked to the same;
- soliciting or obtaining confidential information which may compromise the integrity or reputation of the Company or of other Recipients.

Recipients may offer/accept gifts, presents, or services only when of modest value, in line with internal procedures and the laws applicable to the Recipient of said gifts/presents/services; such events must be carefully recorded in accounting books or other available document that cannot be modified unilaterally.

Recipients may offer/accept gifts to/from clients or others in those nations where it is customary, when said gifts are of an appropriate nature, of a modest value, and the giving of said gifts is duly documented and justified; in any event, Recipients are required to periodically inform the Supervisory Body, through the information flows to the same, so that the latter may evaluate whether or not they may be opportune.

Before taking any decisions in doubtful cases, Recipients must immediately report to their line managers, or, where necessary in consideration of their position in the Company's organisation, directly to the Supervisory Body, any offers of benefits received from public officials.

The Company's Division which, based on their assigned tasks, interacts with members or employees of the Public Administration or other equivalent Recipients must

- Follow the same guidelines detailed above;
- Document, as much as possible and in writing, all dealings with the Public Administration;
- Record in writing and properly file and keep available all the contracts and agreements made;
- Offer/accept fits, presents, and services only when they are of modest value, lawful, and in line with all applicable law, and take action to ensure they are properly recorded in the accounts, or otherwise appropriately recorded;
- Never delegate dealings with the Public Administration to a consultant or a “third party” when there is a possibility to create a conflict of interest or situation of potential violation of the Principles of this Code;
- Immediately inform their Manager and/or the Supervisory Body of any non-ethical behaviour of the Public Administration.

Recipients may not allocate any grants or funding obtained from the State, a public body, or the European Community to purposes other than those for which they were granted.

Recipients may not utilise or present false statements or documents, or statements and documents that attest falsehoods or omit any due information. In general, Recipients must not use any subterfuge or deception to obtain funding or any undue profit to the detriment of the State or other public Entity.

Any Recipient who, in any capacity, directly or indirectly, accesses computer or telecommunication systems of the Public Administration must not in any way alter their operation, taking any action without authorisation or in any manner on data, information, or programmes.

The Company and Recipients may contribute to financing political parties, committees, public organisations and political candidates, provided they do so in compliance with the laws in force and under the applicable accounting regulations.

PRINCIPLE 30

Dealings with healthcare professionals

In dealings with healthcare professionals, Recipients must act in accordance with the

values of the Company, and particularly with all the values expressed in this Code of Ethics, with the applicable laws and regulations (and particularly with anti-corruption law, Law No. 190/2012, Legislative Decree No. 219/2006, Legislative Decree No. 165/2001, Legislative Decree No. 231/2001, as amended and supplemented), and with internal procedures.

5.5 Principles concerning corporate crimes

GB Pharma S.r.l. condemns any form of behaviour aimed at supporting, encouraging, facilitating, and inducing its representative bodies, or individuals linked thereto, to violate the Principles expressed in this Code, and particularly,

PRINCIPLE 31

Management of data and information relating to accounts, assets, and finances

GB Pharma S.r.l. condemns any behaviour aimed at altering the accuracy and truthfulness of the data and the information contained in financial statements, reports, and any corporate communication required by law.

PRINCIPLE 32

Dealings with internal and external control Bodies

GB Pharma S.r.l. requires all its members of staff to act with propriety and transparency in the performance of their duties, and in particular with any request submitted by control Bodies.

PRINCIPLE 33

Protection of the Company's assets

It is forbidden to engage in any action aimed at causing any harm to the integrity of the Company's assets.

PRINCIPLE 34

Dissemination of false information

It is forbidden to disseminate false information, whether internally or externally to the Company, concerning GB Pharma S.r.l., its activities, know-how, assets, employees, consultants, external collaborators, and third parties who operate within the Company.

PRINCIPLE 35**Dealings with the Public Supervisory Authority**

During checks and inspections conducted by the competent public Authorities, all employed members of staff, consultants, external collaborators, and third parties who work on behalf of the Company must have an open, transparent, loyal, and collaborative attitude towards inspection and control bodies.

It is forbidden to hinder, in any manner whatsoever, the functions of the Public supervisory Authorities who come into contact with the Company on account of their institutional functions.

6. Supervisory Body

The Supervisory Body is a Body, appointed by the Board of Directors of the Company, with supervisory and monitoring functions with regard to the effectiveness, meaning efficacy, appropriateness, updating, and maintenance over time of the Organisational and Management Body and of the Code of Ethics.

In exercising its functions, the Supervisory Body has wide-ranging and free access to the data and information useful to the performance of its activities.

Recipients are required to provide the full and loyal collaboration in favouring the proper conduct of the functions entrusted to the Supervisory Body.

7. Methods for dissemination and implementation of the principles of the Code of Ethics**7.1 Dissemination and information**

GB Pharma S.r.l., its managers and employees, endeavour to disseminate the knowledge of the Code and its contents to all Recipients.

Each Recipient is required to carefully read the full text of this Code, assimilate its contents, and ask the competent Bodies, other employees of the Company or members of the Supervisory Body, any clarifications they may deem necessary to ensure the full and effective application thereof.

GB Pharma S.r.l. and its managers guarantee the appropriate training on the Code to all internal and external Recipients, making themselves available to deliver and explain any pertinent Company procedures to Recipients.

7.2 Responsibilities

In addition to the above provisions, Supervisors ensure the periodic updating thereof and check to ensure that the Recipient's conduct comply with the same. In addition, Supervisors

provide answers to address any doubts, questions, or uncertainties expressed by Recipients or convey the same to persons who are capable of providing appropriate responses in a timely manner.

Recipients are required to report any alleged violation of the Code of which they may become aware to the Supervisory Body.

All employed members of staff have the duty to immediately inform the Supervisory Body of any event taken place of which they have gained knowledge which appears to be in violation of the Code of Ethics.

The Supervisory Body keeps the report received and the identity of the Recipient reporting on said violation as confidential as possible.

7.3 Disciplinary Measures

Failure to comply with the principles contained in this Code may entail the application of the measures contained in the internal Disciplinary System and reported in the OGM, within the limits and based on the specifics of the case and the conditions therein established.