

Code of Ethics Of Farmitalia s.r.l.

Approved by the Legal Representative
on 18th October 2022

CHAPTER I – GENERAL

ART. 1. PREMISES, OBJECTIVES AND ADJUSTMENT TO ANTI-CORRUPTION LAW

1. Farmitalia Industria Chimico Farmaceutica Srl (hereinafter referred to as Farmitalia or Company or Firm) deems it necessary to express in a code of conduct the principles of correctness and consistency that distinguish the Company and to remind all internal and external collaborators to comply with them. The aim is to create a common culture within the Company in order to achieve the best economic result according to ethical principles, in compliance with the legislation on administrative liability pursuant to Legislative Decree n. 231/2001 and in compliance with the principles governing the sector in which the Company operates.

This Code of Ethics and Behavior (hereinafter the Code) therefore enunciates the set of rights, duties and responsibilities of Farmitalia with respect to all the stakeholders with which the aforementioned Company enters into a relationship for the achievement of its corporate purpose. It therefore constitutes a directive containing rules of conduct and behavior that must be observed in everyday work and become responsibility of each employee of the Company.

Farmitalia expects that the Code will contribute to the cohesion between all employees and collaborators, making them aware and oriented, within the scope of their functions and responsibilities, in pursuing the Company's objectives with fair and correct methods.

The Code is a tool susceptible to subsequent amendments and additions based on changes within and outside the Company, as well as the experiences acquired over time.

2. The Code also intends to provide the rules of conduct established by the anti-corruption legislation.

3. For this reason, Farmitalia has decided to integrate the "Farindustria Code of Ethics", inserting the prescribed rules of conduct, integrating the sanctioning system and renaming the "Code of Ethics" as a "Code of Ethics and Behavior".

4. Farmitalia undertakes to disseminate this Code among all stakeholders, directly or indirectly interested, and to communicate any updates and / or changes to the aforementioned document using the means it considers most appropriate. Anyone among the recipients of this Code who has interpretative doubts on the principles represented therein, or on the best conduct to be held in certain concrete circumstances, is

encouraged by the Company to represent them without delay to the Vigilance Bodies in charge of applying and safeguarding the Code from time to time. .

ART. 2 – SCOPE OF APPLICATION

1. The principles and rules of this Code of Ethics apply to the following stakeholders:

- the shareholders of the Company, possibly also in the form of legal persons and trusting shareholders in the event of fiduciary management of the investment;
- companies and / or related or controlling entities;
- the legal representatives and directors of the Company;
- the general attorneys, special attorneys, persons with special power of attorney ad acta and any institor and person in charge;
- the members of the board of statutory auditors;
- the managers of the Company;
- subordinate workers, as well as stakeholders in a coordinated and continuous collaboration relationship, project collaboration and program collaboration;
- the stakeholders (natural and / or legal persons) who perform supervisory and control functions within the Company based on the law, the bylaws and the organisation and control model pursuant to Legislative Decree 231/2001;
- the stakeholders (natural and / or legal persons) having consultancy and / or collaboration and / or external professional or technical service relationships with the company, agency and mandate relationships with or without representation, representation relationships, mediation and procurement of business.
- holders of bodies and assignments in the offices of direct collaboration with the steering body
- collaborators in any capacity of companies supplying goods or services and carrying out works in favour of the company.

2. Specific provisions or clauses for termination or forfeiture of the relationship are included in the appointment deeds and in the contracts for the acquisition of collaborations and consultancies, for the most

serious cases of non-compliance with the Code, while for the less serious cases of non-compliance with the Code, clauses involving financial penalties, possibly as a percentage of the expected remuneration.

3. Also with regard to collaborators in any capacity of companies supplying goods or services and carrying out works in favour of the Company, the relative contracts include for the most serious cases of non-compliance with the Code, termination clauses and forfeiture of the contract while for less serious cases of non-compliance with the Code clauses involving economic penalties, possibly as a percentage of the expected remuneration.
4. Failure to comply with the clauses is detectable by anyone and even ex officio. The procedure aimed at ascertaining non-compliance and applying any sanction is conducted by the corporate body which, according to the Company's legal system, has the competence, power and authority to conduct the proceedings and to apply the sanction, in compliance with the principle of the cross-examination and of the certainty of the timing of the conclusion of the procedure and in any case in compliance with the provisions of the law and / or regulations and / or internal corporate acts governing the sanctioning power.
5. The Company, consistently with the address given by the Court of Cassation section work (see lastly Cass. 15094/2018; Cass. 11697/2020) may make use, if the conditions exist, of the investigative agencies to verify the activity carried out even outside the Company premises, which may constitute criminally relevant hypotheses or integrate fraudulent activities, sources of damage for the employer.
6. The administrative body is responsible for the application of this Code of Ethics throughout the company. Similar responsibility falls to the persons who may be placed at the top of each area and / or company function who, in particular, are required to ensure compliance with the Code by all those who work in the area or function itself.
7. Any conduct put in place by the recipients of this Code of Ethics must be an expression of powers formally attributed and be inspired by criteria of clarity and transparency, must not prejudice the dignity of the Company or question the legitimacy of its work.

CHAPTER II - ETHICAL AND DEONTOLOGICAL VALUES -

ART. 3 - ESSENTIAL ETHICAL PRINCIPLES

1. Farmitalia intends to define and clarify the values and principles that inform its business and its relationships with all the stakeholders who interact with the Company, from which prompt compliance with this Code of Ethics is required in the course of carrying out its own performance on behalf and in favour of the Company.

2. In line with these principles, all Farmitalia's staff are required to adopt an ethically correct conduct in relations with colleagues, collaborators, customers, suppliers, public institutions, competitors, as well as all the stakeholders better indicated in article 2 of the present Code, based on the observance of the following fundamental ethical principles.

- Legality: Farmitalia assumes compliance with the laws and regulations in force in the Italian Republic and with the rules of the European Union, as well as with the territories, countries and foreign states in which and with which Farmitalia may be called upon to operate. For activities carried out abroad, Farmitalia intends to prevent and prohibit conducts and behaviors which, even if lawful according to the provisions of the country in question, are in contrast with the laws and regulations of the Italian Republic and / or with European Union rules.
- Any activity carried out by anyone in favour of the Company must be conducted in the awareness and in compliance, both formally and substantially, with the applicable laws and regulations.
- Honesty: every action must pursue the fundamental principles of moral integrity of its author, resulting in a behavior based on legality, a deep sense of proportion and loyalty towards the Company and in interpersonal relationships.
- Trust: establishing relationships of trust and collaboration with interested parties, both inside and outside the Company, represents a rule of conduct on which every business initiative must be based.
- Transparency: Farmitalia considers it a priority to relate with its own opponents in a clear, complete and diligent way, activating the necessary operational links for aspects that also involve the skills of other organisational structures.

- Impartiality and independence: to operate always observing objective evaluation criteria, avoiding discriminatory and / or opportunistic behaviors within the company organisation, as well as any conditioning of a personal nature deriving from constraints and / or attempts to undue influence put in place by stakeholders both inside and outside the Company.
- Professionalism: to carry out their duties professionally correctly, refraining from any conduct that is contrary or not in accordance with the law or that may in any case affect the image of the Company. Establish relations with the public and with all recipients of this Code with the utmost courtesy and mutual respect.
- Competence: in carrying out the tasks undertaken, it is an unavoidable rule to operate with commitment and constancy, adhering, daily and with diligence, to the duties and tasks received in compliance with functional and contractual obligations, refraining from making decisions that are not compatible with compliance of official duties, or in excess of the delegations and / or authorizations granted, and committing to acquire and maintain, for the entire duration of the contractual relationship, the necessary professional skills indispensable for the performance of one's activity.

ART. 4 – GENERAL DEONTOLOGICAL RULES

1. All recipients of the Code must engage in conduct consistent with the following ethical principles.

They therefore undertake:

- to adapt their internal and external conduct to the ethical principles set out in this Code, in the awareness of the responsibilities incumbent on the Company during the management of its institutional and commercial activities;
- to report any personal and / or economic relationships with persons or representatives of companies that have in progress with the Company, or in relation to any assets managed by it, litigation proceedings or transactions of any kind;
- to report any direct or indirect involvement or interests, judicial or extrajudicial activities, which may in some way affect the normal and proper conduct of the Company's relations with its customers, suppliers, entities and third parties in any case in relation to Farmitalia;

- to promptly report any violation made within the Company of laws or regulations, of instructions given by the competent supervisory authorities, or of this Code. To report, furthermore, any episode of omission, falsification or neglect in the keeping of the company's accounts and / or in the conservation of the documentation, on which the accounting records are based;
- to respect, use prudently and safeguard the assets made available to the Company as well as prevent their fraudulent or improper use. The use of these assets must be functional to the performance of company activities or to the corporate purposes authorized by the internal functions in charge, with the exclusion of any illegal, immoral use, capable of causing harassment or contrary to the protection of intellectual property rights;
- to take care of their skills and professionalism, enriching them with the experience and collaboration of their colleagues, taking a constructive and proactive attitude in carrying out the assigned functions;
- to take steps to ensure that each operation is approved by the competent authorization level according to the hierarchical and / or delegated system that may be in force within the company;
- to interact with their colleagues with dignity and respect for the individual, valuing the differences in lifestyle, perspectives and personal culture. To cooperate in carrying out the company activities in good faith and mutual trust, avoiding non-constructive or unnecessarily polemical attitudes;
- to ensure impartial behavior in the performance of their duties, not accepting and not taking into account recommendations or reports, however denominated and in any form given, in favour or to the detriment of stakeholders with whom they interact for reasons of their office. To refuse gifts or other benefits from such stakeholders, avoiding receiving benefits of any kind of nature, entity or value that could affect their independence and impartiality of judgment;
- to base their activity on maximum efficiency, whatever the level of responsibility connected to the role, by complying with the operating instructions issued by the higher hierarchical levels, reporting any irregularity or malfunction relating to the management or the methods of providing services, certain that no type of retaliation will take place against the complainant; ;
- to maintain a behavior inspired by the utmost fairness and integrity in relations with and between employees, collaborators and representatives of entities, public administrations and political and / or

trade union organisations, avoiding to pursue any form of pressure capable of improperly influencing the decisions of the counterpart or to request unjustified favourable treatment;

ART. 5 GIFTS, FEES AND OTHER UTILITIES

1. The employee does not ask for, or solicit, for himself or for others, gifts or other benefits.
2. The employee does not accept, for himself or for others, gifts or other benefits, except those of modest value made occasionally in the context of normal courtesy relations and in the context of local customs. In any case, regardless of the circumstance that the fact constitutes a crime, the employee does not ask, for himself or for others, gifts or other benefits, not even of modest value by way of consideration to perform or to have performed an act of his office by subjects who may benefit from decisions or activities related to the office.
3. The employee does not accept, for himself or for others, from a subordinate, directly or indirectly, gifts or other benefits, except those of modest value of use. The employee does not offer, directly or indirectly, gifts or other benefits to a supervisor, except those of modest value for use.

ART. 6 - PARTICIPATION IN ASSOCIATIONS AND ORGANISATIONS

1. In compliance with the regulations in force concerning the right of association, the employee promptly communicates to the Manager and / or the manager of the structure to which he belongs, his adhesion or belonging to associations or organisations, regardless of their confidential nature or not, whose areas of interest may interfere with the performance of the office to which the employee is assigned. This paragraph does not apply to membership of political parties or trade unions or religious associations or associations related to other "sensitive" information areas.
2. The employee does not put pressure on colleagues or users of services or with stakeholders with whom he comes into contact during his professional activity to join associations and organisations of any kind, regardless of their character or the possibility or not to derive economic, personal or career benefits.

CHAPTER III - RESOURCE MANAGEMENT AND RULES OF CONDUCT

ART. 7 – PROTECTION OF HUMAN RESOURCES

1. Farmitalia considers the principle of worker protection as a primary value.
2. For this reason, the company attaches the utmost importance to those who work within the company structure, contributing directly to developing, providing, improving and ensuring optimal management of their services. It is also in the interest of the company to promote the development and professional growth of the potential of each human resource, also in order to increase the wealth of skills possessed by each employee or collaborator.
3. Relations between employees, regardless of the levels of responsibility, must be based on the values of loyalty, fairness and mutual respect.
- 4.4. Each manager and / or manager of the structure must exercise their powers with objectivity and balance, with a view to enhancing and empowering their employees and collaborators, adopting criteria of merit, competence and in any case strictly professional for any decision relating to employment relationship with its employees and external collaborators. Discriminatory practices in the selection, hiring, training, management, development and remuneration of personnel, as well as any form of nepotism or favouritism, are expressly prohibited. Each recruitment or promotion must be carried out in compliance with the criteria of merit and competence.
5. Each employee must be cooperative and carry out their duties with responsibility, efficiency and diligence.

ART. 8 - CONDUCT IN PRIVATE RELATIONS, CONFIDENTIALITY AND RELATIONS WITH THE MEDIA.

1. In private relationships, the employee does not exploit or mention the position he holds in the company to obtain benefits that are not due to him and does not engage in any other behavior that could harm the image of the company.
2. Employees respect the secrecy and keep confidential the news and information learned in the context of the activity carried out.
3. Relations with the media are held by the sole administrator and by the bodies and offices of direct collaboration in charge of this, as well as by the employees expressly appointed

ART. 9 – COMPORTAMENTO IN SERVIZIO

1. The employee carries out the activity assigned to him within the terms and in the manner provided by the law and by the internal acts adopted by the Company, unless there is a justified reason, he does not delay or adopt behaviors such as to cause other employees to carry out activities or to adopt decisions pertaining to himself.
2. The employee uses the leave of absence from work, however named, in compliance with the conditions provided for by law, regulations and collective agreements.
3. The employee uses the material or equipment available to him for office reasons and the telematic and telephone services of the office in compliance with any constraints imposed by the company, as required by art. 19 of this Code. The employee uses the Company's means of transport at his disposal only for the performance of his office duties.

ART. 10 – RELATIONS WITH THE PUBLIC

1. During public relations, the employee allows his / her recognition through the visible use of the identification tag provided by the Company, or with other identification support made available (plaque on the desk or on the door), unless otherwise provided by the service, also considering the employee's safety.
2. The employee addresses users with courtesy and operates with a spirit of service, fairness and availability and, in responding to correspondence, telephone calls and e-mails, operates as completely and accurately as possible and in the utmost timeliness.
3. The employee uses the fastest and most immediate means to respond to the requests of the users of the services, taking care to maintain ownership and courtesy in the style of communication. If he is not competent by position held or by subject, he directs the interested party to the competent employee of the same company, facilitating the achievement by the user, also by personally contacting the competent office in advance and making sure that the information provided is actually sufficient. to reach (physically or electronically) the requested office.
- 4.. The employee, without prejudice to the rules on confidential information, provides the explanations that are requested regarding his own behavior and that of other employees for whom he is responsible or coordinator, while avoiding to express negative personal judgments on his collaborators or to assign them

the entire responsibility for a hypothetical or ascertained disservice, reserving any sensitive reports from a disciplinary point of view to be afforded elsewhere.

5. Without prejudice to the right to express assessments and disseminate information to protect trade union rights, the employee refrains from offensive public statements towards the Company, his colleagues and managers.
6. Employees who work in a department that provides services to the public, regardless of their hierarchical position in the structure, ensure compliance with the quality and quantity standards set by the company and the managers.
7. The employee does not undertake commitments or anticipate the outcome of own or others' decisions decisions or actions relating to the service, excluding the cases permitted by the Company.
8. The employee observes the legislation on the protection and processing of personal data and, if requested verbally to provide information, deeds, documents that are not accessible protected by the provisions on personal data, inform the applicant of the reasons that prevent the acceptance of the request. If it is not competent to provide for the request, on the basis of internal provisions, it ensures that the same is forwarded to the competent office of the same Company.
9. The employee makes public statements or other forms of outsourcing as a representative of the Company only if expressly authorized. The Manager and / or the head of the department is always authorized to make such statements, omitting judgments and / or personal considerations.

ART. 11 – SPECIAL PROVISIONS FOR MANAGERS AND / OR DEPARTMENT MANAGERS

1. The manager and / or in any case the department manager:
 - a. diligently carries out the functions due to it on the basis of the act of conferment of the assignment, pursues the assigned objectives and adopts adequate organisational behavior for the performance of the assignment..
 - b. before assuming the duties, and in any case no later than 30 days from the assignment of the task, the manager communicates to the Company the shareholdings and other financial interests that could create a conflict of interest with the function performed and declares if there are relatives and related up to the second

degree, spouse or cohabitant who carry out political, professional or economic activities that put them in frequent contact with the office that will have to direct or who are involved in decisions or activities related to the office. Every two years from the assignment of the task, an update of the communication relating to shareholdings and other financial interests that may place the manager in a position of conflict of interest is due.

c. assumes loyal and transparent attitudes and adopts exemplary and impartial behavior in relations with colleagues and collaborators. He also ensures that the resources assigned to his office are used exclusively for business purposes and, in no case, for personal needs.

d. takes care, compatibly with the available resources, of the organisational well-being in the structure to which he is in charge, favouring the establishment of cordial and respectful relationships between collaborators, takes initiatives aimed at the circulation of information, training and updating of personnel, inclusion and enhancement of differences in gender, age and personal conditions.

e. takes care of a fair distribution of the workload, taking into account the skills, attitudes and professionalism of the staff at its disposal. Entrusts additional tasks on the basis of professionalism and, as far as possible, according to rotation criteria.

f. promptly undertakes the necessary initiatives if he becomes aware of an offense, promptly reports the offense to the Supervisory Body, providing his cooperation if required and promptly submits a complaint to the criminal judicial authority.

g. he favours the dissemination of knowledge of good practices and good examples in order to strengthen the sense of trust in the company.

ART. 12 – HEALTH PROTECTION

1. All Farmitalia's employees, collaborators or consultants, whose physical and moral integrity is considered a primary value, are guaranteed working conditions that respect individual dignity, in safe and healthy work environments.

2. Coherently with the business activity and the economic initiatives that derive from it, as well as with the values that animate this Code, Farmitalia considers the protection of the health of its employees as a basic

principle. The company therefore considers full and integral compliance with the legislation on safety and hygiene at work to be of preminent interest, and actively works for the prevention of accidents at work and for the safety and hygiene of workers.

ART. 13 – MANAGEMENT OF INTERNAL RELATIONS

1. The corporate bodies of the Company, as well as the individual department managers, in the awareness of their responsibilities and competences, make their respective choices inspired by the principles contained in this Code.
2. In particular, the aforementioned stakeholders, in compliance with the principles of sound and prudent management, undertake:
 - to comply with the supervisory and management obligations required by the assigned task;
 - to support and stimulate the professional growth of the assigned resources, taking into account the attitudes of each in the assignment of tasks, ensuring everyone the same opportunities to express their professional potential, in order to achieve real efficiency in the operational field;
 - to make decisions and take risks based on the logic of sound and prudent management, ensuring the economic and efficient use of resources in compliance with the law and internal regulations, as well as the correct use of risk control procedures. In particular, when called upon to manage business relations in general, they undertake to carry out their duties in accordance with the powers received and safeguarding, in any case, the company assets, as well as the economic interests of the stakeholders involved in various capacities in company activities.;
 - to pay due attention and, where possible and appropriate, to follow up on the suggestions and / or requests of their collaborators, with a view to total quality, favouring a motivated participation in the Company's activities;
 - to bring its added value in the implementation of business development programs that increase the Company's assets.
3. It is considered a common objective of all levels of the organisational structure to participate in the development of a control system of the various operating functions that contributes to improving the

efficiency of company processes, to contribute to its effective functioning also through the timely compliance with internal procedures, in order to allow easier identification of any points of responsibility.

4. All those who collaborate with Farmitalia are expressly requested to abide by the principles contained in this Code. Any compensation to be paid to these stakeholders must be commensurate with the service indicated in the contract and the payments cannot be made to a subject other than the contractual counterpart, nor credited in a third country other than that of the contracting parties..

ART. 14 – PROHIBITION OF DISCRIMINATORY ACTS

1. In the context of its internal relations and in external relations with all third parties, Farmitalia avoids any discrimination based on age, racial and ethnic origin, class, nationality, trade union membership or political opinions, religious beliefs, sex, sexuality, status health or disability of its interlocutors.

ART. 15 – COMMUNICATION OF FINANCIAL INTERESTS AND CONFLICT OF INTEREST

1. All recipients of the Code of Ethics must make every effort to avoid any possible situation of conflict of interest. In this perspective, the same stakeholders are required to refrain from any activity that could oppose a personal interest to those of the Company or that could interfere and hinder the ability to make, impartially and objectively, decisions in the interest of the Company.

2. The recipients of the Code are also encouraged to avoid, as far as possible even in their own private sphere, conduct (also in the form of personal and / or financial relationships) that may even apparently generate risks of conflict situations and / or lack of objectivity in the exercise of one's duties.

For this reason, the Company considers it a duty that its employees and collaborators maintain a line of conduct that excludes any possibility of overlapping or in any case confusing, for a logic of personal interest, the duties carried out within the company with other activities carried out with reference to companies or entities in which they hold roles or are stakeholders.

3. The Company adopts rules and procedures that make it possible to identify in advance and to manage any conflict of interest with correctness and transparency, also in order to prevent the occurrence of conduct or situations that are incorrect, unprofessional and / or contrary or non-compliant with the law.

4. Without prejudice to legal, regulatory and contractual obligations regarding the processing and dissemination of confidential information, the Company's employees, collaborators or consultants are required to provide complete, transparent, understandable and accurate information.

5. The employee refrains from making decisions or carrying out activities related to his duties in situations of, even potential, conflict of interests with personal interests, of the spouse, cohabitants, relatives, relatives up to the second degree. The conflict can concern interests of any kind, including non-financial ones, such as those deriving from the intent to indulge political, trade union or hierarchical pressures.

ART. 16 – OBLIGATION TO ABSTAIN

1. The employee refrains from taking part in the adoption of decisions or activities that may involve his own interests, or that of his relatives, similar up to the second degree, of his spouse or cohabitants.

ART. 17 - CONFIDENTIALITY

1. It is forbidden for all recipients of the Code of Ethics to process and use information, acquired in any way, directly or indirectly relating to the activity carried out for the Company for purposes beyond the ordinary performance of their professional duties.

2. It is also prohibited to all recipients of the Code of Ethics to disclose information to the outside that is deemed confidential by Farmitalia.

ART. 18 – FINANCIAL AND ACCOUNTING MANAGEMENT

1. Each operation and transaction of the Company must be legitimate, consistent and congruous, properly authorized and adequately recorded so that it can be verified.

2. No financial transaction can be carried out without observing the procedures established by the Company and in the absence of adequate supporting documentation.

3. Without prejudice to the provisions of the civil code, tax legislation and other national regulatory sources, the accounting system of the Company must allow, at any moment, the timely verification of every operation that involves the movement of incoming and outgoing, of the substantive reasons that led to its execution, of the persons who authorized its execution and of the related supporting documents.

4. The Company, as a taxpayer, must correctly and promptly fulfill all the obligations imposed on it by the current tax regulations, Farmitalia therefore ensures the keeping of the accounting records, the preparation and drafting of the financial statements, interim financial statements, reports, prospectuses, corporate communications in general and anything else compulsorily provided for.

5. All employees of Farmitalia s.r.l. are required to comply with the rules set by law to protect the integrity and effectiveness of the share capital, also in order not to damage the guarantees of creditors and third parties in general.

ART. 19 – PROTECTION OF COMPANY ASSETS

1. Each recipient is responsible for the protection and conservation of movable or immovable property, physical and intangible and of the resources, whether human, material or intangible, entrusted to him to carry out his duties.

ART. 20 - INFORMATION POLICY

1. Farmitalia believes that any type of information transmitted within its own business environment and to the outside world must be timely, truthful and transparent.

2. Safeguarding the corporate assets includes the custody and protection of the Company's material and intellectual assets, as well as company-owned information and data, of which employees become aware for office reasons. Due to the strategic importance of such information, it is necessary to correctly share them, in order to allow the achievement of the objectives common to the various functions, with the awareness that unauthorized dissemination, tampering, improper use or loss can cause damage to Farmitalia.

3. The activities of the Company's business involve the acquisition, storage, processing, communication and circulation inside and outside of documents, studies, data and written, telematic or verbal information. This information, acquired and processed by employees in the exercise of their duties, must be limited to those with an effective corporate interest in knowing and using it and will be disclosed in full compliance with the obligations of diligence, loyalty and confidentiality deriving from the law, by employment contracts, as well as by the rules of conduct dictated by this Code.

4.The disclosure of confidential information to third parties and in any case for internal use requires the authorization of the Manager.

5.Relations with the press and other media are entrusted to the company functions in charge of it or to external consultants. Similarly, a prior agreement with the relevant functions is required to represent the positions and activities carried out by Farmitalia in any form and occasion.

6.Farmitalia s.r.l. guarantees the processing of personal and sensitive data relating to its employees and third parties according to the criteria established by current legislation on privacy.

ART. 21 – RELATIONS WITH CUSTOMERS AND SUPPLIERS

1.Correctness, professionalism, efficiency, seriousness and reliability are the basis for establishing a valid relationship also with customers, suppliers and external collaborators, whose choice is related to assessments based on objective elements of reference.

2.Farmitalia's employees are obliged to ensure equal opportunities for supplier companies.

ART. 22 – CONTRACTS AND OTHER NEGOTIAL ACTS

1.In the conclusion of agreements and negotiations and in the stipulation of contracts on behalf of the Company, as well as in their execution phase, the employee does not resort to the mediation of third parties, nor does he correspond or promise any benefit by way of intermediation, or for facilitating or have facilitated the conclusion or execution of the contract. This paragraph does not apply to cases in which the Company has decided to resort to professional intermediation.

2.An employee who receives oral or written complaints about the work of the office or that of his collaborators from natural or legal persons participating in negotiation procedures in which the Company is a party, shall immediately inform their supervisor.

3.All employees, collaborators or appointees who, in the exercise of their functions and duties, intervene in the proceedings relating to negotiations and contracts of the Company, including execution and testing, at each stage, must implement the following behaviors , in addition to those already governed by this Code:

- - act impartially, guarantee equal treatment and avoid any preferential treatment;

- refrain from disseminating and using, for personal purposes, the information available for service reasons, without prejudice to compliance with the rules for the protection of the right to information.

ART. 23 - RELATIONS WITH PUBLIC INSTITUTIONS

1.1. Relationships held in the name and on behalf of Farmitalia with national, EU and international public institutions, public officials or persons in charge of public services, or bodies, representatives, agents, exponents, members, employees, consultants, persons in charge of public functions or services, public institutions, public administrations, public bodies, including economic ones, public bodies or companies of a local, national or international nature, must be based on clarity, transparency and professionalism, in the mutual recognition of their respective roles and organisational structures, also for the purpose of a positive comparison aimed at formal and substantial compliance with the legislation applicable from time to time.

2. In relations with public officials, every Farmitalia's employee must behave in a manner inspired by the utmost fairness and integrity, also avoiding giving the impression of wanting to improperly influence decisions or requesting preferential treatment. In this regard, Farmitalia activates the appropriate precautions and suitable measures to prevent similar behaviors by those who act in its name and on its behalf and which could be configured as corruption of a public official or a public service officer.

3. In addition, gifts or acts of courtesy and hospitality to public officials and public employees are not permitted, unless they are of moderate or low value and in any case such as not to compromise the integrity and reputation of one of the parties or be interpreted as capable of acquiring illegal or undue advantages and / or improperly. Similarly, in relations with public officials, with whom he comes into contact for work reasons, the employee cannot accept remuneration, gifts or favourable treatment of more than symbolic value. The same employee is obliged to inform his manager of the offers received in this regard.

ART. 24 SCIENTIFIC INFORMANTS - CONGRESSES AND CONFERENCES - SPONSORSHIPS

24.1.1 The general principles

The company is responsible for the information and promotional actions carried out on its own products and on those for which it holds the sales concession. The following provisions apply to products that can be configured as medicines and for products belonging to other categories (medical devices, food supplements, etc.)

The contents of the information are always documented or documentable. Exaggerated statements, universal and hyperbolic statements, and comparisons that cannot be demonstrated and lack an evident objective basis are not allowed.

The use of faxes, e-mails, automatic call systems and other electronic means of communication for the dissemination of promotional material duly approved by AIFA is prohibited, except in the case in which the recipient doctor's documentable consent has been previously acquired.

The scientific informant of the drug must introduce himself to the healthcare professional qualifying himself in his function.

The scientific informant of the drug must not exercise health or parasanitary professions, or in any case relating to the use of the drug, even if not remunerated, or any other continuous activity that involves the employment relationship.

It will be the responsibility of the Company to enable the scientific informant of the drug to provide the health care worker with information on the properties and characteristics of the drug itself that allow for proper therapeutic application.

It will also be a responsibility of the Company to enable the scientific informant to collect information relating to their drugs in order to ensure the most in-depth knowledge of the products marketed.

It is part of the scientific reporter's activity to verify and work to ensure the availability of the products both in pharmacies and at any other distribution point.

24.1.2 The informative material

Where the activity of scientific information is carried out using IT, electronic or telephone supports, including through qualified third parties, the same regulatory provisions identified by the law in force and by this Code of Ethics regarding scientific information must be fully respected.

Regardless of ministerial authorization, all-encompassing statements such as "drug of choice", "absolutely harmless" or "perfectly tolerated" and similar, are not allowed and it must not be categorically asserted that a product is free of side effects or toxicity risks.

Scientific citations must accurately reflect the meaning that the author intended to attribute to them.

The texts, tables and other illustrations taken from medical journals or scientific works must be reproduced in full and faithfully, with the exact indication of the source. Quotations are not allowed which, apart from the context from which they are taken, may be partial and / or contradictory to the author's intentions.

24.1.3 The promotional material

As part of the information and presentation of medicines carried out by doctors or pharmacists, it is forbidden to grant, offer or promise prizes, pecuniary or in-kind advantages.

In any case, offering economic incentives aimed at compensating for the time taken away by health professionals from their normal professional activity and dedicated to participation in congress events is prohibited.

It must also be ensured that all promotional material intended for doctors and pharmacists is purchased directly from the company.

24.1.4 Professional updating and scientific collaboration

For the exclusive purposes of professional and scientific updating of the medical profession, it is allowed to make scientific volumes and subscriptions to scientific journals available, provided that they are initiatives of high scientific value, aimed at qualifying therapeutic services.

The above material must be purchased by the company and must be distributed directly by the company to the doctor or possibly delivered to the doctor himself through the local structure.

Outside the scope of clinical trials, donations or loan for use relating to fungible instruments - with different or alternative methods of use with respect to diagnostic or therapeutic purposes such as Smart Phones, Tablets - are not permitted to public and private structures. or similar, to be assigned to doctors for personal use outside the facilities or to be given to patients.

24.1.5 Free samples

Free samples of a medicinal product for human use can only be given to doctors authorized to prescribe it and must be delivered exclusively through scientific informants, upon written request from the doctor bearing the date, stamp and signature of the same.

Each doctor can be delivered 2 samples per visit for each dosage or pharmaceutical form of a medicinal product only for the 18 months following the date of first marketing of the product and within a maximum limit of 8 total samples for each form or dosage. In addition, no more than 4 samples per visit may be delivered within the maximum limit of 10 samples per year chosen from the company's list of medicines on the market for more than 18 months.

The other provisions referred to in Article 125 of Legislative Decree No. 219/2006 and subsequent amendments remain valid

24.2 Congresses, conferences and scientific meetings

24.2.1 General principles

Without prejudice to the regulatory provisions in force on the stakeholders, as the subject of this document are to be intended those conferences, congresses and scientific meetings on issues relating to the use of medicines, which represent an opportunity for meetings between industry and healthcare professionals and which are aimed at a plurality of participants. Participation in congress events by the Company must in any case be connected to the role played by the company in the fields of research, development and scientific information and must be inspired by ethical, scientific and economic criteria.

In this context, the Company will be able to offer Italian health professionals invited to congress events in Italy and abroad, exclusively by air travel in economy class and accommodation in hotels with a maximum of 4 stars.

In the case of rail transport, all travel classes are permitted with the exception of Executive class.

On the occasion of international conferences that include intercontinental flights exceeding 6 consecutive hours of flight, it will be possible to plan travel in business class exclusively for speakers and moderators included in the official program of the conference, with the exception of those who participate with the presentation of Posters.

As for the identification of conference locations in relation to events organized directly by the company, this identification must be inspired by reasonable scientific, logistical and organisational reasons.

Under no circumstances the organisation of scientific initiatives is allowed for tourism purposes.

The invitation by the medical society to conferences and congresses is subject to the existence of a specific relevance between the subject matter of the congress event and the specialization of the participating doctors.

The primary objective of participating or organizing conferences and congresses at an international, national and regional level must be aimed at developing scientific collaboration with the medical profession.

24.2.2 The congress venues

Events organized directly or indirectly by Farmitalia must be held in locations and venues whose choice is motivated by logistical, scientific and organisational reasons, with the exception of places intended for catering, and must be characterized by a qualifying scientific program. The territorial area of origin of the participants must be at an international, national, interregional, regional or local level.

24.2.3 Regional events and scientific meetings at a local level

Regional events and scientific meetings at a local level are characterized by a territorial area of origin of the participants at a provincial level or at regional area. The events must have acquired ECM credits and on this occasion no hospitality can be offered with the exception of the coffee break. For events involving a number of training hours of more than 6, a light lunch may be offered in the interval between the morning and the afternoon session within the facility where the congress is held. These events must be held in venues such as hospitals, universities, scientific foundations or congress halls such as to ensure scientific dignity.

24.2.4 Interregional events

Interregional events are characterized by a balanced representation of doctors from at least three regions and cannot include more than one overnight stay.

24.2.5 International and national events

The participation of the company in congress events with regard to the hospitality offered, cannot exceed the period of time between the twelve hours preceding the start of the Congress and the twelve hours following the conclusion of the same, nor present characteristics such as to prevail over the technical-scientific purposes of the event.

Hospitality for accompanying persons at any level and in any form is also excluded.

Any hospitality charges borne by pharmaceutical companies may concern general practitioners, hospital pharmacists, local pharmacists, and where applicable, nurses only in relation to events taking place in Italy.

24.2.6 The promotional material that can be used in the congress venue

During the congress events, gadgets of negligible value and related to the profession of doctor or pharmacist could be distributed with the exception of objects that graphically recall the packaging of drugs. The name of the medicinal products and / or the name of the active ingredient and / or the company name of the relative company may be shown on the gadgets.

24.2.7 Web-based refresher and training courses

The medical scientific training and updating initiatives carried out through the electronic tool such as web meetings, e-meetings or FADs and similar events, cannot provide for any form of hospitality and are not subject to any constraint in terms of the duration of the works..

24.2.8 Refresher courses

The same rules indicated above for congresses, conferences and scientific meetings must be applied to medical-scientific refresher courses organized at any territorial level.

It is forbidden to organize and sponsor the participation of operators to refresher courses that do not have a medical-scientific purpose such as foreign language courses, of IT or fiscal nature, or similar initiatives.

The sponsorship of refresher initiatives aimed at healthcare professionals (meaning by the latter the various medical figures, pharmacists, healthcare directors, technical and administrative staff of public and private structures) and relating to health care management matters is allowed in direct relationship with drugs, provided that they are held in Italy, organized by qualified persons, take place in hospitals or universities or in any case suitable for ensuring scientific dignity and end within a day with a forecast of at least 6 hours of actual work. In these cases, companies will not be able to bear any hospitality costs except for a light lunch.

The sponsorship of initiatives whose duration is longer than one day is also allowed only in the case of national level events, organized by qualified companies in relation to the topic dealt with. In this case, the Company will also be able to bear the travel and hospitality charges in favour of the participants with a maximum limit of one overnight stay. The provisions envisaged for national events apply to these initiatives.

24.2.9 Satellite symposia

If the company arranges for the organisation of satellite symposia in coincidence with congress events in Italy or abroad, the current legal and ethical provisions regarding Conferences and Congresses must be respected and, where applicable, the legislation on Continuing Medical Education. These initiatives must be held either within the main event or in the half day preceding or following the end of it. If the latter begins in the afternoon, the satellite symposium will be held in the morning of the same day or in the afternoon of the last day in case that the main event ends in the middle of the day.

24.2.10 Visits to company laboratories

The visit of doctors to the company laboratories is allowed, provided that it does not exceed the time strictly necessary for its actual performance, the hospitality offered is limited to the period of time between twelve hours prior to the start and twelve hours after the conclusion of the initiative and does not present characteristics that prevail over the technical purposes of the visit itself. Furthermore, on such occasions, hospitality for accompanying persons at any level and in any form is excluded.

24.2.11 Investigator meetings

Investigator meetings are defined as the study meetings of the investigators, concerning pre-clinical, clinical or observational studies. The duration of the initiative must be in accordance with the work program with the exclusion of any tourist-playful aspects and hospitality costs for accompanying persons at any level.

The choice of locations must be made according to the same criteria identified for conferences and congresses as well as the identification of the hospitality limits offered.

24.3 Industry relations with the scientific and healthcare world

24.3.1 Scholarships and scientific advice

Without prejudice to full compliance with current regulatory provisions on the subject, scientific collaboration between the society and the scientific world can also be activated through scholarships and scientific advices, provided that the congruity, adequacy and traceability of the initiative is still guaranteed.

The decision-making aspect of these initiatives must in any case be reserved for the company's top management.

The company may use the collaboration of doctors as consultants for services such as speakers and moderators at conferences, involvement in observational studies, training and education services. These forms of collaboration must be carried out in full compliance with the following criteria:

- - it is necessary to enter into a written contract between the doctor and the company that specifies the nature of the service provided. The necessity for the service must be clearly identified;
 - - the contract must include the obligation for the consultant to declare the existing relationship with the company on all occasions when he writes or speaks in public on the subject of the collaboration relationship. The same obligation is also applicable in the case of companies that employ part-time doctors who practice the profession;
 - - the company is required to keep the documentation regarding the services offered by the consultants for a period of at least 3 years;
 - - the remuneration recognized by the company for the services offered must be identified according to economic criteria and reflect the market value of the services themselves. The congruity, adequacy and traceability of the initiative must also be guaranteed;
- in all cases where travel or any form of hospitality is envisaged, the provisions referred to in the paragraph "Congresses, conferences and scientific meetings" are applied.

24.3.2 Scholarships

Collaboration between the society and the scientific world can also be activated through scholarships.

In this case the grants must have as their object a project of significant scientific interest with specific and measurable objectives; they must be subject to the prior stipulation of a specific Agreement with the structure where the beneficiary operates, in which all the applicable conditions are specified; they must have a singular and non-habitual character as they cannot be repeated with the same hospital structure or with the same operating unit / department before 3 years. The decision-making aspect relating to the disbursement of scholarships must be reserved for the company's top management.

24.3.3 Relations with scientific societies

The company may entertain collaborative relationships with scientific societies and medical associations as long as it is inspired by the dissemination of scientific knowledge and the improvement of professional knowledge, and is carried out in collaboration with bodies of proven reliability and national standing, of which the mission is well known.

24.3.4 Drug related trials and investigations

In the phase following the release of the marketing authorization of the medicinal products, only clinical trials authorized under the current legislation governing the matter are allowed..

It must be ensured that clinical studies, post marketing and post-marketing surveillance investigations are conducted exclusively for scientific purposes.

The implementation by the company of non-interventional (observational) clinical studies is subject to compliance with the relevant legal provisions. In addition, the following criteria must be met:

- - a written contract must be drawn up in advance between the sponsoring company and the bodies involved in the study within which the characteristics of the study itself and the nature of the services offered by the body and / or participating doctors must be specified in detail;
- - the Study Protocol must be approved by the competent and appropriately delegated corporate bodies, which must also monitor the conduct of the Study in compliance with the privacy legislation;
- - any remuneration recognized for participation in the Study must be identified according to economic criteria and reflect the market value of the work performed;
- - the study should not contain elements of induction or recommendation to prescribe or purchase a particular medicine;
- - scientific informants may be involved in observational studies exclusively from a logistical point of view, with the exclusion of any aspect of economic-financial nature.

In the event that, for the purposes of the study or for the purposes of a training initiative carried out directly or indirectly by the company, it is necessary to use instrumental supports (such as holter, electrocardiographs and other telemedicine tools) aimed exclusively at such studies or initiatives, the distribution to doctors of the instruments must be carried out through the body or bodies involved in the study (ASL, University, Hospital

Bodies and IRCCS) and its use must be regulated under a specific agreement between the company and said bodies.

In any case, the fixed-term use of equipment must be envisaged exclusively for the purpose of completing the study or training initiative, their withdrawal at the end of the study or initiative and the prohibition of their reuse in immediately subsequent investigations carried out by the company with the same bodies. In any case, the use of computer-type equipment (such as laptops and other computers, palmtops and similar products) is prohibited, unless they are strictly necessary for carrying out the study.

24.3.5 Websites

Each website that is aimed at the public and Italian operators, in addition to meeting the requirements of the Regulations and the laws in force on the subject, must ensure that the sponsor, the source of all the information reported on the site, the recipients of such information and the objectives of the site are clearly identified. In any case, it must be ensured that access to the sections bearing promotional information on company products is reserved exclusively for doctors and pharmacists.

24.3.6 Relations between Pharmaceutical Companies and Patient Associations

Any form of direct or indirect economic support from the company towards a patient association must be in compliance with the following criteria:

- - a specific agreement must be signed in advance to regulate the amount of the loan and the purpose for which it is disbursed. To this end, each company will have to develop a standard internal approval process for this category of agreements;
- - public use of the logo or material owned by a patient association by the company must be authorized in advance by that association. In order to acquire the authorization, the purposes and methods of using the logo must be clearly defined;
- - any form of sponsorship by the company towards Patient Associations must be transparent and free from promotional purposes;
- - the company may request to be the sole lender of a Patient Association;
- - in all cases where travel or any form of hospitality is envisaged, the provisions set out in the paragraph "Congresses, conferences and scientific meetings" are applied.

For the only purpose of supporting Public Health or Research, contracts may be stipulated between the company and Patient Associations aimed at providing the company with specific services. It is also allowed to employ representatives of Patients' Associations as experts or consultants for Services such as participation in Advisor boards and speakers. To this end, an agreement or a preventive contract must be signed in which the nature of the services provided and the criteria for the payment of the Services themselves are specified. As part of the contract, the need to use these services must be clearly identified and documented. The remuneration awarded must be reasonable and must not exceed the normal market value of the service provided.

ART. 25 - ENVIRONMENTAL PROTECTION

1. Farmitalia respects the principle of environmental protection and pursues the objective of protecting the environment compatibly and consistently with the business activity and the economic initiatives that derive from it.
2. Farmitalia therefore believes that environmental protection is a topic of preeminent importance, for this reason it carries out its activities in such a way as to guarantee the prevention of possible environmental risks, favouring the development of a better environmental awareness in the commercial sector in which the company operates.
3. Farmitalia believes that the development of its activities must therefore be compatible with the surrounding environment and should contribute to spreading a spirit of eco-compatibility in defense of the territory, identity and the right to live in a healthy environment. There is therefore a commitment to improve the Company's performance in order to significantly reduce the environmental impact and guarantee its employees and collaborators a healthy, clean and eco-friendly working environment.

CAPO IV - COMPLIANCE WITH ANTI-CORRUPTION AND TRANSPARENCY RULES -

ART. 26 – PREVENTION OF CORRUPTION

1. Employees respect the organisational measures to prevent corruption, lends his collaboration and complies with the prescriptions given. Failure to comply with the aforementioned measures and requirements as well as the unjustified omission of cooperation leads to disciplinary offense.
2. Managers and department managers are required to enforce these prevention measures in their area of competence.
3. Employees report any difficulties encountered in fulfilling the obligations referred to in paragraph 1 to their supervisor or directly to the sole director or managing director and suggest, if possible, the useful measures to overcome such difficulties.
- 4.4. Employees, without prejudice to the obligation to report to the judicial authority, report to the supervisor and / or to the sole or managing director any situations of unlawfulness in the activity of which they have become aware.
5. Improper diffusion of the data linked to the report of the offense is subject to disciplinary sanctions.

CAPO V - FINAL PROVISIONS -

ART. 27 - UPDATES, AMENDMENTS AND DIFFUSION OF THE CODE OF ETHICS

- 1.1. The provisions of the Code of Ethics do not contemplate every behavior or concrete situation but establish values and set criteria whose observance and implementation is entrusted to the sense of responsibility of the recipients, who - in the case of doubts or uncertainties of interpretation - are required to ask for indications to their direct manager who, if necessary, may request a specific opinion from the Supervisory Body set up in compliance with the provisions of Legislative Decree 231/2001. The opinion will be issued by the Supervisory Body no later than thirty days after the interrogation, or, in case of particular urgency, within ten days, and formally communicated to the Sole Director or CEO of Farmitalia.

2. All the provisions of the Code of Ethics are valid and binding until any modification that may be made, subject to the binding opinion of the Supervisory Body, in order to adapt them to the changed needs of the Company or in order to eliminate any interpretative doubts.
3. Farnitalia undertakes to ensure, also through the designation of specific internal functions for each corporate structure:
 - maximum diffusion of this Code of Ethics, also through publication on the Company's website and / or intranet;
 - the preparation of cognitive, explanatory, information and awareness tools with reference to the contents of the Code of Ethics;
 - the constant updating of the Code of Ethics, in relation to the economic, financial and commercial evolution of the Company's business, any changes in its organisational or management structure, as well as in relation to the types of violations found in the context of supervisory activities;
 - the provision of adequate prevention tools, the implementation of appropriate sanctioning measures, as well as their timely application in the event of an ascertained violation of the provisions of the Code of Ethics.
4. In contractual relations, the Company undertakes to require third parties to comply with the provisions of this Code of Ethics, providing an explicit clause for having read it..
5. Violations committed by the contractual counterparty will therefore be punishable in accordance with the provisions of the relative contracts, up to the termination of the professional relationship.
6. In the context of relations with third parties, the Company is required to:
 - promptly and adequately inform recipients about the commitments and obligations set out in this Code of Ethics and to request compliance;
 - not voluntarily enter into business relationships with anyone who expressly refuses to comply with, or in any case fails to observe, the provisions of this Code of Ethics;
 - report any behavior that is, even if only potentially, in contrast with the provisions of this Code of Ethics.

ART. 28 - SUPERVISION AND CONTROL

1. The Supervisory Body may at any time carry out checks aimed at verifying the correct application of the provisions of the Code of Ethics.
2. All recipients of the Code must undertake to observe the provisions contained therein, reporting to their manager or directly to the Supervisory Body any violation of the Code of Ethics and any activity in conflict of interest with the Company.
3. The reports of violation, or suspected violation, must be drawn up in writing and not anonymous, without prejudice to the right of the Supervisory Body to follow up on any verbal and / or anonymous communications deemed reliable. The Supervisory Body analyzes the reports and evaluates the appropriateness of the related communication to the top management of the Company, so that any measures are taken. The Supervisory Body will guarantee the confidentiality of all reports received, thus encouraging a sense of responsibility of all interested parties and recipients of the Code.

ART. 29 – COMING INTO FORCE

1. The provisions of this Code of Ethics come into force from the date of publication on the company's website.

Catania, 18/10/2022


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