



FARMAGOMMA S.r.L. CODE OF ETHICS

Farmagomma S.r.L. Code of Ethics – approved and signed on the 3rd January 2021, during the Board of Directors annual meeting

Summary

	Farmagomma SRL.....	3
	PURPOSE AND RECIPIENT	3
1	GENERAL PRINCIPLES	5
	1.1 Legality.....	5
	1.2 Fairness	5
	1.3 Non-Discrimination	5
	1.4 Confidentiality.....	6
	1.5 Diligence	6
	1.6 Integrity	6
2	RELATIONS WITH EMPLOYEES AND COLLEAGUES	7
	2.1 Recruitment.....	7
	2.2 Staff Management	7
3	WORK ENVIRONMENT	7
4	ENTERPRISE MANAGEMENT	8
	4.1 Compliance with internal procedures	8
	4.2 Account Management.....	8
	4.3 Assets protection.....	8
	4.4 Communication	8
5	EXTERNAL RELATIONSHIP	9
	5.1 Relations with Authorities and Public Administration.....	9
	5.2 Relations with Political Parties and Trade Unions.....	9
	5.3 Relations with Customers and Suppliers	9
6	INTERNAL CONTROL SYSTEM.....	10
7	SANCTION SYSTEM GUIDELINES.....	10

INTRODUCTION

Farmagomma SRL

Farmagomma Srl is aware that the authority of a company is recognized by the competences of its employees and the high quality of the service provided to its customers, but also by the attention it pays to the entire community needs.

The principles that have always inspired the work this Company's work are formally collected in the Code of Ethics, in the belief that reliability is built daily by respecting the rules and valuing people.

The Code of Ethics therefore represents a distinctive and identifying element towards the market and third parties. The knowledge and sharing of the Code of Ethics principles is required to all those who work in the Company or who collaborate with it and constitute the foundation of our activity and the first step towards the pursuit of our vision.

The aim of Farmagomma Srl is to pursue excellence in the market it operates in and to obtain Employees, Customers and Community satisfaction, guaranteeing them an added value through Sustainable Development, environmental protection and the defense of involved people's safety. These objectives can be only reached respecting the principles of Social Ethics.

PURPOSE AND RECIPIENT

This Code of Ethics (hereinafter, the "Code") illustrates the set of ethical and moral principles that constitute the basis of Farmagomma Srl's activity (hereinafter, the "Company") as well as the lines of conduct adopted by the Company both internally (in the relations between employees) and externally (in the relations with Institutions, suppliers, customers, commercial partners, political and trade union (hereinafter, the "Stakeholders")).

The respect of these principles is fundamental to achieve the corporate mission and to guarantee its reputation in the socio-economic context in which Farmagomma works.

Farmagomma srl firmly believes that every activity must be carried out ethically, recognizing itself in the principle sanctioned by the art.41 of the Constitution, according to which any private economic enterprise "may not be carried out against the common good or in a way that may harm public security, liberty, or human dignity"

This Code is binding for the directors and employees of Farmagomma srl, as well as for all those who work and collaborate with the Company through a permanent or fixed-term contract (hereinafter, the "Recipients").

The Code will be widely disseminated within the internal governance structure, and broadly communicated externally through the website.

Farmagomma srl also undertakes to adopt any further provision so that the principles and provisions of the Code can be promptly disclosed and applied.

1 GENERAL PRINCIPLES

The conduct of the Recipients, at all Company levels, is based on the principles of legality, fairness, non-discrimination, confidentiality, diligence and integrity.

1.1 Legality

Farmagomma srl operates in full compliance with the law and this Code.

All Recipients are required to observe the regulations and constantly update themselves on legislative developments, also making good use of the training opportunities offered by the Company.

Farmagomma Srl considers the transparency of financial statements and accounting as a fundamental principle for the exercise of its business and for the protection of its reputation.

1.2 Fairness

Correctness and moral integrity are an unflinching duty for all Recipients.

Recipients are required not to establish any privileged relationship with third parties, which is the result of external solicitations aimed at obtaining improper advantages.

They are also required not to accept donations, favors or benefits of any kind (except for modest value objects) and, in general, not to accept any compensation in order to improperly grant benefits to third parties.

On the other side, the Recipients must not make donations of money or goods to third parties or offer illicit benefits or favors of any kind (except for objects of modest value or commercial presents authorized by the Company) in connection with the activity they carry out on behalf of Farmagomma srl.

The honest conviction of acting in the interest of the Company does not exempt Recipients from observing the rules and principles of the Code.

1.3 Non-Discrimination

Concerning the relations with Stakeholders and, in particular, the human resources recruitment and management, the work organization, the supplier selection and management and the relations with Public Authorities and Institutions, Farmagomma srl avoids and refuses to accept any kind of discrimination regarding age, sex, race, sexual orientation, state of health, political opinions, religion, culture and nationality of its interlocutors.

At the same time, Farmagomma srl supports integration through the promotion of intercultural dialogue and the defense of the rights of minorities and vulnerable individuals.

1.4 Confidentiality

Farmagomma srl undertakes to ensure the protection and confidentiality of the Recipients and Stakeholders' personal data, in compliance with all applicable legislation on the protection of personal data.

Recipients are not allowed to use confidential information, learned as a result of their job, for purposes unrelated to the exercise of their activity. They will act in compliance with the confidentiality obligations assumed by Farmagomma srl towards all the Stakeholders.

In particular, the Recipients are required to maintain the utmost confidentiality on documents suitable for disclosing expertise and knowledge, transport and commercial information and corporate transactions.

1.5 Diligence

The relationship between Farmagomma srl and its employees is based on mutual trust: employees are therefore required to work to promote the interests of the Company, in compliance with the values set out in this Code.

Recipients must refrain from any activity that could constitute a conflict of interests with Farmagomma srl, renouncing to pursue the personal interest that results in conflict with a legitimate interest of the Company.

Where a conflict of interest can be depicted, the Recipients must contact their superior so that the Company can evaluate, and possibly authorize, the potentially critical activity.

In cases of violation, the Company will take all appropriate measures to put an end to the conflict of interest, reserving the right to act for its own protection.

1.6 Integrity

Farmagomma srl and the Recipients undertake to create fair competition, in compliance with national and EU legislation, being awarred that virtuous competition constitutes a healthy incentive for innovation and development processes and protects the customers and community interests.

2 RELATIONS WITH EMPLOYEES AND COLLEAGUES

2.1 Recruitment

The recruitment of personnel is carried out according to fairness and transparency and respecting equal opportunities in order to combine the Company's needs with the candidates' professional profiles, ambitions and expectations.

Farmagomma srl will adopt useful measure to avoid any form of favoritism in the recruitment process, using objective and meritocratic criteria, in the interest of the Company's good performance.

The hired personnel receive clear and correct information about the roles, responsibilities, rights and duties of the subjects, through the fulfillment of this Code.

2.2 Staff Management

Farmagomma srl protects and enhances its employees, creating the conditions that allow professional growth, developing knowledge and skills of each person involved and carrying out the appropriate training for continuing professional development.

Farmagomma Srl promotes the employees' active engagement in Company's vision and strategy, encouraging workers' opinions and suggestions and guaranteeing them the widest involvement.

Despite the willingness towards the Company's requests, no worker can be obliged to perform duties, services or favors not included in his contract and his role within Farmagomma.

The Company is firmly committed to combating episodes of mobbing, stalking, psychological or physical violence and any other behavior that is discriminatory or harmful to the dignity of the person, inside and outside the Company premises.

Relations between employees have to be carried out with loyalty, correctness and mutual respect, in compliance with the values of civil coexistence and people's freedom.

3 WORK ENVIRONMENT

Farmagomma srl offers its staff a healthy, safe and respectful working environment.

Work Health and Safety is ensured both by implementing the rules established by the law and by actively promoting Safety culture during specific training programs. Training represents a crucial resource in the management system in force.

Farmagomma srl protects the health of its employees, guaranteeing compliance with hygiene and

health prevention regulations

4 ENTERPRISE MANAGEMENT

4.1 Compliance with internal procedures

Farmagomma srl believes that management efficiency and control are fundamental elements to achieve its goals.

Recipients are required to strictly observe the procedures and instructions of the Company and fulfill the tasks they are authorized for, keeping track of the actions completed on behalf of the Company.

4.2 Account Management

In the accounting management activity, the Recipients are required to act in compliance with the principles of truthfulness, accuracy and transparency, to protect Farmagomma's reputation both internally and externally.

Respecting these principles also allows the Company to plan its future strategies, considering its real assets and economic situation.

All the bookkeeping entries must be supported by complete, clear and valid documentation, avoiding any form of omission, falsification and / or irregularity.

In the case of balance sheets or economic elements based on evaluations and estimates, the relative accounting entry must be based on reasonableness and prudence criteria.

4.3 Assets protection

The Recipients exercise their duties trying to rationalize and contain the use of Company resources.

Recipients are required to apply the security provisions to protect *hardwares* devices from any unauthorized access, which could seriously damage the rights to data protection of Farmagomma srl personnel and customers.

4.4 Communication

Farmagomma srl provides suitable communication tools to the Stakeholders, in order to interact with the Company, forward requests, ask for clarifications or make complaints.

Farmagomma srl promotes an effective corporate communication, able to put the Company in contact with civil society, in order to spread its values and its mission and to acknowledge the requests and needs of the community.

The information disclosed to the Stakeholders is complete and accurate so that the recipients can make correct and informed decisions.

The advertising promotion respects ethical values, protecting minors and repudiating vulgar or offensive messages.

5 EXTERNAL RELATIONSHIP

5.1 *Relations with Authorities and Public Administration*

Relations with Authorities and Public Administration must be based on clarity, transparency and collaboration, in full compliance with the law and according to the highest moral and professional standards.

The Recipients, unless expressly authorized, cannot relate in the name and on behalf of Farmagomma srl with Authorities and with Public Administration.

When relating with Public Officials, Public Service Officers, and with Public Administration in general, the authorized Recipients will comply with the highest levels of correctness and integrity, refraining from any form of pressure, explicit or veiled, aimed at obtaining any advantage for himself or for Farmagomma srl.

The authorized Recipients will also be required to strictly observe the provisions of this Code, as well as the guidelines issued by Farmagomma's Management.

5.2 *Relations with Political Parties and Trade Unions*

Farmagomma srl does not favor or discriminate against any political or Trade Union organization.

The Company refrains from making any undue contribution to parties, Trade Unions or other social formations, except for specific exceptions and always within the limits permitted by current regulations.

Recipients are required to avoid any direct or indirect pressure on politicians or Trade Unions' representatives.

5.3 *Relations with Customers and Suppliers*

Recipients deal with third parties with courtesy, competence and professionalism, in the belief that

the protection of the Company's image, reputation and consequently the achievement of corporate objectives, depends on their conduct.

In particular, the Recipients must refrain from any form of unfair or deceptive behavior that could induce customers or suppliers to rely on unfounded facts or circumstances.

Recipients are required to commit themselves constantly to offer a timely and high quality service, trying to limit any form of disservice or delay and maximize customer satisfaction.

Relations with suppliers are based on loyalty, correctness and transparency.

Farmagomma Srl choose his suppliers on the basis of objective criteria of cost-effectiveness, opportunity and efficiency.

The choice of suppliers on a subjective and personal basis or by virtue of interests contrasting with those of the company is precluded.

The Recipients should put in place every possible control so that even suppliers and customers will be able to comply with the Code ethical principles.

6 INTERNAL CONTROL SYSTEM

The internal control system is oriented towards the adoption of tools and methodologies aimed at countering potential business risks, in order to ensure compliance not only with the laws, but also with internal provisions and procedures.

Farmagomma invites all Recipients to report to their superiors any facts or circumstances potentially in conflict with the principles and provisions of this Code.

Farmagomma's management and the designed bodies take all the necessary measures to end any violations, also using disciplinary measure in compliance with the law and workers' rights, including trade union rights.

7 SANCTION SYSTEM GUIDELINES

The internal control system supports the adoption of tools and methodologies aimed at countering potential business risks, in order to ensure compliance not only with the law, but also with internal provisions and procedures.

The violation of the principles established in the Code and in the procedures compromises the relationship of trust existing between the Company and its directors, employees, consultants, collaborators, customers, suppliers, commercial and financial partners.

Such violations will be immediately prosecuted by Farmagomma srl in an incisive and timely way, through the adoption of adequate and commensurate disciplinary measures.

The effects of Code of Ethics' and internal protocols' violations must be taken into consideration by all those who, for whatever reason, have relations with Farmagomma srl.

Depending on the seriousness of the violation, Farmagomma srl will respond appropriately, even if the action requires a prosecution by the judicial authority.

Conducts in violation of the Code of Ethics constitutes:

- serious non-fulfillment for employees (workers, middle managers and executives), with the penalties provided for by the National Collective Labour Agreement (verbal reprimand, written reprimand, fine not exceeding three hours' salary, suspension from work and from salary up to a maximum of three working days, dismissal for just cause or justified reason);
in case of pending criminal action or execution of a measure restricting personal freedom taken against an employee, the suspension from service and remuneration may be adopted, for the entire duration corresponding to the criminal action's outcome or until the end of the provision restricting personal freedom;
- just cause for directors' mandate revocation;
- cause of immediate termination of the relationship, in the most serious cases, for external and subordinate collaborators;
- cause of immediate termination of the relationship, in the most serious cases, for suppliers, contractors and subcontractors;

The sanctions' identification and application will always take into account the general principles of proportionality and adequacy with respect to the alleged violation.

In all the aforementioned cases, Farmagomma srl also reserves the right to execute all the actions it deems appropriate to compensate the damage suffered because of a Code of Ethics' violation.