



FARMAFLOR SRL ETHICS CODE

Description of the Code of Ethics

This Code, updated to the principles UNI/pdr 125:2022 "Guidelines for the system of management of gender equality", which consists of 8 pages, defines the principles and models of conduct of business of the Farmaflor s.r.l. Company and the commitments and responsibilities of the collaborators.

Farmaflor s.r.l. acts in full compliance with the laws, transparency, fairness and professional commitment in order to develop its value for the benefit of members and the professional growth of its human resources. In this regard, the Code provides information on the solution of ethical and commercial problems. In particular, the conviction to act in some way to the advantage of the Company does not justify the adoption of behaviours contrary to these principles.

All actions, transactions and transactions relating to the activity of the Company must be undertaken and pursued in full respect of the legality, impartiality and principles of fair competition, must be managed in the utmost fairness, be based on the completeness and transparency of the information, be supported by documentary evidence and be subject to checks and controls.

Relations with the Authorities must be characterised by maximum transparency and cooperation, with full respect for their institutional functions. The Code, together with all other rules, policies and provisions issued by the Company, constitutes the program to ensure effective perception and detection of violations of laws.

Recipients of the Code of Ethics

The Code applies to all employees, collaborators/bulls, interns/s of the Company and to all other subjects or companies acting on its behalf, which are, therefore, are committed to observing and enforcing the content of this Code of Ethics in the context of their duties and responsibilities, as well as in the course of their professional activity.

The Company shall endeavor to ensure that the Code is considered a standard of best practices for the conduct of business by those parties with whom it has long-term relationships such as consultants and experts.

Key provisions of this Code

- Impartiality
- Probity
- Fairness in the event of potential conflicts of interest
- Internal controls
- Transparency and completeness of information
- Duties of employees and collaborators
- Business assets
- Environment and safety
- Gender equality policy
- Rules of conduct
 - Relations between employees
 - Hierarchical relationships within society

FARMAFLOR S.R.L.

Sede Legale: Via Donatori di Sangue n. 9
12026 Piasco (CN) - ITALY
Tel. 0175 27 02 45 - Fax 0175 27 09 56
P. IVA 01773280043
www.farmaflor.it





FARMAFLOR srl

- Relations with public authorities and institutions and other bodies representing collective interests
 - Payment of money, gifts and free services by third parties
 - Transparency of accounts
 - Business communication
 - Confidential information
 - Relations with political, trade union and welfare organisations
 - Relations with customers and suppliers
 - Protection of the company's assets
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- Sanction system
 - Towards employees
 - To executives, directors and senior management
 - Towards collaborators/managers, consultants and other third parties
 - Validity
 - More information
 - Information and consent

GENERAL PRINCIPLES

Impartiality

In decisions that affect relationships with its workers, Farmaflor s.r.l. avoids any discrimination based on age, gender, health status, race, nationality, political opinions and religious beliefs of its interlocutors.

Probity

As part of their professional activity, the Company's employees are required to comply with due diligence with applicable laws, the Code of Ethics and internal regulations. Under no circumstances can the pursuit of the interest of Farmaflor s.r.l. justify their non-compliance.

Fairness in the event of potential conflicts of interest

The conduct of any activity must avoid situations where the parties involved in the consultation and data processing are, or may even appear, in conflict of interest. This refers to the case where an employee/collaborator pursues an interest other than the mission of the company and the balancing of corporate interests or takes advantage "personally" of business opportunities of the company, whether the representatives of customers or suppliers, or institutions, act contrary to the fiduciary duties attached to their position.

In this perspective, the employee and the collaborator are required to avoid any situation and to refrain from any activity that may oppose a personal interest to those of the Company or that may interfere and hinder the ability to hire, impartially and objectively, decisions in the interest of the Company itself. Employees and collaborators must therefore exclude any possibility of overlapping or otherwise crossing, exploiting their functional position, economic activities corresponding to a logic of personal and/or family interest and the tasks they perform within the Company.

Any conflict of interest, even indirect or potential, must be promptly referred to the appropriate bodies (e.g. Legal Representative of the Company) in order to assess its viability and gravity and to exclude or mitigate the resulting effects.

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Internal controls

It is the policy of Farmaflor s.r.l. to spread at all levels a culture oriented towards the exercise of control, characterized by the awareness of the existence of internal procedures and the awareness of their positive contribution to the improvement of efficiency. Internal controls are all the tools necessary or useful to address, manage and verify the activities of the Company with the aim of ensuring compliance with the laws and procedures of the company, protecting the company assets, efficiently manage assets and provide accurate and complete financial and accounting data.

Responsibility for the implementation of an effective internal control system is common at every level of the organisational structure; consequently all/i the employees and/or co-workers of Farmaflor s.r.l., within the scope of the functions performed, are responsible for the definition and proper functioning of the control system.

Within the scope of their competence, managers and/or managers are required to participate in the company control system and to involve their colleagues at all levels.

Transparency and fulness of information

The employees and collaborators of Farmaflor s.r.l. are required to give complete, transparent, comprehensible and accurate information, so that the company is able to make independent decisions and aware of the interests involved, the relevant alternatives and consequences.

In particular, in the formulation of commercial and employment contracts, Farmaflor s.r.l. takes care to specify to the contractor the behaviors to be held in all the foreseen circumstances, in a clear and understandable way.

Duties of employees and collaborators

Farmaflor s.r.l. expects from its employees and collaborators, during the performance of their duties, ethically impeccable behaviors, as well as legally and professionally correct, to strengthen mutual trust and consolidate the image of the Company.

Employees and collaborators are therefore required to:

- to operate with integrity and integrity in relations between them, with competing companies, with customers and, in general, with third parties, be they public or private entities;
- to comply with the legal provisions of each of the legal systems in which the Company operates;
- to avoid conflicts of interest with the Company to which it belongs and, in any event, to avoid behaviours which are harmful to the Company;
- to support the Company's commitment to combating and condemning any illegal form of abuse of the profession of Labour Consultant, Accountant and Lawyer.

Business assets

Employees are required to protect the Company's assets and to use them exclusively for work purposes. Everyone, from the Members to the aforementioned employees, is responsible for protecting the Company's properties and the properties of third parties entrusted to Farmaflor s.r.l., against theft, damage and improper and unauthorized use. Ownership includes all kinds of assets including, but not limited to, money, land, buildings, tools, supplies, computers and accessories, as well as intellectual property including confidential information, trademarks, patents and company logos.

Environment

Farmaflor s.r.l. will adhere to all applicable laws and regulations governing the use, emission, storage and disposal of potentially hazardous materials and will endeavour to conduct any operation in such a way as to minimize the risk of damage to people and the environment.

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Safety

Safety is the responsibility of every employee of Farmaflor s.r.l. The Company guarantees a safe workplace for its employees. Every employee is required to comply with all company health and safety rules and to work in every situation in such a way as not to endanger himself and others. Employees must report immediately any accident, injury, equipment, practice or unsafe condition.

Gender equality policy adopted by Farmaflor s.r.l.

The Company is committed to guarantee:

- staff have equal access to roles of responsibility with equal skills, qualifications and abilities;
- a fair level of remuneration based on the competence, skills and professional experience of each employee with the aim of achieving fair pay;
- a commitment to the family welfare of its staff both in economic terms and in terms of flexible working hours and agile work;
- to raise awareness of gender equality issues, such as inclusive language, gender stereotypes, prejudice, harassment, bullying;
- to communicate, both internally and externally, their willingness to pursue gender equality, enhance diversity and support female empowerment.

CODE OF CONDUCT

Employee relations

The relations between employees of our Society must always be marked by the principles of civil coexistence and must be carried out in respect, reciprocal, rights and freedom of persons.

Hierarchical relationships within the company

The relations between the levels of responsibility, linked to the different hierarchical positions existing in the Company, must be carried out with loyalty and correctness, respecting professional and office secrecy.

All/he/she responsible for specific activities and organizational structures must exercise the powers connected with the delegation received with prudent balance, respecting the dignity of the person of their employees/collaborators. As regards the procedures for exercising the powers conferred, reference should be made to the appropriate business procedure.

All the members of the organisational structures or of specific working groups must, in turn, cooperate as closely as possible with those responsible for both, observing the provisions for the performance and discipline of the work to be carried out by the latter, and in general, by the Company.

Relations with public authorities and institutions and other bodies representing collective interests

All/ those who, in any capacity, maintain on behalf of Farmaflor s.r.l. relations with state authorities, government and public institutions, including community and foreign, as well as with other entities representing collective interests, and with the natural persons who represent them, must operate in constant and strict compliance with the legislation in force in Italy and in the country in which the relationship takes place, basing their activities on fairness and transparency.

In particular, consistent with the principles set out in this Code, it is prohibited, in relations with representatives of the Italian or foreign Public Administration, directly or indirectly, to:

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- Promise or make payments in cash, gifts outside the purposes or for purposes other than institutional and service.
- Promise or grant advantages of any nature, in order to influence the independence of judgment or to obtain any advantage for the Company.
- Hold a misleading conduct that may lead the Public Administration into error of technical-economic assessment of the products and services offered/ provided.
- Allocate grants, subsidies, incentives, concessions or public funding for purposes other than those for which they were obtained.

The relations with the subjects listed above are reserved exclusively to the functions delegated to it, in compliance with the hierarchical and organizational structure of the Company.

Payment of money and free services to third parties

Any employee of the Company shall not promise or pay any sums or assets in kind of any entity or value to any entity to promote or further the interests of the Company, including through unlawful pressure. The only exceptions are small gifts or courtesies of modest commercial use (gifts for the public or for holidays, or invitations to conferences or meetings for presentations or greetings, etc.) when they are not prohibited.

Any employee of the Company must not circumvent the provisions of the above paragraph by resorting to different forms of aid or contributions that under the guise of sponsorship, assignments, advice, publicity, etc. have the same purposes as those prohibited in the first paragraph.

Any employee of the Company receives explicit or implicit requests for such benefits from any person, must immediately suspend any consultation with the applicant and immediately inform its superior or, in the absence, the legal representative of the company.

Payment of free money, gifts and services by third parties

In the performance of their duties no employee or collaborator, either directly or indirectly through members of their family, may request or accept money, other gifts and benefits of any non-symbolic value from third parties who have business or work relationships with the Company.

"Non symbolic" value means gifts, services, supplies, etc. of a unit value not exceeding 100 euro. In the case of gifts, services, supplies, etc. of a unit value of more than 100 euros, the employee/collaborator is obliged to give immediate information to the Human Resources Manager, with whom he will agree the behavior to be held.

Transparency of accounts

The completeness and clarity of accounting data, reports, and financial statements represent a fundamental value in relations with members, third parties, and supervisory bodies. For this value to be respected, it is first necessary for the basic information and accounting records of transactions to be complete, true, accurate, and verifiable.

Therefore each employee/ collaborator is required to ensure that the facts of management are represented correctly and promptly in the accounts, maintaining, for each operation, adequate documentation to support the activity carried out.

Any Mayors and any appointed auditing firm may have free access to data, documentation and information useful for carrying out their activities.

Corporate communication

In order to avoid the spreading of erroneous news and information or the establishment of situations involving responsibility of any kind and content for the Company, communication outside the Company must be clear, accurate and truthful aimed at fostering knowledge and consent to the Company's corporate policies and programs and projects.

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Particular attention must be paid to the external communication of documents, news and information relating to events that occur in the direct sphere of activity of Farmaflor s.r.l., not in the public domain. The communication of information to the public, in particular, must be managed by the organizational structures expressly responsible for direct emanation of the Commercial Management.

Relations with the media must be governed by the same rules as those already laid down for relations with public institutions. In any case, relations with the press and the mass media must be marked by the protection of the Company's image.

Confidential information

Confidential information and documents, personal data of employees and suppliers, work projects, know-how and technological processes must be properly and continuously safeguarded and protected both in relation to third parties and in relation to colleagues who are not directly concerned.

Persons who, for reasons of work, have access to it must, however, treat them in accordance with the instructions and procedures laid down by the employer. At all times and, in particular, at the time of the conclusion and execution of contracts, the duty of confidentiality must be strictly observed both in relations with third parties, in relations with the press, and in relationships with subjects not authorized to communicate.

The employees and collaborators of the Company are committed to the protection of privacy, both with regard to data relating to other employees of the Company itself, and with regard to data relating to customers, suppliers, consultants, to any other contractor and to all persons having business relations with them, in compliance with current legislation.

Relations with political, trade union and welfare organisations

All forms of direct or indirect contributions to parties, movements, committees and political and trade union organisations, their representatives and candidates, shall be prohibited, except those due under specific legal provisions and in accordance with the forms, the manner and content thereof, subject to approval by the legal representative of the company.

Relationships with customers and suppliers

The selection of suppliers and the purchase of goods and services must be in compliance with the principles of this Code and internal procedures, using the written form and respecting the organizational structure.

In any case, the selection must be made exclusively on the basis of objective parameters of quality, convenience, capacity, efficiency.

In business relations with customers and suppliers are prohibited actions, benefits, services of any other kind, both direct and indirect, tributes, acts of courtesy and hospitality, unless they are of a nature and value that does not compromise the Company's image and cannot be interpreted as being aimed at obtaining preferential treatment that is not determined by market rules.

Protection of the company's assets

Each employee/collaborator is responsible for the conservation and protection of the assets and tools that are personally entrusted to him for the work and must contribute to ensuring the safeguarding of the entire company's assets. To this end, he must comply with the operating and safety procedures established by the Company.

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In any case, the documents relating to the activity of the Company, the working tools and any other goods, physical or intangible, shall be used exclusively for the achievement of the Company's institutional purposes and in accordance with the procedures laid down by the Company. They may not be used by the employee/collaborator for personal purposes or be transferred by him or made available, even temporarily, to third parties. Exceptions are any "fringe benefits" (for example, the company car in use promiscuous) of which the function of the legal representative of the company has authorized the use also for personal purposes, in compliance with current regulations.

DISCIPLINARY SYSTEM

To the employees

Failure to comply with and/or the violation of the rules of conduct indicated in the Code by employees and collaborators of the Company constitutes a breach of the obligations arising from the employment relationship and gives rise to the application of disciplinary sanctions.

The sanctions imposed will be applied in compliance with the provisions of the Law and the National Collective Labour Agreement applied.

Such penalties shall be granted on the basis of the findings of the individual cases concerned and shall be proportionate to their seriousness.

The detection of such infringements, the management of disciplinary procedures and the imposition of sanctions remain the responsibility of the corporate functions in charge and delegated. This Code of Ethics will accompany the disciplinary code already in force and will be displayed in a public place accessible to all/the employees of the Company with the same provisions of L. 300/1970 (Statute of Employees).

To managers, directors and management

In the event of a violation by managers and/or managers of the rules of conduct indicated in the Code of Ethics, the Company will assess the facts and conduct and take appropriate action against the responsible persons pursuant to the provisions of law and applicable National Collective Agreement, bearing in mind that such breaches constitute breach of the obligations arising from the employment relationship.

To employees/managers, consultants and other third parties

Any conduct by/the collaborators/managers, consultants or other third parties related to Farmaflor s.r.l. by a contractual relationship not of employment in violation of the provisions of the Code of Ethics, may, in the most serious cases, also determine the termination of the contractual relationship, without prejudice to any claim for compensation if such behavior results in damages to the Company and this also regardless of the termination of the contractual relationship.

VALIDITY

This Code is valid for all employees, collaborators, managers, interns, practitioners and consultants of Farmaflor s.r.l.

Violations of the Code of Ethics or any other company policy may result in disciplinary actions which may also include termination proceedings and, if justified, legal proceedings.

Farmaflor s.r.l reserves the right to correct, interpret and translate the Code. Nothing in this Code can bind the Company to assume an employee or terminate the working relationship with it.

signature:
FARMAFLOR S.R.L.

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