



CODE OF BUSINESS CONDUCT AND ETHICS

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Goals

The business conduct and ethics code of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. sets the policies and practices related to law abidance and business ethics.

In business relations, the code of conduct serves as a guide by means of the principles that reflect the values of Farmaceutica REMEDIA Distribution & Logistics S.R.L.

The principles of this code are designed to help each employee clearly understand their responsibilities and role within the company. At the same time, they are meant to raise awareness of ethical issues that we may encounter in our activity at any time.

The code of conduct of Farmaceutica REMEDIA Distribution & Logistics S.R.L. applies to all employees and persons working for the company, managers and administrators.

The customers and suppliers shall act according to the provisions of the code of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L.

Each employee is responsible for the reputation of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. and it is very important that each employee prove his/her integrity and ability to made decisions, in compliance with the Code of Business Conduct and Ethics, the company policies and the legislation in force. Correct actions are first of all based on honesty and integrity.

We are driven by the ambition to achieve added value for all our customers and attractive profitability for our shareholders, to be the employer of choice for our employees.

All these require the highest level of integrity and professionalism.

Our business success depends on the confidence of our customers, shareholders, employees, suppliers, service providers, authorities, competitors, but also the trust of the company as a whole.

Therefore, it is essential that both the management and the employees keep in mind the great importance of observing legal obligations and internal policies and respect the fundamental values promoted by the company. The employees of Farmaceutica REMEDIA Distribution & Logistics S.R.L. shall carry out the duties they have towards the customers with competence, efficiency, responsibility and professionalism.

This code helps us to ensure and promote a common system of values.

Chapter 1. - Fundamental Values of Farmaceutica REMEDIA Distribution & Logistics S.R.L.

• Contribution

A defining concern is to provide our customers with diversified, quality services, which differentiate our company from the competition on the pharmaceutical market.

• Professionalism

People are our most valuable capital. Investment in motivational and professional development programmes for our employees is a priority in achieving individual and team performance.

• Adaptability

In our partnerships we create sustainable competitive advantages and we constantly adapt to the demands and expectations of our customers and partners.

• Quality

The company implements the quality management system according to the requirements of standard SR EN ISO: 9001-2008 and 27001:2013 certified by the company RINA SIMTEX-OC.

• Ethics

We apply high professional and ethical standards in all the components of our business, in strict compliance with the laws and regulations in force.

Chapter 2. - Compliance with the Law

Each employee has the obligation to comply with all the laws, rules and regulations applicable to company operations.

They include, without limitation thereto, laws on bribery and kickbacks, copyrights, trademarks and trade secrets, confidentiality of information, illegal political contributions, copyrights, anticorruption practices, granting or receiving gratuities, environmental hazards, discrimination or harassment at the workplace, occupational health and safety, false or misleading financial information, or misuse of corporate assets.

Each employee must understand and comply with all laws, rules and regulations applicable to their job. All the employees of the company are trained according to the provisions of the Regulation regarding the Protection of Personal Data adopted within the Pharmaceutical REMEDIA Distribution & Logistics SRL, in full accordance with the provisions of the EU Regulation 2016/679, the protection of personal data being a purpose of the company itself. within the operations carried out in the course of the corporate activity.

Chapter 3. - General Business Principles

Our goal is to have a profitable, attractive business for the shareholders and the investors, and to offer transparency, by observance of behavioural standards and laws in force.

3.1 - Responsibility towards:

- **Customers:** Our services aim at meeting the demands and expectations of the customers. We are concerned with constant diversification of the quality services that we provide, by being close to the customers, as well as understanding and meeting their needs with professionalism.
- **Employees:** In achieving the company goals, we rely on the work capacity and competence of our employees. We promote staff development through personal and professional training courses, and we provide appropriate information and suitable working conditions. Each employee sets his/her individual goals in line with the company goals.
- **Suppliers:** For quality and profitability of our services, we also rely on the experience and ability of our carefully selected suppliers.
- **State authorities:** We strictly comply with the applicable legislation and the quality standards in the field of pharmaceutical and personal hygiene product distribution and trade.
- **Business partners:** Our company convinces by the quality of products and services provided. All our business partners are treated with professionalism and respect. All employees are required to use honesty and transparency in the relation with the business partners.
- **Company:** We respect the human rights and promote public wellbeing through corporate responsibility activities, and we comply with the legislation in force and competition regulations.

3.2 - Confidentiality

Business secrets must remain confidential.

This also applies to other information that Farmaceutica REMEDIA Distribution & Logistics S.R.L. and its suppliers, business partners and customers have an interest to keep secret.

Such information shall not be transmitted to unauthorised persons without the consent of the person authorised to remove the confidential nature of the information.

This obligation is still applicable after cessation of the work relation or any other contractual relations.

3.3 - IT Resources

The IT resources of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. must be used responsibly and in compliance with the legal regulations and the company procedures, including those related to specific information technology, data protection, confidential and private information of the company, as well as intellectual property rights.

The IT resources of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. include all computer equipment owned, rented or leased, regardless of the physical location thereof, including but not limited to: personal computers, notebook computers, network servers, internet access, access to the intranet of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. and e-mail access devices.

These also include voice mail and other voice messaging systems, faxes, telephones, digital assistants (e.g. Blackberry), instant messaging or information obtained or downloaded from the internet and/or distributed on the internet or the intranet of Farmaceutica REMEDIA Distribution & Logistics S.R.L., respectively the intranet of

the company .

IT resources also include access to the network of Farmaceutica REMEDIA Distribution & Logistics S.R.L. and the e-mail system on a computer that the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. does not own, rent or lease (e.g. employee home computers).

All IT resources of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. are the property of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L., including all information created, stored or transmitted via the IT resources of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. The only information that is not considered company property is the information obtained during limited use for personal purposes of the IT resources of Farmaceutica REMEDIA Distribution & Logistics S.R.L., or information that is not considered company property under the laws and regulations in force.

The IT resources of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. shall be used in carrying out the company activity.

It is prohibited to use such resources for the following purposes:

- Harassing, discriminatory, libellous, fraudulent or threat messages, including offensive messages about race, gender, age, sexual orientation, religion, political beliefs, national origin, disability, ethnical origin, veteran status, sexual identity or any other particularity protected by law.
- Transmitting, accessing or storing any materials or communications of offensive or obscene nature.
- Unauthorised distribution of private or confidential information or trade secrets of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L.
- Causing or facilitating security breaches or communication breakdown in the network and/or inappropriate disclosure of password or giving permission to other people to use your password.
- Violation of the rights of any person or company protected by copyrights, trade secrecy, patents or any intellectual property rights or any similar laws or regulations.
- Violation of the confidentiality rights of any person protected by the laws in force.
- Requests on behalf of an organisation, company or external causes, totally unrelated to Farmaceutica REMEDIA Distribution & Logistics S.R.L. including, for instance, any commercial, religious or political organisation, company or cause.

3.4. - Policy on electronic mail

Business records may include e-mail and even individual notes, personal calendars and agendas. The e-mail service provided by the company shall be primarily used for business purposes. All communications and the e-mail address provided to the employees is and shall remain the exclusive property of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. and shall only be used in carrying out the duties related to the person's job within the company.

Any private correspondence is prohibited, regardless whether it is addressed to other employees of Farmaceutica REMEDIA Distribution & Logistics S.R.L., or to persons outside the company, or received from such third parties, including any attachment accompanying the correspondence. Such message, regardless of format, is and shall remain the exclusive property of Farmaceutica REMEDIA Distribution & Logistics S.R.L..The employee can claim no rights to the mailing address or to the content of the messages sent from or received on this address.

In this respect, the employee understands and agrees that Farmaceutica REMEDIA Distribution & Logistics S.R.L. is entitled, by means of its qualified employees and collaborators and at any time, to supervise, censor or block messages received or sent from that address, without prior notification of the employee and without the need for

consent thereof.

Employees cannot use their e-mail to obtain personal profit, for advertising, requesting funds, sending chain letters or any other messages that may harm the reputation of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L.

The e-mail service shall be used with discretion when sending confidential or proprietary information, since e-mail communications are not secure, being in fact an electronic postcard.

Internet shall be used in compliance with company policies so as not to disclose confidential information or to obtain unauthorised information. It is strictly prohibited to access and distribute pornographic or offensive materials via internet or e-mail.

3.5 - Social commitment

Farmaceutica REMEDIA Distribution & Logistics S.R.L. is constantly involved in humanitarian, social responsibility, public utility, professional training or cultural actions.

3.6 - Company management as good example

Company management sets an example. The lives of the members and of the management must be a model of impeccable ethical behaviour. Impeccable ethical behaviour at the workplace mainly signifies honesty and fairness in the relation with the employees, as well as the customers, suppliers, other collaborators and representatives of state institutions.

The integrity and good reputation of the company REMEDIA Distribution & Logistics S.R.L. are of major importance.

Chapter 4. - Principles of Staff Policy

4.1. Competence of employees

In order to achieve these goals, we rely on the competence and efficiency of our employees. For this reason, we promote personal and professional development of our employees and we provide them with appropriate information and adequate working conditions.

For us, the safety and health of our employees are a priority.

4.2. Respect and honesty in the relation with the superiors, colleagues and employees

The quality of the collaboration between the management, the executive and the assisting staff, the colleagues and the employees is essential for the success of the company.

An impeccable behavioural approach of mutual relations, marked by respect and openness towards the other person and avoiding incorrect behaviour, not only ensures communication and quality of company culture, but also decisively influences the image of the company in terms of its effect outside the company.

4.3. Equal work opportunities

Farmaceutica REMEDIA Distribution & Logistics S.R.L. does not discriminate among employees or persons seeking employment, based on race, skin colour, ethnical or national origin, gender, sexual orientation, age. This rule applies to recruitment, employment, training courses, promotion and other employment terms and conditions.

Discrimination against any employee or applicant for employment is a serious violation of the law on equal work opportunities and company policies.

It is the responsibility of all employees and management of Farmaceutica REMEDIA Distribution & Logistics S.R.L. to maintain a work environment without discriminations.

Farmaceutica REMEDIA Distribution & Logistics S.R.L. takes action to make sure that competent candidates have equal opportunities for employment and promotion.

4.4. Conflicts of interest

There is a conflict of interest when an employee's personal interest comes in conflict with company interest.

A situation of conflict arises when an employee takes actions or has interests that make it difficult for him/her to perform work within the company objectively and effectively.

A conflict of interest may also arise when a manager/head of department, an employee or member of his/her family receives unjustified benefits as a result of the position s/he holds in the company.

Loans, loan guarantees or other obligations of employees and family members may create conflicts of interest.

A conflict of interest may also arise when an employee of the company Farmaceutica REMEDIA Distribution & Logistics S.R.L. works at the same time for a client, supplier or competitor, or has a financial interest related thereto.

Conflicts of interest must be notified, as soon as they arise, by the person in question, in a written statement submitted with the Board of Directors of Farmaceutica REMEDIA Distribution & Logistics S.R.L.

4.5. Bribery and corruption

In connection with commercial activities of any kind, no company employee or delegate may offer or claim advantages, offer illegal direct or indirect benefits (e.g. offering or presenting money or other personal benefits) to business partners or various authorities, employees or delegates thereof or other third parties, or allow promises or accept such.

This provision applies in particular to services that may unjustifiably influence the behaviour or decision of the abovementioned persons.

Any gift, expression of hospitality or invitation must be within the limits accepted by law and the company.

Infringement of these provisions shall be punished according to legal regulations - termination of work relations or contract, and may lead to prosecution, payment of fines or registration of additional tax receivables and civil compensation for damages.

4.6. Compliance with legal competition regulations

Farmaceutica REMEDIA Distribution & Logistics S.R.L. practises fair and open competition in strict compliance with the legislation in force.

Our company, its employees or delegates are not allowed to accept anti-competitive practices, such as conventions with other companies aiming at or causing hindrance, limitation or distortion of competition.

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This code is reviewed periodically, along with our conduct, and we evaluate our gathered experience for continuous improvement of principles and values.

Review 3

Review date: 16.12.2019

