

# Zeta Farmaceutici Code of Ethics

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## Foreword

*In drawing up this Code of Ethics, as promoted by our Managing Board, Zeta Farmaceutici has reflected on the standards of conduct it expects to promote a corporate culture based on values of integrity, respect and transparency.*

*In fact, this Code of Ethics is a vital tool to guide every action and decision, both internally and externally, and to ensure that all stakeholders, including employees and third parties, operate according to the same principles.*

*We are committed to spreading this Code widely and making it available to all our employees, collaborators and external partners, making sure that they all understand and comply with the principles it contains. We want to foster an ever-evolving ethical reflection, which may involve updating the document periodically, so that the values of responsibility, respect and honesty are always at the heart of everyday actions.*

*The President*

*Cesare Benedetti*

Any questions concerning the contents of the Code of Ethics may be addressed to:

- your direct supervisor;
- members of the Managing Board.



## Mission

We work together with passion, determination and cooperation to create and manufacture high-quality products designed for people's health and well-being.

Our mission is to continuously innovate, centring our customers' needs and providing effective solutions to improve their quality of life. Every stage of our work, from research and development to production, is driven by a strong commitment to excellence, safety and sustainability.

We believe that our success is closely linked to the care we devote to every detail, our respect for the environment and our desire to make a positive contribution to society.

## Vision

Every day, we strive to improve people's well-being and quality of life, working with passion and dedication to offer innovative, sustainable solutions.

Our commitment is based on strong values which guide our every action: ethics, integrity and responsibility.

By constantly improving our products and the services we offer, we aim to make a lasting positive impact on people's lives and on the communities in which we operate. We firmly believe that progress and success are the result of working with respect, transparency and care, while always centring the health, well-being and safety of our customers and collaborators.

## Core Values

Zeta Farmaceutici is inspired by solid values that guide every decision and action it takes. These principles form the foundation of our organisation and of our approach to the market, and we apply them constantly and meticulously in order to ensure excellence in every area of our activities.

1. **Strong Focus on Customers:** Customer satisfaction is at the heart of our operations. We work to offer solutions which are always up to date, in line with market developments and our customers' needs. Our unwavering focus on customers allows us to anticipate their needs and to supply products and services which are not just effective, but at the cutting edge.
2. **Reliability and Integrity:** Our organisational structure is based on collaboration and teamwork. We believe that motivation, combined with the ongoing training of our employees, enables us to always offer the highest level of skill and professionalism. Every



member of our team is committed to maintaining high standards of reliability and integrity, values that are the bedrock of our reputation and our success.

3. **Certified Quality:** For us, quality is more than just a technical issue. We select raw materials only from reliable suppliers, with whom we share a mutual commitment to excellence. We use state-of-the-art, constantly updated technology to ensure maximum efficiency and precision. Our production is certified, and thanks to the expertise of our qualified professionals, we ensure that each product meets the highest quality standards, complying with safety and sustainability regulations.

### Scope of application

The rules of this Code of Ethics apply to the following parties:

- *Internal parties* who have a continuous relationship with the company, whether on a permanent or temporary basis. By way of example, these include the corporate bodies, employees, collaborators (including para-subordinate workers), interns and trainees;
- *Third parties* such as external professionals, partners, suppliers and consultants, staffing agencies and, in general, those who have working relationships with or carry out activities in the name of and/or on behalf of the company itself, despite not belonging to the company.



## Fundamental Ethical Principles

### Legality

Zeta Farmaceutici is committed to operating in full compliance with the applicable laws at all times, recognising legal compliance as a key element in maintaining the trust of our customers, partners and stakeholders.

To that end, the company:

- encourages a corporate culture that promotes compliance with regulations, both in the health sector and in other areas (e.g. occupational health and safety, the environment);
- requires every employee and collaborator to be aware of the laws and regulations;
- adopts a strict compliance policy, which ensures that all operations are conducted in line with the applicable regulations;
- continuously monitors and supervises evolving regulations, updating its policies to reflect legislative and regulatory changes;
- rejects any practice that may compromise the integrity and fairness of its operations;
- approaches its dealings with Public Administrations in a spirit of full cooperation and fairness.

### Product Safety and Quality

The quality and safety of products are cornerstones of our business and of our commitment to customers. Every stage of production is driven by the desire to offer safe, effective, high-quality solutions that meet the needs and expectations of those who rely on our products.

With this goal in mind, the company:

- ensures that all products undergo rigorous quality control and safety testing at every stage of production, from conception to distribution;
- works in accordance with the highest international standards, adhering to regulations specific to its sector, such as those related to consumer safety, good manufacturing practices (GMPs) and quality certification requirements;
- uses advanced technologies and scientific methodologies to continuously monitor and improve production processes, ensuring that each product satisfies the highest reliability and performance criteria;
- invests in training and updating its staff to keep skill levels high and to meet the challenges posed by increasingly stringent regulations on safety and quality.



## Fair Competition

Zeta Farmaceutici recognises fair competition as a determining factor for the growth and constant improvement of the company, as long as it is fair.

## Managing Conflicts of Interest

A conflict of interest arises when a party within Zeta Farmaceutici finds themselves in a situation where their personal, economic or family interests could influence their professional decisions, compromising their impartiality. This type of conflict does not only concern situations of an economic or financial nature, but also includes personal or family ties that may influence choices at work.

It is essential that each person recognises such situations and acts transparently:

- avoiding any behaviour that could give the appearance of a favour, or a personal interest conflicting with Zeta Farmaceutici's priorities;
- refraining from work activities with third parties (customers, suppliers, competitors, etc.) the same as or similar to those carried out in the company, even outside working hours. If work is undertaken with third parties which does not conflict or compete with the activities of the company, the company must be notified in advance;
- in the event of any doubt about a situation, it must be discussed with a direct supervisor or with the Managing Board or the Guarantor of the Code of Ethics, in order to resolve the issue before it can negatively affect Zeta Farmaceutici or its reputation.

Zeta Farmaceutici will not tolerate any ambiguity in this area, and is committed to maintaining the highest levels of integrity, transparency and fairness in business decisions.

## Proper Use of Information Systems

All persons within the company are responsible for the security of the computer systems they use, within the scope of their duties, and must comply with the internal company regulations. They must also use the utmost care and attention in order to avoid the potential commission of any offences involving the use of the company's computer systems.

It is expressly forbidden to:

- download and install unauthorised or borrowed software on the company's software systems, or to make unauthorised copies of licensed software for personal, corporate or third-party use;
- send offensive or threatening emails, or use inappropriate language;
- generate an amount of traffic on the company's computer network sufficient to significantly impair its efficiency and have a negative impact on the company's capacity for production and communication;
- access websites that contain indecent, offensive or inappropriate content.



## Privacy and Integrity of Data and Information

Zeta Farmaceutici guarantees the utmost confidentiality, integrity and protection of all company data and information, recognising secure information management as essential for the proper functioning and reputation of the company.

For this purpose, the company:

- handles sensitive information, both corporate and personal, with the utmost care and attention, adopting strict policies and procedures to prevent unauthorised access to data or the loss or misuse thereof;
- is committed to ensuring that all data are processed in accordance with the applicable regulations, including those related to the protection of personal data, such as the GDPR (General Data Protection Regulation) and relevant local or international laws;
- undertakes to train employees on risks and opportunities and on the rights of data subjects;
- uses advanced security systems and up-to-date technologies, and continuously trains its personnel on best practices in relation to data management;
- in the event of a breach of confidentiality or suspected unauthorised access, investigates the cause of the incident, ensures that appropriate measures are taken to prevent a recurrence, and takes immediate corrective action;
- undertakes to comply with the provisions of the NIS2 Directive, ensuring compliance with cyber security and business continuity requirements in relation to the relevant recipients.

Each employee, consultant and collaborator is obliged to:

- comply with internal data protection regulations;
- behave responsibly in relation to information management;
- refrain from unauthorised access to computer or telecommunications systems.

## Relations with Business Partners and Customers

Relations with business partners and customers are based on the values of transparency, fairness, mutual respect and the laws and regulations applicable to the sector. Trust is a key element in building lasting, fruitful relationships, along with open, honest and professional communication with all parties involved in activities.

During dealings with partners, it is necessary to:

- establish relations with entities that enjoy an excellent reputation, operate in compliance with the law, and share an ethical culture similar to that of the company. This may involve a preliminary check of the information available on such entities;
- ensure full transparency in agreements and avoid entering into any which are secret or which may violate the law.



In addition, in carrying out its contractual obligations and professional services, Zeta Farmaceutici, together with its employees and collaborators, shall act with the utmost diligence and professionalism.

Relationships and business dealings with partners and customers are aimed at supporting service quality, correct information and people's health.

### **Health and Safety**

Zeta Farmaceutici is firmly committed to ensuring that every workplace respects the highest health and safety standards, creating a protective environment that promotes the well-being of all those who work there. The health and safety of employees, collaborators and all persons involved in its activities are a key priority for the company, which constantly strives to prevent accidents, injuries and occupational diseases.

Zeta Farmaceutici:

- adopts strict company policies and operating procedures that comply with local and international occupational safety regulations;
- is committed to keeping workplaces safe and healthy, and to investing in continuous training for employees so that all are aware of the risks present and the correct procedures to follow to protect themselves and others;
- promotes a safety culture in which each person is responsible for promptly reporting hazardous working conditions and taking corrective action whenever necessary;
- adopts modern technology and advanced management systems to continuously monitor and improve health and safety conditions, preventing risks before they occur.

Clear and ongoing communication on safety-related issues is an integral part of the strategy, as is the constant monitoring of our operating environments to ensure that standards are always maintained at the highest levels.

### **Harassment Prevention**

Zeta Farmaceutici strongly condemns all forms of harassment, whether physical, psychological, verbal or sexual, and believes that everyone has the right to work in an environment free from any type of discrimination and harassment. Any behaviour that undermines the dignity, well-being and mutual respect of employees is unacceptable and has no place within the company.

Zeta Farmaceutici makes it clear that harassment of any kind is not tolerated, and concrete measures are taken to prevent and deal with any situation that could compromise safety and harmony.



Zeta Farmaceutici is actively engaged in ensuring:

- an inclusive and respectful workplace, where every person can express themselves freely without fear of being subjected to abuse, discrimination or acts of intimidation;
- the right of every person to feel protected and supported, including through a culture of respect and cooperation, where diversity is seen as a value and not a reason for division.

### **Personnel Management and Equal Opportunities**

The company acts with respect for the fundamental rights of each individual, protecting their moral integrity.

The company safeguards the physical and moral integrity of its employees and collaborators, guaranteeing the right to working conditions that respect human dignity. It is therefore committed to maintaining a healthy and respectful workplace, in which everyone can work safely and in compliance with labour laws (with particular regard to working hours and remuneration), principles and shared values.

All parties are required to work together to maintain a climate of mutual respect for the dignity and reputation of every person.

In addition, Zeta Farmaceutici promotes a working environment and relations with all stakeholders that guarantee equal opportunities for all, without any form of discrimination related to sex, racial and ethnic origin, nationality, religious beliefs, sexual orientation, or other personal characteristics.

### **Environmental Protection**

Zeta Farmaceutici is committed to protecting the environment, and promotes the principle of environmental sustainability by taking the consumption of energy resources and natural raw materials into consideration. In making decisions, it seeks to balance its economic interests with environmental needs, in compliance with the regulations in force.

### **Relationships with Suppliers**

With regard to the management of relationships with suppliers of goods and services, the employees responsible must comply with the following guidelines:

- conduct an evaluation of the supplier, including, among other aspects, its reliability in meeting its contractual obligations;
- guarantee equal opportunities to all suppliers who meet the requirements, avoiding unjustified rejections, and always seeking the best competitive advantage for the company;
- foster effective collaboration with suppliers, aimed at meeting company standards in terms of quality, cost and delivery times;



- comply, and ensure the compliance of others, with the terms of contracts, which must be drawn up in writing and in a transparent manner;
- promote open and fair communication with suppliers, in accordance with good business practices.

## **Observance of the Code of Ethics and reporting breaches**

The task of assessing the actual appropriateness of the Code of Ethics, verifying its implementation and observance is entrusted to the “Guarantor of the Code of Ethics”. The Guarantor of the Code of Ethics operates with full autonomy and independence, reporting periodically to the Managing Director on any reports received, checks carried out and the outcome thereof, while respecting the confidentiality of the parties involved.

Company personnel to whom this Code of Ethics applies are obliged to report conduct or events of which they have become aware, which may constitute a breach of the Code.

Third parties (e.g. external professionals, partners, suppliers, staffing agencies and, in general, those who have relationships with the company) also have the right to make such reports.

Reports should be addressed to the Guarantor of the Code of Ethics, together with any information or documents the latter may require for the performance of their duties.

In any event, it should be noted that reports will only be subject to verification if they are substantiated and based on specific, consistent facts, not on generic, incoherent and/or blatantly defamatory content. This assessment is made by the Guarantor of the Code of Ethics.

The company has set up the following channel for the communication of reports; using electronic methods, it is able to keep the identity of the whistleblower confidential:

- <https://zetafarm.whistleblowing.it/#/>

Reports may be made anonymously, i.e. it is possible to omit the identity of the whistleblower, and to prevent their identity from being found or traced.

The Guarantor of the Code of Ethics shall first verify whether the report falls within their area of competence. If not, they will proceed to archive the report, informing the whistleblower — if their identity is known — of this.

If the report is deemed admissible, the Guarantor of the Code of Ethics shall proceed with the preliminary investigation, engaging the company’s internal structures for the necessary analysis of the reported facts, as necessary and depending on the subject of the report. The Guarantor of



the Code of Ethics may hear directly from the whistleblower — if known — or the persons mentioned in the report.

The Guarantor of the Code of Ethics may inform the whistleblower, if known, of the final outcome of the investigation.

Please note that no negative consequences shall arise from reports made in good faith, even if they prove to be unfounded. On the other hand, the submission of wilfully false or seriously unfounded reports constitutes a breach of the Code of Ethics.

In fact, the company protects those who make reports in good faith from any form of retaliation, penalisation or discrimination, whether direct or indirect, for reasons directly or indirectly linked to the report. Any discriminatory measures taken against whistleblowers may be reported to the National Labour Inspectorate, within the extent of its remit, not only by the whistleblower themselves but also by the trade union organisation indicated by the whistleblower.

For the purposes of this document, reports made with the knowledge that they are unfounded and with the intention of harming other parties (merely by way of example: employees, members of corporate bodies, suppliers, partners, group companies, etc.) shall be deemed to be in bad faith. The handling of reports and the rules laid out in this document are without prejudice to any disciplinary measures and civil or criminal liability incurred by whistleblowers in the event of a report made in bad faith.

Should the Guarantor of the Code of Ethics find elements which reveal a report to be made in bad faith, they shall consider all appropriate actions in order to allow the company to assess the implementation of any sanctioning procedures.

It remains understood that the company may take the most appropriate disciplinary and/or legal measures to protect its rights, assets and image against anyone who has made false, unfounded or opportunistic reports in bad faith and/or for the sole purpose of slandering, defaming or causing prejudice to the reported party or to other parties mentioned in the report.

The company adopts appropriate technical and organisational measures to ensure that the identity of whistleblowers is kept confidential at all times, including during management of the report. In general, the information and personal data acquired through the application of this paragraph shall be processed by the Guarantor of the Code of Ethics and those authorised by the company exclusively in compliance with the principles established by the current privacy legislation (EU Regulation 679/2016 - the “GDPR”).

It should be noted that all company parties involved in the processing of reports are required to ensure the absolute confidentiality of the contents of reports and of the identity of



whistleblowers, where known. In particular, it is expressly forbidden to reveal the identity of whistleblowers, or provide any information on them, to any reported party.

The protections in place for whistleblowers will only be guaranteed for reports submitted by clearly identified (i.e. not anonymous) persons.

## Sanctions

Breaches of the ethical rules laid out in this document and in the corporate procedures represent an undermining of the trust between the company and the party who commits the breach.

It should be noted that, in addition to the matters set out in more detail above, breaches of the Code of Ethics also include:

- any form of retaliation against somebody who has reported possible breaches of the Code of Ethics in good faith;
- any accusation of a breach of the Code of Ethics made against other employees, in the knowledge that such a breach and/or such conduct did not take place, whether through malice or gross negligence;
- any breach of measures to protect the confidentiality of whistleblowers.

Once confirmed, breaches will be promptly sanctioned through the adoption of appropriate and proportionate disciplinary measures, in compliance with the provisions of the applicable legal framework and national or corporate labour contracts. This is without prejudice to the criminal aspect of any such conduct, in cases where it constitutes an offence.

Disciplinary measures for breaches of the Code of Ethics, if deemed appropriate, shall be taken by the company after discussion with the Guarantor of the Code of Ethics. Such measures may also include the perpetrators being removed from the company.

Sanctions are applied in accordance with proportionality, gradation and the right to be heard, taking into account the seriousness of the breach and the overall conduct of the party.

With regard to parties who do not have a relationship of employment with the company, breaches of the Code of Ethics will be sanctioned with the application of the remedies provided for by civil law.

