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# **CODE OF ETHICS**

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## **CHAPTER 1: GENERAL PRINCIPLES**

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### **1.a COMPANY PROFILE**

DOC Generici, a company that produces generic drugs, was set up in 1996 with the aim of offering high quality products at low prices, both to patients and to the public.

DOC Generici was producer of generic drugs whose capital was mostly in Italian hands. Its shareholders were two leading Italian companies: Gruppo Chiesi and Gruppo Zambon, partnered by Apotex, a leading Canadian company in the North American market for the production and distribution of generic drugs. DOC Generici was founded pursuant to the enactment of Law 425 on 8th August 1996, which paved the way for the generic drugs market, being prompted by its great potential for development, as already experienced in other European countries. Since 1<sup>st</sup> July 2019, DOC Generici has been purchased by IGC Europe, in partnership with Merieux Equity Partners.

DOC Generici is well aware of the social value of generic products which, being sold at a lower price, significantly help to reduce the pharmaceutical expenditure for the National Health Service.

DOC Generici's price list includes a wide range of products covering most therapeutic fields: non-steroidal anti-inflammatory drugs, antiviral drugs, antidepressants, antithrombotic drugs, cardiovascular and gastroenteric drugs.

### **1.b MISSION AND KEY VALUES**

DOC Generici's mission is to develop its business and reach social goals by satisfying the needs of the scientific community and of patients too, whilst respecting the interests of all those involved in social actions and of those concerned therewith.

This is especially in the light of the fact that the market which DOC Generici works in encompasses interests that have a great social value, implying also an important contribution to the training of the medical profession.

In pursuing its mission, DOC Generici shapes its activities, choices and behavioural approach according to the following ethical principles which, taken as whole, represent its **CORPORATE POLICY**:

- **Fairness:** the company makes sure that all its workers comply with the principles of fairness and loyalty when performing their in-house and external functions, also for the purpose of preserving the company's image and its trusted relationship with its clients and, in general, with third parties.
- **Honesty in business:** the company's staff are committed to adopting a fair and honest conduct, both when performing their own functions and in their relationships with the other members of the company, avoiding unlawful or illegitimate purposes or conflicts of interests to their own or third party benefit. In no case can the company's interests or benefit induce and/or justify a dishonest conduct.
- **Transparent and comprehensive information:** in the light of the principle of transparency, the company is committed to giving accurate, truthful and comprehensive information to third parties.
- **Fair competition:** in compliance with competition and antitrust national and European laws and with the guidelines issued by the Italian Competition and Market Authority, the company does not endorse conduct or execute agreements which may prejudice competition between the many competitors involved in the market in question.
- **Impartiality:** the company takes action to ensure that both its staff and external workers act impartially and loyally, not only when performing their functions but also *vis-à-vis* other companies and the company's own interlocutors.
- **Independence:** the activities pursued by the company's staff are assigned and managed independently and with due care, according to the kind of activity required and to the delicate and difficult nature thereof.
- **Diligence and accuracy:** the company makes sure that its staff carry out their assignments with the required diligence and accuracy, complying with the instructions given by their hierarchical superiors and/or managers and, in general, with the company's quality standards.
- **Confidentiality and privacy protection:** the company is committed to complying with the law on personal data protection and with all recommendations and communications given by the Italian Authority for the Protection of Personal Data. Each collaborator of the company may use or publish confidential information and data only within the limits and for the purposes of his/her own duties.
- **Equity and equality:** the company seeks to develop a corporate "spirit of belonging" and condemns any kind of discrimination and/or abuse within its external and internal relationships. It makes sure that none of its workers acts discriminately on the basis of age, sex, nationality, political views, religious beliefs, health status etc., and promotes meetings and/or events aimed at fostering its workers' team spirit, mutual knowledge and respect.

- **Quality of services and products:** the company pays special attention to its (current and potential) clients' needs, requests and expectations. In its own field of business, it provides increasingly competitive services whilst guaranteeing professional quality and flexibility.
- **Hierarchical principle:** in order to promote the synergy and efficiency of corporate processes, the company endorses the hierarchical principle, whereby each single member, depending on his/her own position within the company's structure and being judged purely on the merits, is competent and responsible for his/her own actions and omissions. Hence, any person who has management and representative powers within the company, even at a departmental or functional level, will guide, coordinate and control the activities of those under him/her and/or coordinated by him/herself, which he/she will be accountable for according to law.
- **Professional qualities:** the people working at the company or those which the company assigns specific services to are highly skilled, well-experienced and professional workers. The company constantly pays attention to its own staff's training, updating and professional growth.
- **Persons' protection:** in compliance with the law on physical and moral integrity, the company guarantees its staff suitable work conditions in a safe and healthy environment.

## **1.C INTRODUCTION TO THE CODE**

This Code of Ethics (hereinafter “**the Code**”) is designed to give information about the key principles of DOC Generici's business, and to express the commitments and ethical responsibilities accepted and implemented by the company itself in doing business. Moreover, such principles guide the conduct of all those who work at/for the company, thus preventing any improper conduct pursued in the interests or to the benefit of the company and any crime, even where indirect. This is in accordance with Legislative Decree no. 231/2001 and with the Code of Ethics of Assogenerici, available on web site [http://www.assogenerici.org/articolihome/Codice\\_deontologico\\_Assogenerici.pdf](http://www.assogenerici.org/articolihome/Codice_deontologico_Assogenerici.pdf) which the company endorses and whose values and precepts it will comply with and have everyone comply with.

The Code is an official document of the company, approved by its Board of Directors.

The infringement of any principle of the Code jeopardizes the trusted relationship between the company and the infringer, and is followed, incisively, promptly and immediately, by suited and proportionate disciplinary measures, regardless of the criminal relevance of such conduct.

This Code is addressed to:

- a) shareholders;
- b) corporate bodies, and any person who has representative, decision-making and/or control powers within the company, even if only in fact;
- c) the company's staff, widely meant as all natural persons who have an on-going and essentially personal relationship with the company (i.e. employees, para-employees and project-based collaborators, etc.);
- d) the company's consultants and suppliers of goods and services (including professional ones), agents and any person acting in the name and on behalf of the company or under its control;
- e) third parties who do not act in the company's name or on its behalf (e.g. the company's clients), though nonetheless have a relationship therewith.

The above parties are required to comply with the principles of the Code and to follow its behavioural rules.

The knowledge of and compliance with the Code's provisions are a condition precedent to the creation and maintenance of collaborations with third parties; the company shall provide them with all related information notes, acting with the utmost transparency.

Should any subject mentioned in points a) b) and c) fail to comply with the Code, he/she shall be subject to sanctions which will differ according to his/her relationship with the company, as laid down in the Code itself. Any employee's infringement amounts to a breach, with the ensuing application of disciplinary sanctions.

Moreover, should any party mentioned in letters d) and e) infringe the Code, such conduct may amount to an "express termination clause" of the relationship with the company due to infringer's wilful misbehaviour.

## **CHAPTER 2: BEHAVIOURAL GUIDELINES**

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### **2.a CORPORATE GOVERNANCE**

The company believes that a suitable and effective control system is an essential component of its organization. Such a system amounts to a set of instruments, processes and bodies that are necessary and needed to guide, manage and check corporate actions for an efficient and ethical way of doing business, in full compliance with the abovementioned values that represent the company's policy.

#### **(i) Corporate structure**

The shareholders are the first addressees of the Code. Therefore, they undertake to respect its principles and to foster their shared knowledge. The company makes sure that its shareholders do not act against the company's interests, by pursuing their own or third party interests or interests that are contrary to the company's object, or by acting partially or antithetically and in conflict with the company.

The company involves its shareholders in corporate decisions that pertain thereto, taking into account and guaranteeing minority interests too. Prompt and comprehensive information is guaranteed, as well as transparency and full access to data and information.

#### **(ii) Board of Directors and Managing Directors**

The Board of Directors and the Managing Director carry out their functions professionally, autonomously, independently and responsibly towards the company, its shareholders, creditors and third parties. The executive board is required to be well-aware of its role and responsibilities, and to act sensitively in its own leadership and serve as an example to all those working at the company.

The company's Directors and those who carry out their functions must not hinder or prevent the control of their activities by bodies entrusted with this task. Within the ambit of his/her assignment, each Manager is required to take part in and facilitate the company's system of control, making his/her employees aware of such need. Each Manager shall refrain from pursuing collateral activities which may be detrimental to the company's interests or from pursuing his/her own interests or third party interests, even if only potentially in contrast with the company's. In this event, he/she shall promptly inform the Audit Committee (art. 2391 Italian Civil Code) and the Surveillance Body thereof.

Other than performing their functions within their own ambit, the Board of Directors and the Managing Directors are required to have the values of the Code strictly

complied with and shall promote the sharing and distribution thereof as well as of the behavioural rules included therein, for crime-prevention purposes.

### **(iii) Audit Committee**

The members of the Audit Committee in office carry out their functions by acting impartially, autonomously and independently so as to guarantee an effective control and the on-going monitoring of the company's economic-financial conditions, as well as the conformity and suitability of its management structure. It also pays special attention to fostering the dialogue and information exchanges between the company's internal and external bodies.

### **(iv) External auditing and certification of financial statements**

The external auditor must have free access to all data, documents and information needed to perform his/her assignment.

## **2.b RELATIONSHIPS WITH THE COMPANY'S STAFF**

### **(i) Selecting and employing Staff**

The company pays special attention to the selection of its collaborators and to the employment of workers, guaranteeing the principle of equal opportunities and equality, in compliance with the law, with the Workers' Charter and with the applicable CCNL [National Collective Labour Agreement].

Hence, the company's Management makes sure that the candidates' profiles match the company's needs, in compliance with the law and with the compulsory employment of protected categories of people.

The company enters into regular labour agreements with collaborators or employees, specifying all the essential terms and conditions of such relationship.

The Company does not hire people of compulsory education age or foreign nationals who do not hold the documents required to work in Italy in accordance with the law, taking account of their nationality.

### **(ii) Management of labour relationships**

The company's labour relationships with its employees or self-employed collaborators are grounded on the principle of mutual respect, equal treatment and meritocracy. Hence, the company is against any kind of favouritism, nepotism or discrimination based on sex, sexual orientations and habits, race, religion, different opinions or political views and trade union memberships.

As for employees, hierarchical powers are exercised by respecting the staff's rights, with objectiveness and fairness. In turn, the staff offer their full cooperation to follow the instructions given by their superiors, acting with the greatest diligence and care when carrying out their duties (art. 2104 Italian Civil Code).

The company's staff are required to act loyally and faithfully towards the company, and not to accept any other job or remunerated activity in favour of third parties, or collaborations that are not previously authorized. In any event, the staff shall not carry out any activity that is (even if only potentially) against the company's interests or that is incompatible with their contractual duties.

Any documents, work tools, products and equipment and any other good, whether tangible or intangible (including intellectual property and trademarks) belonging to the company shall be used exclusively for the pursuit of institutional purposes and according to the company's instructions; they cannot be used for personal purposes, or be transferred or provided to third parties, and shall be used and kept with the same care reserved to one's own property.

**(iii) No gifts and/or other benefits**

The company's staff shall not offer, accept or promise any gift, reward, benefit or service, of any kind, and not even of an economic nature, for themselves or for others, for the purpose of influencing or, in any event, obtaining a favourable treatment during the course of their own employment.

If, despite this prohibition, a person working at/for the company is promised gifts and/or benefits by third parties, s/he shall immediately give notice thereof to the company's Management and Surveillance Body.

**(iv) Conflict of interests**

The company's staff shall not pursue any interest that is in conflict (even if only potentially or partially) with those mentioned in the company's object or, in any event, with the company's interests; neither shall the staff be involved, either directly or indirectly, in any collateral business which may conflict, in any way, with the company's business and interests.

Should any transaction give rise to a conflict of interests concerning a person working at/for the company, s/he shall refrain from taking part in such transaction, giving prompt notice thereof to the company's Management and Surveillance Body.

Moreover, if an employee's spouse, relative or relative-in-law is employed at or collaborates with another company or entity that is in competition with the company, the former shall give notice thereof to his/her hierarchical superior and to the Surveillance Body.

In any event, should anyone within the company become aware of other parties' conflicts of interests, whether they be internal and/or external to the company though having a relationship with the company, s/he shall give notice thereof to the company's Management and Surveillance Body.

**(v) Careers and performance assessment**

Other than training its staff, the company pays attention to the latter's professional growth. The staff's merits and performances are assessed by those who work therewith, together with their skills and capacities, their experience and seniority within the company.

**(vi) Protection of dignity and integrity**

The company guarantees its workers the protection of their dignity and psycho-physical integrity, respecting the principles of equal opportunities and privacy protection.

The company has taken all measures to ensure safe and healthy working conditions, such as to guarantee a suitable working environment, together with safety processes (including the smoking ban applicable in its premises) aimed at constantly improving the company's environment.

**(vii) No discrimination**

One of the main goals of this Code is to contrast any kind of discrimination based, by mere way of example, on sex, age, race, political and religious beliefs, and any kind of vexation or mobbing between the company's workers.

Should any worker at the company become aware of similar instances, s/he shall give notice thereof to the company's Management and Surveillance Body.

**(viii) Work safety**

The company takes care of the health and physical integrity of its staff, whether or not employed, and strictly complies with the law on safety at work (Leg. Decree no. 81 of 9 April 2008 and following amendments) whose enforcement is pursued both within and outside the company, requiring all persons it works with to abide thereby.

In particular, in accordance with the law, DOC Generici:

- a) evaluates any health and safety risks;
- b) it takes prevention measures that consistently integrate the company's technical-production conditions and the impact of environmental and work organization factors;
- c) it takes measures that are such as to eliminate risks or, where this is not possible, to reduce them to a minimum, in accordance with the skills and knowledge acquired thanks to technical progress;

- d) it complies with ergonomic principles in organizing work, in conceiving work sites, in choosing equipment and in defining work and production methods, especially to reduce the effects of monotonous and repetitive work on personal health;
- e) it reduces the sources of risk;
- f) it replaces what is dangerous with what is not or with what is less dangerous;
- g) it limits the number of workers who are or may be exposed to risk;
- h) it limits the use of chemical, physical and biological agents at work to what is strictly essential;
- i) it gives priority to collective protection measures over individual protection measures;
- l) it regularly controls its workers' health;
- m) it removes any worker who can no longer be exposed to risk due to health reasons, and assigns him, where possible, another task;
- n) it informs and suitably trains its workers, executives and assigned staff on safety issues;
- o) it informs and suitably trains the workers' representatives on safety issues;
- p) it gives adequate instructions to workers;
- q) it promotes the participation and consultation of the workers' representatives on safety issues;
- r) it takes adequate measures to guarantee the improvement of safety standards over time, also by adopting specific procedures;
- s) it determines the emergency measures to be taken in the event of first aid assistance, fire, evacuation of workers and serious and immediate danger;
- t) it regularly maintains work environments, equipment, plants and especially their safety devices, in accordance with their manufacturers' instructions.

In particular, within its own corporate organization, DOC Generici:

- drafts and regularly updates the risk assessment document laid down by art. 28, Leg. Decree no. 81/2008, and
- it appoints a Prevention and Protection Services Manager, in accordance with art. 17(1), letter b), Leg. Decree no. 81/2008.

Should any worker at the company become aware of any anomaly or irregularity in this respect, s/he shall give prompt notice thereof to the company's Management and Surveillance Body.

## **2.c RELATIONSHIPS WITH PUBLIC ADMINISTRATIVE OFFICES (P.A.O.)**

The company's relationships with civil servants, people entrusted with public services, public employees and assignees are based on transparency, loyalty and fairness.

- The company, its bodies and their members, its staff, its external consultants and, in general, its collaborators who work in the name and on behalf of the company in

their relationships with P.A.O.s, act in line with the constitutional principles of impartiality and good administration, which P.A.O.s are required to comply with.

DOC Generici condemns and prohibits any offers or promises (even indirect) of money, gifts, services, performances or any other benefit, by anyone acting in its name and on its behalf, in return for privileges or favours by any P.A.O. representative or aimed at inducing the latter to act favourably towards the company, unlawfully and contrary to the Code's principles. This principle does not apply to gifts or other benefits of little value or, in any event, in line with usages or customs

With special reference to the company's participation in tenders/competitions launched by P.A.O.s, the company maintains professional and transparent relationships, complying with the law and with P.A.O.s instructions. In any event, any favourable treatment or pressure or any other form of privilege aimed at obtaining an improper or unlawful interest or advantage to the company are prohibited.

- The company is available and cooperative when dealing with P.A.O.s, even for inspections and ascertainties; where due and/or required, it offers comprehensive information, data and documents, in line with the principles of transparency, completeness and accuracy.
- The company may benefit from any kind of funding granted by national and/or European public entities, which shall be limited to the specific use which it is granted and/or requested for.

The company monitors and condemns any contrivance or deceit used by anyone working on its behalf for the purpose of unduly obtaining such funding (to the benefit of the company) or P.A.O.s subsidies or provisions, or of avoiding limits to the use of such funding.

- The company actively cooperates with the judiciary and with the police, even for inspections, controls, investigations or other judicial proceedings.

## **2.d RELATIONSHIP WITH AUTHORITIES AND PUBLIC INSTITUTIONS, PUBLIC AND PRIVATE ASSOCIATIONS AND COMMUNITY**

DOC Generici promotes dialogue with Institutions and all the civil society organizations. In this context, the company, through its own employees and partners, collaborates actively and completely with Authorities and Public Institutions.

In particular, the company, its bodies and their members, its staff, its external consultants and, in general, its collaborators who work in the name and on behalf of the company, must have in their relationships with Authorities, Public Institutions, Public and Private Associations and Community a behavior based on integrity, transparent and traceability. Only the functions and competent positions who are duly authorized (in accordance with the internal systems of responsibilities and powers of attorney) may engage in and

manage these relationships on behalf of the company, in accordance with approved practices and business procedures. The business rules require a preliminary assessment of the quality of operations to be implemented and for the related sharing of actions, as well as for their execution and monitoring.

## **2.e RELATIONSHIPS WITH THE SCIENTIFIC HEALTH WORLD AND DIRECT SCIENTIFIC INFORMATION**

DOC Generici is well aware of the value of its business in the scientific world and of its impact on the health system, and thus acts in full compliance with the laws which regulate, at all levels, pharmaceutical production, the distribution of drugs and scientific information to physicians and healthcare workers, especially with respect to Leg. Decree no. 219 of 24th April 2006.

The company endorses, also in this field, the provisions specifically adopted by the Code of Ethics of Assogenerici, available on web site [http://www.assogenerici.org/articolihome/Codice\\_deontologico\\_Assogenerici.pdf](http://www.assogenerici.org/articolihome/Codice_deontologico_Assogenerici.pdf) and is committed to acting in accordance therewith and requires anyone working therefore to follow all the provisions of said Code, including the provisions related to Transparency in transfers of value (ToV's) to Healthcare Professionals (HCP's) and/or Healthcare Organizations (HCO's).

Specifically:

### **(i) Relationships with the health scientific world**

The company may collaborate and create any kind of relationship with members of the scientific world, including scholarships and consultancy services, even abroad, as long as the congruity, suitability and ascertainability of such actions are guaranteed.

Any decision related to such actions shall always be taken by the company's Management.

The company may also collaborate with scientific companies and medical associations, as long as for the purpose of spreading scientific knowledge and furthering professional expertise.

Any experiment and research on drugs, conducted after they have been authorized for marketing purposes, shall be allowed only if authorized by the law in force in the field.

Moreover, DOC Generici guarantees that clinical trials, post-marketing monitoring enquiries and those carried out after the drugs' launch on the market shall be made only for scientific purposes.

### **(ii) Direct scientific information**

#### **General principles**

The company is well-aware of its responsibility for all information and promotional activities concerning its products, and thus takes measures to ensure that third parties

(consultants, agents, etc.) which it delegates the task of spreading such information act in accordance with the law (including regional laws) and with the ethical principles of the Code of Ethics of Assogenerici which this Code is based on.

Therefore, anyone spreading information on the company's behalf:

- ➡ makes sure that such information is always documented or documentable and does not make exaggerated, universal or hyperbolic representations or comparisons that cannot be proven or that are not objectively grounded;
- ➡ s/he does not use faxes or emails or other automatic calling systems and other electronic means of communication to spread promotional material, unless the physician-addressee of said material has previously consented thereto and this can be proven;
- ➡ s/he introduces her/himself to the healthcare worker by specifying his/her functions;
- ➡ s/he is not engaged in health or para-health activities or that are nonetheless related to the use of drugs, even if they are not remunerated, and in any other on-going business as an employee;
- ➡ s/he does not accept mandates from any other pharmaceutical company, if s/he works as an agent for the company;
- ➡ s/he ensures that the products can be found both at drugstores and at any other retail store.

The company makes sure that its Drug Representatives are able to provide healthcare workers with all the information on the properties and characteristics of the drug itself that is such as to guarantee its proper therapeutic use.

It also makes sure that its Drug Representatives are given the chance of obtaining information concerning its drugs so as to ensure their widest knowledge thereof.

### **Information material**

All information materials on the company's products, prepared by the company itself and used thereby to spread information to physicians, refer to official documents supplied to AIFA [Italian Drug Agency] at the time of the drugs' registration or subsequently approved by the same Agency, in accordance with the law in force.

In no circumstance will all-including statements be used to spread information on the company's products, such as "chosen drug", "totally harmless" or "perfectly tolerated" and alike; moreover, representations that categorically exclude side-effects or toxicity risks will not be used. Scientific quotations must accurately report the meaning intended by their authors.

Any text, table and any other illustration excerpted from medical journals or scientific works will be fully and faithfully reproduced, specifying their source. Any quotation which, separated from its context, appears to be partial and/or contradictory with respect to the author's intended meaning is not allowed.

## **Promotional material**

When informing and presenting drugs to physicians or pharmacists, no prize or benefit (whether pecuniary or in kind) can be granted, offered or promised.

For the promotion of drugs to physicians, healthcare workers and pharmacists, DOC Generici representatives use only promotional materials supplied by the company, which buys it directly at a central level.

Such material, concerning drugs and their use, is of little value, is not fungible and anyhow related to the physician's and pharmacist's activity. It will clearly specify that it comes from the company.

The company does not allow its representatives to offer economic incentives aimed at compensating healthcare workers for the time taken off work to take part in congresses or conferences.

## **Professional updating and scientific collaboration**

Any information material for scientific or professional consultation purposes, not specifically concerning any drug, may be given to public health structures for free. Said material shall be supplied by the company, which buys it directly at a central level.

Any eventual donation, bailment or gift concerning instruments that are strictly connected to the medical profession may be made only to universities, hospitals and nursing homes, in compliance with the relevant entity's administrative procedures.

## **Publicity in newspapers and magazines**

DOC Generici acts with the utmost transparency when making advertisements in newspapers and magazines, respecting the strict separation between information and publicity, and always guaranteeing that the promotional message will be immediately recognizable to the reader, in any form, whether it will be editorial or reported as tables.

## **Congresses, conferences and scientific meetings**

Within the ambit of its function to spread information and to contribute to the scientific and health world, DOC Generici may hold or take part in the organization of conferences, congresses and scientific meetings concerning issues related to the use of drugs, which represent an opportunity for exchanges between the industry and healthcare workers and that are addressed to many participants.

DOC Generici takes part in congresses only when its participation is connected to its role in the field of research, development and scientific information, and is driven by ethical, scientific and economic-soundness considerations.

When participating in or organizing congresses or conferences, DOC Generici's goal is always the development of scientific collaborations with physicians.

Only physicians whose specialization somehow pertains to the event's main theme are

invited thereto.

In no circumstance will the scientific events which DOC Generici takes part in have tourist purposes too.

The venue of such events will be chosen according to merely logistic, scientific and organizational criteria.

No cultural or tourist activities will be organized alongside the congress, neither will any accompanying guest be accommodated in any way.

Eventual medical-scientific courses will be organized by DOC Generici in accordance with the above provisions. No course whose purpose is not medical-scientific will be sponsored.

### **(iii) Transparency in Transfers of Value (ToV's) to Healthcare Professionals (HCP's) and/or Healthcare Organizations (HCO's)**

In accordance with the Transparency provisions contained in the Title 5 of the Code of Ethics of Assogenerici, DOC Generici documents and discloses ToV's made (directly or indirectly) to HCP's and HCO's for promotional purposes in connection with the development and sale of prescription medicinal products (exclusively for human use).

The ToV's disclosure is made using a default template which is published online (on DOC Generici's web site – in the section dedicated to Transparency) on an annual basis. In this section, it is published a note (the “**Methodological Note**”) which describes the scope of the publication, the methodologies used by the company in preparing the disclosure and identifying the categories of ToV's and the related exclusions.

The relevant records related to the ToV's are stored in DOC Generici's archives for a minimum of 5 years, as established by the Code of Ethics of Assogenerici.

For more details about ToV's and methodologies applied by DOC Generici, please refer to the Methodological Note available on <https://www.docgenerici.it/trasparenza.php>.

## **2.f RELATIONSHIPS WITH THIRD PARTIES AND COMPETITORS**

### **(i) Relationships with clients**

The company strives to increase its clients' satisfaction and appreciation of its services/products, making them suited to their needs and providing the latter with wide and comprehensive information, in accordance with the abovementioned terms.

### **(ii) Relationships with suppliers, consultants and outsourcers**

The company's suppliers are chosen on the basis of a careful technical-economic assessment, in the light of the following criteria: their products, offer, economic convenience, technical and professional suitability, competences and reliability.

The suppliers' endorsement of the values hereunder is a condition precedent to the creation and maintenance of their relationship with the company.

All products and/or services supplied must comply with the company's instructions and must be justified by concrete corporate needs, as expressed and illustrated by the company's respective managers, and must be in line with specified budget limits.

Upon termination of the supply relationship and, in any event, prior to payment of the corresponding invoice, the company will check the quality, congruity and timeliness of the services provided, as well as the supplier's compliance with its obligations.

For the purpose of protecting its own image and resources, the company will not deal with any supplier who is not willing to act in strict compliance with the law in force or who refuses to act in line with the values and principles of this Code.

### **(iii) Commercial partners and competitors**

The company's relationship with its commercial partners and competitors is based on strict compliance with the law, with market rules and with the guiding principles of fair competition, opposing any kind of potentially unlawful or collusive agreement or conduct.

In the course of its business, DOC Generici will take care not to damage the image of its competitors and their products.

By endorsing this Code, DOC Generici requires all subjects working in its name and on its behalf (employees and collaborators, agents and consultants etc) to comply with the said principles.

### **(iv) Corporate creditors**

For the purpose of protecting the company's eventual creditors, DOC Generici prohibits anyone working at/in the interests of the company from taking actions which may damage the company's assets, even indirectly, or reduce its capital, for the purpose of causing damage to such creditors.

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The Code shall come into force upon its approval by the Board of Directors of DOC Generici, which is entrusted with this task. The Company shall take all actions to make sure that the Code is widely spread and easily accessible to the company's shareholders, corporate bodies, staff and all subjects interested and involved in its business.

The content of the Code must be coordinated with the company's Articles of Association, with the Italian Civil Code and Criminal Code (as for the crimes that are relevant for the company's business), and with the relevant CCNL.

As for behavioural rules, the Code is applied together with the prescriptions of the organizational, management and control model used by the company for crime prevention purposes.

The Code automatically incorporates any current or future provision which defines the list of typical presumed crimes and that is aimed at preventing and repressing corporate crimes, thus representing a valid legal defence for the company and its business.

***The Board of Directors***