



## **Code of Ethics**

FARMA S.R.L.

## Code of Ethics

Document Nature: Final Edition

Approval: Board of Directors

Approval Date: Pending approval

**Table of Editions and Revisions**

1	0	23/05/2024	Update with structure revision and content integration	Pending approval
0	1	29/06/2020	Update	29/06/2020
0	0	01/09/2017	First issue	01/09/2017
Edition	Revision	Revision Date	Reason	Board of Directors Approval Date

**LETTER FROM THE CHIEF EXECUTIVE OFFICER**

*It is with pride that we present FARMA's new Code of Ethics, which defines - in an organic and unified manner - the principles and reference criteria for regulating the behaviour of Directors, Employees and all those who collaborate with our company.*

*It is founded on the common heritage of shared values upon which FARMA has built and intends to continue building its development.*

*It is a guide for everyday decisions. Respecting and enforcing the Code of Ethics in every business activity generates trust among all stakeholders and contributes to establishing the company's reputation.*

*The reliable behaviour of each of us and the good reputation of the company create value and are an indispensable factor for growth and development. The market chooses FARMA for its ability to maintain commitments made in response to requests, to ensure consistently high levels of product and service quality, and for the reliability of results.*

*All the choices of our stakeholders are based on trust and responsibility: this is why the Code of Ethics represents not only a formal compliance requirement but a daily achievement.*

*The Code of Ethics entails a great commitment on FARMA's part and requires a sense of sharing and responsibility from Directors, Managers, Employees, Collaborators, and relevant business partners. In fact, it is part of the professional relationship that binds them to the company.*

*It will therefore be distributed to all stakeholders and explained to those who want to work at FARMA or with FARMA.*

*It will be applied in daily practice and will be open to every possible improvement to enhance FARMA's spirit of innovation, the continuous pursuit of excellence, and its desire to grow.*

THE CHIEF EXECUTIVE OFFICER

*Qt: D. G. G. G.*

**TABLE OF CONTENTS**

<b>1</b>	<b>INTRODUCTION.....</b>	<b>7</b>
1.1	PURPOSE OF THE CODE OF ETHICS.....	7
1.2	THE COMPANY.....	7
1.3	OUR VALUE SYSTEM.....	8
	1.3.1 MISSION.....	8
	1.3.2 VISION.....	8
	1.3.3 VALUES.....	8
1.4	SCOPE OF APPLICATION AND RECIPIENTS OF THE CODE OF ETHICS.....	9
1.5	ETHICAL VISION.....	9
1.6	ETHICAL BEHAVIORS.....	10
1.7	THE VALUE OF REPUTATION AND FIDUCIARY DUTIES.....	10
1.8	THE VALUE OF RECIPROCITY.....	10
1.9	CODE OF ETHICS AND LEGISLATIVE DECREE 231/01.....	10
1.10	THE STRUCTURE OF THE CODE OF ETHICS.....	11
1.11	THE CONTRACTUAL VALUE OF THE CODE.....	12
<b>2</b>	<b>GENERAL PRINCIPLES.....</b>	<b>13</b>
2.1	LEGALITY.....	13
2.2	RESPONSIBILITY.....	13
2.3	HONESTY.....	13
2.4	REJECTION OF ALL DISCRIMINATION.....	14
2.5	FAIRNESS AND PREVENTION OF CONFLICTS OF INTEREST.....	14
2.6	CONSISTENCY.....	14
2.7	TRANSPARENCY.....	14
2.8	CONFIDENTIALITY.....	15
2.9	EFFICIENCY.....	15
2.10	INVOLVEMENT AND ENHANCEMENT OF HUMAN RESOURCES.....	15
2.11	PHYSICAL AND MORAL INTEGRITY OF THE PERSON.....	15
2.12	EQUITY OF AUTHORITY.....	16
2.13	QUALITY OF PRODUCTS AND SERVICES.....	16
2.14	FAIR COMPETITION.....	16
2.15	SOCIAL RESPONSIBILITY.....	16
2.16	ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT.....	17

---

<b>3</b>	<b>CONDUCT CRITERIA.....</b>	<b>18</b>
3.1	GENERALLY APPLICABLE CONDUCT CRITERIA.....	18
3.1.1	INFORMATION HANDLING.....	18
3.1.2	GIFTS, PRESENTS AND BENEFITS.....	19
3.1.3	EXTERNAL COMMUNICATION.....	20
3.1.4	ACCOUNTING RECORDS AND INTERNAL CONTROLS.....	20
3.1.5	FINANCIAL INTEGRITY AND ANTI-FRAUD.....	22
3.1.6	TAX AND FISCAL COMPLIANCE.....	22
3.1.7	ANTI-CORRUPTION.....	23
3.1.8	PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY.....	23
3.1.9	REJECTION OF ALL FORMS OF TERRORISM.....	24
3.1.10	PROTECTION OF INDIVIDUAL PERSONALITY.....	24
3.1.11	PROTECTION OF TRANSPARENCY IN COMMERCIAL TRANSACTIONS (ANTI-MONEY LAUNDERING) .....	24
3.1.12	FIGHT AGAINST ORGANIZED CRIME.....	24
3.1.13	RELATIONS WITH ENTITIES AND COMPETING COMPANIES.....	25
3.1.14	RELATIONS WITH INTERNATIONAL OPERATORS.....	25
3.1.15	EMPLOYMENT OF PERSONS IN COMPLIANCE WITH IMMIGRATION LAWS.....	25
3.1.16	FIGHT AGAINST SMUGGLING.....	25
3.2	CONDUCT CRITERIA IN RELATIONS WITH SHAREHOLDERS.....	26
3.2.1	SHAREHOLDERS.....	26
3.2.2	RELATIONSHIP WITH SHAREHOLDERS.....	26
3.2.3	ENHANCING SHAREHOLDER PARTICIPATION AND SUSTAINABILITY.....	26
3.2.4	PROTECTION OF COMPANY ASSETS.....	26
3.2.5	CORPORATE GOVERNANCE.....	26
3.2.6	ACTIVITIES OF CORPORATE BODY MEMBERS AND SENIOR FIGURES.....	27
3.3	CONDUCT CRITERIA IN RELATIONS WITH EMPLOYEES AND COLLABORATORS.....	28
3.3.1	EMPLOYEES AND COLLABORATORS.....	28
3.3.2	PERSONNEL SELECTION.....	28
3.3.3	ESTABLISHMENT OF THE RELATIONSHIP.....	28
3.3.4	PERSONNEL MANAGEMENT.....	29
3.3.5	INTERVENTIONS ON WORK ORGANIZATION.....	30

---

---

3.3.6	SAFETY AND HEALTH.....	31
3.3.7	INTEGRITY AND PROTECTION OF THE PERSON.....	31
3.3.8	PRIVACY PROTECTION.....	31
3.3.9	DUTIES OF COLLABORATORS.....	32
3.3.10	ADDITIONAL DUTIES FOR MANAGERS.....	35
3.4	CONDUCT CRITERIA IN RELATIONS WITH CUSTOMERS.....	36
3.4.1	CUSTOMERS.....	36
3.4.2	IMPARTIALITY.....	36
3.4.3	CONTRACTS AND COMMUNICATIONS TO CUSTOMERS.....	36
3.4.4	BEHAVIORAL STYLE OF COLLABORATORS.....	36
3.4.5	QUALITY MANAGEMENT.....	36
3.4.6	CUSTOMER INVOLVEMENT.....	37
3.5	CONDUCT CRITERIA IN RELATIONS WITH SUPPLIERS.....	37
3.5.1	SUPPLIERS.....	37
3.5.2	SUPPLIER SELECTION.....	37
3.5.3	SUPPLIER EVALUATION.....	37
3.5.4	INTEGRITY AND INDEPENDENCE IN RELATIONSHIPS.....	38
3.5.5	FAIRNESS IN CONTRACT MANAGEMENT.....	39
3.5.6	PROTECTION OF ETHICAL ASPECTS IN SUPPLIES.....	39
3.6	CONDUCT CRITERIA IN RELATIONS WITH UNIVERSITIES AND RESEARCH INSTITUTES.....	39
3.6.1	SCOPE OF APPLICATION.....	39
3.6.2	SELECTION AND QUALIFICATION OF THE ENTITY.....	39
3.6.3	INTEGRITY IN RELATIONSHIPS.....	40
3.7	CONDUCT CRITERIA IN RELATIONS WITH THE COMMUNITY.....	41
3.7.1	COMMUNITY.....	41
3.7.2	RELATIONS WITH THE ENVIRONMENT.....	41
3.7.3	RELATIONS WITH THE MEDIA.....	42
3.7.4	RELATIONS WITH PUBLIC INSTITUTIONS.....	42
3.7.5	RELATIONS WITH ASSOCIATION REPRESENTATIVES.....	44
3.7.6	ECONOMIC RELATIONS WITH PARTIES, TRADE UNIONS AND ASSOCIATIONS.....	45
3.7.7	CONTRIBUTIONS AND SPONSORSHIPS.....	45

---

<b>4</b>	<b>IMPLEMENTATION METHODS.....</b>	<b>46</b>
4.1	RESPONSIBILITY FOR IMPLEMENTATION.....	46
4.2	DUTIES OF THE SUPERVISORY BODY REGARDING IMPLEMENTATION AND CONTROL OF THE CODE OF ETHICS.....	46
4.3	IMPLEMENTATION AND CONTROL METHODS.....	47
4.4	DISSEMINATION AND INFORMATION.....	47
4.5	TRAINING.....	47
4.6	STAKEHOLDER REPORTS.....	48
4.6.1	METHOD OF TRANSMITTING REPORTS.....	48
4.6.2	EVALUATI.....	49
4.7	VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS.....	49
<b>5</b>	<b>FINAL PROVISIONS.....</b>	<b>50</b>
5.1	CONFLICT WITH THE CODE.....	50
5.2	AMENDMENTS AND UPDATES TO THE CODE.....	50

## **1 INTRODUCTION**

### **1.1 PURPOSE OF THE CODE OF ETHICS**

This Code of Ethics (hereinafter the "Code of Ethics" or, more simply, the "Code") expresses the commitments and responsibilities in conducting business activities undertaken by Collaborators in any capacity at FARMA (hereinafter "FARMA" or the "Company"), whether they are Directors, members of corporate bodies, Executives, Employees, or Collaborators in every sense of this enterprise (hereinafter the "Collaborators").

FARMA has prepared this Code of Ethics to:

- clearly and transparently define the set of values that inspire it and the principles aimed at guiding the behaviours to be adopted to achieve corporate objectives;
- foster the development of a common corporate culture.

The Code of Ethics is a fundamental tool for carrying out business activities, whose observance is essential for the proper functioning, reliability, reputation, and image of the Company and whose principles constitute the foundations for the current and future success and development of the enterprise.

For effective application, the Code of Ethics should be understood as a tool aimed at inducing and directing, rather than imposing and sanctioning. The correct interpretation of the Code's prescriptions ensures that it can help each Recipient address the problems that arise in daily activities, where ethical issues, organizational problems, and management choices are closely interconnected.

### **1.2 THE COMPANY**

FARMA Srl was founded in 1975 to design and manufacture caps, filler necks, filters, and related accessories for fuel and AdBlue tanks of tractors, trucks, buses, and earthmoving machinery.

Initially, the reference market was the aftermarket, but thanks to innovation capabilities and adaptation to customer needs, FARMA is now a reference point for major OEMs at an international level.

FARMA operates through the following production divisions:

- Industrial Vehicles;
- Tool Making;
- Foundry;
- Plastics.

The Industrial Vehicles division produces complete refuelling systems including caps, filler necks, filters, and related accessories for fuel and urea tanks, providing original equipment, aftermarket service, and special item sub-supplies for cars, motorcycles, tractors, and earthmoving machinery intended for automotive and agricultural sectors.

The tool making division, since 2000, designs and manufactures molds for FARMA products and operates in the market of construction and maintenance of die-casting equipment (molds) and custom tools, offering specialized assistance to identify and implement the best solutions according to the various applications involved.

The foundry division, acquired in 1992, boasts extensive experience in the use of die-casting machines. It produces high-quality and complex zamak components intended for many sectors, such as automotive, windows and doors, hydraulics, medical, food, and electronics.

The Plastics division, established in 2014, manufactures plastic component moulding for the Industrial Vehicles division and customers, ensuring a high-quality standard. Additionally, it provides co-moulding services with various materials.

### **1.3 OUR VALUE SYSTEM**

Values and the Code of Ethics: together with Mission and Vision, they constitute FARMA's value system. The inspiring principles, but also the indication of concrete behaviours that the entire Company, starting from its Directors and Executives, must maintain toward stakeholders, both internal and external.

Values and Code of Ethics are important both for what is written in them and for the way they came to be written.

We present them together because they constitute a unified body. Values and Code of Ethics represent, in fact, our "internal Constitution" and, as such, a guide for daily action.

The objective is to increase ethical sensitivity and responsible behaviours of each individual.

Particular attention and commitment are dedicated to dissemination, knowledge, and training of people. This alone is not enough. Therefore, it is provided that those who violate the Code of Ethics may be reprimanded and sanctioned. Hence the possibility of recourse to the Supervisory Body, through the reporting of behaviours deemed non-compliant.

#### **1.3.1 MISSION**

We design and manufacture innovative and sustainable refuelling systems for mobility, components in light alloys and plastics.

#### **1.3.2 VISION**

To continue growing while remaining a reference point for customers.

---

### **1.3.3 VALUES**

The most important values for the Company's actions are inspired by five fundamental principles, with reference to which we commit together every day:

- Sustainability, which we specifically define as attention to the environment, promotion of health and safety, economic sustainability, promotion of more efficient processes;
- Enhancement of people, in the broad sense of skills development, involvement, equity, respect for personal rights, attention to health;
- Integrity, which we understand as honesty, correctness, fairness, consistency, transparency;
- Innovation, which we consider as continuous propensity toward new products, new business models, process improvement, research and development, and care for the ability to keep pace with market times;
- Customer orientation, which guides our care for meeting requests, operational responsiveness, problem-solving capability, speed of response, collaboration, assistance, risk management.

### **1.4 SCOPE OF APPLICATION AND RECIPIENTS OF THE CODE OF ETHICS**

This Code applies to FARMA. The principles and provisions of the Code of Ethics are binding, without any exception, for Directors, members of any other corporate body, Executives, Employees, Collaborators, subjects who act in the name and/or on behalf of the Company, and all those who, even if external to the Company, establish – directly or indirectly – a relationship, stable or temporary, with FARMA.

All the aforementioned subjects are hereinafter collectively defined as "Recipients". Recipients are, therefore, required to observe and, within their competence, to ensure compliance with the principles and provisions of this Code of Ethics.

Under no circumstances does the claim to act in FARMA's interest justify the adoption of behaviours contrary to what is provided in this document.

The Code of Ethics is valid both in Italy and abroad, while considering the cultural, social, economic, and regulatory diversity of the various countries where FARMA operates or should operate.

### **1.5 ETHICAL VISION**

FARMA aspires to maintain and develop the relationship of trust with its stakeholders, that is, with those categories of individuals, groups, or institutions whose contribution is required to realize FARMA's mission or who have an interest in the company's activities.

Stakeholders are those who make investments connected to FARMA's activities, primarily Shareholders and, therefore, Employees, Collaborators, Customers, Suppliers, Universities, Research Institutes, and FARMA partners.

In a broader sense, stakeholders are also all those individuals or groups, as well as the organizations and institutions that represent them, whose interests are influenced by the direct and indirect effects of FARMA's activities, such as local and national communities where FARMA operates (hereinafter "stakeholders" or "interest holders").

The pursuit of a correct and transparent relationship with stakeholders elevates, guarantees, and protects the Company's reputation in the social context in which it operates.

## **1.6 ETHICAL BEHAVIORS**

Ethical behaviour means the way of acting that realizes the company's value system defined in this Code.

Conversely, the behaviours of anyone, individual or organization, are not ethical and favour the assumption of prejudiced and hostile attitudes toward the enterprise if they:

- seek to appropriate the benefits of others' collaboration, exploiting positions of strength;
- violate the rules of civil coexistence and correct social and commercial relationships, as provided and regulated by current laws and regulations;
- operate contrary to the prescriptions of this Code.

In conducting business activities, unethical behaviours compromise the relationship of trust between FARMA and its stakeholders.

## **1.7 THE VALUE OF REPUTATION AND FIDUCIARY DUTIES**

Good reputation is an essential intangible resource for FARMA.

Externally, it favours social approval, relationships with institutions, attraction of the best human resources, customer loyalty, supplier confidence, reliability toward third parties in general.

Internally, it contributes to making and implementing decisions without friction and organizing work without bureaucratic controls and excessive exercises of authority.

The Code of Ethics clarifies FARMA's particular duties toward stakeholders (fiduciary duties).

## **1.8 THE VALUE OF RECIPROCALITY**

This Code of Ethics is based on an ideal of cooperation with a view to mutual advantage of the parties involved, respecting each one's role.

FARMA therefore requires that each stakeholder act toward it according to principles and rules inspired by a similar idea of ethical conduct.

## **1.9 CODE OF ETHICS AND LEGISLATIVE DECREE 231/01**

Legislative Decree of June 8, 2001, No. 231, titled "Regulation of administrative liability of legal entities, companies and associations even without legal personality, pursuant to art. 11 of law September 29, 2000, No. 300", introduced into the Italian legal system a regime of administrative liability for entities, for a series of specifically listed crimes, committed in their interest or advantage by natural persons who hold, even de facto, functions of representation, administration or direction, or subject to the direction or supervision of one of such subjects.

Article 6 of the mentioned decree establishes, however, that the entity is not responsible for such crimes, provided it demonstrates having adopted and effectively implemented, before the commission of the fact, "organizational and management models suitable to prevent crimes of the kind that occurred", within which the establishment of a control body is provided, internal to the entity itself, with the task of supervising the functioning, effectiveness and observance of the aforementioned models, as well as updating them.

The guidelines promulgated and subsequently updated by various associations highlight how an essential element of the organizational model adopted by entities pursuant to Legislative Decree No. 231 of 2001 is constituted by the Code of Ethics, understood as the entity's official document, approved by its top management, containing the set of rights, duties, responsibilities and behavioural rules of the entity toward the so-called "stakeholders", even independently and beyond what is provided at the regulatory level.

Furthermore, such guidelines identify some fundamental principles that must be contained in a Code of Ethics, in reference to behaviours relevant for the purposes of Legislative Decree No. 231/2001: a) the entity must have as an essential principle respect for laws and regulations in force in all countries where it operates; b) every operation and transaction must be correctly recorded, authorized, verifiable, legitimate, consistent and appropriate; c) the entity must adhere to a series of basic principles regarding relationships with the entity's interlocutors.

The adoption of the Code of Ethics is of central importance for the correct performance of business activities and constitutes – at the same time – an indispensable element within the control and prevention function of illegal acts that entities are called to perform pursuant to Legislative Decree No. 231/2001.

This Code of Ethics is an integral part of the Organization and Management Model adopted by the Company pursuant to Legislative Decree No. 231/2001.

## **1.10 THE STRUCTURE OF THE CODE OF ETHICS**

This Code of Ethics consists of this introduction and the following parts:

- general principles on relationships with stakeholders, which abstractly define the reference values in FARMA's activities;

- conduct criteria toward each class of stakeholders, which specifically provide the guidelines and norms to which FARMA Collaborators must adhere for compliance with general principles and to prevent the risk of unethical behaviours;
- implementation methods, which describe the reference structures for the application and revision of the Code of Ethics, the control system aimed at observance and improvement of the Code itself.

### **1.11 THE CONTRACTUAL VALUE OF THE CODE**

Observance of the Code's norms must be considered an essential part of the contractual obligations of FARMA Employees pursuant to and for the effects of articles 2104, 2105 and 2106 of the Civil Code (Diligence of the work provider, Duty of loyalty and Disciplinary sanctions). Violation of the norms of this Code damages the relationship of trust established with the Company and may lead to disciplinary actions and compensation for damages, without prejudice, for Employee workers, to compliance with the procedures provided by art. 7 of law 300/1970 (Workers' Statute), by collective labour contracts and by the disciplinary system applied by the enterprise.

## **2 GENERAL PRINCIPLES**

The following principles represent the fundamental values to which the recipients of the Code must adhere in pursuing the company mission. The provisions contained therein have primary and absolute value and under no circumstances does the conviction of acting to the company's advantage justify behaviours contrary to the principles of the Code itself.

### **2.1 LEGALITY**

The company has as an essential principle the respect for laws and regulations in force in Italy and in all countries where it operates. The recipients of the Code are required to comply with current regulations.

Under no circumstances is it permitted to pursue or realize the enterprise's interest in violation of laws.

This principle must be considered operative both with regard to activities carried out within Italian territory and those connected to relationships with international operators.

It also refuses involvement with subjects who exercise illegal activities or are financed with capital from illegal sources.

The company undertakes to ensure interested parties an adequate information and training program on the Code of Ethics.

## **2.2 RESPONSIBILITY**

In realizing the company mission, the behaviours of all recipients of this Code must be inspired by the ethics of responsibility.

Recipients must carry out their activities with loyalty and effectiveness, with full awareness of the direct and indirect effects that their work produces.

The Company undertakes to promote knowledge and enhance the effects of business processes for which employed human resources are responsible.

Each person's responsibility is greater the higher the authority they have and the discretion in choices. Consequently, the dissemination and implementation of this Code depend on everyone's commitment and, in particular, on those who hold the greatest decision-making power and whose behaviour is recognized as exemplary.

## **2.3 HONESTY**

All activities must be carried out in compliance with the principle of honesty, renouncing the pursuit of personal or corporate interests and the performance of acts that involve violation of current regulations, this Code of Ethics and internal regulations.

Situations must be avoided through which an employee, administrator or other Recipient can derive undue advantage and/or profit from opportunities known during and by reason of carrying out their activity.

Under no circumstances can the pursuit of FARMA's interest or advantage justify conduct not conforming to an honest line of conduct.

## **2.4 REPUDIATION OF ALL DISCRIMINATION**

In decisions that influence relationships with its stakeholders (relationships with shareholders, personnel selection and management, work organization, management of customers to serve, selection and management of suppliers, relationships with the surrounding community and the institutions that represent it), FARMA avoids any discrimination based on age, sex, sexuality, health status, race, nationality, political opinions and religious beliefs of its interlocutors.

## **2.5 CORRECTNESS AND PREVENTION OF CONFLICTS OF INTEREST**

In conducting any activity, one must always act in respect of the rights of interlocutors, commitments made and avoiding situations where subjects involved in transactions are, or may even appear to be, in conflict of interest.

This means both the case where a Collaborator pursues an interest different from the enterprise mission and from balancing stakeholder interests or personally advantages from the

---

enterprise's business opportunities, and the case where representatives of customers or suppliers, or public institutions, act contrary to fiduciary duties linked to their position, in their relationships with FARMA.

## **2.6 COHERENCE**

Each Recipient undertakes to implement daily and constantly, in any action, the values and operating principles of the Company.

## **2.7 TRANSPARENCY**

FARMA undertakes to ensure transparency in corporate management, communication and information.

All actions and operations must have adequate recording and it must be possible to verify the decision, authorization and performance process.

For each operation there must be adequate documentary support in order to be able to proceed, at any time, with controls that attest to the characteristics and motivations of the operation and identify who authorized, performed, recorded and verified the operation itself.

Communication, in addition to always following established procedures, must be simple, understandable, timely and truthful and - if made public - easily accessible to all.

The Company undertakes to provide complete, transparent, understandable and accurate information, so that stakeholders are able to make autonomous decisions aware of the interests involved, alternatives and consequences that may derive from relationships with the Company itself.

## **2.8 CONFIDENTIALITY**

FARMA ensures the confidentiality of information in its possession, avoiding improper use of such information, and refrains from seeking confidential data, except in case of express and conscious authorization and compliance with current legal regulations.

Furthermore, FARMA Collaborators are required not to use confidential information for purposes not connected with the exercise of their activity.

## **2.9 EFFICIENCY**

FARMA undertakes to carry out every work activity with optimization of resources employed, enhancing and not wasting them, whether they are human, material, technological, energy or financial.

**2.10 INVOLVEMENT AND ENHANCEMENT OF HUMAN RESOURCES**

FARMA Collaborators are an indispensable factor for its success and for the realization of its mission.

For this reason, FARMA promotes personnel involvement in achieving corporate objectives, recognizes people's professional contribution in a context of mutual loyalty and trust, enhances human resources in order to maximize their degree of satisfaction, improve and increase the heritage of competencies possessed by each Collaborator.

**2.11 PHYSICAL AND MORAL INTEGRITY OF THE PERSON**

FARMA protects the physical and moral integrity of its Collaborators, ensuring working conditions respectful of individual dignity and safe and healthy work environments. Suitable equipment is made available to workers with particular reference to careful evaluation and management of risks and an adequate training and education program updated over time.

Consequently, the Company adopts in the exercise of the enterprise the measures that, according to the particularity of the activity carried out, experience and technique are necessary to protect the physical integrity and moral personality of workers.

The Company, within the safety management system, sets and pursues continuous improvement objectives in the field of occupational health and safety.

FARMA recognizes the protection of occupational health and safety as fundamental and essential importance within the corporate organization.

The search for advantages for the Company, when they involve or may involve wilful or negligent violations of regulations regarding the protection of work safety and health, is never justified.

Requests or threats aimed at inducing people to act against the law and the Code of Ethics, or to adopt behaviours harmful to everyone's moral and personal convictions and preferences, are not tolerated.

**2.12 EQUITY OF AUTHORITY**

In managing relationships that involve establishing hierarchical relations - especially with Collaborators - FARMA undertakes to ensure that authority is exercised with equity and correctness, avoiding any abuse.

FARMA guarantees that authority does not transform into exercise of power harmful to the dignity and autonomy of the Collaborator, and that work organization choices safeguard the value of Collaborators.

### **2.13 QUALITY OF PRODUCTS AND SERVICES**

FARMA directs its action toward full satisfaction of its customers, listening to requests that can favour improvement of product and service quality.

It undertakes to ensure that products marketed and services provided to customers are characterized by predefined quality standards and - for areas of greatest importance - measurable with reference to objective targets.

Periodically, operating results are monitored and evaluated and serve as reference points for analysis and continuous improvement actions.

It undertakes to pursue quality improvement and innovation of products and services, dedicating attention and resources to the use of advanced technologies and innovative techniques.

### **2.14 FAIR COMPETITION**

The phenomenon of competition, when correct and fair, leads to maximization of social utility through economic optimization.

FARMA intends to develop the value of fair competition, adopting principles of correctness, fair competition and transparency toward both all operators present in the market and all resources within the company.

### **2.15 SOCIAL RESPONSIBILITY**

FARMA is aware of the influence, even indirect, that its activities can have on conditions, economic and social development and general well-being of the community, as well as the importance of social acceptance by the communities where it operates.

For this reason, FARMA intends to conduct activities aimed at achieving the corporate purpose in function of social appreciation, in respect of local and national communities, and support initiatives of cultural and social value in order to obtain improvement of its reputation and social acceptance.

### **2.16 ENVIRONMENTAL PROTECTION AND SUSTAINABLE DEVELOPMENT**

The environment is a primary good that FARMA intends to safeguard, in carrying out its activities, for the benefit of the community and future generations. To this end, it undertakes to respect applicable regulations and prescriptions related to environmental authorizations.

FARMA manages its processes with environmental protection and efficiency criteria through identification, monitoring and control of environmental aspects, as well as through rational use of energy resources and minimization of emissions, according to a development model

---

compatible with the territory and environment, also considering the relevance of risks related to climate change in context analysis.

FARMA, within the environmental management system, sets and pursues continuous environmental improvement objectives, following environmental risk assessment and measurement of its performance.

## **3 CONDUCT CRITERIA**

### **3.1 GENERALLY APPLICABLE CONDUCT CRITERIA**

The conduct criteria that commit all Recipients in carrying out business activities in general are indicated here, that is, toward all categories of stakeholders.

They must therefore be understood as always applicable, in addition to the conduct criteria specifically indicated in reference to relationships with a single category of stakeholders.

#### **3.1.1 INFORMATION HANDLING**

##### ***3.1.1.1 Transparency and correctness of information***

Each Recipient must ensure, within their competence and knowledge, truthfulness, transparency, accuracy and completeness of documentation and information provided in carrying out activities within their competence.

FARMA condemns any behaviour aimed at altering the correctness and truthfulness of data and information contained in financial statements, reports or other corporate communications required by law and directed to shareholders, the public, Control Authorities, the Board of Auditors and auditors, where present.

All subjects who participate in the formation of the aforementioned acts, and in particular the members of administrative bodies and senior management of FARMA, are required to verify, with due diligence, the correctness of data and information that will then be incorporated for the drafting of the acts indicated above and to provide such data and information in a timely manner.

The Company, through its bodies and delegated subjects, ensures maximum transparency and attention to the relationship with the audit body.

##### ***3.1.1.2 Confidentiality of information***

The Company guarantees correct management of confidential information, ensuring strict compliance with current regulations and corporate procedures and requires each Recipient to maintain absolute secrecy on any confidential information concerning FARMA of which they become aware in carrying out their duties or during the fulfilment of contractual obligations.

**3.1.1.3 Information protection and personal data protection**

Stakeholder information is processed by FARMA in respect of confidentiality and privacy of interested parties, reference regulations and corporate procedures.

FARMA, in carrying out its activity, protects personal data of collaborators and third parties, avoiding any improper use of such information, in compliance with reference regulations and corporate procedures.

Collaborators who carry out personal data processing operations and data processing managers are officially identified and appointed. FARMA verifies their correct operation.

To this end, specific policies and procedures for information protection are applied and constantly updated; in particular FARMA:

- defines an organization for information processing that ensures correct separation of roles and responsibilities;
- classifies information by increasing levels of criticality, and adopts appropriate countermeasures in each phase of processing;
- subjects third parties involved in information processing to signing confidentiality agreements;
- informs its personnel and external managers regarding data processing methods and criticality of processed information;
- adopts data safeguarding, maintenance and conservation policies;
- adopts hierarchical authorization criteria and information visibility.

Each Recipient is required to ensure maximum confidentiality regarding any news learned in carrying out their activities, also to safeguard the company's technical, financial, legal, administrative and management heritage.

In particular, each Recipient is required to:

- acquire and process only information and data necessary for the purposes of their body or function;
- acquire and process such information and data exclusively within the limits established by procedures adopted in the matter;
- store data and information in a way that prevents them from becoming known to unauthorized subjects.

The Company undertakes to avoid any improper use or undue dissemination of all information - of any nature or subject - of which it becomes aware in carrying out activities, with particular attention to ensure that data subject to processing are managed in compliance with current regulations.

**3.1.2 GIFTS, PRESENTS AND BENEFITS**

No form of gift is permitted that could even be interpreted as exceeding normal commercial or courtesy practices, or in any case aimed at acquiring favourable treatment in conducting any activity connected to FARMA.

It is specified that by gift is meant any type of benefit (such as - by way of example - free participation in conferences, the promise of a job offer).

This rule concerns both gifts promised or offered and those received and admits no exceptions even in those countries where offering valuable gifts to commercial partners is customary.

The Company refrains from practices not permitted by law, commercial practices or ethical codes, if known, of companies or entities with which it maintains relationships.

In particular, any form of gift to any counterpart is prohibited, including government representatives, public officials or public service appointees, or their family members, which could influence independence of judgment or induce to ensure any advantage.

FARMA's presents are characterized by being aimed at promoting the Company's brand image.

Gifts offered, except those of modest value, must be:

- previously communicated to the manager of the function involved;
- expressly authorized by the manager of the function involved, after communication to the Supervisory Body by the function manager;
- adequately documented to allow verification.

All Recipients who receive presents or benefits not provided for by permitted cases are required, according to established procedures, to communicate this to FARMA's Supervisory Body which evaluates appropriateness and communicates FARMA's policy on the matter to the sender.

The management of gifts, presents and benefits is regulated by specific Internal Regulation.

**3.1.3 EXTERNAL COMMUNICATION**

FARMA's communication to its stakeholders (including through mass media) is based on respect for the right to information; under no circumstances is it permitted to disclose false or biased news or comments.

All communication activities comply with laws, rules, and professional conduct practices, and are carried out with clarity, transparency, and timeliness.

To ensure completeness and consistency of information, FARMA's relationships with mass media may only be maintained under the coordination of the designated function.

### **3.1.4 ACCOUNTING RECORDS AND INTERNAL CONTROLS**

#### ***3.1.4.1 Transparency and Accuracy of Accounting Records***

Accounting records must be transparent and based on truthful, accurate, and complete information to ensure the reliability of the administrative-accounting system and the correct representation of the Company's economic, financial, and asset position in internal documents, financial statements, and other corporate communications, as well as in information directed to stakeholders. All Recipients are required to collaborate so that management data is correctly and promptly represented in the accounting records.

Accounting evidence must be based on precise and verifiable information and must fully comply with internal accounting procedures.

All accounting records must accurately reflect what results from the corresponding supporting documentation, which must be carefully preserved for potential verification.

Every accounting transaction must be traceable and adequately documented, in compliance with regulations, good accounting practices, and company procedures, to allow for complete reconstruction at any time.

No false or artificial accounting entries may be entered in the Company's accounting records for any reason. No Collaborator may engage in activities that result in such an offense, even if requested by a superior.

Annual financial statements strictly comply with the general principles of true and fair representation of the financial, economic, and asset position in accordance with current regulations.

Valuation criteria refer to civil law regulations and generally accepted accounting standards.

Personnel who must prepare estimates necessary for financial statement purposes must operate with prudential criteria, supported by knowledge of accounting techniques or more specific techniques of the relevant sector, and in any case with the diligence required of sector experts.

Recipients who are involved in any capacity in the preparation of statements that report the Company's economic, financial, and asset situation, intended for Shareholders or third parties, are prohibited from presenting information that does not correspond to the truth, or from omitting information and concealing data in violation of accounting principles, regulations, and internal procedural rules.

The Recipients of this Code undertake to refrain from any behaviour, active or omissive, that directly or indirectly violates the regulatory principles and/or internal procedures pertaining to the formation of accounting documents and their external representation. In particular, the Recipients of this Code undertake to ensure that every operation and transaction is promptly and correctly recorded in the company accounting system according to the criteria indicated

by law, applicable accounting principles, and duly authorized and verified according to company procedures.

The Recipients of this Code are also required to preserve and make available for every operation or transaction carried out - in accordance with applicable regulations - adequate supporting documentation in order to allow:

a) accurate accounting recording; b) immediate identification of underlying characteristics and motivations; c) easy formal and chronological reconstruction; d) verification of the decision, authorization, and implementation process, in terms of legitimacy, consistency, and appropriateness, as well as identification of different levels of responsibility.

Recipients who become aware of omissions, falsifications, or negligence in accounting records or supporting documentation must immediately notify their superior and the Supervisory Body.

#### ***3.1.4.2 Correctness in Maintaining Corporate Books***

The Company ensures the correct maintenance of corporate books in compliance with applicable legal regulations and statutory provisions.

#### ***3.1.4.3 Internal Controls***

The existence of an adequate internal control system is a value recognized by FARMA for the contribution that controls make to improving business efficiency, compliance with current regulations, and the principles of this Code.

Internal controls mean all instruments aimed at directing, managing, and verifying business activities, to ensure the achievement of business interests, compliance with laws and company procedures, protect company assets, efficiently manage activities, and provide accurate and complete accounting and financial data.

Every level of the organizational structure has the task of contributing to the realization of an effective and efficient internal control system. All FARMA Employees, within the scope of their functions, are responsible for defining and ensuring the proper functioning of the company's control system. They are required to communicate to their superior and to the Supervisory Body any omissions, falsifications, or irregularities of which they become aware.

In carrying out business activities, the application of the principle of separation of functions must be pursued, with particular reference to controlled and controller activities.

Every operation and transaction must be carried out in compliance with current regulations and must be correctly recorded, authorized, verifiable, legitimate, consistent, and appropriate.

Each operation and transaction must be supported by adequate documentation that allows for controls to be carried out at any time that attest to the characteristics and motivations of the

operation and identify the subjects who carried out, recorded, and verified the operation itself.

The Company ensures shareholders, corporate bodies with control powers, external subjects in charge of accounting auditing, and the Supervisory Body free access to data, documentation, and any information useful for carrying out their activities.

#### ***3.1.4.4 Regulated Management of Financial and Asset Resources***

The use of the Company's asset and financial resources must be regulated by procedures that allow maximum transparency, require periodic reporting, and permit controls to be carried out at any time to identify who authorized, carried out, recorded, and verified each individual operation.

#### **3.1.5 FINANCIAL INTEGRITY AND ANTI-FRAUD**

FARMA undertakes to carry out all economic operations and financial transactions observing the principles of integrity and transparency and, in any case, not to carry out any fraudulent operation or transaction. Also for this reason, every operation and transaction must be correctly authorized, verifiable, legitimate, consistent, and appropriate.

#### **3.1.6 TAX AND FISCAL COMPLIANCE**

The Company promotes the dissemination and development of a corporate culture based on the management and prevention of tax risk, as well as based on the principles of honesty, correctness, transparency, and full compliance with laws and regulations regarding tax and fiscal matters.

Specifically, the Company ensures compliance with tax and fiscal regulations and company procedures in all activities aimed at fulfilling obligations in these areas, such as the preparation of declarations relating to income taxes or value-added tax, the preparation of financial statements, reports, or corporate communications required by law.

In managing relationships with Italian and foreign Tax Authorities, the Company undertakes to maintain a collaborative and transparent attitude, to ensure constructive relationships and minimize any disputes.

#### **3.1.7 ANTI-CORRUPTION**

FARMA rejects corruption as an instrument for conducting its business. Under no circumstances is it permitted to corrupt or even attempt to corrupt holders of elected public offices, public officials or persons in charge of public services, as well as private individuals.

The Corporate Bodies, Managers, Employees, and Collaborators undertake to comply with all national and international rules and provisions regarding anti-corruption.

**3.1.8 PROTECTION OF INDUSTRIAL AND INTELLECTUAL PROPERTY**

FARMA is aware of the importance of industrial and intellectual property. For this reason, it respects and protects the content of every form of industrial and intellectual property, whether it involves copyrights, patents, trademarks, trade secrets, or other intangible assets.

All activities carried out by FARMA are managed in compliance with current national and supranational regulations regarding the protection of trademarks and other distinctive signs, as well as patents, models, and designs.

The Company undertakes to disseminate and consolidate among all its Employees, Collaborators, and suppliers a culture of protection of trademarks and other distinctive signs, as well as patents, models, and designs belonging to others, prohibiting, pursuing, and condemning every form of counterfeiting, alteration, and improper use thereof.

All Recipients must respect the legitimate industrial and intellectual property rights of third parties and refrain from unauthorized use of such rights, aware that violation thereof may have consequences for the Company.

In particular, Recipients, in carrying out their activities, must refrain from any conduct that may constitute usurpation of industrial property titles, alteration or counterfeiting of distinctive signs of industrial products, trademarks and patents, designs or industrial models, both national and foreign, as well as refrain from importing, marketing, or otherwise using or putting into circulation industrial products with counterfeited or altered distinctive signs or made by usurping industrial property titles.

All Recipients must refrain from using illegally and/or improperly, in their own interest, corporate interest, or that of third parties, works of intellect (or parts thereof) protected under regulations regarding copyright infringement.

Each Recipient undertakes to protect the industrial and intellectual property rights owned or used by FARMA.

**3.1.9 REPUDIATION OF ALL FORMS OF TERRORISM**

FARMA repudiates all forms of terrorism and does not establish any employment or commercial relationship with subjects, whether natural or legal persons, involved in acts of terrorism, just as it does not finance or otherwise facilitate any activities of these.

**3.1.10 PROTECTION OF INDIVIDUAL PERSONALITY**

FARMA recognizes the need to protect individual and personal freedom and repudiates any act that favours phenomena involving exploitation of persons, such as child labour, forced labor (the employment of workers recruited through coercion, force, or blackmail), prostitution and/or child pornography.

**3.1.11 PROTECTION OF TRANSPARENCY IN COMMERCIAL TRANSACTIONS (ANTI-MONEY LAUNDERING)**

With reference to the principle of maximum transparency in commercial transactions, FARMA provides the most appropriate instruments to combat money laundering and receiving stolen goods phenomena.

Compliance with the principles of correctness, transparency, and good faith in relationships with all contractual counterparts must be guaranteed.

Therefore, the Company undertakes to:

- a) preventively verify information available on commercial counterparts, suppliers, partners, and consultants, in order to ascertain their respectability and the legitimacy of their activity before establishing business relationships with them;
- b) operate in such a way as to avoid any implication in operations suitable, even potentially, to favour money laundering from illicit or criminal activities, acting in full compliance with anti-money laundering regulations and internal control procedures.

Before establishing relationships or entering into contracts with suppliers and other subjects in long-term business relationships, Managers, Employees, and Collaborators must ensure the moral integrity, reputation, and good name of the counterpart. Legality protocols and integrity pacts constitute preferential instruments of relationship with the Company.

In any case, each Recipient is prohibited from accepting any requests that could raise suspicion of an attempt to legalize proceeds from illicit activities.

**3.1.12 COMBATING ORGANIZED CRIME**

FARMA condemns and combats, with all instruments at its disposal, any form of organized crime, including mafia-type crime.

FARMA undertakes to always verify the honourability and reliability requirements of every commercial counterpart such as, for example, suppliers, agents, consultants, clients, partners (including those involved in business partnerships), both in the phase preceding the establishment of the relationship and during the course of the same, by requesting information and carrying out the related controls necessary to ascertain their moral integrity, respectability, reliability, and legitimacy of the activities carried out.

All Recipients are required to adopt every possible precaution in order to prevent the risk of criminal infiltrations within the activities managed by the Company.

**3.1.13 RELATIONS WITH COMPETING ENTITIES AND COMPANIES**

The Company undertakes not to implement behaviours in contrast with national and community provisions protecting free competition, with particular reference to the use of violence, threats, or fraudulent means to obtain a commercial advantage.

It is also forbidden to employ illicit means to acquire confidential information from other operators, as well as to hire Employees of other entities or companies for the sole purpose of obtaining confidential information.

**3.1.14 RELATIONS WITH INTERNATIONAL OPERATORS**

All relationships, including those of a commercial nature, between FARMA and subjects operating at an international level, must take place in full compliance with current laws and regulations, with the objective of preventing the danger of committing transnational criminal offenses.

In this regard, FARMA undertakes to adopt all necessary precautions to verify the reliability of such operators, as well as the legitimate origin of the capital and means used by them in the context of relationships with the Company. Within the limits of its possibilities, furthermore, FARMA undertakes to collaborate, with correctness and transparency, with Authorities, including foreign ones, which may request information or conduct investigations regarding the relationships between FARMA and international operators.

**3.1.15 EMPLOYMENT OF PERSONS IN COMPLIANCE WITH IMMIGRATION LAWS**

The Company, in compliance with the principle of legality, considers the employment of only workers who are fully compliant with current immigration laws to be non-negotiable.

Recipients are required to:

- not employ persons of non-EU origin who are not in compliance with current provisions regarding residence permits and/or who cannot present a valid residence permit;
- require all suppliers called upon to provide services or work in accordance with regulatory provisions adopted by the Company to use exclusively personnel of non-EU origin who are in compliance with current provisions regarding residence permits and/or who can present a valid residence permit.

**3.1.16 COMBATING SMUGGLING**

The Company firmly condemns all forms of smuggling and prohibits conducting business with subjects implicated in any capacity in smuggling affairs or who, in any case, do not comply with regulatory provisions in the matter.

Any relationships with the Customs Agency must be based on the principles of correctness, maximum collaboration, and transparency.

## **3.2 CONDUCT CRITERIA IN RELATIONS WITH SHAREHOLDERS**

### **3.2.1 SHAREHOLDERS**

A FARMA shareholder is anyone who owns capital shares in the Company.

### **3.2.2 RELATIONSHIP WITH SHAREHOLDERS**

FARMA pursues a policy aimed at ensuring its shareholders have access to information necessary for exercising their rights in compliance with applicable laws and regulations.

Therefore, FARMA commits to ensuring that all shareholders receive equal access to information, thus promoting widespread and informed participation of shareholders in decisions within their competence.

### **3.2.3 ENHANCEMENT OF SHAREHOLDER PARTICIPATION AND SUSTAINABILITY**

FARMA directs its activities toward the satisfaction and protection of its shareholders, working to ensure that economic performance is sufficient to safeguard and increase the value of the enterprise, with the aim of enhancing the benefits that shareholders derive from their participation in the Company.

### **3.2.4 PROTECTION OF CORPORATE ASSETS**

Available resources must be employed, in compliance with applicable laws, the Articles of Association, and this Code, to increase and strengthen corporate assets for the protection of the company itself, capital holders, creditors, and the market.

To guarantee the integrity of capital, it is prohibited, except in cases where the law expressly permits it, to return contributions in any form or release shareholders from the obligation to make them, or to distribute profits not actually achieved or legally reserved.

### **3.2.5 CORPORATE GOVERNANCE**

FARMA adopts a Corporate Governance system based on full compliance with the rules established by the Articles of Association, Internal Regulations, applicable national and European legislation, as well as national and international best practices in this area.

The corporate governance system is oriented toward:

- The application of good management principles in order to increase FARMA's reliability, for the protection of shareholders and other interested parties;
- The maximization of enterprise value in the medium to long term, in order to increase benefits to shareholders and future generations;
- The distribution of benefits according to statutory provisions;
- The respect of shareholders' rights;

- The control of business risks;
- Socially responsible management;
- The safeguarding of corporate assets.

The exercise of corporate governance at FARMA is inspired by diligence and is incompatible with the exploitation, for personal or group purposes, of superior information available compared to shareholders.

FARMA shareholders are committed to respecting decisions made by governing bodies in accordance with the powers conferred upon them.

### **3.2.6 ACTIVITIES OF CORPORATE BODY MEMBERS AND SENIOR EXECUTIVES**

The activities of corporate bodies are based on full compliance with the rules established by the Articles of Association, Internal Regulations, and applicable national and European legislation.

In particular, corporate bodies must:

- Ensure behaviour inspired by autonomy, independence, and integrity in relationships with both public institutions and private parties (including corporate creditors, economic associations, and national and international operators);
- Maintain behaviour inspired by integrity, loyalty, and sense of responsibility toward the Company;
- Guarantee consistent and informed participation in meetings and activities of corporate bodies;
- Refrain from acting in situations of conflict of interest within their activities;
- Facilitate control and/or audit activities by shareholders, corporate bodies, the Supervisory Board, and the auditing firm;
- Make confidential use of information acquired in their official capacity, avoiding using their position to obtain personal advantages. External communications must comply with laws and safeguard price-sensitive information and that covered by industrial secrecy;
- Respect, within their competence and within the limits of their responsibilities, the conduct standards established for Employees and Collaborators in the section "Conduct criteria in relations with Employees and Collaborators."

The members of FARMA's Corporate Bodies and Senior Executives are required to comply with this Code.

Every Senior Executive and every Function Manager must:

- Ensure compliance with this Code by their direct subordinates;
  - Represent through their behaviour an example for their Collaborators;
  - Work to ensure that Collaborators understand that the provisions contained in this Code constitute a contractual duty and an integral part of their work performance;
-

- Select Employees and Collaborators, also in compliance with immigration regulations for workers from third countries, who commit to respecting the principles contained in the Code of Ethics;
- Report promptly to the Supervisory Board any reports or needs from their subordinates.

All members of Corporate Bodies, as well as FARMA's Executives, may maintain relationships or contract obligations with the Company they administer, manage, or control only in compliance with general and sector legislation, statutory provisions, and related internal regulations.

### **3.3 CONDUCT CRITERIA IN RELATIONS WITH EMPLOYEES AND COLLABORATORS**

#### **3.3.1 EMPLOYEES AND COLLABORATORS**

In this Code, Employee or Collaborator is defined as any person who, regardless of the legal qualification of the relationship, maintains a working relationship with FARMA aimed at achieving the Company's objectives.

#### **3.3.2 PERSONNEL SELECTION**

The evaluation of personnel to be hired is carried out based on the correspondence between candidates' profiles and expected profiles and company needs, ensuring equal opportunities for all interested parties. Information requested during the selection and hiring phase is strictly connected to verifying aspects provided for in the professional and psycho-aptitudinal profile, while respecting the candidate's private sphere and opinions. During the selection and hiring phases, the designated evaluation committee, within the limits of available information, adopts behaviours to avoid favoritism, nepotism, or forms of clientelism. The Company undertakes not to favour in any way candidates recommended by third parties, particularly those belonging to Public Administrations. In case of candidate recommendations to Function managers or Employees by members of Public Administrations, immediate notification shall be given to the Supervisory Body, which will proceed with appropriate investigations. Should candidates recommended by the aforementioned parties prove suitable to hold a position within the Company, their hiring must nonetheless be authorized in advance and in writing by the Supervisory Body.

#### **3.3.3 ESTABLISHMENT OF THE EMPLOYMENT RELATIONSHIP**

Personnel are hired with regular employment contracts; no form of non-compliant work or work that circumvents current regulations is tolerated. Upon establishment of the employment relationship, each Collaborator receives accurate information regarding:

- characteristics of the function and tasks to be performed;
-

- regulatory and remuneration elements, as regulated by the applicable national collective labour agreement;
- rules and procedures to be adopted in order to avoid possible health and environmental risks associated with work activities;
- this Code of Ethics. Such information is presented to the Collaborator in such a way that acceptance of the assignment is based on effective understanding of the same.

### **3.3.4 PERSONNEL MANAGEMENT**

#### ***3.3.4.1 Personnel evaluation***

FARMA avoids any form of discrimination against its Collaborators. Within personnel management and development processes, as well as during the selection phase, decisions made are based on the correspondence between expected profiles and profiles possessed by Collaborators (for example in case of promotion or transfer) and/or on the basis of merit considerations (for example assignment of incentives based on results achieved). Access to roles and positions is also established in consideration of competencies and capabilities; furthermore, compatible with general work efficiency, those flexibilities in work organization that facilitate the management of maternity status and generally childcare are favoured. The evaluation of Collaborators is carried out in a comprehensive manner involving managers, the function responsible for personnel management and, as far as possible, parties who have come into contact with the person being evaluated. Within the limits of available information and privacy protection, the function responsible for personnel management operates to prevent favouritism, forms of clientelism or forms of nepotism.

#### ***3.3.4.2 Dissemination of personnel policies***

Personnel management policies are made available to all Collaborators through corporate communication tools.

#### ***3.3.4.3 Enhancement and training of resources***

Managers fully utilize and enhance all professional skills present within FARMA, taking action to favour the development and growth of their Collaborators (for example, through job rotation, pairing with expert personnel, experiences aimed at covering positions of greater responsibility). In this context, communication by managers of the Collaborator's strengths and weaknesses is particularly important, so that the latter can strive to improve their competencies also through targeted training. FARMA, with the aim of enhancing specific competencies and preserving the professional value of personnel, makes available to all Collaborators the informational and training tools necessary for this purpose. The Company, within personnel training processes, establishes training courses in which selected Employees must participate mandatorily. Such courses are aimed at providing personnel with complete training and information on areas of interest. The Company makes available to each employee all documentation necessary to train and inform personnel on procedures and rules relevant to the work position.

#### **3.3.4.4 Management of Collaborators' working time**

Each manager is required to make the most of Collaborators' working time by requesting performances consistent with the exercise of their duties and with work organization plans. Requesting performances, personal favours or any behaviour that constitutes a violation of this Code of Ethics as an act owed to the hierarchical superior constitutes abuse of position of authority.

#### **3.3.4.5 Involvement of Collaborators**

The involvement of Collaborators in carrying out work is favoured, also by providing moments of participation in discussions and decisions functional to achieving corporate objectives. The Collaborator must participate in such moments with a spirit of collaboration and independence of judgment. Listening to various points of view, compatible with corporate needs, allows the manager to formulate final decisions; the Collaborator must, however, always contribute to the implementation of established activities.

### **3.3.5 INTERVENTIONS ON WORK ORGANIZATION**

In case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and/or professional requalification actions. FARMA adheres to the following criteria:

- the burdens of work reorganization must be distributed as uniformly as possible among all people, consistently with the effective and efficient exercise of the activity;
- in case of new or unforeseen events, which must nonetheless be made explicit, the Collaborator may be assigned to different tasks compared to those previously performed, taking care to safeguard their professional competencies.

### **3.3.6 SAFETY AND HEALTH**

FARMA commits to spreading and consolidating a safety culture by developing risk awareness, promoting worker involvement and responsible behaviours by all Collaborators, organizing proactive improvement meetings for each sector.

FARMA promotes its health and safety policy through the following tools:

- compliance with legislation and regulations;
  - safety organization according to standards provided by current laws and applicable international voluntary standards, directed at continuous improvement;
  - adequate information, training and instruction to personnel in relation to the task performed and the results of risk assessment, with particular reference to safety procedures;
  - periodic system of monitoring and analysis of safety-related KPIs and verification of the progress of corporate actions in terms of impact on workers' health and safety.
-

The Company operates to preserve, with preventive actions, workers' health and safety, as well as the interest of other stakeholders. To this end, it implements technical and organizational interventions through:

- the introduction of an integrated risk and safety management system aimed at identifying the main critical aspects of processes and resources to be protected;
- the adoption of the best technologies;
- the adoption of formal work procedures;
- the control and updating of work methodologies;
- the provision of training and communication interventions;
- constant dialogue with RLS, RSPP, competent physician, unions and workers.

### **3.3.7 INTEGRITY AND PROTECTION OF THE PERSON**

The moral integrity of Collaborators is protected by guaranteeing the right to working conditions respectful of human dignity. For this reason, FARMA safeguards workers from acts of psychological violence, and counters any discriminatory attitude or behaviour that is harmful to the person, their convictions and their preferences (for example, in case of insults, threats, isolation or excessive intrusiveness, professional limitations).

### **3.3.8 PRIVACY PROTECTION**

The Collaborator's privacy is protected by adopting standards – in compliance with current regulations on the matter – that specify the information that the company requires from the Collaborator and the related methods of processing and storage. Any investigation into ideas, preferences, personal tastes, political or religious beliefs and, in general, the private life of Collaborators is excluded. Such standards also provide for the prohibition, except for cases provided by law, of communicating/disseminating personal data without prior consent of the interested party and establish the rules for the control, by each Collaborator, of the rules protecting privacy.

### **3.3.9 DUTIES OF COLLABORATORS**

#### ***3.3.9.1 Conduct Obligations***

Collaborators must act with loyalty in order to comply with the obligations set out in their employment contract and with the provisions of the Code of Ethics, ensuring the required performance is delivered.

#### ***3.3.9.2 Information Management***

Collaborators must be familiar with and implement the company's information security policies to ensure the integrity, confidentiality, and availability of information. They are required to prepare their documents using clear, objective, and comprehensive language, enabling possible checks by colleagues, supervisors, or authorized external parties upon request.

### **3.3.9.3 Conflict of Interest**

A conflict of interest arises when personal interests or activities concretely, or even potentially, impair the ability to act in FARMA's best interest.

All FARMA collaborators must refrain from any actions or behaviours that may be in conflict or competition with FARMA's activities, goals, or interests, and must avoid any activities or decisions that may involve, directly or indirectly, their own or third-party interests—whether financial or otherwise—to the detriment or disadvantage of the company.

By way of example, but not limited to, the following situations may give rise to a conflict of interest:

- Holding interests—including financial and economic ones (such as shareholdings or professional assignments)—with suppliers, customers, or competitors, even through family members, that may influence one's professional activity for FARMA;
- Managing relationships with suppliers or engaging in work activities, even through a family member, for suppliers;
- Accepting money or favours from individuals or companies that have or seek business relationships with FARMA;
- Managing relationships with external stakeholders (including but not limited to clients, suppliers, banks) without formal authorization and without prior notification to one's direct manager and the Supervisory Body;
- Gaining a personal, financial or non-financial, advantage through the access and improper use of information;
- Disclosing confidential information regarding FARMA's activities—even during informal meetings—before the company has officially communicated such information;
- Exploiting one's position or role to obtain a personal benefit of any kind that conflicts with FARMA's interests.
- If a Collaborator finds themselves in a situation that could even potentially constitute a conflict of interest, they must refrain from engaging in the activity and promptly notify their Manager in advance (that is, the head of the office and/or organizational unit under whose direction they operate, or their direct hierarchical superior if they are an employee, or the person they report to if they are a collaborator). The Manager shall, in accordance with established procedures, inform FARMA's Supervisory Body, which will assess the actual presence of a conflict of interest on a case-by-case basis.
- Furthermore, and in accordance with the applicable employment contract, the Collaborator is required to inform their Manager and the Supervisory Body of any activities carried out outside the scope of their employment if such activities may appear to conflict with FARMA's interests and/or may compromise the collaborator's physical or psychological integrity.

### **3.3.9.4 Use of Company Assets**

Each Collaborator is required to act diligently to safeguard company assets through responsible conduct and in accordance with the operating procedures established to regulate their use, accurately documenting their utilization.

---

Each Collaborator is responsible for protecting and preserving the company's property, particularly that which has been entrusted to them, and must use it appropriately and in alignment with company interests. They are also obliged to promptly inform the relevant corporate units of any threats or harmful events affecting FARMA.

In particular, each Collaborator must:

- Use the assets entrusted to them with care and frugality;
- Avoid improper use of company assets that could cause damage or reduce efficiency, or that may in any way be contrary to the company's interests;
- Refrain from unauthorized personal use of company assets.

With regard to IT applications provided by the company for work-related purposes, each Collaborator is required to:

- Strictly adhere to the company's IT security policies, procedures, and any other regulatory instruments;
- Avoid compromising the functionality or security of IT systems;
- Not disclose passwords or access codes under any circumstances;
- Not access third-party IT systems without authorization;
- Refrain from any conduct aimed at damaging or destroying IT systems or information;
- Not unlawfully duplicate software installed on company computers;
- Avoid sending threatening or offensive emails, using inappropriate language, or making comments that could offend individuals or damage the company's image;
- Avoid browsing websites with indecent or offensive content, or otherwise unrelated to professional activities.

FARMA reserves the right to prevent misuse of its assets and infrastructure through any form of data monitoring and operational control systems, as well as risk analysis and prevention tools, while complying with all applicable data privacy and labour laws (e.g., privacy regulations and workers' statute).

### ***3.3.9.5 Confidentiality of Information and Knowledge***

All Collaborators are required to maintain the confidentiality of any information acquired as part of their professional duties.

Information, knowledge, and data acquired or developed by employees during their work or through their assigned tasks belong to FARMA and may not be used, communicated, or disclosed without specific authorization from a superior.

Collaborators must not disclose confidential information or trade secrets to unauthorized third parties, even after the termination of their employment contract. It is also strictly forbidden to use, either directly or indirectly, confidential company information for personal gain or for the benefit of third parties, or to the detriment of FARMA, even after the end of the employment relationship. Likewise, it is expressly prohibited to remove information or data for purposes inconsistent with company goals or for use after the termination of the employment relationship.

***3.3.9.6 Confidential Information About Third Parties***

FARMA Collaborators must refrain from using unlawful means to obtain confidential information about third-party companies or entities.

Anyone who becomes aware of confidential information about third parties in the context of a contractual relationship must use such information solely as permitted by the contract.

Without proper authorization, individuals may not request, receive, or use confidential information concerning third parties. If a Collaborator comes into possession of confidential information about another party that is not already protected by a non-disclosure agreement or other confidentiality measures, they must report it to their supervisor to receive guidance on how to handle the information appropriately.

***3.3.9.7 Fair Competition Practices***

FARMA conducts its business based on fair and honest competition. The company is committed to fully complying with applicable competition laws and cooperating with market regulatory authorities.

Any form of collaboration with competitors involving pricing, marketing, customer or product lists, product or service development, sales areas or targets, market research, or proprietary/confidential information of FARMA may constitute an illegal act and expose the company to liability under applicable antitrust laws.

Therefore, employees are strictly prohibited from engaging with actual or potential competitors unless such interactions are expressly approved in advance by their supervisor and receive prior clearance from the Supervisory Body.

The company does not engage in unlawful or otherwise unfair conduct to obtain trade secrets, supplier lists, or information relating to competitors' infrastructure or other aspects of their operations.

***3.3.9.8 Participation in Antisocial and Criminal Activities***

The company firmly condemns all antisocial and criminal activities and clearly states its unwavering intent not to be involved in any such phenomena.

FARMA's Collaborators are strictly prohibited from maintaining any kind of relationship with organizations or individuals involved in antisocial or criminal activities that threaten society or the lives of citizens.

In the event of extortion attempts or demands by antisocial or criminal entities, individuals must categorically reject any compromise and refrain from making payments or offering any other form of benefit. They must instead promptly inform their supervisors to allow the necessary consultations with the company's general management.

**3.3.9.9 External Effectiveness**

Anyone acting on behalf of the Company who comes into contact with third parties with whom the Company intends to establish or is required to maintain relationships—whether institutional, social, political, or of any other kind—is obliged to:

- a) Inform such parties of the commitments and obligations imposed by the Code;
- b) Demand compliance with the obligations of the Code in the course of their activities.

**3.3.10 ADDITIONAL DUTIES FOR MANAGERS**

In addition to complying with the obligations applicable to all Collaborators, each company manager (defined as anyone who coordinates the work of others) is required to:

- a) Make the best use of Collaborators' working time by requesting tasks that are consistent with their roles and in line with organizational plans;
- b) Avoid any abuse of authority, where abuse is defined as any act required by a superior that results in personal favours or conduct that violates this Code;
- c) Lead by example through their own behaviour;
- d) Ensure their Collaborators comply with the Code;
- e) Actively help Collaborators understand that the rules set out in the Code are an integral part of their professional duties;
- f) Promptly report to the Supervisory Body any concerns, reports, or needs expressed by their Collaborators.

**3.4 CONDUCT GUIDELINES IN CUSTOMER RELATIONS****3.4.1 CUSTOMERS**

A customer is defined as any party who benefits from the Company's products or services in any capacity.

**3.4.2 IMPARTIALITY**

FARMA is committed to avoiding any form of arbitrary discrimination in its dealings with customers.

### **3.4.3 CONTRACTS AND COMMUNICATIONS WITH CUSTOMERS**

FARMA's contracts and communications with customers (including advertising messages) are:

- clear and simple, using language as close as possible to that commonly understood by the recipients;
- compliant with applicable laws, without resorting to deceptive or otherwise improper practices;
- complete, ensuring that no relevant element is omitted that could influence the customer's decision.

The purpose and target audience of each communication guide the selection of the most appropriate contact channels, avoiding excessive pressure or solicitation. FARMA is committed to refraining from the use of misleading or false advertising.

### **3.4.4 CONDUCT OF COLLABORATORS**

FARMA's approach to customer relations is characterized by helpfulness, respect, and courtesy, with the goal of fostering collaborative and highly professional relationships.

Accordingly, each Collaborator must:

- comply with internal procedures governing customer relations;
- provide services with efficiency and courtesy, within the contractual framework, ensuring they meet the expectations and needs of customers;
- offer accurate and comprehensive information regarding services, enabling customers to make informed decisions.

### **3.4.5 QUALITY MANAGEMENT**

FARMA is committed to ensuring adequate quality standards for the products and services it offers, based on predefined levels, and to monitoring perceived quality on a regular basis.

The Company undertakes periodic improvement initiatives, both in terms of organizational enhancements and improvements in working conditions, as well as efficiency in performance and cost control.

FARMA is attentive to customer satisfaction, requests, and expectations, with the objective of delivering innovative technological solutions and high-quality, reliable products and services.

### **3.4.6 CUSTOMER ENGAGEMENT**

FARMA is committed to responding promptly to customer suggestions and complaints, including those submitted through consumer protection associations, using appropriate and timely communication channels.

The Company ensures customers are informed upon receipt of their communications and provided with an estimated response time, which must in any case be brief.

### **3.5 CONDUCT GUIDELINES IN SUPPLIER RELATIONS**

#### **3.5.1 SUPPLIERS**

Suppliers are defined as those who provide goods, services, performances, and resources necessary for carrying out the Company's activities and delivering its services.

#### **3.5.2 SUPPLIER SELECTION**

The procurement of goods and services is guided by the pursuit of maximum competitive advantage for FARMA, granting equal opportunities to all suppliers and ensuring pre-contractual and contractual conduct based on mutual loyalty, transparency, and collaboration.

The supplier qualification system is based on the following principles:

- ensuring that any supplier meeting the required criteria has the opportunity to compete for contracts, using objective and documented criteria for shortlisting candidates;
- ensuring sufficient competition during the supplier selection process, typically by considering at least three candidates. Any exceptions must be duly authorized and documented;
- separating roles within the various stages of the procurement process, maintaining traceability and documentation of all decisions made;
- seeking new potential suppliers to broaden competition and enrich the supplier base;
- regularly assessing both existing and new suppliers to monitor the quality of their products and services;
- focusing on the highest professional standards, best practices in ethics, health and safety protection, and environmental compliance.

#### **3.5.3 SUPPLIER EVALUATION**

Supplier selection and monitoring procedures are based on objective and verifiable criteria, including economic convenience, technical capacity, reliability, material quality, and compliance with applicable Company procedures.

In dealings with suppliers, the Recipients of this Code may not accept any compensation, gifts, or preferential treatment that do not comply with the provisions of this Code and other relevant corporate regulations.

Recipients are obliged to inform their department manager and the Supervisory Body of any such offers received.

Likewise, it is forbidden to offer or provide suppliers with gifts or preferential treatment that contravene the provisions of this Code and related internal regulations.

If a supplier acts in a manner inconsistent with applicable laws, the general principles of this Code, or any relevant Company policies while carrying out activities on behalf of FARMA, the Company reserves the right to take appropriate measures, including excluding the supplier from future collaboration.

### **3.5.4 INTEGRITY AND INDEPENDENCE IN RELATIONS**

Relationships with suppliers are always governed by specific contracts and are subject to ongoing monitoring by the Company.

Contracts with suppliers must always be based on clear and transparent relations, avoiding, where possible, any form of dependency.

For example:

- contracts involving repeated or segmented performance (e.g., long-term agreements) with significant value must be constantly monitored;
- long-term projects should not, as a rule, be managed through short-term contracts that require continuous renewal and entail price revisions, nor through consulting contracts lacking adequate knowledge transfer clauses;
- it is inappropriate to induce a supplier to enter into an unfavourable contract by suggesting the promise of a more advantageous agreement in the future.

To ensure maximum transparency and efficiency in the procurement process, FARMA ensures:

- separation of roles between the requesting unit and the contracting unit;
- full traceability and documentation of procurement decisions;
- retention of contractual and accounting records for periods established by applicable laws and internal procedures;
- periodic analysis of any significant variances in usage trends related to key suppliers.

Additionally, FARMA maintains a system for monitoring the ownership structures of its suppliers to ensure transparency in relationships.

### **3.5.5 FAIRNESS IN CONTRACT MANAGEMENT**

Contract management with suppliers must be conducted with fairness, avoiding any possible abuse.

Depending on the circumstances, negotiations, and contract content, FARMA undertakes to inform suppliers in a correct and timely manner regarding the nature of the activity, payment terms and methods, in full compliance with current legislation and counterpart expectations.

Suppliers must perform their contractual obligations in accordance with the principles of fairness, correctness, diligence, and good faith, as well as in compliance with applicable laws.

### **3.5.6 PROTECTION OF ETHICAL PRINCIPLES IN SUPPLY RELATIONSHIPS**

Violations of the general principles set out in the Code of Ethics may result in sanctions, also aimed at preventing criminal conduct related to FARMA's activities.

To this end, specific contractual clauses are included in supplier agreements.

In particular, for suppliers located in "at-risk" countries as defined by recognized international organizations, contracts must include:

- a self-certification by the supplier affirming compliance with specific social obligations (e.g., measures guaranteeing respect for fundamental workers' rights, principles of equal treatment and non-discrimination, and prohibition of child labour);
- the possibility for FARMA to conduct inspections at the supplier's production facilities or operational sites to verify compliance with these requirements.

## **3.6 CONDUCT GUIDELINES IN RELATIONS WITH UNIVERSITIES AND RESEARCH INSTITUTES**

### **3.6.1 SCOPE OF APPLICATION**

Universities and Research Institutes are entities that carry out research in scientific and technological fields relevant to the Company's business.

Research is defined as the process—carried out in academic, industrial, or other contexts—for acquiring new knowledge and capabilities to develop new products, processes, or services, or to improve existing ones.

### **3.6.2 SELECTION AND QUALIFICATION OF THE ENTITY**

In dealings with representatives, officials, or employees of Universities, the Company undertakes not to establish privileged relationships through illegal conduct.

The partner qualification system is based on the following principles:

- not excluding any eligible entity from participating in research projects, using objective and documented selection criteria;
- regularly assessing both existing and new partners to monitor the quality of performance in research projects;
- paying particular attention to the highest professional standards, best practices in ethics, health and safety protection, and environmental responsibility.

Selection and monitoring procedures for research entities are based on objective and verifiable criteria, taking into account—among other things—technical capability, reliability, and the quality of research services offered.

FARMA is committed to evaluating research projects that enable the development of new products and/or industrial solutions ensuring environmental protection and safety, particularly in the case of projects that include improvement actions in these areas.

### **3.6.3 INTEGRITY IN RELATIONS**

Relations with Universities and Research Institutes are governed by maximum transparency, fairness, rigor, and consistency.

Company personnel assigned to manage relationships with universities must not, under any circumstance, attempt to improperly influence decisions or engage in unlawful behaviour that could compromise the impartiality of the collaboration.

Collaborative relationships with Universities and Research Institutes are formalized through specific agreements and are subject to ongoing monitoring by the Company.

Entering into an agreement (such as a contract or convention) with a University or Research Institute must be based on fully transparent terms, avoiding—where possible—any form of dependency.

The Company undertakes to:

- not unduly obtain grants, subsidies, or funds provided for research purposes through the use or submission of false or misleading documentation or by omitting required information;
- not use grants, subsidies, or public funds for purposes other than those for which they were awarded.

In relations with Universities or Research Institutes, no FARMA representative may accept compensation, gifts, or preferential treatment that violate the provisions of this Code or any other relevant internal regulation. Similarly, it is forbidden to offer or grant such benefits to the aforementioned parties in contravention of this Code or any other applicable corporate regulation.

## **3.7 CONDUCT GUIDELINES IN RELATIONS WITH THE COMMUNITY**

### **3.7.1 COMMUNITY**

The term “community” refers to the system composed of territory, population, and institutions.

- **Territory** denotes a defined physical area with its natural and historical characteristics.
  - **Population** comprises all individuals who live and operate within that territory.

- **Institutions** are the bodies that enable the functioning of the community and its various social organizations.

### **3.7.2 ENVIRONMENTAL RELATIONS**

In matters of environmental protection, FARMA establishes policies for sustainable industrial development, defining internal implementation guidelines and promoting the following environmental policy measures:

- Comply with all applicable environmental laws and regulations;
- Adhere to and implement the requirements of ISO 14001 (or adopt equivalent environmental management systems aimed at the continuous improvement of environmental performance and organization);
- Commit to developing and executing programs for the rational use of energy resources, in order to minimize—and, where feasible, eliminate—the negative environmental impacts generated by the Company’s activities and facilities;
- Ensure the correct application of technologies used to contain environmental impacts and, where possible, pursue enhancements to those technologies or adopt more advanced solutions;
- Engage, involve, and raise awareness among all personnel to secure full alignment with the Company’s environmental policy and objectives, fostering a culture of prevention;
- Provide all employees with adequate information and training on the environmental requirements relevant to their roles and cultivate awareness that improper conduct may cause adverse impacts on the environmental management system;
- Subject the environmental policy and the operation of the environmental management system to periodic review in order to assess their appropriateness and effectiveness, with a view to continuous improvement;
- Establish a regular system for collecting environmental data;
- Monitor the progress of corporate actions in terms of environmental impact.

All recipients of this Code of Ethics are required to support and implement the Company’s environmental policy.

### **3.7.3 RELATIONS WITH THE MEDIA**

#### ***3.7.3.1 External Communication***

The Company is committed to maintaining open dialogue with all media representatives, in line with its corporate communication policies.

FARMA’s communication is guided by the principles of respect for the right to information; under no circumstances may false or misleading information or comments be disclosed.

All communication activities must comply with applicable laws, regulations, and professional conduct practices, and must be carried out with clarity, transparency, and promptness. Any form of pressure or attempt to gain favourable treatment from the media is strictly prohibited.

Relations with the press and other media channels are exclusively reserved for the company functions specifically authorized for this purpose, or for those who have obtained prior approval from them, and must always respect established procedures.

Employees must refrain from issuing any formal or informal statements or communications regarding the Company without prior authorization from the delegated corporate functions.

Specifically, in interactions with the media, FARMA undertakes to:

- Provide timely responses to inquiries or requests from media representatives, after assessing the relevance and content of such requests;
- Safeguard confidential information and materials. The contents of contracts with partners, institutions, suppliers, or other stakeholders must not be disclosed externally, except in the manner agreed upon with the respective parties;
- Ensure that all collaborators and partners involved in communication limit their statements—written or verbal—to matters within their own area of responsibility and provide clear, individual contributions regarding the Company’s activities and projects.

### **3.7.4 RELATIONS WITH PUBLIC INSTITUTIONS**

#### ***3.7.4.1 Relations with Public Administrations***

Relations with public institutions—whether local, national, or international—intended to safeguard FARMA’s overall interests and support the implementation of its programs are exclusively reserved for the corporate functions and individuals formally delegated to manage such matters.

These relationships must be guided by the highest standards of transparency, integrity, consistency, and fairness, and must avoid any collusive conduct.

Individuals tasked with maintaining relations with Public Administrations must never attempt to improperly influence decisions or engage in unlawful conduct that could compromise the impartiality of a public official.

The Company is committed to:

- **Refraining from unlawfully obtaining** subsidies, grants, or funding issued or provided by Public Administrations through the use of false or misleading documentation, or by omitting relevant information;
- **Avoiding the misuse** of public subsidies, grants, or funding for purposes other than those for which they were granted;
- **Not obtaining undue advantages** through deceit or fraudulent actions at the expense of Public Administrations.

When dealing with representatives, officials, or employees of Public Administrations, the Company commits to avoiding preferential relationships through illegal means and, more specifically, to:

- **Prohibiting the pursuit or establishment of personal relationships** intended to influence, directly or indirectly, the outcome of dealings with Public Administrations; and banning the offer or acceptance of money, items, services, or favors with the purpose of obtaining preferential treatment;
- **Preventing corruption** by prohibiting illicit payments made directly by company representatives, executives, employees, or individuals acting on their behalf;
- **Avoiding improper influence** during negotiations or interactions with Public Administrations;
- **Participating in public tenders and procedures** in compliance with applicable laws and fair commercial practices, and avoiding collusive agreements with competitors;
- **Preventing conflicts of interest** in all dealings with Public Administrations;
- **Acting in full compliance with anti-corruption regulations.**

The offer or acceptance of gifts, hospitality, or benefits of any kind that could be interpreted as exceeding customary and acceptable standards or intended to secure favourable treatment is strictly forbidden.

The management of gifts and hospitality is regulated by a specific internal policy, in accordance with the guidelines outlined in the section “Gifts, Hospitality and Benefits.”

In the management of any type of public funding, regardless of its source, the applicable laws and internal company rules must be observed, ensuring:

- **Accuracy and truthfulness** in the documentation submitted to prove eligibility for funding, and in all communications with the funding authorities;
- **Integrity and compliance** in the use of public funds, ensuring that such resources are used exclusively for the purposes and under the terms established in the grant agreements.

If the Company intends to engage employees of Public Administrations as consultants or service providers, all relevant legal provisions must be strictly observed.

#### ***3.7.4.2 Relations with Public Authorities, Regulatory and Supervisory Bodies***

The Company ensures full cooperation with public oversight bodies, including compliance with all legally mandated disclosures and any legitimate requests from such Authorities.

When managing relations with public authorities, regulatory agencies, or oversight bodies, all recipients of this Code of Ethics must:

- **Strictly comply** with applicable laws, regulations, and directives issued by such authorities;
- **Respond promptly and fully** to any official request, ensuring full cooperation and avoiding any form of obstruction.

**3.7.4.3 Relations with Judicial Authorities**

When dealing with judicial authorities, it is strictly forbidden to exert any kind of influence over individuals summoned to provide testimony in legal proceedings in order to discourage or distort their statements.

Furthermore, no assistance may be given to individuals who have committed a criminal offense in an attempt to obstruct investigations or evade law enforcement.

**3.7.4.4 Relations with Former Public Administration Employees**

Without prejudice to the provisions previously stated regarding personnel selection and recruitment, the hiring of former employees of Public Administrations who, in the exercise of their public duties, maintained relations with FARMA—or of their relatives or in-laws—must strictly comply with the company’s formal recruitment procedures.

Likewise, any form of collaboration with former Public Administration employees or their relatives must follow the same rigorous internal procedural standards.

**3.7.5 RELATIONS WITH REPRESENTATIVES OF ASSOCIATIONS**

FARMA maintains relationships with trade associations, labour unions, environmental organizations, and similar associations with the aim of developing its activities, establishing mutually beneficial forms of cooperation, and presenting its positions. The presentation of specific company positions to political entities and/or associations must be carried out with the consent of the relevant functions.

**3.7.6 FINANCIAL RELATIONS WITH POLITICAL PARTIES, TRADE UNIONS, AND ASSOCIATIONS**

FARMA does not finance political parties, either in Italy or abroad, nor their representatives or candidates, nor does it sponsor congresses or events whose sole purpose is political propaganda. It refrains from any direct or indirect pressure on political figures.

Should it be deemed appropriate, for reasons strictly related to FARMA’s presence in the area, to undertake such initiatives, the responsible function must request prior authorization from the Supervisory Body, which will assess each case individually. The requested initiative may only be implemented following specific authorization from the Supervisory Body.

FARMA does not provide contributions to organizations with which a conflict of interest may arise. However, cooperation, including financial, with such organizations is possible for specific projects, provided that the purpose aligns with FARMA’s mission and the allocation of resources is clear and documented. The decision regarding the appropriateness of the initiative rests with the Supervisory Body: the initiative may only be implemented following specific authorization from the Supervisory Body.

Any involvement in political activities by individuals subject to this Code of Ethics occurs strictly on a personal basis and must be conducted in compliance with applicable laws.

### **3.7.7 CONTRIBUTIONS AND SPONSORSHIPS**

FARMA may respond to requests for contributions only from entities and associations that are explicitly non-profit and have duly constituted statutes and articles of association, provided they are of high cultural, social, or charitable value or, in any case, involve a significant number of citizens.

Sponsorship activities, which may concern social, environmental, sporting, entertainment, or artistic themes, are intended only for events that guarantee quality or for which FARMA can collaborate in the planning, thereby ensuring originality and effectiveness.

In any case, when selecting proposals to support, FARMA pays particular attention to any potential personal or corporate conflicts of interest.

The management of contributions and sponsorships is governed by a specific procedure.

## **4 IMPLEMENTATION METHODS**

### **4.1 RESPONSIBILITY FOR IMPLEMENTATION**

All responsibilities regarding the dissemination and implementation of this Code are reserved for the Board of Directors.

Specific responsibilities are assigned to the Supervisory Body (hereinafter also referred to as ODV) for the activities necessary for the application of this Code, as indicated in the following respective paragraphs.

### **4.2 DUTIES OF THE SUPERVISORY BODY IN IMPLEMENTATION AND MONITORING OF THE CODE OF ETHICS**

With regard to the Code of Ethics, the Supervisory Body is responsible for:

- promoting consistency between the principles of the Code of Ethics and company policies, including liaising with relevant function managers;
- responding to requests for clarification regarding the Code of Ethics;
- verifying the application and compliance with the Code of Ethics through Ethical Internal Auditing, which involves verifying and promoting the continuous improvement of ethics within FARMA's activities by analysing and evaluating processes for controlling ethical risks;
- monitoring initiatives aimed at spreading knowledge and understanding of the Code of Ethics; specifically: ensuring the development of ethical communication and training activities; analysing proposals for revising company policies and procedures that have significant impacts on corporate ethics, and preparing recommendations for any corrective actions;
- receiving and analyzing reports of violations of the Code of Ethics and conducting the related investigations;

- communicating the outcome of the investigation to the Board of Directors for the purpose of imposing sanctions;
- providing advisory functions regarding the adoption of disciplinary measures;
- issuing binding opinions on the revision of the most significant policies and procedures, to ensure their consistency with the Code of Ethics;
- preparing proposals for the periodic revision of the Code of Ethics, including in relation to received reports;
- proposing to the Board of Directors any amendments and additions to the Code of Ethics.

These activities are carried out with the support of the relevant company functions and, furthermore, with free access to all documentation deemed useful.

### **4.3 IMPLEMENTATION AND MONITORING METHODS**

The implementation of the Code of Ethics, as well as the monitoring of its effective application, depend on the commitment and responsibility of everyone, through full awareness of the contents of this document and the Values that inspired it. Stakeholders are required to:

- review the Code;
- understand the behavioural principles stated therein;
- contact the bodies responsible for dissemination, awareness, and compliance with the Code for advice regarding its application;
- observe the Code and actively contribute to its concrete application, including by reporting any behavior of questionable compliance.

### **4.4 DISSEMINATION AND INFORMATION**

The Code of Ethics is communicated to internal and external stakeholders through specific communication activities.

Specific communication initiatives are planned to promote awareness of the Code of Ethics among all internal and external stakeholders, which are activated upon the initial release of the Code and on each subsequent revision.

Corporate bodies, managers, and employees must become familiar with this Code of Ethics.

The Code of Ethics is published both in a dedicated section of the company intranet and on the company's institutional website, to make it accessible to all stakeholders.

The culture and principles of the Code of Ethics are disseminated and promoted through all available internal and external communication tools.

The Code of Ethics must be expressly accepted by all Recipients, who must declare that they have received, read, and fully understood it, also committing to behave in accordance with the said Code and to comply with all its provisions.

### **4.5 TRAINING**

In order to ensure proper understanding of the Code of Ethics by all FARMA collaborators, the Human Resources function prepares and implements, also based on the indications of the Company's Supervisory Body, a training plan aimed at promoting knowledge of ethical

principles and standards and awareness regarding behavioural principles for daily activities and implementation and control procedures. Training initiatives are differentiated according to the role and responsibility of collaborators; for new hires, a specific training program is provided that explains the contents of the Code, compliance with which is required. Similarly to communication, whenever significant revisions of the Code of Ethics and the related regulatory system occur, training is repeated for the entire company population.

## **4.6 REPORTING BY STAKEHOLDERS**

In compliance with current regulations and with a view to planning and managing business activities aimed at efficiency, fairness, transparency, and quality, FARMA adopts suitable organizational and management measures to prevent, detect, and promptly report unlawful conduct or conduct otherwise contrary to the rules of this Code—by any person acting in the interest of the Company or dealing with it—and to eliminate related risk situations.

### **4.6.1 METHODS OF SUBMITTING REPORTS**

All FARMA stakeholders are required to report, in writing and possibly anonymously, any violation or suspected violation of the Code of Ethics to the Reporting Manager, who is responsible for receiving and handling reports in accordance with applicable laws, using the reporting channels provided in the Procedure for managing reports.

If the reports or information received by the Reporting Manager relate to violations of the provisions of this Code of Ethics and/or offenses under Legislative Decree 231/2001 and/or violations of the Organizational Model adopted by FARMA pursuant to Legislative Decree 231/2001, they will be communicated by the Reporting Manager to the Company's Supervisory Body, which will make the relevant decisions regarding their management. If the Company appoints a member of the ODV as a component of the Reporting Manager, such communications and the evidence of the resulting decisions within the ODV's competence must still be formalized.

The following provisions apply:

- each function manager must collect any reports relating to behavior not in line with the provisions of the Code of Ethics;
- if an employee wishes to make a report, they must inform their direct superior (provided the report does not concern the superior), who will then forward the report to the ODV using the reporting channels provided in the Procedure for managing reports. If the report does not yield results, or if the employee feels uncomfortable reporting to their direct superior, they may send it directly to the Reporting Manager;
- all other stakeholders may send reports directly to the Reporting Manager, using the reporting channels provided in the Procedure for managing reports;
- reports must be sufficiently precise, detailed, and attributable to a specific event or area of activity.

#### **4.6.2 ASSESSMENT OF REPORTS**

The Supervisory Body acts—in accordance with current regulations and the Procedure for managing reports—to protect whistleblowers against any form of retaliation, understood as any act that could even give rise to the suspicion of discrimination or penalization (such as, for suppliers: termination of business relations; for employees: denial of promotion). The confidentiality of the whistleblower's identity is also ensured, subject to legal obligations and the protection of the rights of the Company or persons who are wrongly and/or maliciously accused.

The Supervisory Body is not required to consider reports unrelated to the principles and provisions of the Code of Ethics or anonymous reports that are clearly irrelevant, unfounded, or insufficiently detailed.

Within its competence, and in accordance with current regulations and the Procedure for managing reports, the Supervisory Body analyses the report and decides whether to initiate an investigation. The decision to initiate or not initiate an investigation is always justified in writing by the Supervisory Body.

If an investigation is initiated, the Supervisory Body conducts the inquiry, possibly interviewing the author, the person responsible for the alleged violation, and collecting any useful testimony.

#### **4.7 VIOLATIONS OF THE CODE OF ETHICS AND SANCTIONS**

The Supervisory Body reports alleged violations of the Code of Ethics to the Board of Directors, as identified through stakeholder reports and the results of any investigations.

The Board of Directors, after appropriate analysis of the evidence received, determines whether the behaviour reported constitutes a violation of the Code of Ethics.

If a violation is found, the Board of Directors orders the appropriate measures, in accordance with current regulations, the applicable National Collective Labor Agreement (CCNL), and the Disciplinary System adopted by the Company.

The relevant company functions, activated by the Board of Directors, apply the measures, ensure their implementation, and report the outcome to the Supervisory Body.

### **5 FINAL PROVISIONS**

#### **5.1 CONFLICT WITH THE CODE**

In the event that even a single provision of this Code conflicts with provisions set forth in internal regulations or procedures, the Code shall prevail over any such provisions.

#### **5.2 AMENDMENTS AND UPDATES TO THE CODE**

The Code may be amended and supplemented by resolution of FARMA's Board of Directors, also based on suggestions and recommendations from the Supervisory Body.

This Code shall be reviewed and, if necessary, updated by FARMA's Board of Directors at least every three years, including upon proposal by the Supervisory Body.