

Prepared by

Lorenzo Brina
Global Director of HR

Approved by

Jorge Nogueira
CEO



Policy: Human Rights, Guidelines and Rules of Conduct

Normative System

Procedure

Code	
Version	001
Issued on	17.05.2021
Effective from	17.05.2021
Pages	6
Cancels and replaces	N/A

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1. SCOPE

Dipharma Francis S.r.l. (also Dipharma or the Company) considers of fundamental importance that its conduct respects human rights and is committed to protecting, safeguarding and promoting such rights in its working environment, in its business operations and in its relationship with stakeholders, as well as in the different environments in which it operates. To this end, the Company has decided to adopt this "Policy" (and/or Document) which is addressed to:

- all persons performing management, administration, direction and control functions of the Company;
- its directors;
- its employees and collaborators;
- all the parties that engage with the company such as: contractors, suppliers and business partners or, more generally, Stakeholders.

This Document, reinforcing what is already indicated in the Code of Ethics, sets out the commitment and responsibilities of the Company and its stakeholders to operate - in accordance with the choice they have made - with due respect of human rights and in the promotion of the highest standards of work in the company.

Dipharma Francis S.r.l. undertakes to respect and actively disclose the principles established by the applicable legislation and international standards, including:

1. the Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights;
2. the Declaration on Fundamental Principles and Rights at Work and the eight fundamental Conventions of the International Labor Organization (ILO);
3. the United Nations Conventions on the rights of the child, the rights of persons with disabilities, the rights of women, the elimination of all forms of racial discrimination.

2. RESPONSIBILITY

- HR Dept:
Definition of the Policy, of its general principles and subsequent supplements and revisions
- General Management:
Approval of the Policy and subsequent supplements and revisions

3. REJECTION OF FORCED OR COMPULSORY LABOR AND CHILD LABOR

Dipharma rejects the use of any form of forced or compulsory labor. All working relationships must be voluntary (Dipharma does not confiscate money or identity papers upon commencing employment relationships to retain workers against their will).

Dipharma rejects the use of child labor, as defined by local legislation where Dipharma is based.

4. [EQUAL TREATMENT](#)

Dipharma is committed to ensuring equal treatment of its employees for all that concerns employment, working conditions, access to training, career opportunities and vocational training, including internships.

Dipharma guarantees to its workers fair and proportionate compensation and equal pay, regardless of gender, for work of equal value, based on an objective and verifiable evaluation.

Dipharma guarantees that the minimum wage of the Group's employees cannot be lower than the minimum established in collective labor agreements and law regulations.

5. [NON-DISCRIMINATION](#)

Dipharma is committed to opposing any form of discrimination based on gender, age, physical and mental disabilities, language, nationality, marital status, belonging to ethnic, social, geographic and trade union groups, sexual orientation, religious or political beliefs, color, social extraction and status, and is committed to preventing any discrimination in all areas of the working lives of our employees. The Company undertakes to eliminate and, in all cases, remove any obstacle or limitation that, even only potentially, may constitute an impediment, even indirectly, to the implementation of the above.

6. [INTEGRITY](#)

Dipharma believes that corruption is one of the factors undermining institutions and democracy, ethical values and justice, as well as hindering the well-being and development of the Company, and therefore, rejects corruption completely in all its forms, both direct and indirect. To this end, Dipharma has adopted a specific Code of Ethics.

7. [FREEDOM OF ASSOCIATION](#)

Dipharma acknowledges and guarantees the right of its employees to form or take part in organizations aimed at defending and promoting their interests. It also recognizes their right to be represented, within the various production units, by trade unions or other forms of elected representation in accordance with the legislation and practices in force.

Dipharma acknowledges the value of collective bargaining as a favored instrument for determining the contractual conditions of its employees, as well as regulating the relations between management and trade unions.

8. HEALTH AND SAFETY

Dipharma is committed to ensuring high health and safety standards in the workplace and in the environments in which its activities are carried out.

Dipharma promotes the reinforcement of a culture of safety within the Company, by developing awareness of safety-related risks and fostering responsible behavior of all collaborators and employees, also through training activities focused on the promotion of safety, awareness-raising, and risk prevention.

Dipharma endeavors to protect the health and safety of workers, particularly through preventive measures.

9. CONDITIONS OF EMPLOYMENT

To maintain a respectful and positive work environment, Dipharma rejects any action which can damage the dignity and psychological well-being of a person, any form of physical, verbal, sexual or psychological harassment, abuse, threats, or intimidation in the workplace.

10. REPORTING - WHISTLEBLOWING

To be fully compliant with this Policy, Dipharma has adopted a whistleblowing system, available to everyone (both internal and external to the Company), through the Navex portal which can be accessed via the link: <http://www.dipharma.ethicspoint.com>. Alternatively, Dipharma has set up a hotline number:

China - 400 120 3557

Italy - 800194669

US - (844) 950-0557



These tools have been designed and adopted to ensure the complete anonymity of the person making the report. Dipharma undertakes to verify every report of illegal conduct or violations of this Policy anonymously, if they are substantiated and based on accurate and consistent facts.

Dipharma undertakes, in any case, to manage the information as confidential and to guarantee the confidentiality of the identity of the person making the report, ensuring that no acts of retaliation or discrimination are enacted against them, for reasons directly or indirectly related to the reporting.

Dipharma, furthermore, will apply disciplinary sanctions against those who violate the measures provided for the protection of the person making the report, as well as against those who make reports intentionally or with gross negligence that prove to be unfounded.

Dipharma undertakes to follow up on these reports within an adequate period, in relation to the investigations required by the violation or misconduct reported.

11. DISCIPLINARY MEASURES

Dipharma will take all the measures that will be necessary against the violation of Human Rights, will apply disciplinary sanctions to employees who adopt a non-compliant behavior and will terminate any relations with the stakeholders who violate Human Rights and the principles outlined in this Policy.

12. SUPPLIERS

Dipharma undertakes to select suppliers who share the same values and to ask them to recognize, respect and support all the actions needed to protect Human Rights as set out in this Policy, thus generating a responsible line of conduct.

13. PRIVACY

Dipharma respects the confidentiality and the right to privacy of all its employees, collaborators and stakeholders in order to guarantee the correct use of the data and information provided to it, in accordance with the law.

This Policy is adopted by the company starting from May 15, 2021.

It will be disclosed to all the employees and collaborators so that they can be aware of its content and the importance of acting in compliance with the provisions therein, as well as the consequences of non-compliant behavior.

This Policy will be available in full on the Company's intranet and on the Company website so that external parties become aware of it.

The Document will be subject to periodic reviews and updates which will be communicated and published as above.