

Approved  
by the Chief Executive Officer  
of Dipharma Francis S.r.l.  
on 12 June 2026

# Supplier Code of Conduct



Regulatory system

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# INTRODUCTION

Dipharma Francis S.r.l. and its subsidiaries (hereinafter also referred to as “Dipharma” or the “Company”) recognise sustainability as a guiding principle for corporate decisions and actions. Operating in an ethical, transparent and responsible manner, with due regard for environmental, social and economic values, is a fundamental priority for the Company.

In this context, the active involvement of partners and suppliers is essential to achieve a sustainable, ethical and responsible supply chain. For this reason, the Company shares this Supplier Code of Conduct (hereinafter also referred to as the “Code”), which is also inspired by the principles of the United Nations 2030 Agenda for Sustainable Development, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Responsible Business Conduct, with the aim of promoting responsible behaviour throughout the value chain.

Collaboration with partners who share these values contributes to building a responsible industrial system capable of creating long-term value for the entire community.

Dipharma is committed to acting with fairness, integrity and equity at all times, respecting its contractual commitments, promoting long-term partnerships based on an integrated, coordinated and transparent approach, and encouraging a fair distribution of risks and opportunities.

This Code refers to, supplements and implements the principles and values set out in Dipharma’s Code of Ethics, defining the standards of conduct that suppliers are required to comply with in their business dealings with the Company. Dipharma also requires its suppliers to comply with the principles set out in its Human Rights Policy, which establishes the Company’s commitment to the protection of fundamental human rights, the prohibition of all forms of forced and child labour, the guarantee of equal treatment, non-discrimination, freedom of association, and the protection of health and safety in the workplace. These principles apply to all stakeholders, including suppliers, contractors and business partners. Both documents are published on the Company’s website.

## 1. Preliminary provisions

### 1.1 Purpose

This Supplier Code of Conduct is intended to promote a culture of sustainability among Dipharma’s suppliers, encouraging a supply chain that is fair, transparent and respectful of human rights, the environment and applicable laws. The Code represents a guide for all parties operating with and for Dipharma, ensuring that all business relationships are based on shared responsibility.

### 1.2 Scope of application

The Code applies to all entities that supply goods and/or services to Dipharma, in any capacity (hereinafter “suppliers”).

The Code must be shared with and accepted by each supplier both when defining new contracts and when updating existing ones. The Code is not intended to replace applicable laws, but rather to complement them by setting out the minimum ethical and sustainability standards that Dipharma expects from its partners.

### 1.3 General conditions

Suppliers undertake to comply with all applicable national and international regulations (including, but not limited to, human rights standards set out in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights, the core conventions of the International Labour Organisation, the United Nations Convention on the Rights of the Child, the United Nations Convention on the Rights of Persons with Disabilities, the United Nations Convention on the Elimination of All Forms of Discrimination against Women, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises), as well as applicable technical standards and the contents of this Code. Dipharma acknowledges that each company has its own cultural, organisational and operational features, and that alignment with the principles set out herein may require a gradual adaptation process.

Suppliers are also required to communicate these principles throughout their organisation and to all parties within their supply chain, including any subcontractors, ensuring full compliance. Suppliers are responsible for maintaining clear, transparent and verifiable documentation proving substantial compliance with the contents of this Code.

Suppliers undertake to identify actual or potential adverse impacts arising from their activities and their supply chain, to adopt measures to cease, prevent and mitigate such impacts, where identified, and to monitor the effectiveness of such measures over time, promptly informing Dipharma of any critical issues identified in relation to their activities and their supply chain.

### 1.4 Compliance

Dipharma reserves the right to carry out audits or inspections, either directly or through third parties, to monitor the actual implementation of this Code. Suppliers are required to provide full cooperation in all monitoring and inspection activities, ensuring the timely provision of relevant information and documentation.

Dipharma may periodically assess the level of compliance of the suppliers with the principles and provisions of this Code, using appropriate evaluation methods and tools, also within the supplier qualification, selection and monitoring processes.

In the event of confirmed non-compliance, Dipharma may require the implementation of an improvement plan with defined actions and timelines, and the supplier must ensure full cooperation in promptly implementing the corrective actions required to achieve full compliance with this Code. Failure to implement such actions may result in the suspension or termination of the business relationship, depending on the severity of the non-compliance.

Signing the corresponding commitment form is a necessary condition to establish and maintain a business relationship with Dipharma.

## 1.5 Reporting and Sanctions

Breaches of this Supplier Code of Conduct, the Code of Ethics, or Dipharma's corresponding policies and procedures can be reported through Navex, the independent partner chosen by the Company to manage reports confidentially.

At the request of the reporter, the information will be forwarded by Navex to Dipharma in complete confidentiality and anonymity.

To report an event, use the portal, following the instructions for completion:

<https://www.dipharma.ethicspoint.com>

All reports will be handled with the utmost attention.



## 2. Ethical standards and labour practices

### 2.1 Working conditions and human rights

Dipharma considers it essential to ensure working conditions that are fair and respectful of fundamental human rights, as already established in its Human Rights Policy. Suppliers are required to establish lawful and transparent employment relationships, in full compliance with the laws in force in the countries in which they operate and, in all cases, with internationally recognised human rights.

In accordance with the principles set out in applicable laws, international standards and the core Conventions of the International Labour Organisation (ILO), all forms of forced, undeclared or child labour are strictly prohibited. Suppliers must not employ individuals below the minimum legal working age or the age for completion of compulsory education in the country concerned and must, in any case, ensure that any work assigned to minors is appropriate and does not interfere with their physical and mental development.

The dignity and physical and psychological well-being of workers must be safeguarded during all phases of the employment relationship; suppliers are required to adopt inclusive and non-discriminatory policies and to commit to preventing any form of physical, verbal, sexual or psychological harassment, abuse, threats or intimidation in the workplace.

Suppliers are required to organise working hours and remuneration in accordance with local laws, ensuring fair wages, annual leave, statutory leave entitlements and weekly rest periods in accordance with applicable legislation. In addition to this, suppliers must recognise the workers' rights to freedom of association, collective bargaining and belonging to representative organisations.

It is understood that compliance with local laws may not, under any circumstances, justify treatment of workers below the minimum standards of protection established at international level, nor compromise the ability to maintain a decent standard of living, as provided for by international human rights and ILO conventions.

## 2.2 Equal treatment

Dipharma recognises equal treatment as a fundamental principle for social, economic and cultural development. Suppliers are required to ensure equal opportunities and fair conditions throughout the entire employment lifecycle, guaranteeing equal access to employment, professional development, positions of responsibility and fair remuneration systems, in accordance with the Conventions of the International Labour Organisation (ILO).

## 2.3 Non-discrimination

Suppliers must adopt suitable policies and practices to prevent any form of direct or indirect discrimination based on gender, gender identity or sexual orientation, age, physical or mental disability, language, nationality, marital status, ethnic, social, geographical or trade union affiliation, religious or political beliefs, skin colour, origin or social status. Suppliers are also required to promote respect for individuals and to support work–life balance, in accordance with ILO Conventions.

## 2.4 Access to remedies and grievance mechanisms

Suppliers must ensure that their employees and collaborators have actual access to appropriate, effective and non-retaliatory reporting and grievance mechanisms, which allow them to report any violations of human rights, working conditions or the principles set out in this Code, while ensuring the confidentiality and protection of the reporting party at all times. Suppliers are required to examine such reports and to adopt proportionate and appropriate corrective measures to remedy any actual or potential adverse impacts, in compliance with the applicable regulations.

# 3. Business relationships

## 3.1 Ethics, transparency and anti-corruption

Suppliers are required to conduct their business in an ethical and responsible manner, operating with transparency and in compliance with applicable regulations relating to accounting, tax reporting, anti-money laundering and anti-corruption. They must act fairly and responsibly towards their own suppliers, avoiding unfair practices or unbalanced contractual conditions.

No form of corruption, extortion or misappropriation, whether direct or indirect, is allowed. In particular, with reference to the exchange of gifts, gratuities or other benefits, including hospitality, suppliers are required to act in full compliance with the laws and regulations applicable in the countries in which they operate. These practices are allowed only if they are of nominal value, occasional in nature and cannot be interpreted as a means of improperly influencing independent judgement or decisions in business or institutional relationships. In no case are gifts or gratuities in the form of cash allowed.

In this regard, suppliers must not offer Dipharma employees gifts or gratuities with an actual or perceived value exceeding €50. In accordance with Dipharma's Gifts Management Policy (PO 001 GO), gifts exceeding this threshold cannot be accepted by Company employees: any employee receiving such gifts is required to promptly inform their line manager and the Global Head of People & Culture, refuse the gift and record it in the dedicated register. Similarly, suppliers must not offer Dipharma employees invitations to events, travel, accommodation, entertainment, or any other services that exceed normal business requirements or could be interpreted as a means to improperly influence business decisions. These offers, if exceptionally received, are subject to mandatory disclosure and require prior approval from the line manager and the relevant executive member of

the management team, in accordance with the same Policy. Suppliers are therefore encouraged not to place Dipharma employees in situations of conflict with the internal obligations imposed on them by the Company's policies.

Suppliers must also act fairly towards the market and competitors, in compliance with applicable antitrust, commercial transparency, export control and sanction regulations.

Suppliers are required to provide transparent technical, administrative and supporting documentation relating to the products or services provided. In cases of resale, suppliers must provide all available information regarding the origin of products, supporting traceability throughout the supply chain. Any real or potential conflict of interest must be promptly disclosed.

## **3.2 Privacy**

Suppliers are required to protect confidential information and personal data to which they have access, ensuring their management is in accordance with applicable privacy and data protection laws, in particular compliance with the General Data Protection Regulation (GDPR) and any other relevant legislation in the country in which they operate.

## **3.3 Data and information security**

The protection of information and IT systems is of fundamental importance for the integrity of the pharmaceutical supply chain and for safeguarding the interests of all parties involved. Suppliers whose products or services have an impact on Dipharma's pharmaceutical supply chain — including, by way of example, suppliers of raw materials, IT systems, logistics services, outsourced activities, or any other service granting, even partially, access to company data, systems or infrastructure — are required to adopt appropriate and proportionate measures to ensure information security and operational continuity.

### **3.3.1 Protection of confidential information**

Suppliers are required to protect Dipharma's confidential information obtained in the course of the supply relationship, including technical, commercial, regulatory, and process-related information. Such information must be used exclusively for the purposes for which it was shared, must not be disclosed to third parties without Dipharma's prior written permission, and must be handled with a level of protection at least equivalent to that applied by the supplier to its own confidential information. The confidentiality obligations apply to all employees, collaborators and subcontractors who have access to such information and continue to apply after the termination of the business relationship.

### **3.3.2 Cybersecurity measures**

Suppliers must adopt and maintain a cybersecurity control system appropriate to the nature and sensitivity of the information processed and to the risks associated with their activities. In particular, suppliers are required to implement technical and organisational measures including, but not limited to: secure management of system and network access, use of robust authentication systems, encryption of sensitive data in transit and at rest, regular updates of systems and applications, and periodic risk assessments and security verifications. Suppliers must also ensure that their personnel receive adequate cybersecurity training and that the measures in place are periodically reviewed in light of evolving threats and industry best practices.

### **3.3.3 Access and prevention of unauthorised access**

Suppliers must implement measures to prevent any unauthorised access to data, systems, networks or infrastructure, whether their own or Dipharma's, involved in the supply relationship. Access to Dipharma's systems and information must be limited to personnel strictly necessary for operational

purposes, in accordance with the principle of least privilege, and must be revoked promptly when the relevant operational need or collaboration no longer exists. Suppliers must guarantee that the same standards are complied with by any subcontractors or third parties engaged, in whole or in part, to perform the contracted activities.

#### **3.3.4 Notification of security incidents**

In the event of a cybersecurity incident — including, by way of example, data breaches, unauthorised access, cyberattacks, loss or destruction of confidential information — affecting, or potentially affecting, Dipharma's data, systems or information, the supplier must notify Dipharma without undue delay and, in any case, within 48 hours of becoming aware of the incident. The notification must include a description of the nature of the incident, the categories and approximate volume of affected data or systems, the likely consequences, and the measures adopted or planned to remedy the situation. Suppliers must fully cooperate with Dipharma in the analysis, containment and restoration activities, and provide timely updates on the evolution of the situation and the corrective actions undertaken.

### **3.4 Intellectual property protection**

Suppliers must respect and protect the intellectual property rights and confidential information of third parties, including patents, trademarks, copyrights and trade secrets. Any use of such rights must be carried out solely with the necessary authorisations and licences.

## **4. Impacts on health, safety, environment and local communities**

### **4.1 Occupational health and safety**

Suppliers are required to comply with applicable laws and standards to ensure health and safety in the workplace, by means of preventive and protective actions, appropriate maintenance, emergency plans, and training for all workers, making sure that all information is provided in a language that is understood by employees, in accordance with applicable regulations in the countries where they operate and, in any case, consistent with ILO conventions. For Dipharma, the implementation of preventive and corrective measures is of particular importance, along with continuous monitoring of their effectiveness and periodic updates (or updates whenever necessary) aimed at managing and mitigating health and safety risks, following a specific risk assessment of the various operational activities.

Suppliers are also encouraged to promote the professional development and personal growth of their personnel, creating positive, stimulating and motivating work environments.

### **4.2 Product quality and safety**

Suppliers must guarantee that the products and services provided comply with applicable quality and safety requirements and must implement appropriate inspections to prevent risks to health, safety and product integrity throughout the supply chain. Where applicable, suppliers are required to comply with the relevant industry quality standards, including Current Good Manufacturing Practices (CGMP) or other applicable requirements.



### **4.3 Environmental impact**

Dipharma is actively committed to environmental protection and requires the same commitment from its suppliers. Suppliers must hold all environmental permits required under applicable regulations in the countries in which they operate and comply with obligations relating to atmospheric emissions, discharges into water and soil, water consumption and the management of waste and hazardous substances.

Suppliers are required to use natural resources efficiently and responsibly, implementing actions aimed at reducing consumption, as well as initiatives to reduce greenhouse gas emissions. Suppliers must promote innovation and continuous improvement by identifying solutions with a lower environmental impact throughout the supply chain, periodically reviewing their industrial processes in light of available technologies and scientific evidence.

### **4.4 Social impact and local communities**

Dipharma is committed to carrying out its activities in a manner that respects the human rights of local communities, through constructive dialogue carried out with the utmost transparency and by ensuring that stakeholders have access to relevant information regarding the actual or potential environmental and social impacts of its activities, as well as opportunities to participate in decision-making processes relating to operations that may affect their rights. Dipharma also encourages its suppliers to identify actual and potential adverse impacts of their activities on the human rights of local communities, to adopt the necessary measures to cease, mitigate and prevent such impacts and, in any case, to contribute to the well-being and development of those communities.

A responsible approach towards the community is a key element of the supplier's relationship with Dipharma.

## **5. Governance and internal training**

### **5.1 Business continuity**

Suppliers must take appropriate measures to guarantee the continuity of their operations and of supplies to Dipharma, also in the event of unexpected events or emergency situations, in line with the nature of the goods or services provided.

### **5.2 Training and awareness**

Suppliers are required to implement appropriate internal communication and training measures to ensure that directors, employees and collaborators acquire an adequate level of knowledge and understanding of the principles and provisions set out in this Supplier Code of Conduct, as well as of applicable laws, regulations and relevant standards.

## **ANNEXES**

- 1) Commitment / Acceptance form

## SUPPLIER CODE OF CONDUCT (C.C.F. 001, VER. 01)

### Annex 1) COMMITMENT / ACCEPTANCE FORM

*Supplier Code of Conduct – Dipharma Francis S.r.l.*

The undersigned, acting in the capacity of legal representative of the supplier indicated below, hereby declares that they have read, understood and accepted in full the Supplier Code of Conduct of Dipharma Francis S.r.l. (C.C.F. 001, VER. 01), and undertakes to comply with its principles, values and provisions throughout the entire supply relationship, both directly and indirectly through their subcontractors, collaborators and supply chain partners.

Supplier details:

- Company name: \_\_\_\_\_

- Registered office address: \_\_\_\_\_

- VAT No. / Tax Code: \_\_\_\_\_

Name and Surname of the legal representative / authorised signatory: \_\_\_\_\_

Position / Title: \_\_\_\_\_

Signatory's email address: \_\_\_\_\_

Place and Date: \_\_\_\_\_

Signature of the legal representative / authorised signatory: \_\_\_\_\_

*(This declaration must be signed and returned to the relevant Dipharma Francis S.r.l. Buyer)*