SUPPLIER CODE OF CONDUCT

NEOPHARMED GENTILI

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1. INTRODUCTION

Neopharmed Gentili S.p.A. (hereinafter also "Neopharmed Gentili" or "Company") is one of the leading players in the Italian pharmaceutical market. The company's business is focused on developing, promoting and marketing pharmaceutical products, some of which are reimbursed by the Italian national health service (SSN, Servizio Sanitario Nazionale). The Company's product portfolio is broad and diversified, with a focus on numerous therapeutic areas, including the cardiovascular, central nervous system, osteo-articular and respiratory areas.
Neopharmed Gentili relies on an extensive network of specialised partners to support its business operations. Given its positioning within the production chain, the Company is aware of the role it plays in promoting the principles of environmental, social and economic sustainability at every level of the supply chain. For this reason, Neopharmed Gentili has chosen to involve its partners in its corporate sustainability journey, sharing with its suppliers the values and strategies that guide the Company and promoting sustainability compliance throughout the entire supply chain.

1.1 PURPOSE OF THE NEOPHARMED GENTILI SUPPLIER CODE OF CONDUCT

To ensure that sustainability principles permeate every level of the supply chain, Neopharmed Gentili has voluntarily chosen to draft its own Supplier Code of Conduct.

The purpose of this document (hereinafter referred to as the "Code") is to outline the minimum principles and guidelines that every participant in the supply chain must follow to help develop a virtuous supply chain in terms of environmental, social and economic impacts. Additionally, the Code aims to inspire Neopharmed Gentili's partners to improve their Environmental, Social and Governance (ESG) performance through continuous development and monitoring initiatives.

1.2 REFERENCE STANDARDS

The regulatory references that have inspired Neopharmed Gentili in the drafting of this Code can be found in the main international agreements and guidelines that concern sustainability, which include: the United Nations 2030 Agenda and its 17 Sustainable Development Goals[1], the "Ten Principles of the United Nations Global Compact (UNGC)"[2], the conventions and recommendations of the International Labour Organization (ILO)[3], and the Universal Declaration of Human Rights (UDHR)[4].

Furthermore, where corporate documentation is concerned, this document is inspired by Neopharmed Gentili's sustainability strategy, summed up in the Strategic Sustainability Plan published by the Company in 2024, as well as the Code of Conduct and the Organisation, Management and Control Model (MOG) updated in 2024, in line with the provisions of Italian Legislative Decree no. 231/2001.

1.3 SCOPE OF APPLICATION AND RECIPIENTS

The Code applies to all parties involved in the Neopharmed Gentili supply chain. Therefore, the Code's recipients are all the natural persons, organisations and companies that provide the Company with goods and services.

The suppliers are required to comply with the Code and its principles and are responsible for sharing it with relevant parties (e.g. their suppliers, subcontractors, external collaborators).

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[1] 2030 Agenda: adopted in 2015 by the 193 member states of the United Nations, the 2030 Agenda is an international policy document created in order to provide guidance for the transition towards full sustainable development based on its 17 Sustainable Development Goals.

[2] United Nations Global Compact: the United Nations Global Compact is a non-binding guideline on corporate sustainability that sets out ten principles addressing the following concerns: human rights, labour, environment and the fight against corruption.

[3] ILO standards: the International Labour Organization is a United Nations agency that has been established to promote fair, decent, free and safe working conditions by issuing international labour conventions and recommendations.

[4] Universal Declaration of Human Rights: this declaration was adopted in 1948 by the General Assembly of the United Nations and refers to the individual, social, political, economic and cultural rights that affect all people, based on the fundamental principles of freedom and equality.

2. VALUES AND GUIDING PRINCIPLES OF NEOPHARMED GENTILI

Aware of its ethical responsibilities, the Company adheres to the principles of honesty, personal integrity, transparency, professionalism, non-discrimination and impartiality. In conducting business operations and relationships, Neopharmed Gentili values loyalty and efficiency. Furthermore, in compliance with the principle of legality, Neopharmed Gentili urges its supply chain partners to comply with current national and international regulations on working conditions, competition, environmental protection and fundamental human rights. Likewise, the Company encourages its suppliers to participate in third-party audits and external certification processes.

3. CORPORATE ETHICS AND INTEGRITY

Neopharmed Gentili's commitment regarding transparency and lawfulness has led to the introduction of a series of business practices that meet the highest standards of ethical and responsible behaviour. With this Code, the Company ensures that its entire supply chain aligns with its corporate ethical principles, as outlined in the Code of Conduct and the Organisation, Management and Control Model (MOG).

Suppliers are required to make every effort to comply with laws and regulations, applying the most rigorous standards derived from national laws, international guidelines and conventions, and the commitments outlined in this Code.

Neopharmed Gentili establishes and strengthens its relations with its partners on the basis of the **principles of good faith, transparency and fairness**. Through this Code, the Company encourages its suppliers to do the same, refraining from any form of corrupt practices aimed at gaining personal advantage from business operations and avoiding conflicts of interest.

Neopharmed Gentili rejects any form of anti-competitive behaviour and complies with competition laws aimed at **promoting the development of efficient markets and guaranteeing equal opportunities to all players in the sector.** Likewise, the Company asks its suppliers not to share or use confidential or unlawfully obtained information without consent, not to conceal privileged information, and not to engage in any activity that could unfairly and illegally benefit them. Suppliers are also encouraged to make every effort to ensure the protection of intellectual property and confidentiality in all business relations.

Neopharmed Gentili promotes a **culture of legality** within the Company and at every level of the supply chain, prohibiting affiliation with criminal organisations and any transaction involving illegally sourced money or other assets. Consequently, the

recipients of this Code must refrain from engaging in illegal money laundering practices. Shareholders must keep track of financial transactions to ensure transparency and control over the company's operations.

Through its established IT security governance system, Neopharmed Gentili aims to ensure the confidentiality, integrity and availability of data, formalise security requirements, assess risk and business continuity levels, monitor existing security levels, and respond promptly to critical security events. The Company similarly requires its partners to **ensure data privacy and information security** by implementing advanced encryption protocols, conducting regular security checks, and staying informed about emerging threats and best practices in cybersecurity.

With this Code, the Company seeks to raise awareness among its suppliers of their responsibility regarding the **health and safety of the end customer.** In line with Good Manufacturing Practices (GMP), it is essential that all Neopharmed Gentili products adhere to strict safety protocols, and suppliers are called upon to ensure compliance with these standards. This includes providing accurate and complete product information, promptly addressing safety issues or recalls, and implementing rigorous quality control procedures throughout the production process.

4. LABOUR AND HUMAN RIGHTS

Neopharmed Gentili requires its suppliers to comply with the provisions of the United Nations Conventions on human rights, monitoring for any violations within their value chain. In particular, the Company condemns any form of **forced labour and child labour.**

In line with the principles that guide its operations, Neopharmed Gentili upholds the rights of workers across its entire supply chain. By endorsing this Code, suppliers are obligated to ensure **freedom of association, fair working conditions and compliance with contractual obligations**. Furthermore, workers must be guaranteed the right to organise and engage in collective bargaining.

The Company prioritises the **occupational health and safety** of its workers and extends this commitment to its suppliers, urging them to meet the highest health and safety standards. More specifically, Neopharmed Gentili encourages its suppliers to ensure fair working conditions and clearly defined safety standards through dedicated policies and continuous monitoring tools. Suppliers are called upon to **identify and assess emergency situations** in the workplace and are responsible for implementing emergency plans, tailored training and response procedures to be followed in case of an emergency.

Neopharmed Gentili supports the principles of **inclusivity and non-discrimination**, fostering a work culture that promotes equal opportunities for all workers within its supply

chain. In accordance with the Company's principles, suppliers are expected to reject any discriminatory acts based on ethnicity, skin colour, age, gender, sexual orientation, disability, religion, political affiliation, union membership, or marital status. Partners are also called upon to prohibit discrimination and harassment to ensure a safe, inclusive and fair working environment. Finally, suppliers are encouraged to monitor indicators such as the gender gap and gender pay gap, as well as any instances of discrimination.

5. RESPECT FOR THE ENVIRONMENT

Neopharmed Gentili is committed to minimising its environmental impact by adopting targeted policies and strategies within the Company. Aware of the potentially negative impacts that its supply chain may have on the planet, the Company promotes the awareness and implementation of virtuous strategies among its stakeholders.

Suppliers are expected to conduct their business responsibly and efficiently, aiming to **minimise the environmental effects of their activities and safeguard the well-being of the planet and its resources.** For this reason, it is essential that supply chain partners comply with all applicable environmental regulations, including permits, licences, logging of information and required environmental restrictions, and must also comply with their operational and reporting requirements.

With a view to minimising the risk of environmental damage, Neopharmed Gentili's partners are called upon to draw up and **implement environmental safety procedures** with particular reference to the need to adopt **responsible water management solutions** and **effective waste management practices**. Particular emphasis is placed on the correct management of hazardous substances to reduce environmental impact to a minimum.

Neopharmed Gentili undertakes to diligently monitor the **origin and quality of the raw materials contained within its products.**

Neopharmed Gentili urges its suppliers to use **energy from renewable sources,** either through self-production or by purchasing it from the grid. The company also requires its partners to **monitor the level of climate-altering gas emissions** using international standards.

6. MONITORING AND COMPLIANCE WITH THE CODE

Neopharmed Gentili promotes the adoption of the Supplier Code of Conduct by all suppliers of goods and services to the Company and its distribution to key stakeholders. The Supplier Code of Conduct is available on the Company's website. Through this document, Neopharmed Gentili commits to monitoring the ESG performance of its supply chain based on the principles and parameters outlined in the Code. In addition, the Company monitors the percentage of suppliers who have adopted the Code to ensure that its values are upheld throughout the value chain.

6.1 SUPPLIER ENGAGEMENT AND AUDITS

In line with this Code, Neopharmed Gentili evaluates and selects its suppliers based on a Sustainable Purchasing Policy, which includes a dedicated section on Green Procurement. The Company's objective is in fact to assess its partners not only on the basis of technical, economic and product quality parameters but also on the basis of their ESG performance and compliance with the principles outlined in this document.

To support the improvement of sustainability performance among suppliers, Neopharmed Gentili intends to introduce ESG evaluation criteria prior to starting a commercial relationship and periodically during the collaboration. The objective of these assessments is to monitor the progress of sustainable practices throughout the supply chain by evaluating policies and initiatives related to the environment, human rights, working conditions, product responsibility and corporate ethics.

Neopharmed Gentili reserves the right to conduct, either directly or with the support of third parties, ESG audits and inspections on its suppliers, subcontractors and any parties involved in its supply chain to verify compliance with the Code and applicable regulations. Suppliers are required to maintain up-to-date and accurate records of relevant information and to share them with Neopharmed Gentili upon request to facilitate the audit process.

6.2 REPORTING VIOLATIONS AND HANDLING NON-COMPLIANCE CASES

If any supplier or third party becomes aware of a violation of this Code, they are encouraged to report it to Neopharmed Gentili at the following address: neogen_whistleblowing@complegal.it. .

Neopharmed Gentili is committed to handling all reports confidentially and protecting the anonymity of whistleblowers, ensuring that they are not subjected to any form of retaliation, in compliance with applicable regulations.

Cases of Code violations will be promptly reported to the Sustainability Committee for review. The Sustainability Committee will evaluate each non-compliance case and apply appropriate measures depending on the nature and severity of the situation. Suppliers

may be required to collaborate with Neopharmed Gentili in order to take remedial actions and comply with the Code's guidelines. In the event of a serious or systematic violation of this Code, Neopharmed Gentili reserves the right to terminate the Agreement.

6.3 APPROVAL AND ACCEPTANCE OF THE CODE

The Supplier Code of Conduct is designed to ensure the integrity of Neopharmed Gentili's operations and adherence to the Company's founding principles. This Code was approved by the Board of Directors of Neopharmed Gentili on 11/12/2024.

In order to keep the contents of the Code in line with company strategy and the most recent legislative updates, the Code will be subject to periodic reviews.

Having read this Code, the Supplier:

- undertakes to respect the Code and implement its provisions;
- undertakes to ensure that the directors, employees and collaborators of said Supplier comply with the Code of Conduct, ensuring their respective compliance with and adoption of its principles;
- undertakes to promote compliance with the Code throughout the entire value chain involved in the activities of Neopharmed Gentili.

Milan, 11 December 2024

Neopharmed Gentili S.p.A.

Chief Executive Officer

Alessandro Del Bono