

## FARMACEUTICI PROCEMSA S.p.A. Code of Conduct

### What does "Ethics" means?

Ethics is a pool of rules followed by a person or a group in the public and private conduct. This word is used in a lot of fields and reminds us of the rules and principles to be followed. The application field of Ethics, even if it is an abstract word, (principles and values) refers to the daily conducts and becomes a rule of behaviour.

### Company's Commitment

Farmaceutici Procemsa is committed to supply the highest quality food supplements, cosmetics and Medical Devices all around the world. For us the quality and safety of our products is the core of our business approach, and this is followed through all our processes and it is our daily commitment in accordance with our Code of Conduct.

Ethics, applied to the activities of the business group, associates the individual awareness to the concept of Social Accountability of the company. For FARMACEUTICI PROCEMSA the Social Accountability is identified in the capability to link the activities of the company with the protection of the interests of all people with whom it relates, in respect of the value of all living and non living things, optimizing the use of environmental sources.

The core principles by which Farmaceutici Procemsa operates are:

- being responsible for our people;
- being a responsible neighbour;
- responsible stewardship of our environment

As an international business with customers, suppliers and representatives the world over, we accept that we have a duty to trade responsibly.

### Ethical Code aim

The Ethical Code has the scope to:

- Remind that no advantages can justify the adoption of behaviours in contrast with the shared principles and values.
- Share through all levels the values of integrity in which the company believes, allowing that each time a decision is made the commons interests, rights and duties must play a major role.

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**P.IVA n. IT07410740018 - Capitale Sociale: 3.838.540,50 EURO i.v.**

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- Make the employees aware that the welfare and the respect of individuals must always be taken in consideration in the daily behaviour.

### FARMACEUTICI PROCEMSA'S PLEDGE

#### **The owners**

The owners hold themselves directly responsible for the right conduct of the company and guarantee the quality of products.

The owners assure to put some money aside to be used in the eventuality of hardships.

The owners pledge to invest accurately, in a sustainable and honest manner to guarantee the company's growth without risking its solidity

The ethical development is due to the management will and coherence, and to the company responsibility.

#### **Personnel and Consumers**

People are the main and focal point of all the company's activities.

Our consumers have the right to safety, to be informed, to choose and the right to be heard.

People who work in the company are our main source.

Procemsa recognises that different cultures and talents are fundamental values.

Coherence, transparency and respect must be at the base of each decision and behaviour in an environment of reciprocal trust.

We base the good functioning of the Ethical Code on dialogue and cooperation.

#### **Products, Customers, Suppliers and Competitors**

The Quality of our products is the core business of our processes and it is our daily duty.

The target of the activities of people who work in the group is to offer food supplements, Medical Devices and cosmetics produced with respect of the environment and of the human dignity.

Our Customers are our first partner in order to reach our objectives successfully and so the cooperation is always very strong.

Our Competitors are our incentive to be always better; a correct, concurrent spirit animates the challenge to always improve.

Our Suppliers must have the possibility to gain a right profit. Where suppliers breach this Code of Conduct we will always try to work with them to improve business standards and employee welfare as long as there is a clear commitment from the Supplier to improve their principle and social responsibility. Suppliers should seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local laws.

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## **FARMACEUTICI PROCEMSA'S VALUES**

### **Honesty and transparency**

...in the relations with Stakeholders, Customers and Suppliers  
...in the economic reports and communications  
...in the application of production models able to defend human rights and to respect the Earth, promoting the sustainable development, also in the Countries that produce raw materials used in our products.  
...in the choice of suppliers, impartially selected on the base of competitiveness, economic convenience and quality.

### **The Core is the Person**

Everybody must be considered as an unique being and treated with dignity.  
The job must give a sense of certainty.  
The wage must be adequate and the work place must be clean and safe.  
Everybody must feel free to raise concerns with their employer about suggestions or compliances.  
Recruitment and growth are based on personal professional merits; no forms of harassment, discrimination or favouritism is allowed.  
The Responsible must be competent and their actions must be honest and correct.

### **Defending the job**

Procemsa refuses all types of discrimination based on age, gender, race, caste, color, disability, nationality, marital status, sexual, political and religious opinions, union membership.  
FARMACEUTICI PROCEMSA's duty is to avoid each form of mobbing and to recognize the working merits in order to help career and salary growth.  
Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are be prohibited.

### **Child labour shall not be used**

There shall be no recruitment of child labour. A child is defined as any person less than 15 years of age, unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age would apply. A young person or young worker is defined as any worker over the age of a child as defined above and under the age of 18.

### **Employment is freely chosen**

There is no forced, bonded or involuntary prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

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**Working hours are not excessive**

Working hours comply with national laws and benchmark industry standards, whichever affords greater protection. Overtime shall be voluntary, shall not be demanded on a regular basis and shall always be compensated at a premium rate.

**Freedom of association and the right to collective bargaining are respected**

Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively. Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

**Regular employment is provided**

To every extent possible work performed must be on the basis of a recognised employment relationship established through national law and practice.

Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, subcontracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

**Living wages are paid**

Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

**Working conditions are safe and hygienic**

A safe and hygienic working environment are be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment. Workers shall receive regular and recorded health and safety training and such training shall be repeated for new or reassigned workers. Access to clean toilet facilities and to potable water and sanitary facilities for food storage are be provided. The company observing the code shall assign responsibility for health and safety to a senior management representative.

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### **Defending the Environment**

Nature is considered a primary property.

FARMACEUTICI PROCEMSA pledges to reduce the impacts of its activities. Its duty is to follow the laws in force and to apply the Environmental Policy that is constantly up-to-date.

The involvement of all employees, collaborators and suppliers is required in the environmental system management.

### **Land Acquisition**

We adhere to the principle of free, prior and informed consent of all communities when acquiring land. The rights of communities and traditional peoples to maintain access to land and natural resources will be recognised and respected.

### **Compliance of the applicable rules**

The respect of the applicable laws is a fixed condition for the existence of the Company itself. Further, the Company applies prevention plans to guarantee the respect of all applicable prescriptions.

### **Confidentiality**

The confidentiality of information exchanged in the course of business must be respected and never be used for illegal purposes or for individual gain. False information must not be given in the course of commercial negotiations.

### **The conflict of interests**

Decisions must be based on the best interest for the Company.

We must avoid situations in which our personal interest could be in conflict with the company's one.

This could happen in the case of:

- economic opportunities linked to our roles,
- other jobs, even if not financially recognized,
- involvement in Administration Boards of other companies,
- political activities,
- offering or receiving of gifts, benefits, money that could influence our professional judgement or become a law violation.

### **No bribery or corruption will be tolerated**

The offering, paying, soliciting or accepting of bribes or kickbacks, including facilitation payments, is strictly prohibited. A bribe may involve giving or offering any form of gift, consideration, reward or advantage to someone in business or government in order to obtain or retain a commercial advantage or to induce or reward the recipient for acting improperly or where it would be improper for the

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recipient to accept the benefit. Bribery can also take place where the offer or giving of a bribe is made by or through a third party. Some examples of bribes are as follows:

- lavish gifts, meals, entertainment or travel expenses, particularly where they are disproportionate, frequent or provided in the context of ongoing business negotiations
- the uncompensated use of company services, facilities or property
- cash payments
- loans, loan guarantees or other credit
- the provision of a benefit to a member of the family of a potential customer, public or government official;
- providing a subcontract to a person connected to someone involved in awarding the main contract; and engaging a local company owned by a member of the family of a potential customer, public or government official.

Facilitation payments are small payments or fees requested by government officials to speed up or facilitate the performance of routine government action. Such payments are strictly prohibited.

Also Suppliers and their employees must comply with all applicable anti-bribery and corruption laws.

### **Environmental management**

Procemsa is certified ISO 14001; it has always been believed in the importance of taking care of the environment and constantly evaluates all the aspects that could become potential environmental impacts, so workers apply compatible procedures in the mission of a continuous improvement, for the wellness of the community.

The main objective is the reduction of waste through the separation of recuperable materials, reducing of energy consumption, reduction of use of water and emissions in air.

To reach this objective the involvement of all employees is always required.

We support and encourage operating practices and agricultural production systems that are sustainable, included water conservation programmes, and we participate to circular economies projects.

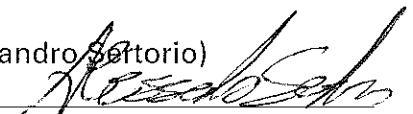
### **Quality**

Any goods supplied shall be without fault and of the best available design, quality, material and workmanship, be fit for any purpose held out and conform in all respects with any specification.

Any services supplied shall be provided by appropriately qualified and trained personnel, with due care and diligence, to such high standard of quality.

Nichelino, 03.05.2022

CEO (Alessandro Sartorio)



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