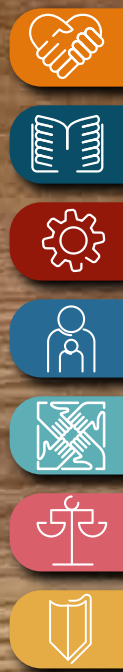




GLOBAL CODE OF CONDUCT





PHARMACEUTICALS WITH PASSION

Stefano Golinelli p. 2

Francesco Balestieri p. 3

[1] WHO WE ARE p. 4

[2] THE GLOBAL CODE OF CONDUCT p. 10

[3] IMPLEMENTATION MECHANISMS p. 16

[4] WE RESPECT OUR PEOPLE AND THE ENVIRONMENT p. 22

[5] WE OPERATE WITH INTEGRITY p. 28

[6] WE MANAGE RELATIONSHIPS RESPONSIBLY p. 36

[7] WE PROTECT OUR COMPANY p. 44





Stefano Golinelli,
Chairman

THE MESSAGE FROM OUR CHAIRMAN

A company's code of ethical conduct codifies what we consider to be the correct behaviors to apply in our daily activities within the organization and towards the stakeholders with whom we interface externally.

In the pharmaceutical sector, more than in other industries, how we carry out our activities is just as important as the outcome of these. It's not enough to achieve a result, you have to achieve it in the right way, respecting laws, regulations and industry guidelines.

It is no coincidence that, in order to pursue our mission, we have defined a model of behavior and specific corporate values. Our mission is to improve the health and quality of life of patients, offering caregivers and healthcare professionals therapeutic solutions and support with passion and professionalism.

Though the values of passion and tenacity, we wanted to emphasize the importance of integrity. Integrity in everything we do.

For this reason, I am happy to introduce this edition of Alfasigma's Global Code of Conduct, hoping that it will become a useful compass for all colleagues.

Stefano Golinelli



Francesco Balestrieri,
AD

THE MESSAGE FROM OUR CEO

I am pleased to present Alfasigma's Global Code of Conduct which represents an evolution of the Group's Code of Ethics already in use.

The Global Code of Conduct is a tool that the company has prepared to ensure compliance with all laws and regulations that govern the industry. The Code defines the guidelines for conduct and explains, with examples and concrete cases, how we want our activities to be carried out in accordance with the Ethical principles and corporate values.

The Code is applicable to all the companies of the Group and all business partners. An organization as complex and articulated, on an international level, as Alfasigma must have a structured approach that includes every aspect of the business and is valid on a global level. This is the reason for which we have decided to produce a document, which is easy to understand and can be applied to every area of the organization.

It is crucial that the Global Code of Conduct is well understood by each of us and put into practice in our own activities, guiding our daily behavior and thus preventing illegal or unethical conduct. Every employee and business partners of Alfasigma is required to read it, make it his or her own, follow its instructions and, if necessary, promptly report any violation through the channels provided.

Enjoy reading

Francesco Balestrieri
Alfasigma Spa's Managing Director



1

WHO WE ARE

- ▶ OUR MISSION
- ▶ OUR VALUES
- ▶ OUR LEADERSHIP MODEL
- ▶ OUR COMMITMENT TO SUSTAINABLE DEVELOPMENT



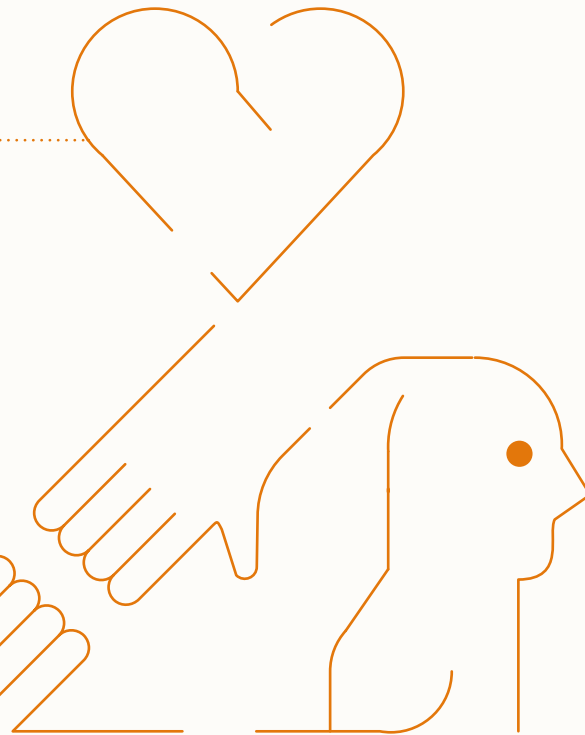
The birth of Alfasigma coincides with a crucial moment in the history of humanity. In fact, in 1948 in Paris the International Charter of Human Rights was signed and in the same year, in Bologna, Marino Golinelli founded Biochimici Alfa, which later became Alfa Wassermann S.p.A., a reality that grew steadily, year after year, adopting a twofold strategy:

- **INTERNAL:** through the focus on research and development, production and marketing in Italy and abroad, on a few proprietary molecules, which today represent more than 50% of the Group's consolidated turnover;
- **EXTERNAL:** through a solid strategy of mergers and acquisitions with other Italian and foreign companies.

Alfasigma S.p.A. was born between 2015 and 2017, from the merger between the Alfa Wassermann and Sigma-Tau groups. The new company immediately became one of the main players in the Italian pharmaceutical industry, capitalizing on the industry, on the know-how, on the potential and expertise of the original companies.

OUR MISSION

Our mission is to improve the health and quality of life of patients and healthcare professionals. Serving people is our most important source of energy and our vocation, which we pursue every day with passion. We work with our hearts and minds. This is how we make a difference, *"so that our patients can dream big and live life to the fullest"*.



OUR VALUES

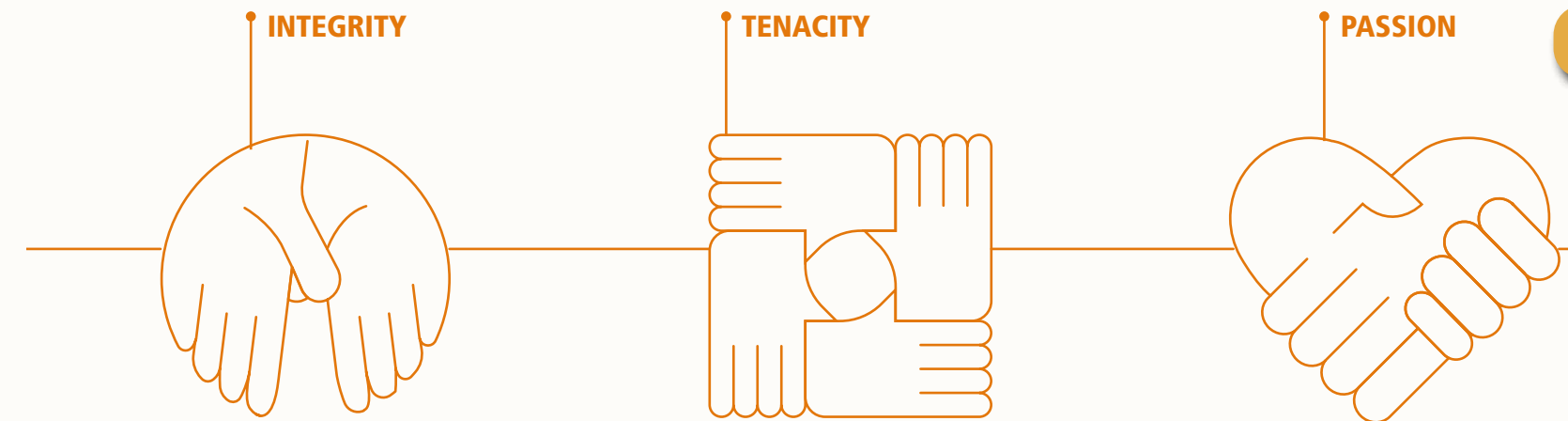
Our company culture is based on three core values:

INTEGRITY means that we require our employees, managers and business partners to operate in a transparent, respectful and honest manner, always taking responsibility for their actions.

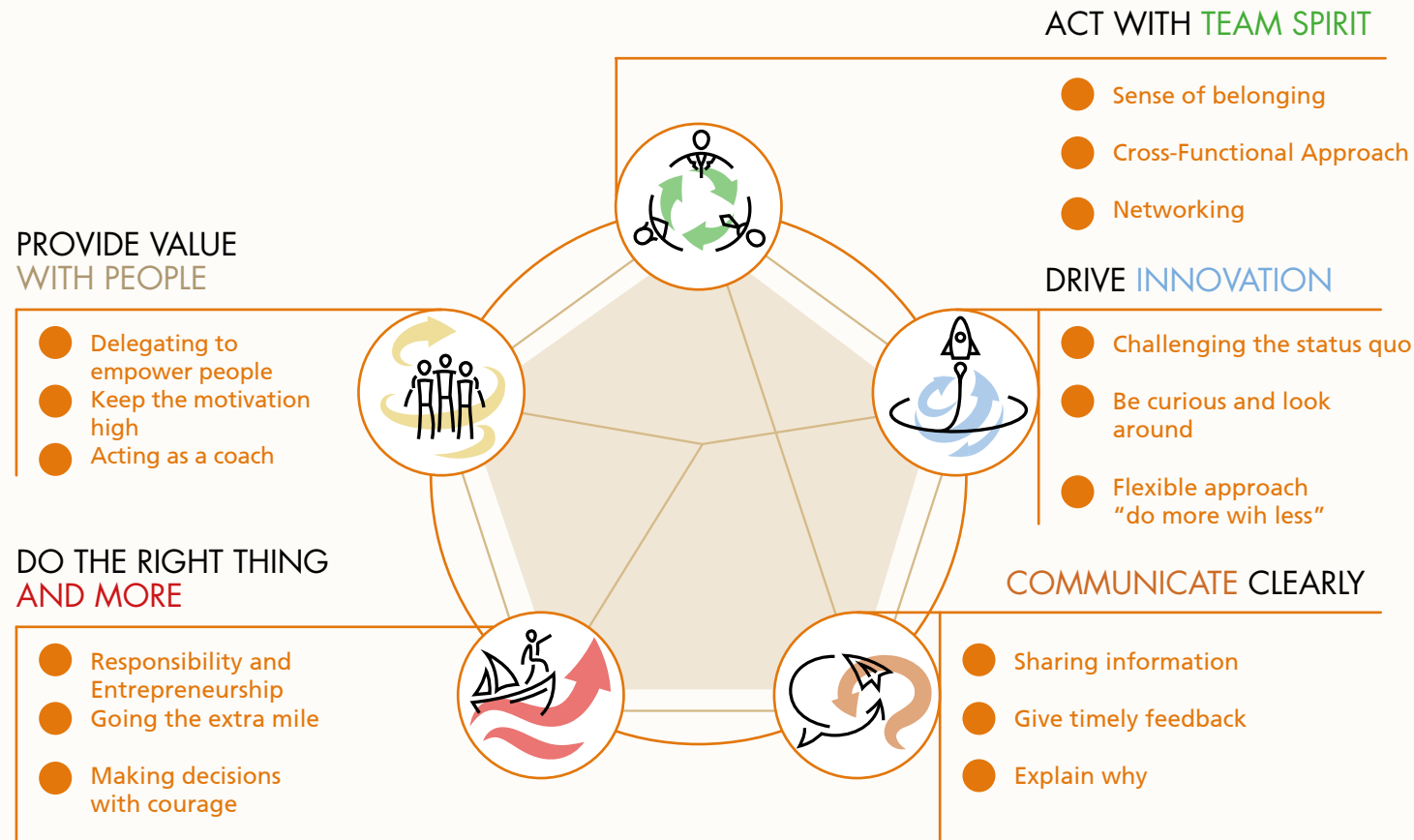
TENACITY is well represented by the company slogan *"Never give up"*. We ask all the people of Alfasigma to take a persevering and tenacious approach in every project and activity. The history of the company has deep roots in the tenacity of our employees.

PASSION refers to our corporate payoff *"Pharmaceuticals with passion"*. We strongly believe that people, if driven by passion for their work, can always go one step further. Passion is in everything we do, in our products and on the impact they have on patients. *A passion made in Italy.*

OUR LEADERSHIP MODEL



We ask our employees to adhere to our corporate values and, to this end, we have adopted a **Leadership Model** that prescribes **five virtuous behaviors to be put into practice on a daily basis**. This set of behaviors represents the compass for making decisions and facilitating the exercise of one's role in the Group. It enables our employees to enrich their skills, develop their talent and increase their individual contribution to the company.



OUR COMMITMENT TO SUSTAINABLE DEVELOPMENT

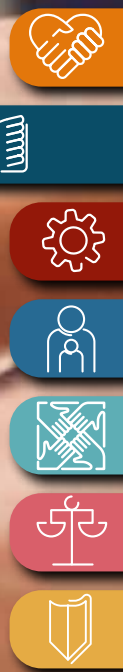
The 2030 Agenda for Sustainable Development, ratified at the ONU summit by 193 countries in 2015, includes 17 sustainable development goals (**Sustainable Development Goals** or **SDGs**), defined in 169 targets or goals.

Alfasigma's business strategy is closely linked to sustainability principles, for this reason, as a player in the pharmaceutical industry, we are committed to positively contributing to the goals that mostly align with our business and our activities, as well as to promote their application in every country and context in which we operate.

2

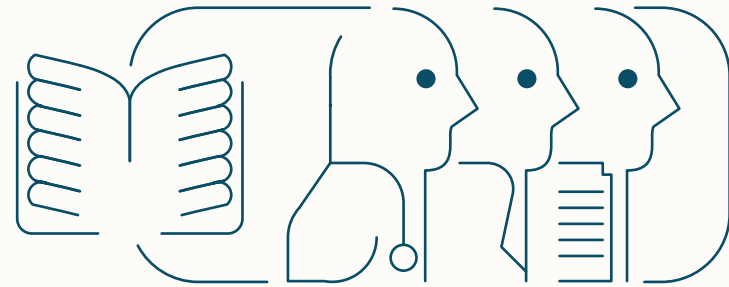
THE GLOBAL CODE OF CONDUCT

- ➔ WHO IS THE CODE AIMED AT?
- ➔ WHAT ARE THE RESPONSIBILITIES OF THE RECIPIENTS?
- ➔ HOW TO RESOLVE ANY DOUBTS AND ASK FOR CLARIFICATION



The Alfasigma Global Code of Conduct (hereafter the “Code” or the “Code of Conduct”) is the instrument with which we intend to ensure compliance with all laws and regulations and summarize the ethical principles and values existing within Alfasigma Group, in order to guide daily behaviors and choices and prevent unlawful or unethical conduct.

It is adopted by Alfasigma S.p.A and its subsidiaries and affiliates (hereinafter also “the Group” or “Alfasigma”).



Who is the Code aimed at?

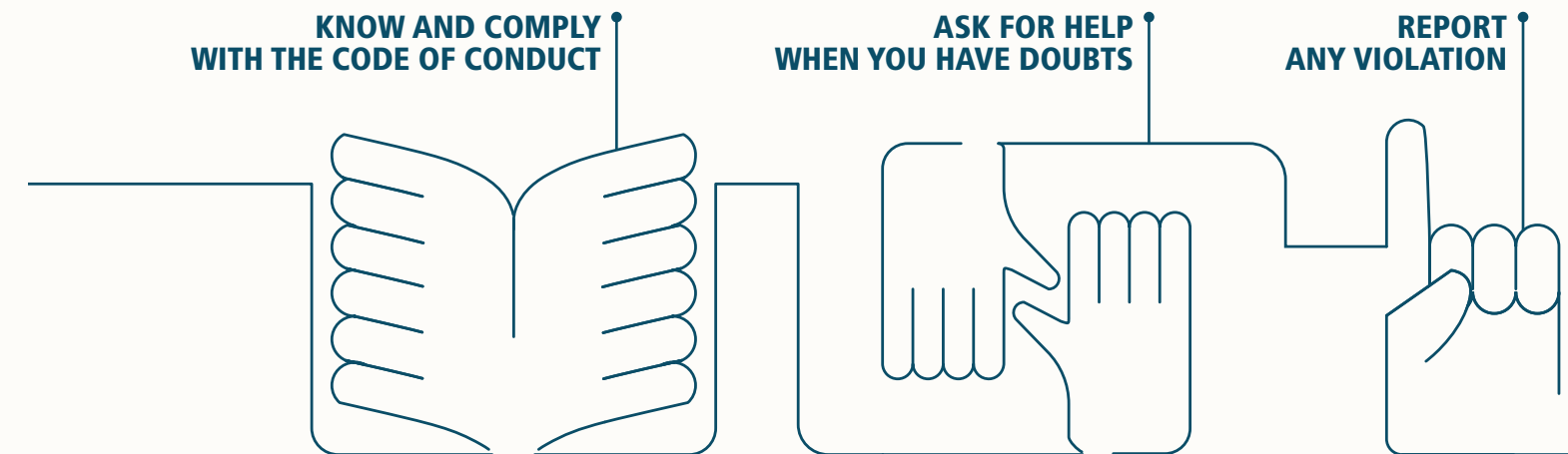
The Code is addressed to employees, executives, Group’s governing bodies and all other third parties linked to Alfasigma by contract, even occasional and/or only temporary, who act, operate and collaborate in any way with the companies of the Group (e.g., consultants, agents, attorneys, suppliers, business partners etc. hereinafter also “Third Parties”). These subjects are identified as “Recipients” of the Code.

What are the responsibilities of the Recipients?

The Recipients are required to act in compliance with the principles referred herein. In carrying out the activities entrusted to them, they are required to act in compliance with the regulations and the general principles of absolute honesty, loyalty, good faith, fairness and diligence, in addition to complying with the specific obligations that may derive from the industry associations guidelines.

Recipients are asked to:

- **know and comply** with the Code of Conduct and apply it in the performance of duties and professional assignments;
- **ask for help** from their company contact person or supervisor and/or the relevant departments when faced with situations of uncertainty in the application of laws, company policies and the Code;
- **promptly report** to the responsible departments, any violation, even potential, of laws, external and internal regulations, the Code of Conduct and the industry associations codes.



Management is also responsible for:

- **overseeing** the implementation of the Code and taking all necessary steps to ensure its implementation within their respective areas of responsibility;
- **setting** an example for the team, all colleagues and business partners;
- **promoting** a collaborative work environment that is characterized by honesty and transparency, where people feel comfortable and encouraged to discuss any concerns they may have about how to conduct themselves in the performance of their jobs.

Third Parties must know and respect, in the performance of their business relationship with Alfasigma, the ethical principles described in the Code of Conduct.

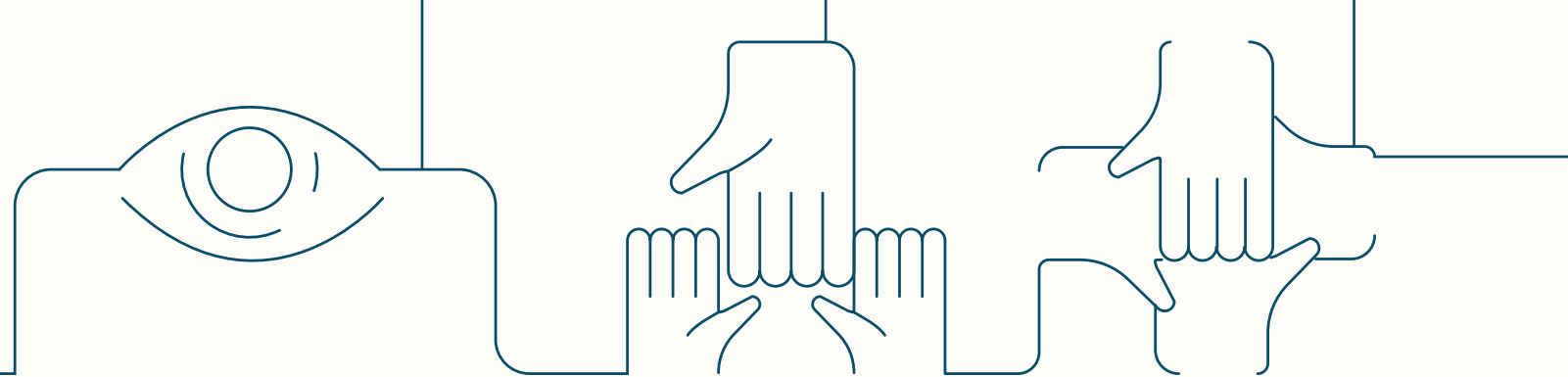
How to resolve doubts and ask for clarification

The Code of Conduct does not purport to provide a specific answer for every need or situation that could arise. In the course of daily work, in fact, situations may arise that are not explicitly dealt with in the Code. However, the Code can be a useful guide for the decision-making process of each Recipient.

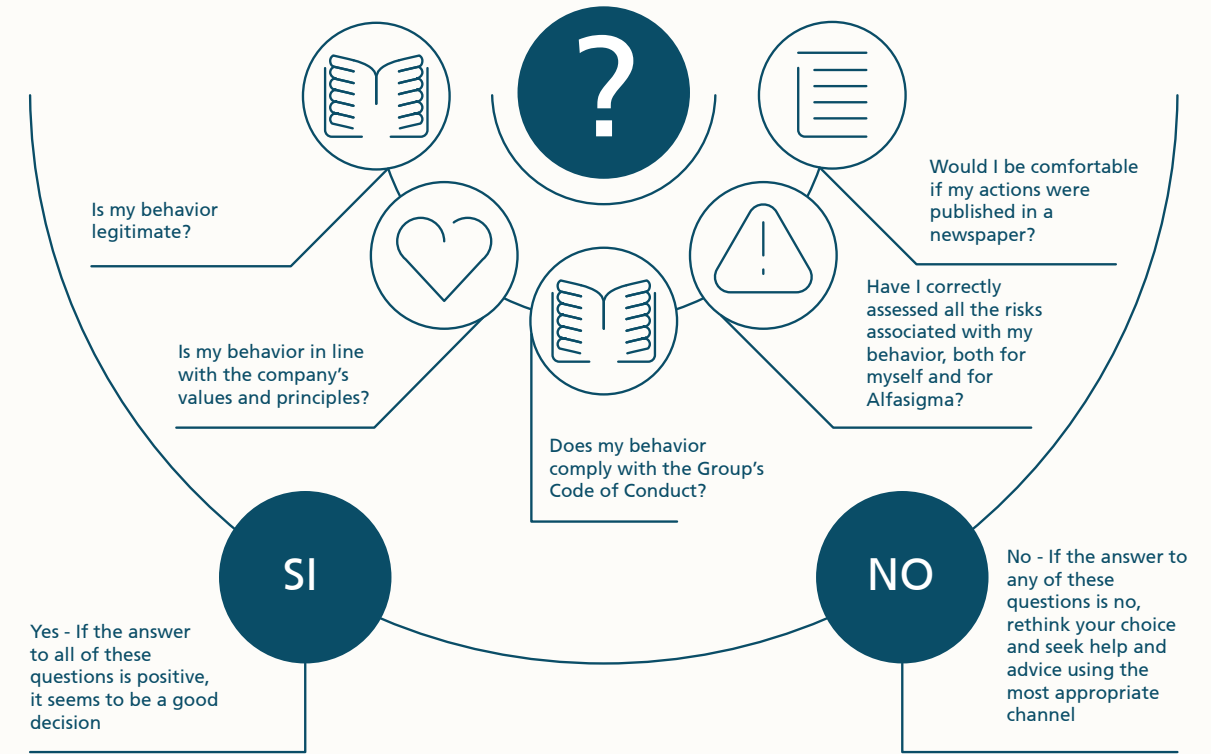
OVERSEE THE IMPLEMENTATION OF THE CODE

SET AN EXAMPLE

PROMOTE A COLLABORATIVE WORK ENVIRONMENT



THE ETHICAL DILEMMA



IF I HAVE CONCERNS OR QUESTIONS, WHO CAN I CONTACT? WHAT ARE THE REPORTING CHANNELS AT ALFASIGMA?

In such cases you can always reach out and ask for support:

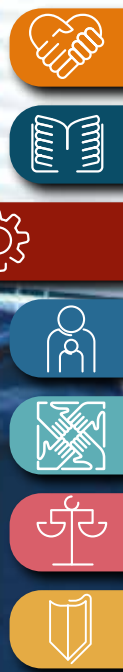
- to your company contact person or supervisor;
- to the Human Resources Department;
- to the Local Compliance Officer (contact person of the Compliance function at the subsidiaries of Alfasigma S.p.A.);
- to the Corporate Compliance Manager;
- to the Head of Corporate Internal Audit & Compliance.



3

IMPLEMENTATION MECHANISMS

- GOVERNANCE AND DISSEMINATION OF THE CODE
- REPORTING AND PRINCIPLE OF NON-RETALIATION
- DISCIPLINARY AND SANCTIONING SYSTEM

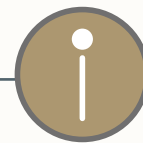
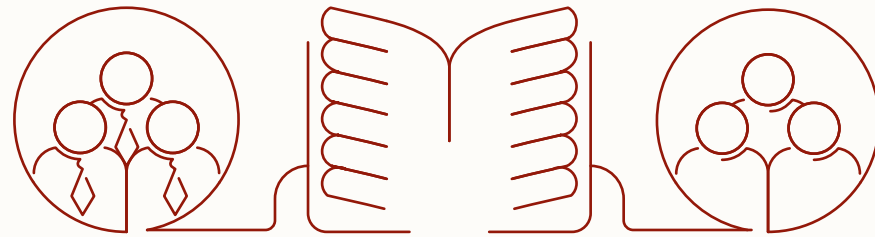


Governance and dissemination of the Code

The board of Directors of Alfasigma S.p.A. (hereinafter the "Parent Company") and the governing Bodies of the other Group companies are responsible for the adoption and implementation of the Code.

The dissemination of the Code is ensured by the Compliance department of the Group companies, which also ensures the provision of training sessions to all corporate functions.

In order to ensure full accessibility to all Recipients, the Code is available and may be viewed on the Group's website.



METHOD OF COMMUNICATION

The Code is brought to the attention of all Recipients by:

- appropriate **communication activities** as revised;
- **paper delivery or digital dissemination** at the time of hiring (with the signing of the relevant acknowledgement and acceptance);
- availability on **Alfasigma's website** (www.alfasigma.com);
- **identification and signing of specific contractual clauses** in relation to Third Parties.

It is also available to all employees on the intranet site called "The Hub".

Reporting and principle of non-retaliation

If we believe that someone is or may act in violation of the laws, regulations or the principles contained in this Code we have the duty to report it through the appropriate channels.

Recipients, who make reports, are acting in the interest of Alfasigma and are protected.

Alfasigma protects the confidentiality of whistleblowers and prohibits any form of retaliation against them.

Reports must be made in good faith, be detailed, based on precise and consistent elements and relate to verifiable facts.

Reports of a private nature or personal grievances against colleagues or supervisors do not fall within the scope of reporting and are the responsibility of the Human Resources Department.

Reports may be sent via the dedicated web platform, or through the other reporting channels available at each Group company.

Alfasigma will not tolerate any abuse of the reporting channels.



WHAT SHOULD I DO IF I AM RETALIATED AGAINST, FOLLOWING A REPORT?

Alfasigma expressly prohibits any form of retaliation against whistleblowers for reasons related, directly or indirectly, to the report. If you have suffered retaliation of any kind, we ask you to report it immediately, through the appropriate channels, to allow Alfasigma to start an investigation.



Disciplinary and sanctioning system

All Recipients are required to comply with this Code, therefore any conduct in violation of the same will result in the application of sanctions calibrated and proportionate to the type of violation committed.

Sanctions will be adopted by each Group company in accordance with applicable local laws and regulations and will be imposed consistently, impartially and uniformly.

The sanctions provided for, in the specific contractual clauses, will be applied to Third Parties, depending on the seriousness of the violation.



4

WE RESPECT OUR PEOPLE AND THE ENVIRONMENT

- ▶ WE CREATE A HEALTHY, SAFE AND COMFORTABLE WORK ENVIRONMENT
- ▶ WE VALUE DIVERSITY AND FOSTER A CULTURE OF INCLUSION
- ▶ WE ARE COMMITTED TO THE GROWTH OF OUR PEOPLE
- ▶ WE PROTECT THE ENVIRONMENT



People are the main source of the Group's success. We put people first, we are committed to ensuring healthy and safe workplaces, spreading a culture of inclusion, valuing diversity, ensuring equal opportunities and encouraging professional growth.

We create a healthy, safe and comfortable work environment

People are our priority. For this reason, we consider it essential to protect the physical and moral integrity of our employees and co-workers and we have established a strong culture of prevention and protection of people in the workplace.

FOR THIS, WE ARE COMMITTED TO...

- guaranteeing compliance with the applicable laws and regulations regarding health and safety at work, ensuring that no dangerous behaviour is carried out;
- reducing the risks for workers also by choosing the most suitable and less dangerous materials, protective devices and equipment, as well as mitigating the risks at the source, with the aim of pursuing the "zero accidents" objective;
- educating all workers, through suitable training and information activities regarding health and safety laws and regulations.

WE DO NOT TOLERATE:

- any form of intimidation and/or harassment that may compromise the moral and professional dignity as well as the physical and psychological integrity of individuals;
- the use, presence or distribution of alcoholic or narcotic substances;
- the employment of illegal or undeclared workers;
- any form of exploitation of employees.



WHAT IS MEANT BY...

"Workplace harassment" is defined as unwelcome conduct with the purpose or effect of violating the dignity of an employee and creating an intimidating, hostile, degrading, humiliating or offensive environment.

This may be physical, psychological and/or sexual in nature, be isolated incidents or more systemic, occur between colleagues, between supervisors and subordinates or by Third Parties.

Workplace is meant to broadly include, for example, common areas, places associated with business travel, places where training courses are held, events, virtual spaces such as email, chat or video calls.

By way of example, psychological harassment in the workplace may constitute:

- use of offensive or sarcastic language;
- continuous criticism of the worker/employee.

By way of example, sexual harassment in the workplace may constitute:

- unwelcome physical contact;
- unwelcome verbal or nonverbal appreciation;
- inappropriate comments with references to a person's sexuality;
- sending inappropriate pictures or e-mails;
- vulgar jokes and mockery of various kinds;
- retaliation for rebuffing advances.



I AM THE ONLY WOMAN ON MY TEAM AND FREQUENTLY, DURING A MEETING OR A BUSINESS DINNER, MY COLLEAGUES, JOKING AMONG THEMSELVES, USE EXPRESSIONS WITH CLEAR SEXUAL INNUENDO AND OFTEN ASK ME QUESTIONS ABOUT MY PRIVATE LIFE. THIS MAKES ME FEEL REALLY UNCOMFORTABLE, WHO CAN I TALK TO ABOUT IT?

This is inappropriate behavior and is not acceptable in our work environment. You may wish to discuss this matter with your supervisor or with the Human Resources Department, in order to assess the most appropriate actions to ensure that Alfasigma's values described in this Code are understood and adopted also by your colleagues.



We value diversity and foster a culture of inclusion

In Alfasigma we offer all employees the same opportunities, based on merit and in the principle of equality. We value diversity and encourage collaboration and team spirit, promoting full inclusion of all employees in the working environment.



FOR THIS, WE ARE COMMITTED TO...

- promoting a corporate culture based on inclusion and respect;
- guaranteeing equal opportunities to all people working in Alfasigma;
- encouraging team spirit and collaboration, as well as information, ideas and knowledge sharing;
- guaranteeing that the selection and hiring process is based on the respect for the principles of transparency, impartiality and professionalism.

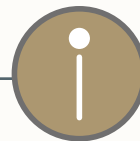
WE DO NOT TOLERATE:

- any form of discrimination based on age, gender, nationality, ethnicity, skin color, sexual orientation, personal characteristics, religious beliefs, geographical origin, political orientation or any other personal or social condition;
- any form of favoritism, nepotism and patronage in the selection and recruitment of personnel and in the subsequent stages of professional development.

WE RESPECT HUMAN RIGHTS

With particular reference to the protection of Human Rights, Alfasigma is committed to...

- protecting and promoting human rights, operating with the utmost respect for the dignity of the person, and requiring the same commitment from Third Parties;
- contributing to the creation of the socio-economic conditions necessary for the effective enjoyment of human rights recognized by the highest international standards;
- condemning all forms of child and forced labor, modern slavery and human trafficking;
- opposing any form of exploitation, abuse or coercion against all our co-workers.



We are committed to the growth of our people

The contributions of our people are fundamental for the growth and success of the Group and that is why we are committed to enhancing and developing talents and professional skills of our employees.

FOR THIS, WE ARE COMMITTED TO...

- ensuring that the process of developing and enhancing human resources is based on respect for the principles of transparency, impartiality and professionalism;
- making available the best training tools with the aim of enhancing and developing specific professional skills and talents of employees;
- guaranteeing remuneration commensurate with position, tasks and responsibility of each employee;
- defining objectives, both general and individual, focused on possible, concrete, measurable results such as not to induce employees to commit unlawful acts to achieve them.

We protect the environment

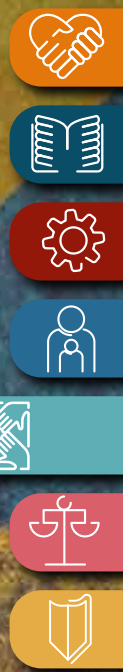
Alfasigma has as an unavoidable objective the protection of the environment in all countries in which it operates, always in compliance with applicable environmental legislation. We seek to balance financial and economic policies with environmental ones through responsible and conscious governance. We are committed to contributing positively to sustainable development, as well as continuously improving the environmental performance of our processes, optimizing the use of resources in order to minimize environmental impacts.



5

WE OPERATE WITH INTEGRITY

- ▶ WE ARE COMMITTED TO COMPLYING WITH LAWS AND REGULATIONS WORLDWIDE
- ▶ WE COMBAT MONEY LAUNDERING AND TERRORIST FINANCING
- ▶ WE FIGHT CORRUPTION
- ▶ WE REPORT CONFLICTS OF INTEREST
- ▶ INSIDER TRADING



We work in an honest, open and transparent manner, respecting the applicable laws and regulations, honoring our commitments and ensuring that we do not compromise in any way the values, integrity and reputation of Alfasigma.

We are committed to complying with laws and regulations worldwide

We act in compliance with the applicable laws and regulations in all the countries in which we have a presence, either directly or indirectly.

We also operate in compliance with the ethical principles defined by the pharmaceutical industry associations.

We believe in the value of a culture based on the definition of rules and on the establishment of an adequate system of internal controls to prevent unlawful conduct.



FOR THIS, WE ARE COMMITTED TO...

- promoting the knowledge of current laws and regulations and company policies to all employees of Alfasigma through training programs and adequate internal communication channels;
- being up-to-date, knowing the laws and regulations, both external and internal, applicable to one's own function, consistently with one's own degree of responsibility;
- participating in training programs, carefully reading company communications and delving into the contents available through the channels made available by Alfasigma;
- discussing and asking for advice from colleagues, supervisors or the company contact person in case of doubts on the conduct.

WE DO NOT TOLERATE:

- conduct contrary to laws, regulations and ethical principles defined by the associations of the pharmaceutical industry, even when acting in the interest of Alfasigma.

We combat money laundering and terrorist financing

We comply with applicable anti-money laundering and anti-terrorist financing legislation by conducting preventive checks on information relating to counterparties with whom we intend to do business.

FOR THIS, WE ARE COMMITTED TO...

- carrying out preventive analyses on available information of potential counterparties (e.g. suppliers, partners, customers, co-workers, agents, etc.) in order to verify their reliability, honorableness and absence from the so-called "reference lists";

WHAT IS MEANT BY...

By "Reference Lists" we mean the lists, national and international, in which there are names of individuals and names of legal entities involved in illegal activities and on which restrictive sanctions have been imposed by the European Union or other supranational bodies in the fight against terrorism or anti-money laundering.

Alfasigma immediately interrupts relations with its suppliers and business partners if, during a control activity, it finds that a counterparty has been included in the "Reference Lists" drawn up by the Security Council of the United Nations (UN) and/or the European Union (EU) and/or the Office of Foreign Assets Controls (OFAC) of the U.S. Treasury Department.



- not entertaining relations with Third Parties suspected of belonging to organized crime;
- not accepting money and/or goods and/or services and/or anything else of value that is of illegal or uncertain origin;
- not making payments to a party other than the contractual counterparty;
- not accepting payments in cash.

We fight corruption

We firmly believe that corruption represents a serious obstacle to sustainable economic development. At Alfasigma we adopt a “zero tolerance” approach to any corrupt practice, whether active or passive.

FOR THIS, WE ARE COMMITTED TO...

- acting on the basis of the principles of honesty, transparency and integrity;
- accepting and offering gifts or other benefits only if they are of modest value and fall within local courtesy practices, in compliance with the laws and regulations applicable in all countries in which Alfasigma operates;
- making donations and sponsorships in compliance with applicable regulations, ensuring traceability.



IN ORDER TO FACILITATE THE WINNING OF A BID FOR A SUPPLY CONTRACT TO ALFASIGMA, I THOUGHT OF OFFERING A GIFT (FOR EXAMPLE, A BOTTLE OF FINE WINE) TO ONE OF THE BID DECISION-MAKERS. CAN THIS BE CONSIDERED A CORRUPTIVE ACT?

Yes, offering a gift could be considered a corruptive act. In fact, a gift of this kind could be interpreted by an impartial Third Party as a gesture motivated solely by the desire to win the bid.

WE DO NOT TOLERATE:

- conducts aimed at including or improperly influencing acts of Third Parties by offering or promising money, goods, services or benefits of any other kind, in the name or on behalf of Alfasigma, nor on a personal basis;
- conduct aimed at influencing a decision or activity by offering any form of gift or hospitality that may be interpreted by a Third Party as exceeding normal business practices or courtesy;
- soliciting or accepting money, goods, services or personal benefits of any kind from suppliers or customers, public or private, in connection with one’s job or with activities carried out on behalf of Alfasigma.

We report conflicts of interest

We make impartial decisions and avoid situations, even potential ones, of conflict of interest, ensuring that business decisions are made in the interest of Alfasigma and not on the basis of personal interests.

WHAT IS MEANT BY...

“Conflicts of interest” is when a personal interest may interfere with the ability to make decisions in the sole interest of Alfasigma.

By way of example, a conflict of interest may exist when:

- one purchases goods or services on behalf of Alfasigma from a relative or from a company in which the relative has an interest;
- one provides services and receives compensation from suppliers, customers or other Third Parties in a business relationship with one or more Group companies;
- one owns shares, directly or indirectly, in companies that sell goods or services to Alfasigma;
- one exploits one’s position or role in order to obtain a personal advantage of any kind.



FOR THIS, WE ARE COMMITTED TO...

- immediately reporting any situation of conflict of interest, even if only potential, to a company contact person or supervisor;
- avoiding any situation that interferes, or may interfere, with the ability to make impartial decisions in the interest of Alfasigma;
- asking a supervisor or the functions in charge (Local Compliance Officer or Corporate Compliance Manager) for clarification on how to manage a conflict of interest or whether a situation is a conflict of interest.

WE DO NOT TOLERATE:

- conduct aimed at gaining any advantage for oneself, one's family members or acquaintances from opportunities arising from company duties.

CAN I ACCEPT AN EMPLOYMENT OR CONTRACTOR OFFER FROM ANOTHER PHARMACEUTICAL COMPANY WHILE WORKING AT ALFASIGMA?

You are required to notify the Human Resources Department in advance. Should this situation constitute a conflict of interest and interfere with your job responsibilities and/or should it produce a risk of loss of confidentiality of Alfasigma's data and information, the offer cannot be accepted.

Disciplinary sanctions may be applied in the absence of the aforementioned communication.

**IF I FIND MYSELF MANAGING A NEGOTIATION ON BEHALF OF ALFASIGMA WITH AN EXTERNAL PARTNER (SUPPLIER OR CUSTOMER), WHOSE OWNER IS A RELATIVE/FRIEND, WHAT SHOULD I DO?**

You must notify your company contact person or manager of the conflict of interest in which you find yourself in and ask to be assigned to another negotiation or not to be the only person handling it.

**Insider Trading**

Recipients of the Code are prohibited from trading or enabling others to trade stock of a company – such as current or potential customers, suppliers, competitors, or partners of a company of the Alfasigma Group – while in possession of confidential information about that company.

All non-public information about Alfasigma and companies it does business with is considered confidential.



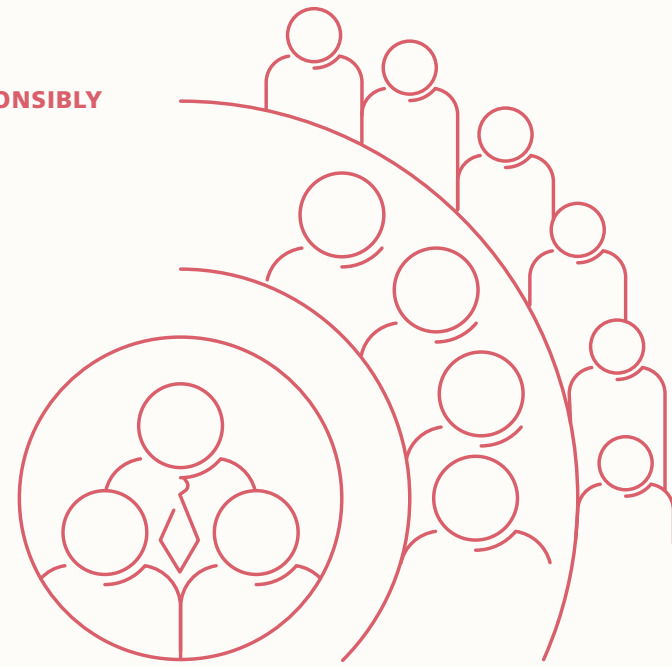
6

WE MANAGE RELATIONSHIPS RESPONSIBLY

- ▶ WE COMPETE FAIRLY
- ▶ WE GUARANTEE THE QUALITY AND SAFETY OF OUR PRODUCTS
- ▶ WE MANAGE RELATIONSHIPS WITH OUR SUPPLIERS AND PARTNERS IN AN ETHICAL MANNER
- ▶ WE WORK RESPONSIBLY WITH GOVERNMENTAL AND PUBLIC PUBLIC AUTHORITIES AND INSTITUTIONS
- ▶ WE DO NOT FINANCE POLITICAL PARTIES AND TRADE UNION ORGANIZATIONS
- ▶ WE ACTIVELY INTERACT WITH PATIENT ASSOCIATIONS
- ▶ WE MANAGE RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS, SCIENTIFIC SOCIETIES, MEDICAL ASSOCIATIONS AND HEALTHCARE FACILITIES IN A TRANSPARENT MANNER

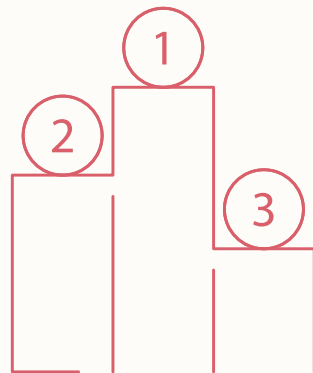


We believe in the value of conduct based on the highest ethical standards for Alfasigma, for its Stakeholders and for the entire Community.



We compete fairly

We believe in the value of fair competition and refrain from collusive practices and abuses of power, as well as from behaviors that could alter or distort competition. We base our conduct on the principles of fairness and transparency.



FOR THIS, WE ARE COMMITTED TO...

- complying with applicable competition laws in all countries in which we operate;
- opposing any collusive practices that could undermine the proper functioning of competition.

WE DO NOT TOLERATE:

- any form of abuse of power, where the company finds itself in a possible dominant position in the market;
- the definition of agreements, even informal, with competitors, aimed at limiting free competition, such as, by way of example but not limited to, agreements for the fixing of prices, the sharing of the market, the awarding of bids.

We guarantee the quality and safety of our products

The safety of our patients is a priority. We, therefore, adopt the **highest quality standards in research, development, manufacturing, distribution, and pharmacovigilance activities**, aligning with international best practices and complying with applicable laws and regulations.

FOR THIS, WE ARE COMMITTED TO...

- complying with quality standards defined by Alfasigma and the regulations governing the research, development, manufacture and distribution of our products, in particular the good practices recognized at European and international level;
- collaborating with qualified suppliers, recognizing the importance of carefully choosing one's counterparts for the creation of safe and quality products;
- carefully considering any complaints relating to the quality of the products, ensuring for our patients a continuous improvement of production;
- communicating to the competent functions of Alfasigma any information regarding the safety of the products in accordance with internal pharmacovigilance procedures;
- monitoring the possible adverse events of our products during the entire life cycle of the product in order to guarantee the highest level of quality and safety, in compliance with good pharmacovigilance practices and the provisions of the regulatory authorities;
- providing clear, complete and correct scientific information.



I FOUND OUT THAT A FRIEND OF MINE, USING AN ALFASIGMA PRODUCT, HAD SOME SIDE EFFECTS. SHOULD I REPORT IT EVEN IF I LEARNED THE NEWS DURING AN INFORMAL SETTING?

Yes, regardless of the context in which this information is collected, potential adverse reactions, i.e. any adverse and unintended effect arising from the intake of an Alfasigma medicinal, product must be reported according to Pharmacovigilance procedures.

We manage relationships with our suppliers and partners in an ethical manner

Our relationships with our suppliers of goods and services and business partners are based on the principles of honesty, fairness, respect, diligence, impartiality, clarity and confidentiality.

We only work with reputable and honorable suppliers and business partners with a solid reputation.



FOR THIS, WE ARE COMMITTED TO...

- adopting selection processes based on objective and traceable criteria;
- formalizing contracts with suppliers/business partners in writing, setting out the rights and obligations of both parties. Contracts must contain specific clauses requiring our counterparties to comply with applicable legislation and the principles of the Global Code of Conduct;
- not exploiting situations of weakness of the supplier in the formulation of contractual relationships. We expect this behavior from our counterparties as well.

We work responsibly with governmental and public authorities and institutions

We manage our relations with authorities and public institutions according to principles of integrity, accuracy and transparency and we condemn any conduct aimed at gaining an undue/illicit advantage, even in the belief that we are acting in the interest of Alfasigma.

The assumption of commitments and the management of relations with the government/public administration and, in general, with national and international public bodies, may only be undertaken by persons expressly authorized and endowed with appropriate powers.



THE AUTHORITIES HAVE ASKED ME TO PROVIDE A NUMBER OF DOCUMENTS. CAN I AVOID TURNING OVER MATERIAL AND DOCUMENTATION THAT I DON'T THINK IS IMPORTANT?

No, Alfasigma collaborates with all authorities and institutions, maintaining transparent and cooperative relations. Failing to hand over all or part of the documentation is an action that could lead to serious consequences in terms of penalties/liability and reputation.

FOR THIS, WE ARE COMMITTED TO...

- not offering, even through a Third Party, money, benefits (e.g. work or commercial opportunities) or other items of value to government officials, their family members or persons connected to them, in order to obtain an undue/illicit advantage;
- not making or inducing false statements to the judicial authority and the government/public administration.

WE DO NOT TOLERATE:

- conduct that may affect the independence and autonomous judgment of representatives of the government/public administration;
- conduct aimed at unduly obtaining public grants and/or funding, or at allocating them for purposes other than those for which they were granted.

We do not finance political parties and trade union organizations

Alfasigma refrains from financing, directly or indirectly, political parties, movements, committees and political and trade union organizations, or their representatives and candidates. We do not sponsor events, manifestations, congresses or conferences whose purpose is political propaganda.



We actively interact with patient associations

The interaction with patient associations allows us to understand how the patient lives with the disease and to identify the needs to improve the quality of life.

FOR THIS, WE ARE COMMITTED TO...

- supporting patient associations, in full compliance with the applicable legislation and the ethical rules of relevant associations;
- respecting the autonomy of patient associations;
- initiating projects and collaborations based on mutual benefit.

WE DO NOT TOLERATE:

- conduct designed to exert undue influence on patient associations.

We manage relationships with healthcare professionals, scientific societies, medical associations and healthcare organizations in a transparent manner

Our relationships with healthcare professionals (doctors, pharmacists, nurses or other healthcare personnel), scientific societies, medical associations and healthcare organizations are managed according to the highest standards of integrity, in a transparent and traceable manner, in compliance with applicable legislation and the relevant codes of ethics.

We interact with the medical and scientific community to ensure that patients have access to our products and use them properly to derive maximum benefit.

The materials and activities aimed at medical-scientific information are made with extreme care in order to properly disseminate information about Alfasigma products, in full compliance with applicable laws and regulations.



Alfasigma intends to implement and promote information activities and scientific dissemination, such as, for example, conferences and conventions. These, in fact, allow healthcare professionals to share their clinical experiences and deepen their knowledge of the therapeutic value of the active ingredients contained in Alfasigma's products, in order to ensure their effective use and improve patient care.

FOR THIS, WE ARE COMMITTED TO...

- making the selection of medical consultancies on the basis of objective criteria such as scientific competence;
- formalizing collaborations with healthcare professionals through contracts that describe the nature of the service rendered and the value of the service, which must be aligned with market value.



7

WE PROTECT OUR COMPANY

- WE GUARANTEE TRANSPARENCY AND ACCURACY OF INFORMATION
- WE PROTECT PERSONAL DATA
- WE USE COMPANY ASSETS PROPERLY
- WE PROTECT CONFIDENTIAL INFORMATION
- WE SAFEGUARD INTELLECTUAL PROPERTY RIGHTS
- WE COMMUNICATE RESPONSIBLY TO PROTECT THE REPUTATION OF ALFASIGMA



We protect the company's assets, guarantee the transparency and accuracy of financial and non-financial information, we protect Alfasigma's and Third Party's personal data and information and we safeguard the reputation and image of Alfasigma.

We guarantee transparency and accuracy of information

Alfasigma is committed to ensuring that all information, both financial and non-financial, is accurate, transparent and based on documentable data.

FOR THIS, WE ARE COMMITTED TO...

- correctly recording all transactions with economic and financial relevance;
- complying with company policies and current legislation relating to bookkeeping and the preparation of financial and non-financial reports;
- ensuring the completeness, truthfulness and accuracy of the information, data and criteria adopted for the preparation of financial statements, the balance sheet, the profit and loss account, the cash flow statements and other corporate communications, as well as their proper storage, in compliance with the applicable laws and regulations;
- guaranteeing easy access to company documents for both internal and external auditing bodies.

WE DO NOT TOLERATE:

- conduct aimed at altering the accuracy or truthfulness of data and information intended to be contained in financial statements, reports or other corporate communications required by law, requested by company's governing bodies or governmental/public authorities;
- any form of falsification of declarations, data and/or information to whomever they are addressed.



WHAT IS MEANT BY...

The term "personal data" means any information relating to an identified or identifiable natural person, either directly or indirectly, that can be traced back to that person.

Personal data can provide information on: characteristics, habits, lifestyle, personal relationships, economic situation, characteristic elements of a person's identity, criminal records.

Among the data there are "special categories of personal data" that reveal racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data and those relating to health, sex life or sexual orientation of the person.

We protect personal data

In the course of our business, we process personal data relating to employees, suppliers, customers, patients and Third Parties on a daily basis, paying the utmost attention to compliance with personal data protection legislation.



I ACCIDENTALLY SENT A COMPANY DOCUMENT CONTAINING PERSONAL INFORMATION ABOUT SOME OF OUR CUSTOMERS TO A CO-WORKER. WHAT SHOULD I DO? SHE HAS ALWAYS SEEMED LIKE A TRUSTWORTHY PERSON, PERHAPS I COULD AVOID REPORTING THE INCIDENT?

No, although accidental, this fact must be promptly communicated to your manager and reported to the Privacy Office by sending a notice to the relevant local Group's company Privacy Office email.



FOR THIS, WE ARE COMMITTED TO...

- always maintaining a high level of company compliance with the relevant laws and regulations;
- guaranteeing suitable technical, organizational and IT security measures aimed at avoiding violations of the processed personal data;
- adopting specific procedures relating to the processing of data and their storage, in line with the applicable legislation;
- creating a culture of personal data protection, through training and communications to all personnel;
- identifying and promptly reporting any alleged personal data violations;
- ensuring the exercise of the rights of the data subjects.

We use company assets properly

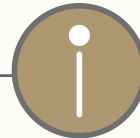
We ensure the protection of company assets, in accordance with the principles of fairness, economy and efficiency. All employees and co-workers of Alfasigma are required to make proper use of company assets made available for the performance of work activities and to protect them from improper use.

FOR THIS, WE ARE COMMITTED TO...

- keeping and using in an appropriate manner, as well as in compliance with company policies, all company assets (tangible and intangible).

WHAT IS MEANT BY...

“Improper use” of company assets means any use of such assets for purposes other than those for which they were assigned and/or in violation of internal policies or procedures governing their use.

**CAN I LET MY DAUGHTER PLAY ON THE COMPANY COMPUTER?**

No, highly sensitive data is stored on company computers that could be compromised by downloading unauthorized software that does not comply with company policies and regulations.

- monitoring the way in which company assets are used in order to identify misuse, damage or sabotage of such assets and preserve their integrity;
- reporting to the supervisor or to the functions in charge any non-compliance or incorrect use of company assets.

We protect confidential information

In compliance with current laws and regulations and company policies, we guarantee the utmost confidentiality on strategic and/or confidential information of Alfasigma and Third Parties of which we become aware in the course of our work.

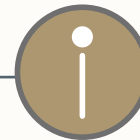
For this, we are committed to...

- not disclosing information or news concerning Alfasigma without prior company authorization;
- maintaining the confidentiality of all information of a strategic and/or confidential nature of Alfasigma and Third Parties;
- ensuring an effective IT security management system, in order to protect the information assets of Alfasigma and of Third Parties.

WE DO NOT TOLERATE:

- any behavior aimed at altering or tampering with the proper functioning of information systems in order to access data, information or programs.



**WHAT IS MEANT BY...**

The term “**intellectual property**” refers to the system of legal protection of intangible assets, the result of human inventiveness and ingenuity, such as artistic works (protected by copyright), industrial inventions (protected by patents), design, know-how, trademarks or distinctive signs.

The law pays particular attention to the protection of intellectual property with the aim of:

- guaranteeing an exclusive right of exploitation to the person who invented the intellectual work;
- protecting the person who invented the work from possible abuse and illegal exploitation.

We safeguard intellectual property rights

Safeguarding Alfasigma’s intellectual property is fundamental to us as it represents a significant competitive advantage. We also respect the valid and applicable intellectual property rights of Third Parties in the course of our daily work.

FOR THIS, WE ARE COMMITTED TO...

- protecting Alfasigma’s intellectual property against loss, theft or other misuses;
- preventing by appropriate means the premature disclosure of an invention, whether intentional or accidental, as it may preclude the possibility of obtaining patent protection.

WE DO NOT TOLERATE:

- unauthorized use, theft, misappropriation and any other form of violation of industrial and intellectual property rights of Third Parties.

**I HAVE DISCOVERED THAT MY COLLEAGUE HAS DISCLOSED INFORMATION RELATED TO ALFASIGMA’S INTELLECTUAL PROPERTY TO THIRD PARTIES. SHOULD I REPORT IT?**

Yes, if you become aware of alleged or actual violations of the company’s intellectual property, you must promptly notify the relevant manager who will initiate the necessary checks, or report it through the appropriate Whistleblowing channels (see Reporting Channels p. 15).

**We communicate responsibly to protect the reputation of Alfasigma**

The company’s reputation is a priceless asset and must be protected with particular care.

To this end, relations with mass media may only be handled by the relevant corporate functions and in compliance with Group policies.

Particular attention is paid to social media, which must be used responsibly, both in the private sphere and at work. Posting or commenting on online content, directly or indirectly connected to Alfasigma, can damage the company’s reputation.

Only those who have been expressly authorized by Alfasigma may manage the company’s social media and make communications on behalf of Alfasigma.

FOR THIS, WE ARE COMMITTED TO...

- protecting the corporate reputation;
- responsibly using personal social media, always remembering that each of us is part of the Group and that any information regarding Alfasigma that becomes public could damage its image and reputation;
- guaranteeing an adequate management of corporate social channels.

**A COLLEAGUE HAS POSTED A COMPANY COMMUNICATION ON HIS PERSONAL SOCIAL PROFILE. IS HE ALLOWED TO DO THIS? IS IT IN LINE WITH COMPANY POLICIES?**

Employees may only post company communications on personal social media if they have been specifically authorized to do so in advance. Otherwise, any posting of company communications on websites and social media is prohibited.

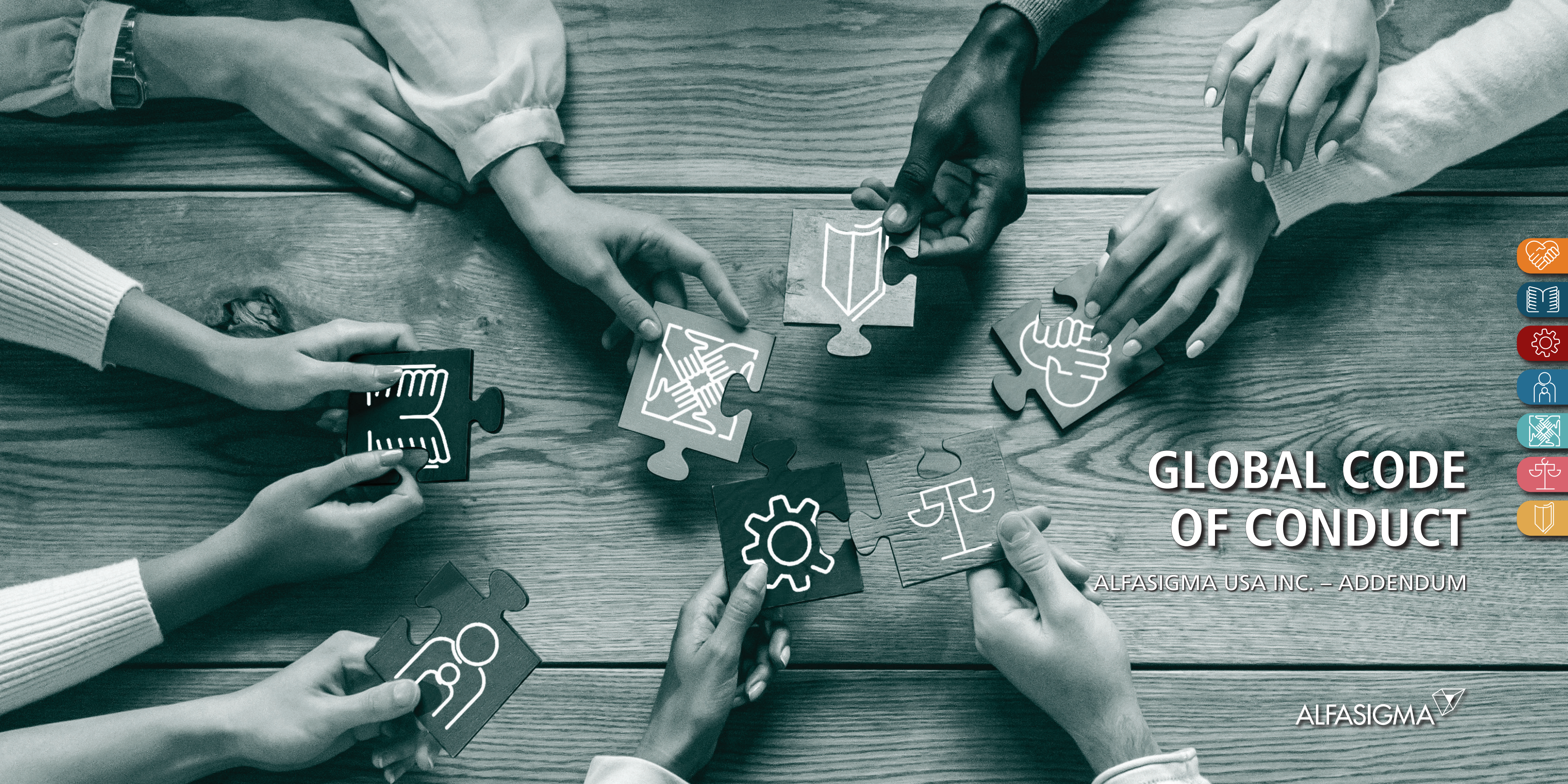




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Approved by resolution of Alfasigma SpA Board of Directors held on March 29th, 2022.

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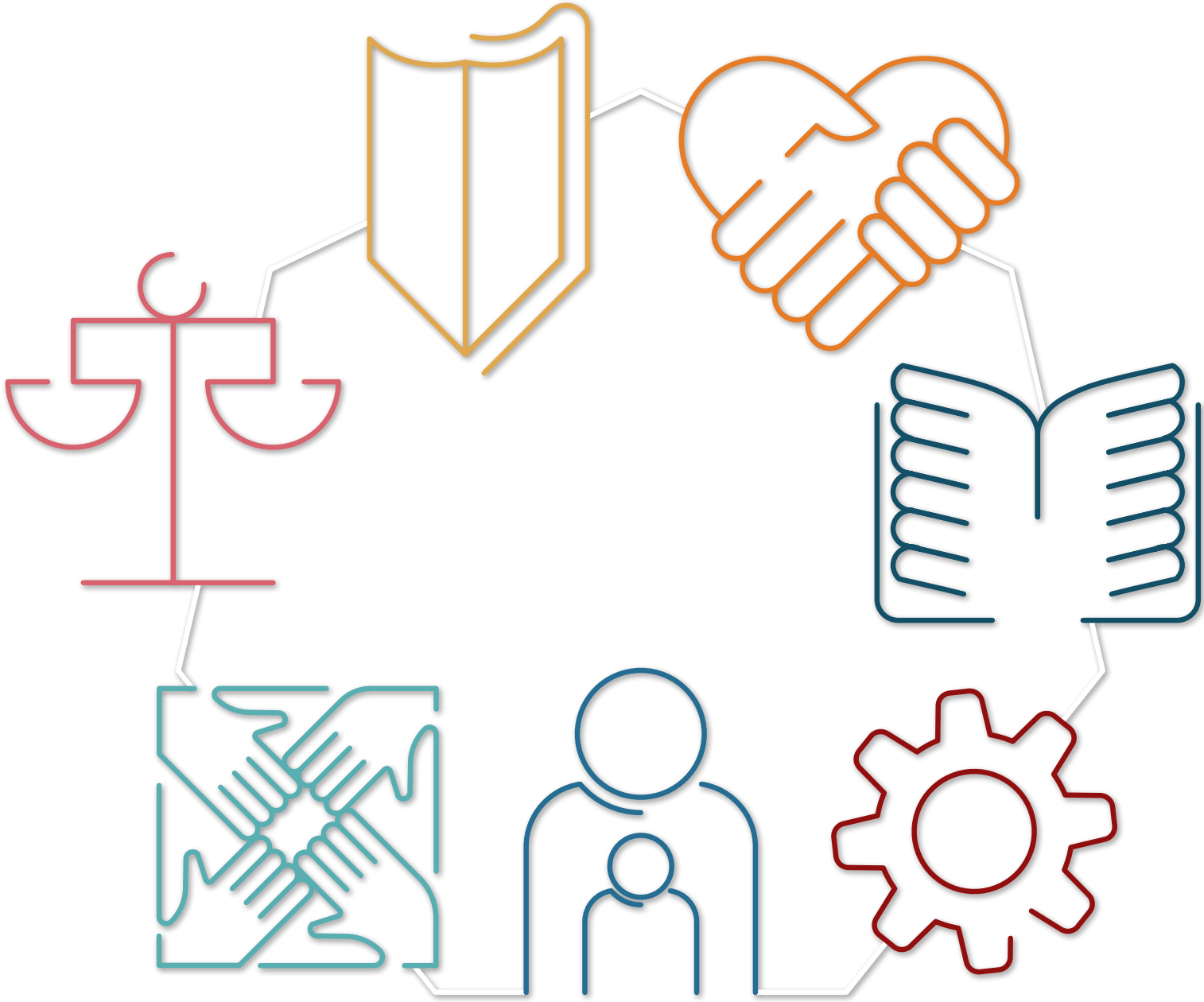
GLOBAL CODE OF CONDUCT

ALFASIGMA USA INC. – ADDENDUM

PHARMACEUTICALS WITH PASSION

Jan Wagner p. 3

[1] WHO WE ARE p. 4 **[2]** THE GLOBAL CODE OF CONDUCT p. 5 **[3]** IMPLEMENTATION MECHANISMS p. 6 **[4]** WE RESPECT OUR PEOPLE AND THE ENVIRONMENT p. 8 **[5]** WE OPERATE WITH INTEGRITY p. 9 **[6]** WE MANAGE RELATIONSHIPS RESPONSIBLY p. 12 **[7]** WE PROTECT OUR COMPANY p. 14 



Jan Wagner
Alfasigma USA, Inc.
Chief Executive Officer
& President

MESSAGE FROM ALFASIGMA USA'S CEO

Alfasigma USA is a values-based company that expects all employees to behave in a responsible and principled way. We act with integrity and compliance. Both are embedded in our culture and support our mission to serve patients. Our social architecture - our values, our leadership model, our aspirations, and our mission - and the Alfasigma Global Code of Conduct and this Addendum to the Global Code of Conduct provide the best guidance for our decisions and actions.

As employees at Alfasigma USA, we understand and unwaveringly follow the policies fundamental to proper business operations. Our code clearly defines what Alfasigma USA, our customers, and our stakeholders expect of us. While our code is not an exhaustive list of every policy that may apply to every particular role, it is a good roadmap that offers additional resources for those seeking further information.

I encourage you to read our code carefully, as I believe it will heighten appreciation of the value of ethical conduct and full compliance. Doing the right thing for the right reasons is the only way to earn and keep the confidence and trust of our peers, partners, customers, the public, and the patients we serve.

1. WHO WE ARE

INTRO

Alfasigma USA, Inc., and its affiliate Brand Direct Health, L.L.C. (collectively the “Company” or “Alfasigma USA”), is a proud, wholly owned subsidiary of Alfasigma, S.p.A. (“Alfasigma”), a major pharmaceutical group created in 2015 by the aggregation of two historic Italian companies, Alfa Wasserman and Sigma Tau. Alfasigma delivers pharmaceuticals with passion. It is our privilege to share our code of conduct, highlighted by the Alfasigma mission and values which are central to our corporate culture.

The Alfasigma Global Code of Conduct (the “Global Code of Conduct”) and Alfasigma USA’s Addendum to the Global Code of Conduct (collectively the “Alfasigma USA Code of Conduct” or “Alfasigma USA Code”) forms the foundation for all of Alfasigma USA’s business activities. The Alfasigma USA Code of Conduct states unequivocally that compliance with all applicable laws and regulations must never be compromised. The Alfasigma USA Code of Conduct is the foundation for Alfasigma USA’s commitment to creating shared value. The Company has fully adopted the Alfasigma Global Code of Conduct, except as set forth in this addendum and to extent applicable laws or regulations require otherwise.

This Company’s Compliance Program (including the Alfasigma USA Code) is consistent with the recommendations set forth in the US Federal Sentencing Guidelines, “Compliance Program Guidance for Pharmaceutical Manufacturers,” published by the Office of Inspector General, U.S. Department of Health and Human Services (the HHS-OIG Guidance), the provisions of the Code on Interactions with Healthcare Professionals created by the Pharmaceutical Research and Manufacturers of America (PhRMA Code) and applicable laws.

2. GLOBAL CODE OF CONDUCT

HOW TO RESOLVE ANY DOUBTS AND ASK FOR CLARIFICATION

Ask for Clarification

If you have concerns or questions involving Alfasigma USA, you have several options for support (in no particular order):

- Discuss with your supervisor, or your supervisor’s supervisor;
- Contact Human Resources;
- Contact Legal; or
- Contact the *Company’s Integrity Hotline*, the 24-hour independently operated confidential hotline, via a toll-free number at 855-654-5552 or via the Internet at www.alfasigmausa.ethicspoint.com.

3. IMPLEMENTATION MECHANISMS

REPORTING AND PRINCIPLE OF NON-RETALIATION

Reporting

You should report all known or suspected violations of law, regulation, the Alfasigma USA Code, or other Company policy, to the Company's *Integrity Hotline*, the 24-hour independently operated confidential hotline via the toll-free number at 855-654-5552 or via the Internet at www.alfasigmausa.ethicspoint.com.

Individuals are encouraged to identify themselves when reporting a known or suspected violation and the Company will make every effort to protect their identity. However, if an individual wishes to remain anonymous they may do so through the Company's Integrity Hotline.

DISCIPLINARY AND SANCTIONING SYSTEM

Violations/Disciplinary Measures

The Company takes all reports of possible misconduct seriously. Once a report is received, we will investigate the matter confidentially, make a determination whether a violation has occurred, and take appropriate corrective action promptly and thoroughly. The Company expects all employees to cooperate in investigations fully and candidly. Anyone who violates the Alfasigma USA Code, Company policies, the law, or a regulation is subject to disciplinary action. Anyone who knowingly makes a false allegation or fails to report a suspected or known violation is subject to discipline. Additionally, anyone who deliberately provides false information or refuses to cooperate in an investigation will be subject to disciplinary action. Any supervisor who fails to take appropriate actions after receiving a report of a known or suspected violation will be subject to disciplinary action. The Company will take the appropriate disciplinary action in response to each case, up to and including termination. In addition, as applicable, individuals may be subject to government fines or criminal or civil liability.

Waiver

The Company will waive application of the policies set forth in the Alfasigma USA Code only where circumstances warrant granting a waiver based on the best interests of the Company. Any waiver pertaining to an employee must be approved by the Company's Compliance Officer and Chief Executive Officer ("CEO"). Waivers of the Alfasigma USA Code for directors and executive officers may be made only by those members of the Company's Board of Directors not involved in the possible waiver and must be promptly disclosed as required by law or regulation.



4. WE RESPECT OUR PEOPLE AND THE ENVIRONMENT

WE CREATE A HEALTHY, SAFE AND COMFORTABLE WORK ENVIRONMENT

WE VALUE DIVERSITY AND FOSTER A CULTURE OF INCLUSION

Discrimination & Harassment

Our Company endeavors to provide a work-environment free from discrimination and harassment. We provide equal opportunities to all employees and applicants. We do not tolerate conduct that disrupts our workplace including behavior that is disrespectful, hostile, violent, intimidating, threatening or harassing. Discrimination and harassment based on age, race, color, religion, national origin, gender, sexual orientation, physical or mental disability, and veteran status or other protected classes is prohibited. In addition, any harassment that either impacts or influences wages, hours, working conditions or employment advantages is specifically prohibited. Employees are expected to follow all policies regarding employee conduct, including the Equal Employment Opportunity, Reasonable Accommodation and No Harassment policy contained in Alfasigma USA's Employee Handbook.

5. WE OPERATE WITH INTEGRITY

WE COMBAT MONEY LAUNDERING AND TERRORIST FINANCING

Anti-Boycott

Our Company does not cooperate with foreign boycotts that are not approved by the U.S. government. If an employee receives a request related to any boycott, employees should contact the Legal Department and do not respond to the request. Federal law prohibits transactions with certain persons or entities that have violated export-related laws or are believed to pose a threat to national security. Additionally, doing business with certain countries may result in imposed economic sanctions. Employees must perform due diligence before any transaction that has an international element to determine whether such parties are on the U.S. government's restricted list. Contact the Legal Department to ensure that all such transactions are properly evaluated to prevent potential violations.

Trade Compliance

Our Company must comply with U.S. federal import and export laws and regulations and all applicable laws that govern international trade. If an employee's work is governed by U.S. custom laws, it is an employee's responsibility to understand the laws and regulations that relate to international trade. We also expect all of our vendors to know and understand the laws that apply to their products, including those of customs and any other U.S. government agencies.

WE FIGHT CORRUPTION

Anti-Corruption and Anti-Bribery

The United States and many other countries have laws that prohibit bribery, kickbacks, and other improper payments. No Company employee or individual acting on our behalf may offer or provide bribes or other improper benefits in order to obtain business or an unfair advantage. A bribe is defined as directly or indirectly offering anything of value (e.g., gifts, money, contract to do business, or promises) to influence or induce action, or to secure an improper advantage. The Foreign Corrupt Practices Act and other U.S. laws prohibit payment of any money or anything of value to a foreign official, foreign political party (or official thereof), or any candidate for foreign political office for the purposes of obtaining, retaining or directing of business. All employees and individuals acting on our behalf must strictly abide by these laws. Employees should contact the Legal Department with any questions regarding anti-corruption, anti-bribery or anti-kickback laws.

WE REPORT CONFLICTS OF INTEREST

Gifts and Entertainment

No gift, favor, or entertainment should be accepted or provided if it will obligate, or appear to obligate, the receiver. No Company employee or individual acting on behalf of the Company shall offer to or accept from any third party gifts taking the form of any of the following, whatever the value involved even if they would be acceptable by local custom: money, loans, kickbacks, bribes, similar monetary advantages, or frequent or regularly provided gifts.

Gifts, favors, or entertainment may be accepted in the form of meals or non-cash items that are modest in value only if: (1) it would not violate the prohibitions in the paragraph immediately preceding; (2) it would not embarrass the Company, (3) its value does not exceed that of accepted business practices; and, (4) it could not be construed as improperly influencing the recipient's good business judgment.

Specific laws apply to interactions with government officials, agents and employees. For example, the U.S. and other countries have strict laws that prevent providing anything, including food or beverages, to a government employee. Employees and individuals acting on behalf of the Company are prohibited from providing gifts, entertainment or favors to any government officials, agents, and employees regardless of the country.

In addition, the PhRMA Code and certain state laws define limits on gifts, including food or beverages, or prohibit gifts entirely to certain healthcare providers. Company employees or individuals acting on behalf of the Company are expected to follow applicable Company policies governing gifts and entertainment to licensed healthcare providers. Employees should contact the Legal Department with any questions regarding providing gifts or entertainment to healthcare providers.



6. WE MANAGE RELATIONSHIPS RESPONSIBLY

WE DO NOT FINANCE POLITICAL PARTIES AND TRADE UNION ORGANIZATIONS

Political Activity

The Company encourages personal participation in the political process in a manner consistent with all relevant laws and Company guidelines. Employees may support the political process through personal contributions or by volunteering their personal time to the candidates or organizations of their choice but may not make or commit to political contributions on behalf of the Company. These activities, however, must not be conducted on company time or involve the use of any company resources such as telephones, computers, or supplies. If you express a personal view in a public forum (such as a letter to the newspaper), do not use Company letterhead, company e-mail, or reference your business address or title. In addition, the following rules apply:

The Company will not reimburse employees for personal political activity.

Do not use the Company's reputation or assets, including your time at work, to further political activities or interests.

If you plan to seek or accept a public office, you must provide prior notice to the Legal Department.

WE WORK RESPONSIBLY WITH GOVERNMENTAL AND PUBLIC AUTHORITIES AND INSTITUTIONS

Government Customers/Contracting

When doing business with federal, state, or local governments, employees must ensure all statements and representation to government procurement officials are accurate and truthful, including costs and other financial data. If your assignment directly involves the government or if you are responsible for someone working with the government on behalf of the Company, be alert to the special rules and regulations applicable to our government customers. Additional steps should be taken to understand and comply with these requirements. Any conduct that could appear improper should be avoided when dealing with government officials and employees.

WE MANAGE RELATIONSHIPS WITH HEALTHCARE PROFESSIONALS, SCIENTIFIC SOCIETIES, MEDICAL ASSOCIATIONS, AND HEALTHCARE ORGANIZATIONS IN A TRANSPARENT MANNER

Interactions with Healthcare Providers

Our Company engages the services of healthcare providers for bona fide services that are legitimately needed by the Company. Employees and individuals acting on behalf of the Company must not enter into a business relationship, offer or provide gifts, entertainment or anything else of value to a healthcare provider to induce, reward or could be perceived as intending to induce or reward favorable decisions about our products and services. All interactions with healthcare providers must follow applicable Company policies which were drafted to comply with PhRMA code and applicable laws.

7. WE PROTECT OUR COMPANY

WE USE COMPANY ASSETS PROPERLY

Computer Use

Company computers and all information on Company computers, as well as any Company information on your home computer or other devices, are Company property. Employees must use licensed software or documentation according to licensing agreements, and do not duplicate it without express permission. Protect any passwords that provide access to our Company networks. Employees must use Company information systems, networks and tools in accordance with Company standards and policies, including the Company's Technology Use and Lack of Privacy Policy and any other Company information systems policies.

Records Management

Our records are our corporate memory, providing evidence of actions and decisions and containing data and information critical to the continuity of our business. Examples of Company records include paper documents, e-mail, electronic files stored on disk, tape or any other medium (CD, DVD, USB data storage devices, etc.) that contains information about our Company or our business activities. All records are the property of the Company and should be retained in accordance with Company policies and applicable laws. Employees must not destroy official Company documents or records before the legally required retention time expires or during any litigation/legal hold issued by the Legal Department. Employees must comply with the Company's Record Retention Policy.

WE COMMUNICATE RESPONSIBLY TO PROTECT THE REPUTATION OF ALFASIGMA

Truth in Advertising

Company employees and individuals acting on behalf of the Company are responsible for accurately representing the Company and our products in our marketing, advertising and sales materials. Deliberately misleading messages, omissions of important facts or false claims about our products, individuals, competitors or their products, services, or employees is inconsistent with our values. All marketing, advertising and sales materials must be approved through our established review and approval procedures prior to distribution.

Communicating with External Parties

All Company press releases or release of nonpublic information on a non-confidential basis requires express authorization from the Company's CEO. All telephone calls or other press inquiries from the media, analyst, or business press, etc. should be referred to the Company's CEO or other employee expressly authorized by our CEO.

This addendum will be revised periodically as needed.

ALFASIGMA 

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Approved by resolution of Alfasigma USA, Inc. Board of Directors held on December the 1st 2023.
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