

OLON HSE & SUSTAINABILITY POLICY

People's Health, Safety, Environmental Protection and Sustainability are values that permeate OLON's business culture, therefore they represent an essential commitment in business development and in the stakeholder's relations management.

OLON firmly believes that the complete, positive integration of its activities with the local environment and a responsible behavior to stakeholders, are the most important conditions for the achievement of its development objectives.

In accordance with such principles, OLON:

- promotes the adoption and application of "best practices" and implements all reasonable initiatives aimed at minimizing risks and removing the causes that can compromise the environment or endanger the safety and health of both its employees and third parties, as well as of the residents in its operational areas;
- assures constant attention and commitment in order to improve its environmental performance in operations and in the energy field, minimizing the environmental impact of its activities, reducing air, water and soil emissions, optimally managing the waste it produce and through a responsible and knowledgeable use of natural resources;
- evaluates in advance the environmental, energetic and social impact of new activities and of the changes or innovations to its corporate processes and to the goods it produces;
- develops a relationship of dialogue and constructive cooperation, based on utmost transparency and trust, with the Institutions and with all its interlocutors, in order to develop its activities respecting local communities;
- promotes the application of our ethic code;
- selects partners that operate according to the principles defined in this Policy;
- maintains high levels of safety and environmental protection through the implementation, testing and certification of effective management systems according to recognized standards.

OLON, aware that the aforesaid objectives cannot be achieved without the active contribution of all personnel, will develop an ongoing action of focused education, awareness and training.

The adoption of responsible behaviors, consistent with company policies, is considered a factor for the evaluation of individual performance, since compliance with legal provisions, with national/international standard (UNI-INAIL, Responsible Care, ISO14001, OHSAS18001, SEDEX, ETI Base Code, PSCI and ISO50001), with the principles set out by the Ethics Code and by Model 231, as well as by the other commitments made, must be constantly assured by all personnel, at every level of responsibility.

OLON encourages adoption of this policy by all Companies in the Group and by its suppliers and customers, particularly vis-à-vis contractors working inside OLON's production sites.

Appropriate reviews and tests are periodically carried out to evaluate the results achieved, according to the system of identified reference indicators, and to define any necessary improvement actions.

SUSTAINABILITY

In OLON Policy integrates the following aspects considered strategic for sustainability: ethics, labor, health and safety, environment, and management systems.

OLON is committed to implementing these Principles as our own Conduct Principles.

Believe that society and business are best served by responsible business behaviors and practices. Fundamental to this belief is the understanding that a business must, at a minimum, operate in full compliance with all applicable laws, rules and regulations.



Are aware of differences in culture and the challenges associated with interpreting and applying these Principles globally. While companies supporting the Principles believe that what is expected is universal, it is understood that the methods for meeting these expectations may be different and must be consistent with the laws, values and cultural expectations of the different societies of the world.

ETHICS:

OLON conducts their business in an ethical manner and acts with integrity.

Business Integrity and Fair Competition

All corruption, extortion and embezzlement are prohibited.

OLON does not pay or accept bribes or participate in other illegal inducements in business or government relationships. OLON conducts their business consistent with fair and vigorous competition and in compliance with all applicable anti-trust laws. OLON employs fair business practices including accurate and truthful advertising.

Identification of Concerns

All workers are encouraged to report concerns or illegal activities in the workplace without threat of reprisal, intimidation or harassment. OLON investigate and take corrective action if needed.

Animal Welfare

Animals shall be treated humanely with pain and stress minimized. Animal testing should be performed after consideration to replace animals, to reduce the numbers of animals used, or to refine procedures to minimize distress. Alternatives should be used wherever these are scientifically valid and acceptable to regulators.

Privacy

OLON safeguards and make only proper use of confidential information to ensure that company, worker, and patient privacy rights are protected.

LABOR AND HUMAN RIGHTS:

OLON shall be committed to uphold the human rights of workers and to treat them with dignity and respect.

Freely Chosen Employment

OLON does not use forced, bonded or indentured labor or involuntary prison labor.

Child Labor and Young Workers

OLON does not use child labor. The employment of young workers below the age of 18 shall only occur in non-hazardous work and when young workers are above a country's legal age for employment or the age established for completing compulsory education.

Non-Discrimination

OLON provides a workplace free of harassment and discrimination. Discrimination for reasons such as race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status is not condoned.

Fair Treatment

OLON provides a workplace free of harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, and no threat of any such treatment.

Wages, Benefits and Working Hours



OLON pays workers according to applicable wage laws, including minimum wages, overtime hours and mandated benefits.

OLON communicate with the worker the basis on which they are being compensated in a timely manner. Suppliers are also expected to communicate with the worker whether overtime is required and the wages to be paid for such overtime.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues are encouraged.

OLON respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers shall be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

HEALTH & SAFETY:

OLON provides a safe and healthy working environment, including for any company provided living quarters.

Worker Protection

OLON protects workers from over exposure to chemical, biological, physical hazards and physically demanding tasks in the workplace and in any company provided living quarters.

Process Safety

OLON has programs in place to prevent or mitigate catastrophic releases of chemicals.

Emergency Preparedness and Response

OLON identifies and assesses emergency situations in the workplace and any company provided living quarters, and to minimize their impact by implementing emergency plans and response procedures.

Hazard Information

Safety information relating to hazardous materials - including pharmaceutical compounds and pharmaceutical intermediate materials - is available to educate, train, and protect workers from hazards.

ENVIRONMENT:

OLON operates in an environmentally responsible and efficient manner to minimize adverse impacts on the environment.

Environmental Authorizations

OLON complies with all applicable environmental regulations. All required environmental permits, licenses, information registrations and restrictions shall be obtained and their operational and reporting requirements followed.

Waste and Emissions

OLON has systems in place to ensure the safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater

discharges. Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

Spills and Releases

OLON has systems in place to prevent and mitigate accidental spills and releases of fuels, raw materials, chemicals, intermediates, products, and other hazardous materials to the environment.

MANAGEMENT SYSTEMS:

OLON use management systems to facilitate continual improvement and compliance with the expectations of these principles.

Commitment and Accountability

OLON demonstrate commitment to the concepts described in this document by allocating appropriate resources.

Legal and Customer Requirements

OLON identifies and complies with applicable laws, regulations, standards and relevant customer requirements.

Risk Management

OLON has mechanisms in place to determine and manage risks in all areas addressed by this document.

Documentation

OLON maintains documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations.

Training and Competency

OLON has a training program that achieves an appropriate level of knowledge, skills and abilities in management, and workers to address these expectations.

Continuous Improvement

First of all it is necessary to have clear objectives, the strategy of continuous improvement is aimed at improving small steps to be taken day after day, with continuity