

**Olon Ethics Manifesto** 





1. INTERNATIONAL REFERENCE FRAMEWORK	4
2. PRINCIPLES 3. WORKING PRACTICES	4
Respect for diversity and non-discrimination	5
Freedom of association and collective bargaining	5
Fair and favourable working conditions	5
Social Dialogue Policy	5
Prevention of conflicts of interest and zero tolerance for corruption	6
4. ENVIRONMENT	6
5. MONITORING	6



### Introduction

The Code of Ethics establishes the principles and core values that govern and regulate Olon Group's operations at all levels, in all organisational areas, and in all the company's operational and production locations. The Olon Code of Ethics is validated and signed by the Group Leadership Team (President, CEO, Finance & Administration, Sales & Marketing, Human Resources, Purchasing & Supply Chain, Operations, Research & Development).

The Code of Ethics was published and circulated to the entire organisation. It is therefore always accessible via the company intranet and the company website, www.olonspa.com. Furthermore, the Group's Code of Ethics is circulated regularly to all employees, who are required to read it and declare their acceptance of the principles expressed therein.

Olon Group's commitment to promoting human rights and the dignity of the individual is an integral part of the Group's corporate vision: "To challenge and innovate the way we deliver science to improve the health of human beings".

The Group's is committed to finding innovative ways to reinvent medicine and facilitate access to sustainable, quality treatments.

Our Code of Ethics provides for a global approach, at all organisational levels, and helps enhance our value chain towards all our stakeholders.

We believe that not only Olon has the potential to make a positive impact both on its internal organisation and its employees, but also in terms of its positive socio-economic impacts on society. It is therefore important to emphasise that respect for all the values expressed in this Ethics Manifesto, particularly those relating to human rights, is the fundamental cornerstone of our way of operating, as a prerequisite for ensuring sustainable progress.

In the Group's Ethics Manifesto, which all employees are required to adhere to in their actions, we declare our commitment and our willingness to apply and respect all the Principles stated therein regarding Labour, People and the Environment.

We believe these principles are in line with our desire to guide our organisation through inclusive, non-discriminatory conduct that highlights the central role of our employees and, ultimately, of the patients who benefit from our products. We adopt the value chain towards internal (employees) and external stakeholders.

We ensure compliance with the application of our Ethics Manifesto through **periodic audits by the Supervisory Board (SB)**, and through metrics aimed to ensure compliance with the Code as well as
current laws and regulations on labour, the environment, and human rights; all this is done with actions
that can consequently lead to the constant improvement of our work.



### 1. INTERNATIONAL REFERENCE FRAMEWORK

The Olon Spa Human Rights Policy, as mentioned above, supports the following fundamental values of International and European Law and applies their founding principles:

- the United Nations (UN) International Bill of Human Rights;
- Universal Declaration of Human Rights;
- · International Covenant on Civil and Political Rights;
- International Convention on Economic, Social and Cultural Rights;
- The core conventions of the International Labour Organisation (ILO);
- The UN Convention on the Rights of the Child;
- Organisation and Management Model pursuant to Legislative Decree No. 231 of 8 June 2001 ('Model 231').

### 2. PRINCIPLES

The Code aims for these principles to be respected in every country in which we operate, while taking into account local cultural, social and economic diversity. It requires each of our stakeholders to conduct themselves in line with these principles, paying particular attention to high-risk or conflict-affected contexts.

By stakeholders, we mean all those who have a direct or indirect interest in the Group's activities. This includes customers, employees of any and all levels, suppliers, contractors, partners, other companies and trade associations, the financial community, civil society, local communities, national and international institutions, the media, as well as organisations and institutions representing them.

In addition to monitoring and ensuring compliance with the contents of the leading international guidelines, stakeholders are required to commit to adopting best practices in terms of occupational health and safety, environmental responsibility and respect for privacy, and human rights and working conditions. The latter includes adequate working hours, practices against child labour or forced labour, respect for personal dignity, non-discrimination, the inclusion of diversity, the guarantee of freedom of association and collective bargaining.

#### 3. LABOUR POLICIES

## Rejection of child labour

Olon rejects forced or compulsory labour and child labour, as well as all forms of slavery and human trafficking - as defined by ILO Convention No. 29.

We consider children and underage workers to be an at-risk category, which is why we reject child labour according to the legislation in force in the countries where we operate. Thus, the age of workers must not be below the minimum age set by ILO Convention No. 138.

### Respect for diversity and non-discrimination

We promote the principles of diversity, inclusion, equal treatment and opportunity. We are committed to ensuring the right to working conditions that respect the dignity of each of the persons concerned, as well as to creating a working environment in which people are treated fairly and valued.



Olon and all its employees undertake to avoid discrimination in terms of age, gender, sexuality, health status, race, nationality, political opinions, trade union membership, and religious beliefs, in all decisions affecting relations with its stakeholders.

We do not tolerate physical, verbal, visual, psychological, discriminatory, or sexual harassment that creates a denigrating, hostile, humiliating, intimidating, offensive, or unsafe working environment.

# Freedom of association and collective bargaining

We guarantee the right of our employees to form or take part in organisations aimed at defending and promoting their interests. Likewise, we also respect their right to be represented by trade unions or other forms of elected representation according to the laws and practices in force in the various countries where they work.

### Fair and favourable working conditions

All Olon employees are entitled to conditions respecting health, safety, well-being and dignity, maximum working hours, rest periods during the day and week, and one paid holiday per year.

### **Social Dialogue Policy**

Olon is committed to high standards for the well-being, safety, and health of its workers. We believe in social dialogue and apply the national collective labour contract at all our sites. In addition to this, we run continuous discussion tables with the workers' trade union representatives, especially on the following issues:

- Application of national contracts (first-level bargaining)
- Application of more favourable conditions according to second-level bargaining
- · Extra contractual remuneration linked to results achieved
- · Worker health and safety and environmental protection policies
- · Internal training plans and the professional development of workers
- · External companies operating on the sites

All these issues are shared with all the workers' elected union representatives at individual sites, some tables are developed at the site level and others with national representatives as well.

### **Prevention of Conflicts of Interest and Zero Tolerance for Corruption**

The occurrence of conflict of interest situations, in addition to being contrary to the law and the principles laid down in the Ethics Manifesto, is detrimental to the company's image and integrity.

We reject corruption in all its forms as we recognise it as one of the factors undermining institutions and democracy, ethical values and justice, well-being and the development of societies.



# 4. ENVIRONMENT

Olon recognises that environmental protection is of paramount importance in ensuring a coherent and balanced growth path.

Combating climate change and contributing to sustainable economic development are strategic factors in the planning, operation, and development of our activities. Olon is therefore committed through all its group companies to safeguarding and helping the sustainable development of the region, also through the use of the best available technologies and the constant monitoring of company processes.

## 5. MONITORING

The monitoring of what is expressed in this document is based on the appropriate control processes that take place through the Supervisory Board and its periodic meetings. This includes a punctual analysis of the analysed state and a gap analysis that may allow the residual gap to be analysed and possible improvement actions to be identified.