



Srl

Document Contents

1	SCOPE	2
2	ETICAL CODE TARGET PEOPLE / SUBJECTS	2
3	REFERENCE'S PRINCIPLES OF PHARMESTE'S CODE OF ETHICS	3
4	MODALITIES FOR IMPLEMENTATION PHARMESTE'S CODE OF ETHICS	4
4.1	OPERATING SYSTEM OF "MODELLO DI ORGANIZZAZIONE"	4
4.2	COMMUNICATION TO THE "ORGANISMO DI VIGILANZA" RISK SITUATIONS OF VIOLATION OF D.LGS 231/01, ACCORDING WITH SPECIFIC PROCEDURE DESCRIBED IN "MODELLO DI ORGANIZZAZIONE"	4

1 Scope

This document is a brief summary of "Codice Etico" which is now developing with consultant support.

The "Codice Etico" has been built according with Italian law in Matter of Corporate responsibility, called D.lgs 231/01, and related Guide Line developed from associations like "Confindustria".

Once the "Codice etico" italian version will be approved, it will be translated in English version.

Below is presented a brief summary of the principles underlying the ethical code.

2 Etichal Code Target People / Subjects

- All Stakeholder

3 Reference's Principles of PharmEste's Code of Ethics

- a) Honesty and fairness of the conduct of staff and collaborators
- b) Transparency and completeness and accuracy of economic information, finance and Techniques.
- c) Confidentiality of information
- d) Equal opportunity between female and male, respect for the individual and the environment
- e) Absence of Interest's Conflicts
- f) Protection of competition and transparency in action in the market
- g) Safety of business continuity and preservation of heritage Company.
- h) Efficient and effective system of controls

In the document, each principle is described accurately in order to facilitate comprehension by recipients

4 Modalities for Implementation PharmEste's Code of Ethics

The document describes in detail the procedures for :

- 4.1 Operating system of "Modello di Organizzazione"
- 4.2 Communication to the "Organismo di Vigilanza" risk situations of violation of D.lgs 231/01, according with specific procedure described in "Modello di Organizzazione"

"Modello di Organizzazione" is a specific governance management model provided for in Articles 6 and 7 of D.lgs 231/01. The rule provides that would adopted and effectively implemented.

"Organismo di Vigilanza" is a specific autonomous and independent company committee set up by Article 6 paragraph 2 of D.lgs 231/01. Periodic reviews of this committee is one way to demonstrate the effective implementation of the "Modello di Organizzazione"