

CODE OF *ethics*





*Naturally ready to promote
innovation, human value
and respect for the biosphere*



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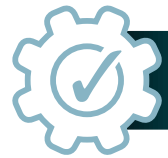
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Nothing
is lost,
nothing is
created,
everything is
transformed

Antoine-Laurent de Lavoisier, Traité élémentaire de chimie, 1789

MESSAGE FROM OUR CEO

We have been producing plant extracts for the well-being of humans and animals since 1933 and **our reputation has always been based on the quality of our products and the seriousness of our work.**

We are deeply convinced that the promotion of **innovation, human value and respect for the biosphere** requires the contribution of all and that this must be based on an **irreproachable and responsible ethical behavior**, having the following principles as the main ground:



Mirella Rigamonti Rodi



COMPLIANCE WITH THE RULES AND REGULATIONS IN FORCE



POLITE AND RESPECTFUL CONFRONTATION WITH ALL THE PEOPLE WITH WHOM WE RELATEE



COMMITMENT AND DILIGENCE IN DOING OUR JOB

In this document, we explain the founding **values, principles of conduct, and mutual commitments between the company and our employees/ collaborators** and between them and third parties. It represents a **reference grid to guide EPO's development plans and corporate governance** in the medium-long term. The dramatic events that have shocked the world in recent times show how indispensable a **responsible approach of companies is for their impact on society**

and the environment. This is an important but essential cultural change, which requires the involvement of all stakeholders and the adoption of a circular model of information and knowledge. That's the real challenge for the new generations: knowing how to transform EPO into a reality capable of creating long-term shared value with as many stakeholders as possible. **Through the use of this Code of ethics, we will continue to uphold the true essence of EPO.**



OUR VALUES



LIVING THE CODE OF ETHICS: WE NEED YOU!

To achieve these ambitious goals, it is necessary the full adhesion and **responsible involvement of all**: shareholders, directors, employees, collaborators, but also suppliers, and anyone who relates to us.

EPO has always focused on creating an **inclusive and serene work environment**, in which everyone can achieve his/her professional and personal goals in **respect of others**, with **integrity and honesty**, but now a **further effort is required to protect the biosphere, the common home that houses all living beings**.

EPO undertakes to observe, promote and respect this Code of Ethics and, above all, to ensure that it becomes a daily practice.



OUR COMMITMENT

MISSION

We want to offer innovative botanicals that contribute to the **maintenance of human and animal health**, according to the three fundamental principles of quality, safety, and effectiveness, respecting the biosphere and promoting people.

VISION

We want to drive the Company's action towards a virtuous model whose cornerstones are:



Investments in technical know-how

to increase the value of products in terms of quality, safety, and effectiveness, thanks to innovation and extraction processes in harmony with nature.



Enhancement of human capital,

safeguarding interpersonal and professional relationships, and strengthening a shared sense of belonging.



Protection of the environment, biodiversity, and social and cultural heritage.





CODE OF CONDUCT



HOW DO WE REALIZE OUR VISION?

We have identified some fundamental and indispensable values, which we intend to promote through specific **rules of conduct**; they can be traced back to three macro-areas: **Profit, People, Planet.**



PROFIT

Innovation is the specific instrument of entrepreneurship (...), the act that endows resources with a new capacity to create wealth

Peter F. Drucker, Innovation and Entrepreneurship, 1985

Pursuing excellence through investment in innovation, research, digitalization

Innovation is the main instrument to generate well-being in any business, but especially in a production company, for the company itself and for those who will use its products; **we have always been strongly oriented towards innovation**, investing every year and with continuity important resources in R&D projects, patents, preclinical and clinical studies, scientific publications, technological and plant innovation, digitization. However, everyone's effort is now required for a change of mentality: **to look further and further, not to take anything for granted**, to face new challenges, even when these, in the immediate future, seem to burden the daily tasks, due to the difficulty of learning to work in a new way. **It is important to look at difficult times as opportunities for growth.**

Reliability

Customer satisfaction is a fundamental goal, which is why we are committed to being reliable and credible partners.

We invest a lot of energy in the training of our staff so that they can accompany our customers in all their requests, both commercial and technical. Our technical customer service and our QA-Regulatory team assist our customers on a daily basis, creating a real added value and **one more reason to choose EPO products.**

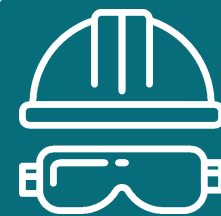


Compliance with applicable laws and regulations

Our QA-Regulatory team collaborates with trade associations and technical consultants in order to operate with maximum transparency and in compliance with the legislation applicable to our activity in the countries in which we operate. **We do not tolerate any form of corruption**, nor can we accept any behavior that aims to promote it. In administration and accounting, **we operate with the utmost transparency**, following strict procedures. **With regard to Privacy**, we have implemented **European and national legislation** regarding the protection of personal data. In our relations with public administrations /institutions and authorities, we adhere to the highest principles of honesty, fairness, and transparency.

Safety at work and health protection

We scrupulously comply with the legislation on safety at work and health protection; we guarantee a **healthy workplace** and promote all **activities that can contribute to the welfare of our employees and collaborators**. We guarantee freedom of association and the right to collective bargaining. Working hours comply with national laws and benchmark industry standards; we encourage working rhythms that leave enough time for private life. In accordance with the ILO Conventions on Child Labor (138 on Minimum Age; 182 on the Elimination of the Worst Forms of Child Labor) and the UN Convention on the Rights of the Child (1989), **we do not tolerate any form of child labor or exploitation of workers** and we ensure that our Suppliers also act in the same way, especially in Developing Countries.



Fair competition

We believe that competitiveness is a necessary incentive for continuous improvement and innovation, but this must always remain on the ground of fair competition, both within the Company and towards **external competitors**. It is not allowed to take advantage of information that is not obtained by legal means or that is not already in the public domain. **EPO has an almost century-old history and our relationships with competitors have always been based on honesty and friendliness.**

Fair scientific information and communication

The information we publish on our technical, scientific, and informative sheets **corresponds to the state of the art at the time of publication**. Scientific information is always taken from authoritative texts, official websites, or proprietary preclinical and, where applicable, clinical studies. We are also in constant contact with trade associations for a frank and constructive discussion in relation to changes in the European regulatory framework.

Transparency in business relationships

We are convinced that business should be pursued according to the quality of the products and services that we offer; therefore, we avoid any practice that may conflict with this principle and that could lead to arbitrary decisions or judgments, in **particular situations in which personal interests** (for us and for our family members) **may conflict with business interests** (see also: Conflict of interest). In addition, we cannot accept in any way gifts and benefits that can be interpreted as exceeding normal commercial and courtesy practices.

PEOPLE

Act in such a way that you treat humanity, whether in your own person or in the person of any other, never merely as a means to an end, but always at the same time as an end.

Immanuel Kant,
Groundwork of the Metaphysic of Morals, 1785



Mutual respect on a personal and professional level

Mutual respect is the foundation for creating a **serene and inclusive work environment**, in which people can grow and give the best of themselves, both from a personal and professional point of view. Therefore, **we do not tolerate either disrespect or intimidation**, especially if related to discriminatory behavior in relation to race/ethnicity, nationality, age, state of health, disability, gender, sexual orientation, marital status, religion or philosophies of life, or political opinions.

Maintaining a familiar and inclusive environment

EPO considers employees and collaborators as members of an extended family. **We guarantee all employees/ collaborators the same opportunities** for training and professional growth, based on their skills and commitment. EPO has implemented some tools to incentive Human Resources and enhance their wealth.

In addition, **we support all activities aimed at promoting** team building.

Equal opportunities, support for women's work and the family

We have always protected women's work and encouraged the birth rate by providing new parents with more agile and **flexible working tools**, which allow them to balance the needs of parental care with professional goals.

Integrity, honesty, and fairness at work

These three values are fundamental to **build loyal and lasting working relationships**, both between colleagues and customers/suppliers. We encourage and promote professional growth based on these values. **Recruitment and promotions take place exclusively on the basis of the qualification required** and the correspondence of the candidate in relation to the skills necessary to perform a given task.

Information and reporting

All relationships with stakeholders must be **clear, transparent, timely, complete, and consistent**, in compliance with the right to information. Each employee is required to collaborate so that operations are represented correctly and promptly in the IT system and in accounting, based on true, accurate, complete, and verifiable information. As such, each employee/collaborator is requested to ensure that operational transactions are correctly authorized and promptly represented in the accounts and that **suitable supporting documentation of the activities is carried out and recorded for every operation**.

It is the task of every employee to ensure that supporting documentation is easily traceable and ordered according to logical criteria. No false accounting entries can be entered into the Company's accounting records for any reason. No employee can commit to activities that result in such an offense, even if requested by a superior.



Conflict of interest

EPO recognizes and respects the right of all employees and collaborators to participate in investments or business outside the workplace, provided that these activities are permitted by law and compatible with their contractual obligations. In particular, **all employees/collaborators must avoid situations in which their interests may conflict with the interests of EPO.**

Everyone is required to report to the direct superior the specific situations and activities into whom he/she or, to the best of his/her knowledge, his/her relatives or de facto cohabitants, are holders of interests in economic and financial conflict with those of the Company within the bounds of suppliers, customers, competitors, third party contractors or parent companies and subsidiaries.

SOME SITUATIONS THAT CAN CAUSE CONFLICT OF INTEREST ARE:

- ▶ **Participation in business** with companies or institutions in which the employee or a family member of the employee may have any interest or when decisions taken by the employee may result in a personal advantage for him/her or a family member of the same.
- ▶ **Use of the Company name** to obtain individual gain or that of third parties.
- ▶ **Use of the position** in the Company or of information/business opportunities acquired in the exercise of the employee's assignment, for his/her own benefit or that of third parties.

The acceptance of a professional assignment offered by a third party to an employee must be preceded by an evaluation with the hierarchical superior in order to verify the existence of any incompatibilities.

**Protection of confidential information, trade secrets, intellectual property, and company assets**

The knowledge of a company is an intangible asset of primary importance that must be adequately protected and enhanced;

all employees and collaborators have the obligation to prevent the accidental or intentional disclosure of confidential information, trade secrets, and intellectual property to third parties, unless this is required by the Authorities.

EPO has put into place procedures, including those in the IT system, to ensure that access to confidential information is strictly limited to those who must make use of it.

We protect intellectual property through the registration of trademarks and patents.

Finally, the use of company assets entrusted to employees and collaborators (machinery, IT equipment, company vehicles, money, etc.) must take place only and exclusively for authorized purposes, as governed by the Company Rules for the correct use of work tools.

PLANET

When we speak of the "environment," what we really mean is a relationship existing between nature and the society which lives in it. Nature cannot be regarded as something separate from ourselves or as a mere setting in which we live.

Pope Francis, Encyclical Letter « Laudato Si », 2015

Protection of the biosphere

The biosphere is that part of the Earth where living organisms are present and in which complex and articulated relationships between living beings and the environment have developed during 3.4 billion years of evolution.

Climate change, glaciers melting, global warming, deforestation, desertification, pollution etc. on the one hand and the profound implications that these phenomena cause on mankind on the other hand, especially in Developing Countries, greatly question each of us as citizens, but require **serious reflection and a change of mentality** on the side of the industry, because only joint and coordinated actions can be successful.

EPO is well aware of this issue and **promotes the most suitable sustainability paths to concretely achieve some of the objectives of the UN 2030 Agenda** (Sustainable Development Goals or SDGs), **in line with our aims.**

Enhancement of the circular economy and upcycling

We are actively engaged, alongside research institutions, universities and/or private initiatives, to **constantly reduce the amount of waste, especially that of vegetal origin, which cannot be recycled;** we are studying the possible use of by-products also for health purposes, in order to give a "second life" to everything that can be reused.

Waste management and responsible use of water and energy

We are constantly looking for solutions that allow us to reduce wastefulness, save electricity, by taking it from renewable sources, and conserve water. **EPO asks its employees and collaborators to do their part in the fight against any kind of squandering**, help waste sorting, and use water and electricity responsibly: we believe that **small daily gestures can make a difference**.

Protection of biodiversity

The loss of biodiversity is closely related to the increasing anthropization of once pristine environments and to its consequences; **it is necessary to re-establish a balance between man and other living species**, as the latter are linked to human beings with very thin, but tenacious threads, and we need them for our survival and well-being. We, therefore, support various projects, especially in the **agronomic field**, in collaboration with universities or rural communities, aimed at safeguarding endangered plant and animal species.



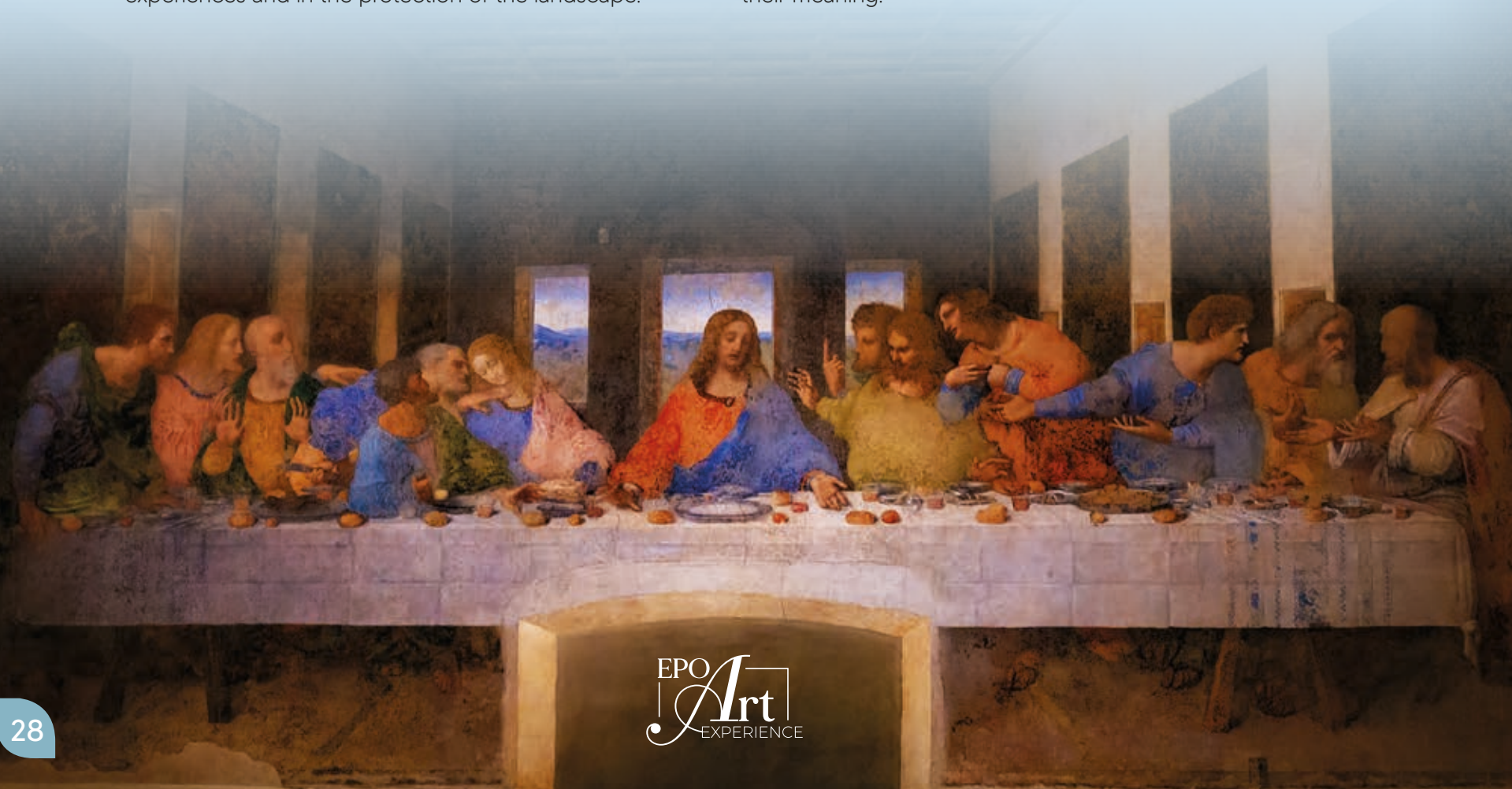


Promotion of culture

Culture is one of the cornerstones of society; the word culture derives from the Latin verb "colère", "to cultivate", in which the concept of care is implicit: it preserves **the historical, literary, artistic memory, the theoretical and practical, traditional and scientific knowledge of a people and feeds the awareness of the new generations**; for this reason, we think we have the duty to support it, especially in the enhancement of artistic experiences and in the protection of the landscape.

In collaboration with research institutions and universities, we support projects aimed at valorizing medicinal plants in relation to the world of culture, from exploring uncommon traditional uses to their use in art conservation. In addition, **we encourage cultural initiatives whose values are in tune with ours, in their different expressions.**

Finally, we raise awareness about culture through our social channels, promoting our activities in this field and their meaning.



Support to training and research institutions

From the previous point and from the vocation of our company towards innovation comes our support to research institutions and universities; **EPO promotes courses, workshops, seminars, etc. focused on medicinal plants, their use, their protection, and valorizing.**

Support for local businesses

EPO promotes the **social and cultural development of local communities** with which it operates, especially on a regional but also national scale, through support programs for the supply chains of medicinal plants, agronomic development, organic pest control, and protection of pollinating insects. We also contribute to studying with a scientific method the traditional uses of local plants, thus preserving their historical memory and contributing to possible innovative uses.





APPLICABILITY



RECIPIENTS OF THE CODE OF ETHICS

Recipients of the Code of Ethics are **shareholders, employees, collaborators, consultants**, and all those who, directly or indirectly, permanently or temporarily, establish relationships with EPO in their professional activities: all, without exception, are required to comply with this Code.

EPO also requires the suppliers and all business partners to conduct themselves in line with the general principles of this Code, considering this aspect of fundamental importance to pursue an ethically responsible production model.

EPO employees have the **obligation to know the rules**, refrain from conduct contrary to them, contact the superior or the Body in charge for clarifications or reports, and collaborate with the Supervisory Body responsible for verifying violations.

Compliance with the rules of this Code is an essential part of the contractual obligations of all employees pursuant to art. 2104 of the Italian Civil Code.



COMMUNICATION AND DISSEMINATION OF THE CODE OF ETHICS

EPO undertakes to promote and guarantee adequate knowledge of the Code of Ethics by disseminating it to all stakeholders. We ensure an adequate training program, and we raise awareness of the values and ethical norms contained in the Code.

CONTROL AND MANAGEMENT OF VIOLATIONS

Each Company function supervises and guarantees the adherence of its actions and activities to the principles and rules of this Code. Each function is also responsible for carrying out relevant checks within its area of competence, detecting possible non-compliances and reporting them; when necessary, it must activate the Supervisory Body.

Reporting violations

The reporting of violations of this Code, or presumed such, must be made by each employee / collaborator to his direct superior or to the Supervisory Body by sending an email to:

segnalazioni.odv@epo.com

No employee may be subject to disciplinary proceedings in the event of incorrect reports made in good faith.

Establishment of the Ethics Committee and the Supervisory Body

EPO undertakes to ensure compliance with the Code of Ethics through the establishment of an Ethics Committee. The Ethics Committee avails itself of the Supervisory Body which acts as follows:

It **analyzes** any report, providing feedback to the author and listening, when necessary, to the person responsible for the alleged infringement;

It **ensures** the confidentiality of the whistleblower's identity, without prejudice to legal obligations;

It **guarantees** whistleblowers against any type of retaliation or any act that may give rise to any form of possible discrimination or penalization;

It **reports** the fact, in case of ascertained violation of the Code of Ethics, and any suggestion, if deemed necessary, to the Ethics Committee.

The Ethics Committee adopts measures to be taken according to the regulations in force and to the disciplinary system of the Company.

Sanctions

The provisions of this Code are an integral part of the contractual obligations assumed by the Recipients or by the subjects having business relations with the Company. **Violation** of the rules of the Code **may constitute a breach of contractual obligations**, with any consequence of the law, including the termination of the contract or assignment, the preservation of the employment contract, and any compensation for damages.



EFFECTIVENESS AND DURATION OF THE CODE OF ETHICS

This Code of Ethics comes into force on **1st June 2022** and remains valid until further amendments are officially approved by the Board of Directors.



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