



PEOPLE & RESEARCH FIRST

Evidilya



The Code of Ethics

The company's commitment to
compliance and respect for integrity

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EVIDILYA'S VISION&MISSION

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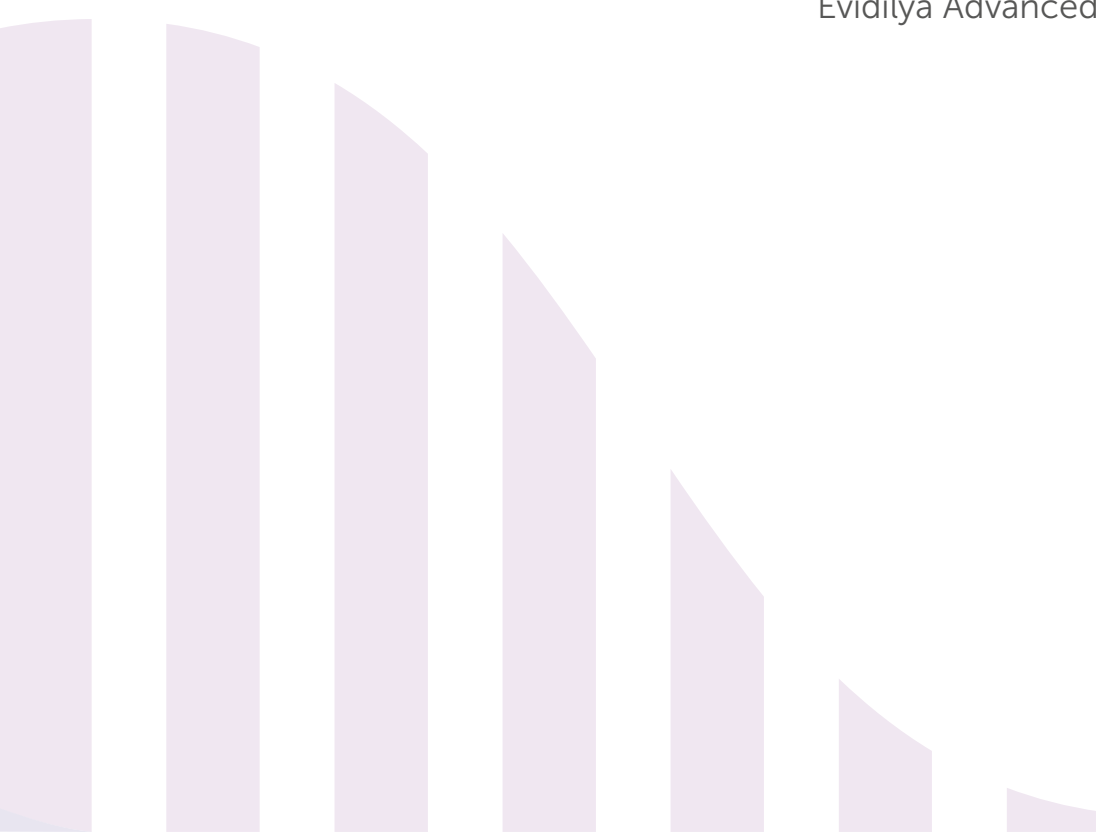
VISION

From Clinical to Real-World Data: we manage both. Totally digital.

Ready to generate strong evidence?

MISSION

At Evidilya we generate scientific evidence, tangible solutions and trusted results in the fields of disease prevention, quality of life improvement and therapy support, thanks to the unique scientific expertise gained in more than ten years of specialty experience with Evidilya Advanced Life Sciences.



THE EVIDILYA CODE OF ETHICS



This is the company reference document which helps all employees and collaborators to act with respect and integrity.

It defines the moral and social rules which all employees must abide by. It favors the sharing and awareness of core company values, fostering virtuous growth, and is based on the ethical principles which distinguish Evidilya.

The Code of Ethics is drawn up in **total compliance with applicable regulations.**

RECIPIENTS

All Evidilya operators are required to know the Code of Ethics and abide by the provisions contained therein: employees, collaborators, suppliers and third parties operating on behalf of Evidilya.





01

THE INDIVIDUAL & THE ENVIRONMENT

To create a safe and positive work environment



“We are all called upon to ensure respect for human rights in the workplace.”



In Evidilya we pay attention to the themes of the **Fundamental Conventions of the International Labor Organization**.

Relations and relationships with people inside and outside Evidilya are based on **fair, courteous and respectful behavior**.

The following are promoted:

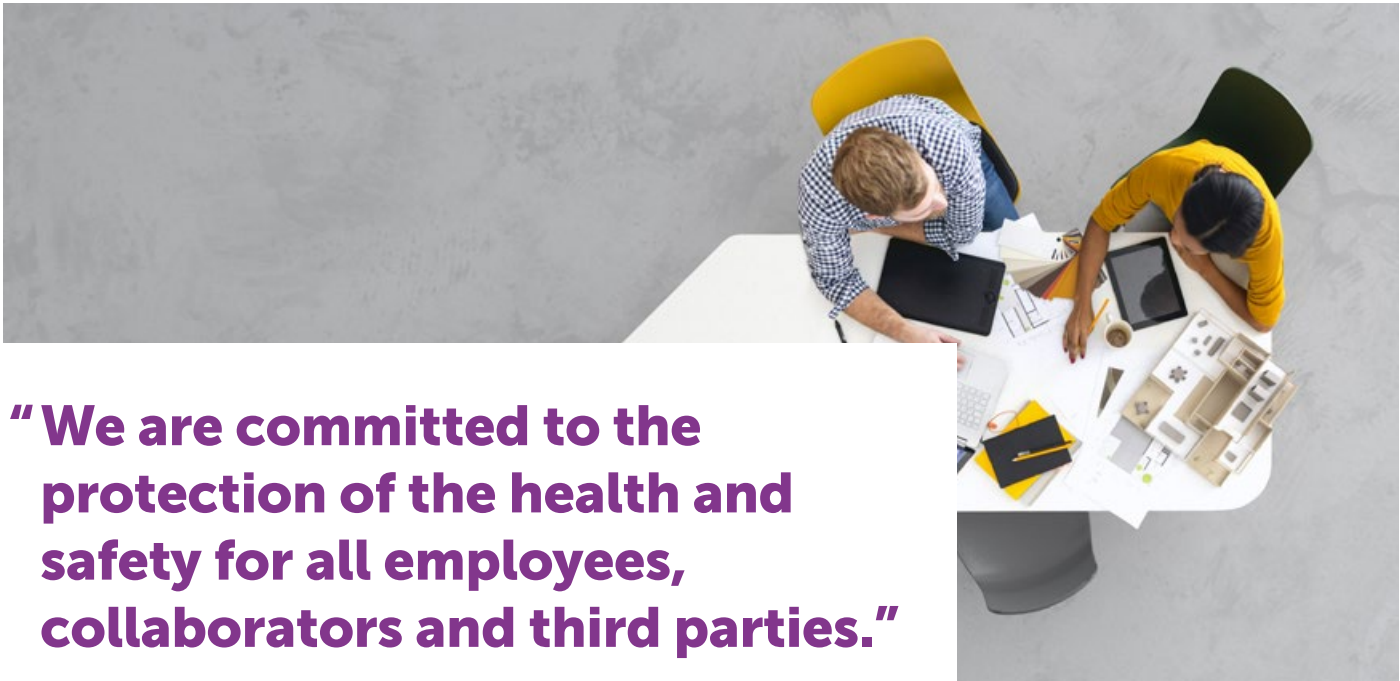


Behavior which underlies or results in psychological, verbal or physical **harassment is not permitted under any circumstances and in any occasion.**

- › Discrimination based on gender, gender identity, age, origin, religion, gender orientation, physical appearance, health, political opinion, nationality is not tolerated or acceptable.

Prejudices and preconceptions must be **avoided**.


Respect and the creation of a **positive working environment** are encouraged every day.




“We are committed to the protection of the health and safety for all employees, collaborators and third parties.”

In Evidilya **every gesture and every activity** is based on the **principle of environmental protection**. We are committed to ensuring that the **controls** required by law are carried out to ensure **a healthy and safe environment**.

Evidilya fornisce:

 Training and information on prevention and safety

 Risk assessment and management plans

We are called upon to adopt an **approach** and a **mentality focused on health, safety and respect** for the places we work in.

We must know how to **prevent** possible **adverse events** of a:

- > **physical** (e.g., electric risk)
- > **chemical** (e.g., fire)
- > **psychological** (e.g., anxiety, depression by stress)

We should avoid situations or places that could put our health at risk.

Every day, we should behave in such a way as to **reduce environmental pollution** as much as possible (reducing emissions, wastewater and wastes) and to promote the **saving of resources** (water and energy).



“Protecting privacy and personal data is a fundamental duty.”

In Evidilya we respect and apply the provisions of the **EU Regulation GDPR** (*General Data Protection Regulation*) in effect from 25 May 2018.



THE GDPR

is a regulation aimed at **ensuring the consistency of European laws on data processing** and the right to exercise total control on our **personal data**. It has established important new aspects such as: the **right to be forgotten** (data subjects can ask for their personal data to be erased) and the **obligation of notification** within 72 hours in the event of companies suffering **leaks of sensitive information**.

Evidilya complies with the European Regulation on the **collection, storage and use of personal data**.

The amount and type of personal data collected and processed is **restricted to the achievement of the set purpose**.

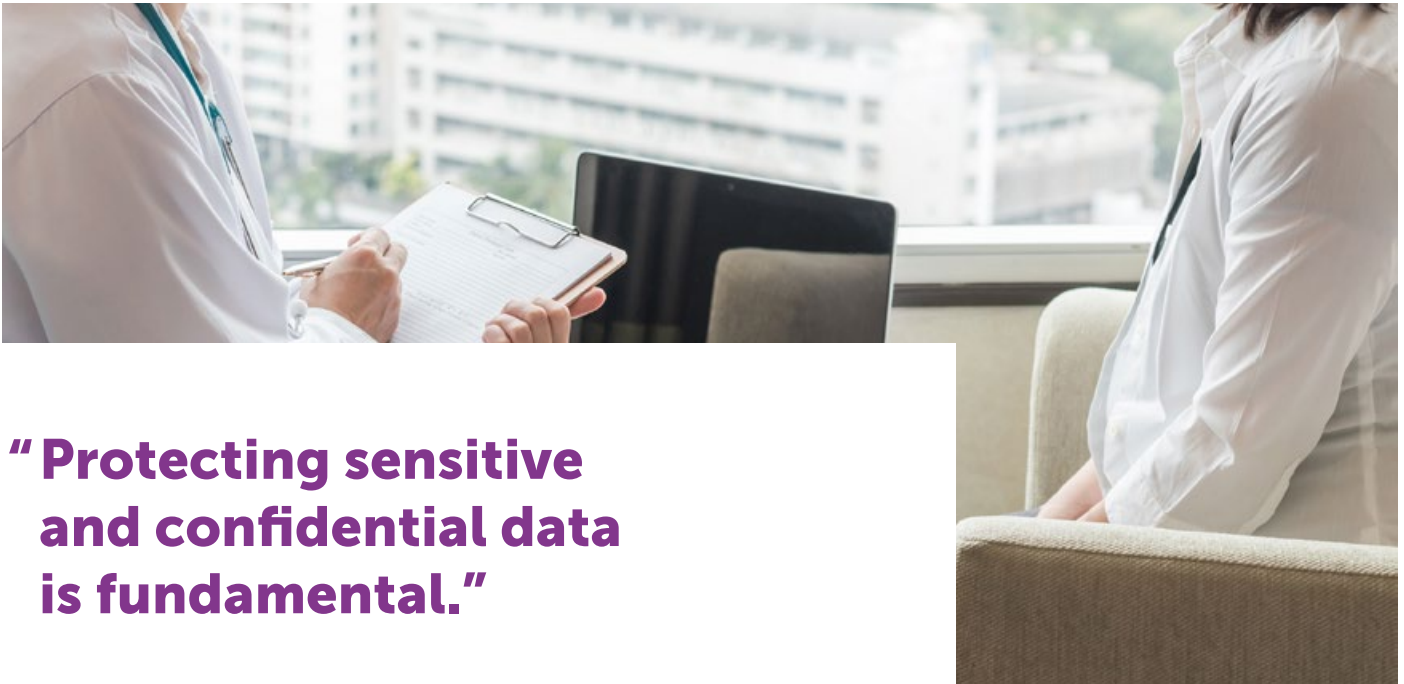
Evidilya **protects** personal data at **every stage** of the data collection, **processing, use and dissemination** processes.



02

CORPORATE DATA MANAGEMENT

*To preserve integrity,
reputation and competitiveness*



“Protecting sensitive and confidential data is fundamental.”

The confidential documents, data and materials belonging to Evidilya and referred to the company, its employees, partners and suppliers **must not be disseminated.**

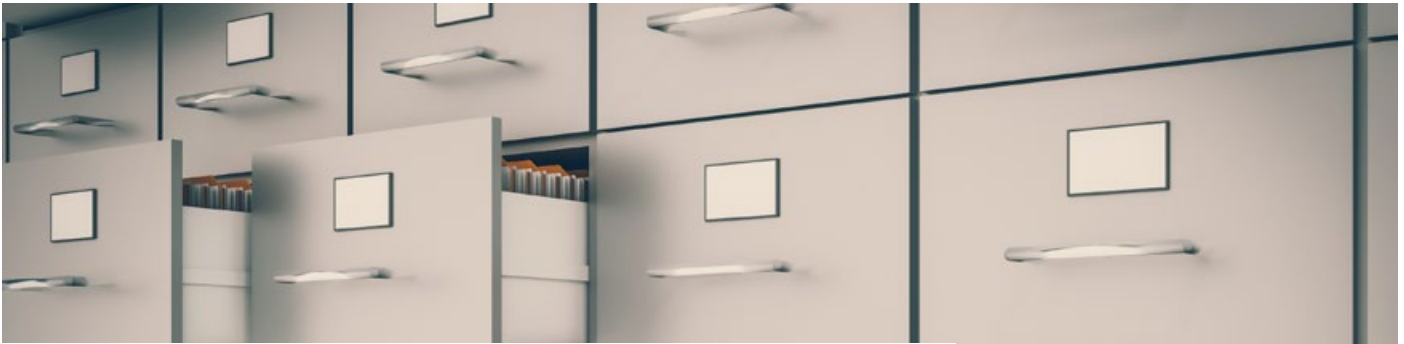


Improper use of this information may expose the company to legal liability and reputational damage with respect to customers, suppliers and partners.

Email exchanges must take place **in compliance with company procedures** and must not harm the interests of Evidilya or disseminate protected information.

We must pay attention to the exchange of **information and sensitive data** related to the company’s activities in **public places**: bars, restaurants, trains, planes and buses, but also in private convivial occasions, both between colleagues and with friends and family.

Company, partner and supplier **logos** must be used in accordance with **guidelines** and **regulations regarding use.**



“Managing company records in the best possible way is an essential factor.”



Records can be understood as any **type of document or data**, received or processed in Evidilya, both **physical** and **digital**.



We are called upon to **effectively manage the company's records**, so that business objectives can be achieved in a clear and transparent manner. But not only! This way we ensure their **speedy consultation** whenever necessary.

These actions and measures do in fact enable us to **achieve and maintain important results** in terms of quality, respecting related laws and regulations and ensuring, at the same time, their **simple use** in case of **audits, controls or possible legal action**.



“Social media must be used in a responsible way.”

The **publication of online contents** must always follow **principles of correctness** avoiding any damage to Evidilya’s reputation.

Only **authorized employees** may publish information on behalf of Evidilya.

It must always be taken into account that **actions carried out on social networks**, even of a personal nature, can have an indirect **negative effect** on the company.

Comments or discussions about Evidilya’s business activity published by third parties or the general public should be avoided.

These indications refer to all **interactive digital media**, such as social network sites (e.g. Facebook, Instagram, LinkedIn and Twitter), blogs and video/photo sharing sites (e.g. YouTube, Flickr, forums, etc.).



03

CORPORATE BUSINESS MANAGEMENT

To maintain trust and respect laws

“We must know how to recognize a conflict of interests and manage it effectively.”

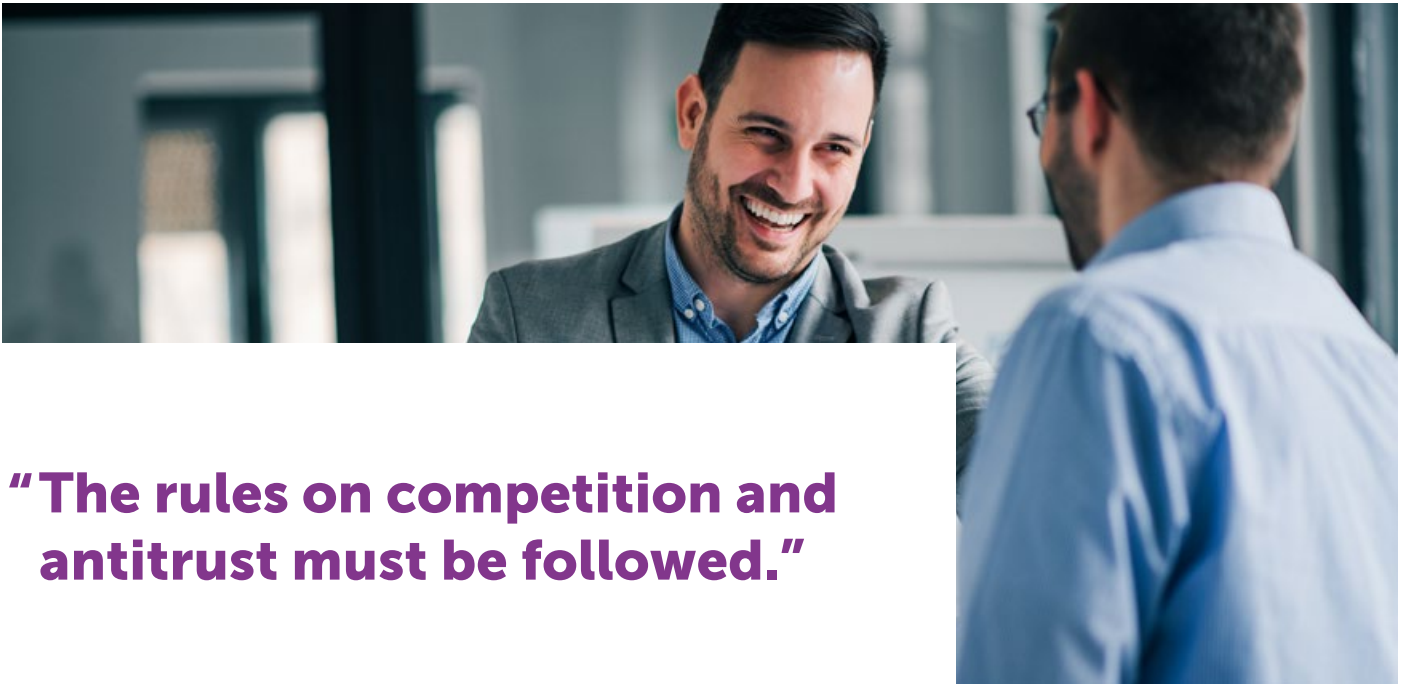


A conflict of interests is a situation in which **the secondary** (financial or non-financial) **interest** of a person (agent, supplier, third parties) tends **to interfere with the primary interest** of another party (company), towards which the former has precise duties and responsibilities.

It is not possible **to work with Evidilya’s suppliers or customers** and receive consideration from them.

In the event of **attempted bribery**, such episodes must be **reported**.


It is **not** possible to try to **influence decisions** made in Evidilya on behalf of third parties, receiving in return gifts offered as an attempt at bribery.



“The rules on competition and antitrust must be followed.”

Any **behavior** considered **unfair** towards competitors must be **avoided**.

Among which:



The exchange of sensitive data



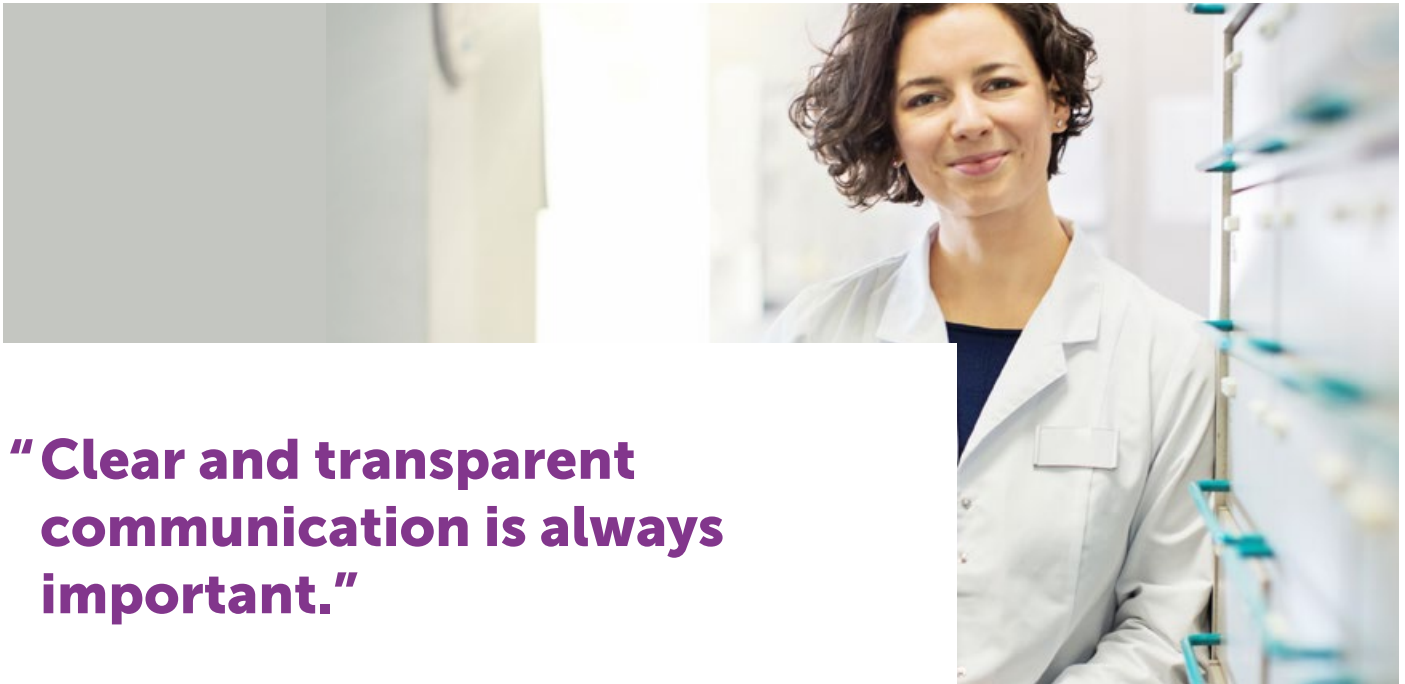
The abuse of a potentially dominant market position



The enforcement of restrictions on customers or suppliers

All employees must **avoid any exchange of sensitive material**, directly or indirectly, with competitors:

- › sales conditions, suppliers or customers, marketing plans and strategies, future expansion plans, profits or margins and discounts.



“Clear and transparent communication is always important.”

When interacting with healthcare workers, always **behave in an honest and respectful way**.

The information we provide must comply with **good** scientific information **practices**.

Giving **false or misleading information is forbidden**.

No **cash gifts** (including prepaid cards or gift certificates) may be offered.

Any problems affecting products, regardless of the nature or severity of the situation, must be identified and reported.



“Complying with the laws and health regulations of the different countries in which we operate is mandatory.”

Many of Evidilya’s business activities are subject to the **regulations** of the **local and state supervisory bodies** of the countries in which the company operates globally.

Evidilya may also find itself, through agreements with its customers or suppliers, required to **comply with health laws and regulations** that would not otherwise be directly applicable to the Company.

In particular, Evidilya must abide by the laws and regulations regarding:

- Clinical trials
- Interaction with patients
- Interaction with healthcare professionals
- Pharmaceutical product marketing
- Privacy of health data



04

INTEGRITY

We are committed to promoting a culture based on ethics and integrity



“Combating bribery in all its forms is a priority matter.”

By bribery is meant **bribing a person** (official, employee, supplier or customer) with money or promises to **fail do his or her duty** or to act improperly for his or her own personal gain.

In Evidilya, **influencing** decisions and actions by **offering objects** of value such as:



All **anti-corruption laws and conventions** such as: OECD Convention 1997, U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act (UKBA) must be respected.

Using **facilitation payments** to speed up work or obtain a permit is forbidden.

Any bribery and corruption involves **civil and criminal penalties**, with serious damage to the company's image.



05

QUALITY

We always promote a corporate culture based on quality



“Quality distinguishes every single process and every single company relationship.”

In Evidilya, quality is considered not so much a point of arrival as a constant, goal to be reached and surpassed, day after day.

One of the objectives of our Company is to promote the **culture of Quality**, through processes and mechanisms that are constantly monitored and constantly improved.

This attention to Quality is evidenced in the **attention we give to people and their needs**; only by maintaining this as a pivotal principle, can our processes stand out in terms of clarity and clarity of objectives.



— Take home messages



The **Code of Ethics** is the document of reference which **helps all employees** and **collaborators** to behave respectfully and with integrity

It is our duty to promote **human rights** and create a **positive work environment**

We are called upon to adopt an approach focused on the **cleanliness of** and **safety** and **respect for the places** we work in

Sensitive and confidential data must not be disseminated

We must declare our **conflicts of interests** and communicate any non-compliant conduct

Free competition must be respected

When interacting with healthcare workers, **communication** must be based on: **respect, clarity and transparency**

Quality is a **part** of all **processes** and all **relationships** within the company



