

CODE OF ETHICS

CROMSOURCE

Our Value:

'We act with ethics and integrity'

We never forget that at the core of our business are the patients whose interest and safety must always come first.

Our conduct firmly adheres to all applicable rules and regulations governing clinical research.

MESSAGE FROM THE CHIEF EXECUTIVE OFFICER

CROMSOURCE has issued this Code of Ethics to state and affirm the ethical principles leading and inspiring the daily work of all CROMSOURCE employees.

Our employees are the most valuable company asset: they are encouraged and supported to develop and maintain the sense of their obligations and responsibilities in pursuing the company mission and objectives.

The CROMSOURCE Management Team keeps employees promptly informed of important decisions and clearly explains what they mean for each employee's daily work.

As well, CROMSOURCE people are guided to develop a proactive and responsible attitude, a company's distinctive mark.

The mission of CROMSOURCE consists of 'Creating a dynamic, flexible and highly skilled organization providing excellent compliant clinical research and regulatory services to its customers according to the highest customer's expectations'.

CROMSOURCE is applying its Code of Ethics as a way to emphasize the daily pursuit of the highest ethical and professional standards of conduct, with the aim of being recognized by its customers as their top-of-mind and top-of-heart choice as well as a robust and solid company, oriented to pursue its own business efficiently, in respect of any applicable legislation.

This Code of Ethics, together with the CROMSOURCE Chart of Values and all related company policies, constitutes the written and recognized commitment of the company to manage the company business and the relationships with all the stakeholders of the clinical research world in one only possible way: ethically and scientifically.

Oriana Zerbini – Chief Executive Officer
CROMSOURCE



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INTRODUCTION

This Code of Ethics expresses the will of the company to define duties and responsibilities, formal standards and principles of business conduct, which any and all parties (acting in the name and/ or on behalf of the company) shall comply with.

On the basis of the good cooperation practice among all stakeholders, this Code of Ethics lays down also the ethical basis of the fair and lawful cooperation with customers.

The Code of Ethics consists of:

- The definition of the scope and the modality pursuant to which the Code of Ethics is committed to regulate CROMSOURCE relationships and partnerships.
- A statement of the general ethical principles defining a range of reference values inspiring CROMSOURCE daily activities: in such statements, the parties and the stakeholders are able to find the ethical basis which constitutes the common ground for initiating and conducting an ethical cooperation.
- The Principles of Conduct which parties should adopt and mandatorily follow in order to guarantee the respect of the general principles laid down by the company and prevent and deter unethical conduct.
- The committees as described in 'Company Governance Policy' (POL-07) and procedures for the implementation and control constitute the monitoring system for actual compliance with the Code of Ethics and for ensuring its ongoing improvement.

This Code of Ethics is maintained updated in order to ensure the highest compliance of the company with the ethical principles in each stage of the daily work and the cooperation with the stakeholders, reflecting and adhering to any change in the regulatory framework, in the company business models and in the partnerships.

The value of reputation

A good company reputation is a critical intangible resource that, from an external interlocutor's point of view, fosters customer loyalty and the serenity of suppliers and creditors, attracts the best human resources, attracts investments and cultivates trust among patients and physicians.

A good company reputation facilitates as well internal conflict-free decision-making processes and allows an organizational structure free of excessive bureaucratic controls and exercises of authority.

CROMSOURCE is committed to implement the dedicated procedures, rules and instructions in order to ensure that all individual conducts reflect the proclaimed values and that adequate sanctions are provided for any violations.

Compliance with this Code of Ethics is the way in which CROMSOURCE takes seriously its commitment to maintain a solid reputation.

Section I.

SCOPE OF THE CODE OF ETHICS AND LEGAL EFFECT

1. Scope of the code and the value of the reciprocity

The principles of the Code of Ethics apply to all CROMSOURCE personnel working at all levels and grades and, to the maximum extent permitted by applicable law, to cooperation partners such as consultants, contractors, or any other person associated with CROMSOURCE (collectively referred to as resources).

The principles and standards set forth in this Code of Ethics apply in all countries where CROMSOURCE conducts its business at.

The Code of Ethics is as well addressed to all CROMSOURCE customers, who see in it a transparent declaration of intent committed to a fair cooperation.

In consideration of the good cooperation practice among all the stakeholders, CROMSOURCE, requires each of them to comply with analogous principles and rules of ethical conduct in their relations with CROMSOURCE.

Wherever there is a contractual relationship between the company and a stakeholder, any lack of reciprocity, should the case may be, would also undermine the conditions which the relationship is based upon, thus making its continuation impossible.

If this actually occurs, CROMSOURCE shall use the most lawful and morally-correct means against any subject who may have failed to honor the reciprocal duty of compliance they were legally bound to respect.

2. Legal effect

This Code of Ethics also constitutes the set of disciplinary rules pursuant to and by effect of statute of workers' rights. Therefore, it represents an integration to the disciplinary provisions contained in the collective bargaining agreement.

Section II.

CROMSOURCE GENERAL ETHICAL PRINCIPLES

1. Compliance with laws, rules and regulations

Our conduct firmly adheres to all applicable rules and regulations governing clinical research.

CROMSOURCE's role to improve healthcare worldwide calls for ethical conduct in clinical studies.

2. Moral legitimacy: integrity in our performance

Maximum attention shall be dedicated to avoid situations in which the subjects involved in transactions are, or even appear to be, under a conflict of interest.

This type of situation arises when a resource attempts to fulfil an interest other than the company mission itself and other than the equitable allocation of stakeholder interests, or reap a 'personal' gain from the various company's business opportunities, whenever the representatives of customers, suppliers or public institutions act in contrast to the fiduciary duties linked to their positions.

3. Responsibility in respect to patients

At the core of our business are the patients whose interest and safety must always come first.

One of the main objectives of the company in conducting the clinical studies activities in an ethical and scientific manner is to support customers to develop their own products to the best of their and our capability, to promote the health care of patients, thus improving their quality of life and increasing their capacity to lead an independent existence which meets their own expectations as closely as possible.

4. Transparency

Resources are bound to furnish punctual, complete, transparent, comprehensible and accurate information so that their relationship with the company can be established in a way that permits stakeholders to make independent and well-informed decisions.

CROMSOURCE makes any of its decisions based on information recorded at every company level. Data integrity is a key requirement to its own business.

5. Confidentiality

CROMSOURCE guarantees the confidentiality of the information in its possession and refrains from analyzing or processing confidential data, except with explicit and conscious authorization of the relevant party and in full compliance with current legal standards.

Resources should not disclose any company confidential information without a valid business purpose and proper authorization by the company Management. Each of them is responsible for protecting the confidentiality of any company information.

6. Fair competition

Competition laws – also referred to as antitrust laws – are designed to protect competition. They prohibit business behavior which has the objective or the effect of preventing, restricting or distorting competition. CROMSOURCE believes that customers and society have a whole benefit from fair, free and open markets.

To this end CROMSOURCE supports all efforts to promote and protect competition, including the legitimate protection of intellectual property and marketing rights.

7. Quality of our services

Our main business is conduct clinical studies that help our customers to evaluate the safety and efficacy of their products.

For this reason CROMSOURCE protects the rights and safety of human participants in all areas of clinical research. CROMSOURCE operates to accept ethical principles for clinical research such as those set forth in but without limitation to the Declaration of Helsinki.

CROMSOURCE follows worldwide standards of quality and ethics, including 'Good Practice' standards. They include good laboratory, good clinical and good promotional practice. CROMSOURCE' supporting policies and procedures help its resources to meet ethical principles, Good Practice standards and legal requirements.

8. Environmental protection

The environment is to be protected as a primary resource; consistently with this assumption, CROMSOURCE strives to strike the best possible balance between commercial initiatives and environmental needs during the planning of its own activities in due consideration for the rights of present and future generations.

Environmental matters are handled at CROMSOURCE with sense of responsibility as part of its commitments towards resources and in compliance with applicable environmental laws and regulations, company standards and best practices.

9. Impartiality and equal opportunities

In its relationships with stakeholders, the company avoids any and all forms of discrimination based on the age, gender, sexual orientation, state of health, race, ethnicity/ nationality, political views or religious beliefs of its interlocutors. The company pursues, as its own foremost value that underlies every relationship, the principle of fairness and equality of treatment.

To meet its growth and efficiency requirements, CROMSOURCE is committed to build an organization that quickly responds to change and that consists to a place where all resources are able achieve their full potential. Differences in backgrounds, experiences, perspectives and talents are a fundamental strength of CROMSOURCE.

10. Value of human resources and safeguarding personal integrity

Our resources are the most valuable company asset.

We value resources and ensure they work in a friendly, family environment and develop their skills and talents.

CROMSOURCE protects and improves the capabilities of its human resources, also by guaranteeing working conditions that are respectful with personal dignity and workplace environments that are wholesome and safe.

11. Equity of authority

CROMSOURCE is committed to ensuring that authority is exercised fairly and equitably so as to avoid any abuses in any contractual relations that entail the establishment of hierarchical relationships.

Section III.

PRINCIPLES OF CONDUCT

In order to ensure the adherence and the respect of the general ethical principles, CROMSOURCE adopts the Principles of Conduct, which the parties are required to follow while conducting the business, relating with resources, during the course of market relationships, when relating to Public Authorities and healthcare professionals along with protecting environment.

Section III.I: PRINCIPLES OF CONDUCT IN BUSINESS

1. Lawfulness, fairness and equity in company actions and activities

Every legal action and tangible activity carried out in the name and/ or on behalf of the company must be lawful on the basis of the current legislation in force and must be inspired by the company's interest, in addition to the principles of transparency, efficiency, effectiveness and good faith.

Resources are aware to conduct activities in accordance with this Code of Ethics and all national and supranational regulations applicable in the countries where CROMSOURCE carries-out its business, operating pursuant to the highest standards required by the Authorities with due regards to the local specific requirements.

CROMSOURCE commitment to complying with applicable laws, rules and regulations governing all aspects of business, including research, marketing and sales is expressed by the presence of a Quality Management System and a regulatory maintenance process in charge to implement aspects to comply with regulative framework.

Resources are made to be familiar with the laws and supporting policies through the setup of most appropriate trainings whose purpose is to enable resources to understand the requirements of this Code of Ethics, the relevant supporting policies, the laws and regulations of the countries in which they work, and how the resources should apply them in practice.

They are as well encouraged and supported, also through coaching and periodic evaluation occasions, to be prepared to exercise good judgment and common sense in deciding the right actions to be taken, including asking for advice whenever they are not sure on which laws, rules and regulations they are required to be compliance with from time to time.

The Legal Affairs Department ensures that contracts and work assignments are executed as openly agreed upon by the parties. CROMSOURCE commits itself to refrain from taking advantage of the possible ignorance or incapacity of its counterparts.

With reference to existing relationships, whoever is working in the name or on behalf of CROMSOURCE must refrain from taking advantage of loopholes in contracts or unforeseen events in order to renegotiate the contract for the sole purpose of exploiting the dependent or weakened position in which the interlocutors may come to find themselves.

2. Conflict of interest

Any decisions made for the company must be inspired by the protection of its interests.

A potential conflict of interest arises whenever a resource has working, financial, commercial, professional, family or close friendship relations with a person engaged to be a relationship with the company, if this resource has decision-making, evaluative and/ or control power on the mentioned relationship.

For purposes of this Code of Ethics, the concurrent interest is nevertheless deemed to be a potential conflicting interest and receives the exact same treatment.

Examples of actual or potential conflicts of interest include:

- Having a personal financial interest in a supplier, customer or competitor.
- Having a close family member or anyone you may treat like a family member working for a supplier, customer or competitor.
- Receiving any form of compensation from a supplier, customer or competitor.
- Having a personal interest or potential for gain in any company transaction.

Resources should avoid situations where personal interests are in conflict, or even appear to conflict, with the interests of CROMSOURCE.

Whoever finds himself/ herself in a situation characterized by a conflict of interest (even a merely prospective one) between a company interest and his/ her own interest (of any kind: property, family, personal, age), so that it is impossible to satisfy the former without sacrificing the latter, or viceversa, shall in any case refrain from taking decision or performing any sort of action.

Whoever falls under an actual or potential conflict-of-interest situation must advise his/ her Department Director immediately in order to take the most adequate precautions and measures.

The Department Director shall inform the Board of the actions being undertaken to prevent the conflict or neutralize it completely through a replacement intervention, if necessary.

Many actual or potential conflicts of interest can be resolved in an acceptable way for both the resource and CROMSOURCE.

The key to addressing conflicts of interest is the full disclosure thereof.

Often, just the mere disclosure of the potential conflict to the company is the only action required.

3. Improper gift

As a common business courtesy, the resources may receive occasional gifts from third parties. Even when gifts or entertainment are exchanged out of the purest motives of personal or professional friendship, they can be misunderstood and create improper influence.

Therefore, even though there may be times when refusing a gift would be impractical or embarrassing, the resources must not accept any gifts or entertainment that could raise any concerns regarding their personal integrity or CROMSOURCE's independence.

To avoid both the reality and the appearance of improper relations with third parties or potential third parties, resources should adhere to the following principles:

- Resources shall not solicit gifts or entertainment from or to any current or potential third party of CROMSOURCE. Gifts include all kinds of advantages.
- Resources may only accept any unsolicited gifts provided they do not go beyond common courtesy and accepted local business practices.

In case of doubt about the appropriateness to accept an unsolicited gift or entertainment, if the case may be, resources must consult with their Department Director and abide by his/ her decision.

4. Obligation of confidentiality, confidential information and data protection

Parties required to respect this Code of Ethics are forbidden to reveal to third parties any information of a technical, technological, commercial, financial, assets or banking nature that they may come to learn of, even by chance, from time to time during the fulfilment of their tasks and responsibilities.

This prohibition is absolute, and the information need not have been formally classified as being confidential in nature beforehand.

The prohibition described above does not apply to information that has already been made public as per company's choice. The prohibition also does not apply when the disclosure constitutes an act required by law or by other provisions.

Generally speaking, the company guarantees that any information belonging to or coming from third parties shall be handled in accordance with the laws on processing personal information and as per contractual arrangements.

CROMSOURCE must comply with applicable laws and external accounting standards and ensure that the information supplied to its auditors and stakeholders, such as regulatory agencies and government bodies is true and fair.

The company shall nevertheless refrain from analyzing or processing confidential data without the prior consent of the interested party, as registered on the proper forms as provided by law.

All processing of personal data (e.g. data of resources, customers and suppliers) must be in compliance with data protection local laws.

CROMSOURCE pays particular attention in respecting the privacy of all of those whom CROMSOURCE makes business with. This is true in particular with patients and clinical studies' participants.

Being active in clinical studies, CROMSOURCE takes due care to prevent any misuse of any personal medical information obtained in the course of its activities. CROMSOURCE is committed to respecting data privacy and has set forth the principles that must be consistently applied for any data processing within CROMSOURCE's Group and with third parties.

CROMSOURCE ensures that any data, information or records which is created, or that is responsible for, is true and fair. Incomplete or inaccurate information may lead to poor decisions and negative consequences.

All information is transparently and accurately recorded. This includes, but is not limited to, expenses, revenues, research results and any other corporate information. All financial transactions and payments must be authorized and recorded.

Falsifying records and accounts or misrepresenting facts may constitute fraud: such practices will be handled as per procedure 'Management of Fraud, Misconduct and Serious Non-Compliance' (SOP-CM-08) as modified from time to time.

In its worldwide operations CROMSOURCE uses systems to process and exchange data between units within the CROMSOURCE's Affiliates and with third parties. Increasing projects' cooperation entails the exchange of personal data. This trend is reinforced by the increasing use of modern telecommunication means.

CROMSOURCE adopts adequate measures and tools as described in 'Data Security Policy' (POL-09).

5. Proper use of strategic information

As resources we have in many occasions access to Confidential Information related to our business. This includes: confidential information about methods, business plans, financial data, marketing and sales strategies, launch of new services, merger or acquisition activities.

Information is a strategic company asset that must be protected. The loss of confidential information can be extremely damaging to CROMSOURCE's competitive position.

We respect the confidential information belonging to third parties. If we share confidential information with a third party, any exchange of such information is subject to the signature of a confidentiality agreement.

We have to be aware that in a competitive environment we must be extremely careful of how we handle confidential information in public places, such as, without limitation to airplanes, trains, trams, bars or restaurants.

6. Free competition

The company recognizes free and fair competition between enterprises as a fundamental market value that stimulates the drive to improve products and cultivates the capacities of its resources.

The company thus refrains from any form of accord, whether oral or written, open or secret, that could distort free market conditions, create or encourage the acquisition or consolidation of dominant positions or concentrations, hinder, restrict or distort competitive play, influence the setting of purchase or sales prices, or inhibit production, market outlets, investments, technical development or technological progress.

All practices that could in any way be classified as unfair competition practices are thus forbidden, as well as any active or omissive conducts that could prejudice the right to privacy of third parties, thereby limiting free competition or encouraging the abuse of dominant positions to the detriment of third parties.

CROMSOURCE's principles of fair competition require that:

- a) CROMSOURCE does not share or exchange price or bid information with competitors.
- b) CROMSOURCE competes aggressively in every market for every customer.
- c) CROMSOURCE does neither make agreements nor general covenants with competitors concerning customers or territories.

CROMSOURCE's standards of fair competition are also covered by law in all countries in which CROMSOURCE operates, and additional statutory laws might be required by local law which CROMSOURCE must comply with.

All resources who have to deal with competition issues during the performance of their tasks are expected to understand the basic principles of competition laws and the importance of complying with the same.

Every Department Director, if applicable, must ensure that all resources involved in sales, purchasing and marketing are aware of CROMSOURCE's standards and the applicable competition laws. If an answer to a specific antitrust question is not clear, resources must seek advice.

7. The patients well-being

We never forget that at the core of our business are the patients whose interest and safety must always come first.

The company complies with the current laws, in particular the national and international rules, by adopting internal standard operating procedures committed to:

- a) Protect data privacy of the patients: CROMSOURCE has adopted an internal standard operation procedure with the aim to respect privacy and handle, fairly and lawfully, any breach of confidentiality.
- b) Contribute to improve product safety, performing, in respect to the contractual arrangements:
 - Pharmacovigilance and materiovigilance activities (as from the date of signature of the informed consent form up to the patient scheduled or earlier conclusion of the clinical study).
 - An accurate monitoring of all product related activities (from the shipment to the stocking at the site, from the accountability until the product destruction operations).
- c) Provide assistance and guarantee the highest standards of quality and efficiency.
- d) Monitor product usage and fulfill the procedures, in strict compliance with current laws, associated with the occurrence of accidents.

Section III.II: PRINCIPLES OF CONDUCT IN MANAGING RESOURCES

1. The company and its resources: the value of human resources

CROMSOURCE recognizes its own resources, both collectively and individually, to be its most important asset, and pursues the objective to promote, through its organization, their professional, economic and social growth.

The company's foremost value lies in pursuing the principle of equality and equal opportunity and treatment for resources without discrimination by gender, race, language, religion, political or union views or personal or social conditions, and combines these principles with the principle of individual capacities, attitudes, inclinations and merits.

Decisions made in the context of managing and developing resources, including decisions taken in the selection phase, are based on the real correspondence between the requisites being sought and the requisites of the resources (or candidates) and on the objective considerations concerning expected and actual performance levels.

Fair treatment also means that CROMSOURCE respects the rights of its resources to constructively voice dissent or disagreement: open mind listening approach is encouraged by the company as an essential pre-requisite for a pro-active behavior.

2. Protection of health, safety and serenity in the workplace

The company safeguards the occupational growth and development of its resources, in order to improve their skills, in respect of the laws on individual rights and with special regard to the moral and physical integrity of the resources.

CROMSOURCE has adopted the Employee Handbook to drive to the correct and respectful management of the resources, internal cooperation and relationship.

The company's primary value is to further the safeguard of health, safety and serenity in the workplace as preconditions for accomplishing the goals.

Moreover, its own actions shall comply with current laws on the subject, particularly in regard to training and prevention - aspects that each resource is responsible for managing carefully and diligently under the domain of his/ her competence.

The performance or the attempted performance of any form of conduct that is or may be injurious to the dignity, serenity or physical-mental integrity of the workforce in the company environment is strictly forbidden.

Any conduct entailing intimidation, oppression, psychological abuse, ostracism (even when no physical violence is involved) or damaging the personal or professional dignity of the victim or threatens his/ her state of health is also forbidden. This type of conduct, whether performed by co-workers or Department Director, shall be promptly prosecuted through criminal and civil disciplinary proceedings.

CROMSOURCE strives to maintain an environment free of harassment, where all resources are duly respected.

Workplace harassment is generally defined as any action that inappropriately or unreasonably creates an intimidating, hostile or offensive work environment.

The variety in backgrounds, cultures, languages and ideas of the resources helps the company to maintain a competitive edge. At CROMSOURCE the diversity is considered a value and it offers a lot of business and individual opportunities.

CROMSOURCE does not tolerate any form of discrimination or harassment in the workplace. It is a CROMSOURCE commitment to ensure that the behavior of its resource does not discriminate against anyone on the grounds of gender, race, age, ethnicity, national origin, religion, disability, sexual orientation, citizenship, genetic information or any other relevant category.

These principles apply to all aspects of the job relationship, such as hirings, assignments, promotions, compensations, disciplines and terminations.

CROMSOURCE conducts its business operations with the highest regard for the safety and health of its resources.

Each resource is responsible for complying with safety rules and regulations and for taking the necessary precautions to protect his/ her colleagues and himself/ herself.

Safety, health and environmental matters are handled at CROMSOURCE with sense of responsibility as part of its commitments towards its resources.

Use of illegal drugs, alcohol abuse and misuse of legal drugs create serious health and safety risks in the workplace. It may affect the resource's safety and the safety of his/ her colleagues, likewise it may impact CROMSOURCE business operations. Being under said influences, the resource may diminish the ability to perform at his/ her best, which is vital to CROMSOURCE's Mission.

Any breach of this disposition shall trigger immediate dismissal of the interested party and the application of disciplinary sanctions, notwithstanding other remedies as provided by law.

3. Protection of Privacy

The company safeguards the privacy of resources in accordance with current laws on the protection of personal information, sensitive data included.

It is prohibited to conduct investigations on the views, preferences, personal tastes and, more generally, the private lives of resources.

CROMSOURCE has adopted a procedure 'Data Protection' (SOP-CM-11) in order to protect privacy and handle, fairly and lawfully, any breach of confidentiality.

4. Duties of resources

All resources are required to perform their tasks to the best of their capacity.

All resources shall carry out their work with diligence, dedication and active participation, promptly and faithfully following any specific instructions and in full compliance with the principles set forth in the hereby Code of Ethics. In their relations with other company interlocutors, the conduct of resources must be distinguished by helpfulness, respect and courtesy in the interest of cultivating and maintaining cooperative relationships and high standards of professionalism over time.

Furthermore, all resources are required to conduct their relations with Public Administration, national and European institutions and entities providing public funding and healthcare professionals, whether inside the company or externally via third party relationships, in a manner distinguished by the principles of integrity, correctness and transparency.

All resources shall strictly act in compliance with the present Code of Ethics. They are fully cognizant of its disciplinary implications.

They are therefore required to:

- d) Familiarize themselves with the entire content of the Code of Ethics, in particular the sections pertaining most directly to their assigned duties.
- e) Promote full awareness and application of the Code of Ethics among colleagues whom they share the same work context with.
- f) Report violations of the Code of Ethics in a timely manner following the procedure set forth in 'Reporting Violations Procedure' (Section IV, paragraph 5) herein.
- g) Consult with the Department Director or the other subjects set forth in 'Asking for Help and Advice: What is the right thing to do' (Section IV, paragraph 4) herein, to resolve any doubts concerning the interpretation of specific sections or clauses of the Code of Ethics.
- h) Actively cooperate with any investigations on alleged violations of the Code of Ethics, respecting the strictest reserve in regard to the specific issues addressed during the ascertainment.

Resources with managerial functions shall shape their own conduct to serve as an example for the resources under their responsibility.

Resources with managerial functions shall oversee rigorous and on-going compliance with the provisions of this Code of Ethics and shall cultivate and maintain a climate of serene and productive collaboration at all times.

Resources with managerial functions shall ensure, under their own responsibility that equal situations correspond with equal treatment and different situations with different treatment in terms of hiring, training, compensation, incentives, professional opportunities and growth.

Requesting services of personal utility or any other behavior that violates the present Code of Ethics is considered to be an abuse of authority.

Resources with administrative or financial roles, including accounting and legal functions, shall:

- a) Comply strictly with civil, fiscal and accounting standards and any dispositions, orders and rules (including technical) that serve to regulate their respective sector of activity.
- b) Act to ensure the provision, to the company of punctual, clear, precise, complete and comprehensible information in the context of any and all documents that need to be submitted to or filed with Public Authorities, including any preparatory or supplementary documents.
- c) Use company assets correctly, transparently and prudently.
- d) Comply strictly with the obligations of confidentiality and discretion when communicating with third parties, remaining highly conscientious of the principle of the pertinence of the contents to the goals of the communication, and always respecting the notions of scope, prudence and impersonality.

Requests or threats intended to induce individuals to act contrary to the law, the Code of Ethics, and/ or their personal and moral convictions and preferences are not tolerated.

All resources are encouraged to escalate fairly to their Department Director, in the framework of a transparent and fair cooperation and in a fast and fair solution of conflicts.

All resources shall refrain from escalating problems in order to pursue personal interest.

All resources are required to use, maintain and protect any company property or assets which may be entrusted to them (even temporarily) from time to time with the due diligence of a good family father, while respecting the company safety policies and promptly signaling any deficiencies, defects or non-conformities.

CROMSOURCE reserves the right to suspend and, if necessary, sanction improper use of any company property which may have been provided to its resources in order to perform their tasks, notwithstanding the provisions of current laws (Statute of workers' rights, privacy laws).

5. Use of company assets

CROMSOURCE assures that company's assets are properly maintained and used in an economical and efficient manner. As a general rule, all resources shall not use company equipment or resources for personal use. However, there may be times when personal use of corporate resources is acceptable. In case of any questions about such situations, all resources are welcome to discuss about them with their Department Director.

CROMSOURCE encourages its resources to make efficient and effective use of communication tools such as e-mail, the Intranet and Internet, voicemail, telephones, photocopiers and fax machines to accomplish business objectives.

Those tools might also allow occasionally resources to accomplish personal activities, and such use is generally permitted, provided that there is no undue cost to the company or adverse effect on productivity or the work environment.

6. Use of communication tools

With the term 'Communication Tools', CROMSOURCE includes company's own telephones, fax machines, computers, mobile electronic communication tools like laptops, handhelds or mobile phones including accessories, e-mail systems, intranet and internet systems.

CROMSOURCE Communication Tools are to be used in principle and primarily for CROMSOURCE's business purposes only.

Resources who have access to CROMSOURCE Communication Tools must handle the same with due care and ensure that they do not get damaged, lost or otherwise displaced. In addition, resources must comply with CROMSOURCE IT security standards, they are not allowed to install or use hardware or software on any CROMSOURCE system that have not been specifically approved by CROMSOURCE IT specialists.

7. Social media

Social media are ‘media tools’ designed primarily for social interaction and collaboration, often featuring communications designated for a broader group (e.g., one-to-many postings and submissions) with the option for continued interaction, sharing, evolution, and ‘socialization’ of the content. Social media include blogs, social networks (e.g., Twitter, Facebook, Linked-In, MySpace, Xing), wikis and YouTube, to mention just a few examples.

Social media brings new opportunities to build conversations and communities, but it also brings new risks.

Considering to growing social media importance, CROMSOURCE wishes to maximize the opportunities represented by this new form of communication, while minimizing the risks and challenges they may represent.

While CROMSOURCE respects the rights of its resources to engage in personal online activities, each of them is responsible for knowing CROMSOURCE's values and corporate principles, as well as rules, and best practices before any of them gets engaged in social media.

This Code of Ethics, the CROMSOURCE's Quality Management System and all applicable laws and regulations, drive any resource's behavior and good judgment in the use of social media.

Resources are aware that anything they may post has the potentiality to be viewed by anyone, and – regardless of their intent – their comments, should the case may be, could be subject to misinterpretation by customers, vendors, other resources.

If any of CROMSOURCE's resource believes or becomes aware of that CROMSOURCE's technologies and/ or electronic communications tools are being used inappropriately or contain inappropriate statements, he/ she shall notify his/ her Department Director, or otherwise follow the procedure set forth in 'Board and Procedure for implementation and control (Section IV of this Code of Ethics). CROMSOURCE may request the resource or any third party to change and/ or remove any comments or similar, made on the social media, which may be inconsistent with this Code of Ethics or that make inaccurate references to the company.

All resources are liable for any damage or harm to CROMSOURCE business or reputation resulting from their use of social media, whether or not such damages or harms occur during or after the business hours.

Section III.III: PRINCIPLES OF CONDUCT IN COMMERCIAL RELATIONSHIPS

1. Relationships with suppliers

The company views its system of suppliers to be a crucial factor in maintaining and improving its level of competitiveness and its ability to meet the demands of the marketplace.

The selection and evaluation of suppliers is based exclusively on quantitative and qualitative elements of the supply, such as: costs, type of product or service, quality control system, innovative capacity, know-how and proactive capacity.

The stipulation of a supply contract (including financial or consulting contracts, as well) must always be distinguished by extreme clarity and avoid, or minimize to the greatest extent possible, any form of dependency.

The procurement process must reconcile the pursuit of maximum competitive advantages for CROMSOURCE with loyalty, transparency and impartiality.

Suppliers will be provided with appropriate information concerning this Code of Ethics. The possibility of including special clauses on the applicability of the code may be considered in the context of the contractual relations with the company's more significant counterparts.

Suppliers shall be banned if they are discovered to have seriously violated (or if there is good reason to believe they engage in serious violations of) the ethical principles of this code or, more generally, basic individual rights.

2. Relationships with customers

The company is committed to satisfy the expectations of its customers and, in view of this goal, it imposes the following provisions to its resources:

- a) Maintain relations distinguished by eager cooperation, honesty, transparency and professional correctness.
- b) Maintain a conduct in the relations with customer, distinguished by helpfulness, respect and courtesy in the interest of cultivating collaborative relationships and the utmost in professionalism.
- c) Promote respect for the principles of equal treatment in the presence of equal situations.
- d) Continuous production of appropriate levels of safety, support, quality and added value
- e) Contracts and correspondence with the customers of CROMSOURCE must be:
 - Clear and simple, employing language that is as close as possible to the normal usage of the interlocutors.
 - In compliance with current laws and regulations, without engaging in elusive or otherwise incorrect practices.
 - Complete so as to keep from neglecting any element of relevance for the sake of the customer's decision.

Section III.IV: PRINCIPLES OF CONDUCT IN RELATION TO PUBLIC ADMINISTRATION AND WITH HEALTHCARE PROFESSIONALS

1. Relationships with Public Administration

The company's relationships with Public Administration are distinguished by the principles of absolute integrity, correctness and transparency and full respect for the law, the standards of this Code of Ethics and other internal procedures.

In any case, said relationships may not be characterized by practices or management styles that prejudice the independence, impartiality or transparency of administrative actions or that cause damage to the company's image.

2. Public funds

In the case in which the company requests public funds from the European Union, the State or other Public Administrations, strict compliance with the law must be observed in relation to the acquisition process and the subsequent designation of purpose.

The work of the resources delegated for funding-related activities must be distinguished by principles of strict correctness and transparency, the observance of appropriate information levels and the safeguarding of the accessibility and availability of support documents for internal relations between the company and its committees as well as with relevant entities and institutions in question.

3. Relationships with healthcare professionals

The company recognizes that a proper relationship with healthcare professionals is crucial for the promotion of progress in medical science, improvement on diagnostic tools and patient care, research and development of innovative medical technologies, fosterer of a safe and effective use of medical technologies and development of more advanced and effective therapeutic methods.

In any case, all relationships with healthcare professionals must be respectful of:

- a) The autonomy and independence of professionals in the healthcare sector of reference.
- b) The current civil, criminal, administrative and fiscal rules and regulations.
- c) The professional standards that apply to professionals involved in the healthcare sector of reference (e.g., the Professional Code of Ethics).
- d) The provisions on the item as adopted by customers.

Training activities (meetings, classes, conferences, conventions etc...), both inside and outside of the company and organized for healthcare professionals by CROMSOURCE or third parties must be carefully examined with respect to the effective purpose of such initiatives and the cost burden for the company.

4. Liberality

Whenever the company wishes to engage in liberality of any form whatsoever, such actions are admissible if they serve for purposes of beneficence or philanthropy (progress in medical education, support for scientific research, public education on healthcare issues) and are addressed to organizations or entities entitled to receive them.

The implementation of liberality remains subordinate, in any case, to strict compliance with a series of conditions:

- a) Compliance with current civil and fiscal laws and regulations.
- b) Precise documentation of the purpose for the liberality.
- c) The liberality's consistency and congruity with said purpose.

Liberalties for healthcare professionals who are Public Administration employees are prohibited out of principle, with the sole exception of modest in person donations (excluding cash donations, however) that are sporadic or occasional in nature and that benefit subjects or serve for purposes that are educational in substance.

The practice of handing out samples for purposes of assessment is legitimate in any case, as long as usage remains limited.

5. Assignments and consulting

Whenever the company entrusts healthcare professionals other than freelancers with assignments, consulting positions or other services (participation in training courses, collaboration in product development, inventive or experimental activities, etc.), those practices are allowed under the following specific conditions:

- a) Comprehensive formalization of the assignment or agreement, including a precise specification of the services to be provided, the compensation paid or promised and the description of the purpose.
- b) Appropriateness and proportionality of the compensation in relation to the service actually being provided, its complexity, the degree of specialization involved and professional decorum; only reasonable expense reimbursement is admissible.
- c) For services that are focused on research, the assignment must be accompanied by a research protocol.
- d) For services performed fully or partially outside of the company premises, the legal domicile or, when allowed, the professional's usual workplace, the chosen location must be suited to the nature of the activities; any food, lodging or travel expenses must be held within normal limits and serve exclusively for the activities performed, or to be performed, with respect to timing and location.

6. Avoiding of improper advantages and bribery

CROMSOURCE is committed to upholding high standards of integrity in its dealings with all its business partners. The effects of bribery and corruption are widespread and they are harmful to both businesses and individuals.

CROMSOURCE condemns and prohibits bribery and all other forms of corruption. No one acting for CROMSOURCE or on behalf of CROMSOURCE is allowed to offer or give any form of improper advantage, either directly or indirectly, to any individual or company for the purpose of obtaining or retaining business.

Improper advantages include illegal rebates, bribes, under-the-table payments and any other similar improper material benefits. This principle applies globally to all public and private business transactions involving CROMSOURCE.

In many jurisdictions bribery of public officials is considered a crime. Violation of these laws or other laws prohibiting unfair competitive practices may result in criminal and civil actions against CROMSOURCE and the resources involved.

CROMSOURCE does not tolerate any type of bribery or corruption, no matter where it may occur. CROMSOURCE principles are applicable regardless of local laws and the various cultures.

These principles shall extend to all CROMSOURCE's global business dealings. They also apply to business associates and third parties worldwide.

CROMSOURCE adopts adequate measures and tools as described in 'Anti-bribery and Corruption Policy' (POL-19).

Section III.V: PRINCIPLES OF CONDUCT REGARDING THE ENVIROMENT

A primary goal of the company is to promote the safekeeping and improvement of environment-related conditions and the conscientious and rational use of natural resources as a precondition for sustaining adequate levels of quality of community life in the domain within which it is working.

The company's activities strictly comply with current laws and regulations on environmental issues, thus consequentially adapting every aspect of its own activities to such laws and regulations.

The company organizes its research and development activities in full respect of environmental concerns and accounts for the new demands for environmental compatibility and resource optimization as it creates new services and improves on existing ones.

The company promotes environmental education among its resources as well as in the context of suppliers and customers.

Section IV.

BOARD AND PROCEDURE FOR IMPLEMENTATION AND CONTROL

1. Accounting and internal controls

The company employs a financial planning, control and accounting system in accordance with the current accounting principles and the best business practices.

The practice of fictitious transactions or the failure to record transactions for which record-keeping is required by law or by the present Code of Ethics constitutes an unlawful act and triggers the application of sanctions against whoever may have ordered, executed, concealed or in any way tolerated such acts.

All resources are required to cooperate in the inspection activities of the internal controls. Any resource designated such as internal and external auditors, is granted full and unlimited access to all data, information and documents required to carry out his/ her respective duties.

2. Board

The supervision of compliance with the Code of Ethics is entrusted to the Board.

Specifically, the Board is responsible for:

- a) Verifying the distribution and awareness of the Code of Ethics among all corporate representatives and, more generally, anyone who may be engaged in a stable relationship with the company (such as suppliers, resources, partners), whether or not in the form of employment or formal subordination.
- b) Periodically reviewing the contents of the Code of Ethics in order to recommend adjustments and improvements.
- c) Providing support for interpretation of the Code of Ethics.
- d) Liaising with the CROMSOURCE Commission in establishing the appropriate sanctions, once the Commission has taken the decision that a breach of the Code of Ethics has occurred.

3. CROMSOURCE Commission

The CROMSOURCE Commission is responsible for:

- a) Receiving any report pursuant to modalities set forth in 'Reporting Violations Procedure' (Section IV, paragraph 5).
- b) Receiving any report pursuant to modalities set forth in 'Anti-Retaliation' (Section IV, paragraph 6).
- c) Maintaining confidentiality about the identity of the person who made a report following to modalities set forth in 'Reporting Violations Procedure' (Section IV, paragraph 5) and 'Anti-Retaliation' (Section IV, paragraph 6).

- d) Investigating, any alert about suspected breaches of this Code of Ethics.
- e) Informing the Chief Executive Officer in case of violations and/ or suspected violations which may result in criminal liability of the Chief Executive Officer.
- f) Deciding whether or not a breach of the Code of Ethics has occurred.
- g) Reporting to the Board the results of the closed investigations and of the decisions taken by the Commission.
- h) Collaborating with the Board in establishing the appropriate measures.

Violations of the anti-bribery and corruption policy will be managed according to the 'Anti-bribery and Corruption Policy' (POL-19).

4. Asking for Help and Advice: What is the right thing to do?

From time to time may any resource in their daily work face situations which are not explicitly covered by the Code of Ethics.

It might happen to be uncertain about the correct behavior to be held. In such cases any resource is required to ask himself/ herself if the actions to be taken are consistent with CROMSOURCE's values and corporate principles. It is also required for each resource to verify if the behavior held is legal and if it complies with the Code of Ethics.

Often the present Code of Ethics will provide all the guidance needed. But if there are still doubts about the correct behavior to be held, each resource shall first contact his/ her Department Director.

Should he/ she deem contacting relevant Department Director does not constitute the most appropriate solution, alternatively the issue may also be addressed to one of the following persons:

- a) The Human Resources Business Partner.
- b) The Legal Affairs Department Director.
- c) The Human Resources Director.
- d) The Compliance Department Director.

All contacts provided above are concretely able to provide concerned resource all indications in order for any of their doubts under this section to be dispelled.

Should anyone feel the need to maintain his/ her request confidential, the issue may be forwarded to the following mailbox: commission@cromsource.com

5. Reporting Violations Procedure

For the purpose of reporting any applicable law, supporting policy or this Code of Ethics related violations, the concerned resource is granted the right make a report directly to one the following parties:

- a) The Department Director.
- b) The Human Resources Director.
- c) The Legal Affairs Department Director.
- d) The Compliance Department Director.
- e) Send a written report directly to the CROMSOURCE Commission at the following mailbox: commission@cromsource.com.

In case of a report being submitted to one or more parties as set forth in letter a), b), c), d) of this paragraph, the allegation will be in any case always brought to the attention of CROMSOURCE Commission by those parties. Should the case may be, in consideration of the nature of the issue, any relevant inquiry will be initiated in order to timely take the most appropriate action(s), and make corrections if required.

When the allegation is brought directly or indirectly (through the Department Director) to the attention of the Compliance Department Director and/ or the Human Resources Director, and/ or Legal Affairs Department Director, all information submitted shall always be treated in a confidential manner.

This means that the information reported will be disclosed on a strict need-to-know basis and confined only within the individuals who have an actual need to know the issue in order to give appropriate answer to the question submitted or look into the matter. However, in some cases, CROMSOURCE may be required by law to reveal the identity of the person who has made the report.

Should anyone feel the need to maintain his/ her report extremely confidential, a written report can be forwarded to the following mailbox: commission@cromsource.com to the extent it is not required by the specific law or regulation of the concerned country, the sender can keep anonymous his/ her identity. However, CROMSOURCE does not guarantee that on the basis of the information received, the company will be able to determine if a potential or an actual misconduct has ever occurred and decide if any action could be appropriately taken.

Without prejudice to all provisions set forth in this paragraph 5 'Reporting Violations Procedure' which will apply unless specifically stated otherwise in the following dispositions, in case a violation and/ or suspected violation is or may be attributable to one or more members of the CROMSOURCE Commission or any person being part of the same department a member of the Commission belongs to, the following reporting violations procedure shall apply for the purpose of preventing the occurrence of a conflict of interest:

- Relevant report shall not be submitted pursuant to modalities set forth above (e.g. the use of commission@cromsource.com is forbidden).
- Relevant Report will be submitted via email individually to all members of the CROMSOURCE Commission except the member(s) of the Commission whose violations

and/ or suspected violations are or may be attributable to (hereinafter the 'Ousted Member').

- The ouster of one or more members of the Commission shall also operate in case violations and/ or suspected violations which are or may be attributable to any person(s) being part of same department which a member of the Commission belongs to. In such a case, the relevant report shall also be sent via email to the dedicated email box of the External Member.
- The composition of the Commission taking the decision on the breach will be without the Ousted Member, who will be replaced by the External Member.

6. Anti-Retaliation

All resources are encouraged to speak up should they believe in good faith that in connection with a business which CROMSOURCE is involved in, someone has done, has been doing, or may be about to do something which violates or attempt to violate the CROMSOURCE Code of Ethics.

If someone raises a compliance concern in good faith, he/ she will be deemed to act in line with CROMSOURCE values and corporate principles.

When a report has been submitted, the issue will be kept confidential and/ or anonymous if applicable. However, the sender will be encouraged to identify himself/ herself since by doing so, communication and investigation will be facilitated. Should the sender opts to identify himself/ herself, all involved parties will make every reasonable effort to keep the sender identity confidential.

However, it is imperative that the sender will practice discretion and refrain from discussing the issue with other colleagues.

CROMSOURCE does not tolerate any retaliation against resources who have raised in good faith a compliance concern.

The fact that a resource has raised concerns in good faith or he/ she may have provided information in an investigation shall not be a basis for benefits denial, termination, demotion, suspension, threats, harassment or discrimination.

This protection extends to anyone giving information in relation to an investigation. If someone has been subjected to retaliation, this behavior shall be reported to any of the following parties:

- a) The Department Director.
- b) The Human Resources Director.
- c) The Legal Affairs Department Director.
- d) The Compliance Department Director.
- e) Send a written report directly to the CROMSOURCE Commission at the following mailbox: commission@cromsource.com

In case of a report being submitted to one or more parties as set forth in letter a), b), c), d) of this paragraph, the allegation will be in any case always brought to the attention of the CROMSOURCE Commission by those parties.

The company takes allegations of retaliation seriously. CROMSOURCE will review any and all complaints of retaliation, threatened attempted and actual retaliatory action.

For anyone who willfully makes a false accusation, provides false information to CROMSOURCE or has acted improperly, the company reserves the right to perform disciplinary sanctions against such individuals.

Without prejudice to all provisions set forth in this paragraph 6 'Anti-Retaliation' which will apply unless specifically stated otherwise in the following dispositions, in case a violation and/ or suspected violation under this paragraph 6 'Anti-Retaliation', is or may be attributable to one or more members of the CROMSOURCE Commission or any person being part of the same department a member of the Commission belongs to, the following Reporting Violations Procedure shall apply for the purpose of preventing the occurrence of a conflict of interest:

- Relevant report shall not be submitted pursuant to modalities set forth above (e.g. the use of commission@cromsource.com is forbidden), rather will it be submitted via email individually to all members of the CROMSOURCE Commission except the member(s) of the Commission whose violations and/ or suspected violations are or may be attributable to (hereinafter the 'Ousted Member').
- The ouster of one or more members of the Commission shall also operate in case violations and/ or suspected violations which are or may be attributable to any person(s) being part of same department which a member of the Commission belongs to. In such a case, the relevant report shall also be sent via email to the dedicated email box of the External Member.
- The composition of the Commission taking the decision on the breach will be without the Ousted Member, who will be replaced by the External Member.

7. Disciplinary and sanctioning profiles

The provisions of the present Code of Ethics serve to discipline the behavior of the subjects whom the Code applies to in conjunction with the current contractual and legal provisions.

Wherever any contractual and legal provisions coincide with the present Code of Ethics, all provisions nevertheless remain applicable. Wherever such provisions fail to coincide, the more severe provision shall apply.

Resources who are found responsible for violating one or more provisions of the present Code of Ethics may be subject to the disciplinary sanctions, if applicable.

Should a member of the Board or an auditor commit a serious violation of one or more provisions of this Code of Ethics, resulting in irreparable damage to the relationship of trust with the company, the CROMSOURCE Commission shall adopt the measures deemed most opportune in accordance with the law.

8. Promotion of the Code of Ethics and training activities

The Code of Ethics can be accessed on the company website (<http://www.cromsource.com>) and the company intranet WAP, where it is freely downloadable in pdf format.

To foster an accurate understanding of the Code of Ethics among all resources, different training sessions have been tailored to address different roles and responsibilities and may also employ e-learning systems. In particular, a training program dedicated to new hires has been developed in order to illustrate the detailed contents of the Code, whose knowledge is mandatory.

DEFINITIONS

Clinical study: the term applies to clinical trials with medicinal products and clinical investigations with medical devices. It applies also to interventional and non-interventional studies.

Code of Ethics: the present code, which the company has adopted by the Board.

Company: see CROMSOURCE.

CROMSOURCE: CROMSOURCE Group, with registered offices.

CROMSOURCE Commission: it is composed by the Human Resources Director, the Legal Affairs Department Director and the Compliance Department Director. In case a violation and/ or a suspected violation is or may be attributable to one or more members of the Commission or any person being part of the same department a member of the Commission belongs to, the composition of the Commission in order for the decision to be taken will be without the Ousted Member, who will be replaced by the External Member.

Entities: legal entities with or without legal status - for instance: corporations, partnerships, consortiums, associations.

External Member: is the person appointed by the Board every two years, joining the CROMSOURCE Commission activities in case of a violation and/ or a suspected violation is or may be attributable to one or more members of the Commission or any person being part of the same department a member of the Commission belongs to, in replacement of the Ousted Member.

Healthcare professionals: persons enrolled in the dedicated registries or lists in effect with an acknowledged qualification from their state of origin or residence, and who regularly perform services, consisting primarily of prevention, diagnosis, care and rehabilitation, on their own account or in public or private facilities of any size or complexity.

Partner: the counterparts engaged in contractually-regulated forms of collaboration with the company (temporary business syndicates, joint ventures, consortiums, licensing, agency, distribution, collaboration in kind).

Public Administration: the public entities (state, regions, provinces and municipalities, healthcare companies, hospital companies, universities, public inpatient and care institutions of a scientific nature, etc.) and private persons (concessionaires, private inpatient and care institutions of a scientific nature, joint enterprises, private companies accredited by the national or regional healthcare system, etc.) who are called on to exercise an administrative role in the interest of the community at large.

Resources: all CROMSOURCE personnel working at all levels and grades and, to the maximum extent permitted by applicable law, to cooperation partners such as consultants, contractors, or any other person associated with CROMSOURCE.

Patient: an individual who participates in a clinical trial with a medicinal product or a clinical investigation with medical device, either as a recipient of the investigational product(s) or as a control.

CONTACTS DETAILS

Human Resources Business Partner: please refer to the local Human Resources Business Partner

Legal Affairs Department Director: nadia.dimatteo@cromsource.com

Human Resources Director: simona.colazzo@cromsource.com

Compliance Department Director: susanne.gerbl-rieger@cromsource.com

External Member: please refer to the details of the External Member appointed by the Board from time to time