

I N T E G R A T E D C O R P O R A T E P O L I C Y

Althea Italia S.p.A., a leading Italian company in the management of biomedical technologies, was created with the aim of improving the approach of healthcare facilities with the new instruments made available by the latest generation technology.

Always focused on the interaction between patient and healthcare facilities, with the aim of facilitating, through constant attention to support activities in the technological field, access to care and preventive activities.

Taking care of the whole management of the biomedical equipment, offering high-tech equipment, managing telemedicine and home teleassistance systems, supporting healthcare facilities in managing IT systems, it allows doctors and staff to dedicate themselves to it with greater peace of mind and faster and more effective to the direct needs of patients, being able to count on constant assistance from the organization.

Althea Italia S.p.A. believes that the expectations of the stakeholders regarding the quality of the services and processes offered, the safety of workers, the respect for the environment and the performance relating to the management of the devices, as well as the management and optimization of customer relationship services carried out through contact centers are an important aspect of the Integrated Corporate Policy.

To this end, the company has set itself the primary objective of maintaining an effective and efficient Integrated Management System that monitors all quality aspects, in the field of Medical Device management, Environment aspect, Health and Safety, Social Accountability, and Security of data processing, all in compliance with UNI EN ISO 9001, UNI EN ISO 14001, UNI EN ISO 45001, UNI EN ISO 13485, UNI EN ISO 18295, UNI EN ISO 27001, UNI EN ISO 20000-1 and SA8000, capable of continuously ensuring the conformity of the product / service to the requirements requested by customers, to the applicable legislation and to the reference Regulations, by adopting an Integrated Corporate Policy to express its commitment to continuous improvement.

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From this perspective of fairness and with respect to the strategic goals of the company, Althea Italia S.p.A. is committed to constantly and progressively improving the framework of its services by implementing an Integrated Management System pursuant to the principles and requirements of the standards to which it has voluntarily adhered - “Quality and management of medical devices, Environment, Health and Safety, Contact Centers, Social Accountability, Security of data processing” encouraging a proactive role of the Management for the promotion of continuous improvement;

- assigning as primary responsibility, to all of the of the departments envisaged in the corporate structure, the application of the Integrated Management System;
- scrupulously complying with applicable laws and regulations, commitments freely undertaken and explicit or implicit requirements relevant to all areas of the Integrated Management System;
- previously and constantly assessing the quality-environment-health and safety and strategic planning aspects of the contact centres, in the decision-making process the choice of new technologies, modifying processes, carrying out projects;
- ensuring that all levels of staff are made aware of, trained/informed about the requirements of the Integrated Management System and Quality - Health and Safety – Environment, Social Accountability and Security of data processing objectives and made aware of the contribution that everybody can make for the achievement of the expected results;
- informing the stakeholders of the appropriate and responsible management of the company's services, communicating the effects of the same transparently, with particular reference to the phases of use/maintenance, reuse and recycling at the end of their useful life;
- suitably selecting suppliers and contractors, that are able to ensure conduct that is correct and in line with the policies and procedures of the Integrated Management System;
- assuming a proactive, open and constructive attitude towards all stakeholders, collaborating in the creation of a virtuous cycle within the context in which it operates;

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- constantly monitoring and evaluating the application of Integrated Corporate Policy, the achievement of goals, efficiency and effectiveness of the Integrated Management System, in order to pursue the constant improvement of the same.

Althea Italia S.p.A., aware of its role and responsibilities in the context of the economic and social community, wants to stand out for that which concerns its Social Accountability.

This means, for Althea Italia S.p.A.:

- to consider its employees as a strategic resource, ensuring respect for their rights and promoting their professional and personal development;
- considering its suppliers as partners, not only for carrying out activities but also for Social Accountability;
- considering its customers and stakeholders as a fundamental element of the success of Althea Italia S.p.A., working for their satisfaction also relevant to the rules of Social Accountability.

To this end, Althea Italia S.p.A. is formally committed to:

- comply with all requirements set by standard SA8000;
- comply with domestic, regional, local Laws, industry regulations, all other applicable Laws, contractual conditions and all other requirements voluntarily signed and adopted, to which Althea Italia S.p.A. adheres, as well as comply with all of the provisions contained within the official international documents and their interpretations, including Italian Legislative Decree 81/2008 and subsequent amendments and supplements, relevant to workplace safety and Italian Legislative Decree 196/03, relevant to confidentiality and data processing;
- comply with International standards and treaties and to the applicable International Labour Organisation Treaties (ILQ) referred to in the Standards;
- comply with the United Nations Convention on the Rights of the Child and the Universal Declaration of Human Rights;
- comply with the rules of conduct defined in the Code of Ethics;

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- ensure constant monitoring and improvement of its management system for Social Accountability, defining specific improvement goals in the context of management review meetings and verifying their achievement.

It is the resolve of Althea Italia S.p.A., that the principles of Social Accountability are followed by all suppliers involved in the supply chain of the product/service, purpose of its activity.

For this purpose, both the internal work environment and the supply chain must guarantee their compliance with the following requirements:

CHILD LABOUR

- Refusal to use and support the use of child labour in the production cycle;
- to not use, within the company, child labour and, in any case, of persons under 18 years of age given the type of work because, in compliance with the laws in force, the employment of child labour must not be a means of economic exploitation;
- even if not envisaged, should Althea Italia S.p.A. discover children working, it must, in any case, ensure them the possibility to go to school so that the overall time dedicated to school, work and travel does not exceed 10 hours a day, taking into account that no attempt must be made on their physical, mental, spiritual, moral and social development and they must not be exposed to risks relevant to their health and safety. In such cases, Althea Italia S.p.A. will provide adequate financial support.

FORCED OR OBLIGED LABOUR

- Refusal to use and support forced labour;
- it is forbidden to employ personnel against their will and to resort to any form of work under the threat of punishment;

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- it is forbidden to resort to any form of physical, bodily and mental coercion, verbal offences or any offence against the personal dignity of any employee or contractor;
- refusal to retain original ID documents or to pay “deposits” at the beginning of the employment relationship;
- compliance with the principles set out in ILO Convention 29;
- refusal to recruit, transfer, accommodate or host persons using threats, force, deception, or other forms of coercion, for the purpose of exploitation;
- the company rejects the use and support of human trafficking and asks the same of any company that provides labour to the company.

HEALTH AND SAFETY OF WORKERS

- Right to safety and health at the workplace;
- Althea Italia S.p.A. provides a safe and healthy workplace, with particular reference to a careful assessment and risk management and to a suitable training program to prevent potential accidents, injuries or illnesses that may occur during, as a result of or in connection with work activities;
- the Company, when assessing risks, takes into consideration workers who have just given birth, are pregnant and that are breastfeeding;
- should the company not be able to reduce or eliminate the causes of any workplace risk it will provide personnel with appropriate PPE at their expense;
- the company provides all personnel with regular and effective training on health and safety, including instructions at the workplace and, where necessary, specific instructions for the job performed;
- Althea Italia S.p.A. has appointed a Health and Safety Committee that is responsible for the supervision of the provisions envisaged by the risk assessment.

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FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING

- Althea Italia S.p.A. respects the right of trade union freedom and collective bargaining;
- Althea Italia S.p.A. will not hinder the election of union representatives or the registration of its employees with unions;
- union representatives will not be discriminated against and collective bargaining will be promoted;
- Althea Italia S.p.A. ensures that trade union members, employee representatives and staff engaged in organising workers are not subject to discrimination, harassment, intimidation or retaliation due to being members of the union, or workers' representatives, or being engaged in the organisation of workers, and ensure that these representatives can have contacts with their members in the workplace.

DISCRIMINATION

- Discrimination is prohibited with reference to recruitment, remuneration, access to training, promotions, termination of employment or retirement based on race, national, territorial or social origin, caste, birth, religion, disability, gender, sexual orientation, family responsibility, marital status, membership in a union, political opinions, age or any other condition that could give rise to discrimination;
- any form of discrimination, including exclusion or preference based on race, gender, age, religion, political opinion, nationality or social class is prohibited;
- Althea Italia S.p.A., does not interfere with the exercise of the rights of employees to follow principles or practices, or to satisfy needs, connected to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, membership in a union, political opinions or any other condition that could give rise to discrimination;
- the Company does not tolerate any threatening, offensive, exploitative or sexually coercive behaviour, including gestures, language and physical contact, at the workplace and in all accommodations and other facilities made available by the company, regardless of whether such premises are owned, rented, contracted;

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- Althea Italia S.p.A. does not subject personnel to pregnancy or virginity tests.

DISCIPLINARY PROCEDURES

- Althea Italia S.p.A. treat all staff with dignity and respect;
- Disciplinary measures are carried out in compliance with current laws and applicable bargaining agreements;
- Althea Italia S.p.A. rejects the use of corporal punishment, physical or mental coercion, verbal abuse against employees;
- Harsh or inhumane treatment is prohibited.

WORKING HOURS

- Right to fair working hours;
- Work hours are devised in compliance with current laws, collective bargaining and industry standards regarding working hours, rest and public holidays;
- Employees receive at least one day off after six consecutive work days;
- The working week is that established by the law.

REMUNERATION

- Right to a decent salary;
- right to an equal wage between men and women and absence of discrimination;
- Althea Italia S.p.A. guarantees the recognition of the salary required by current legislation, ensuring that it is more than sufficient to ensure a dignified life for the entire family;
- the Company does not withhold any amount from salaries for disciplinary reasons;
- Althea Italia S.p.A. ensures that wages and allowances are paid in compliance with the law and in a convenient manner for employees;
- all overtime work is paid with enhanced rates, as set out by domestic laws or collective bargaining agreements;

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- respect for the right to a decent salary in line with legal or minimum industry standards, or collective bargaining agreements. Sufficient to meet the primary needs of employees as well as providing some discretionary gain.

SOCIAL ACCOUNTABILITY MANAGEMENT SYSTEM

Althea Italia S.p.A. commits to:

- Annually define and update this “Social Responsibility Policy” and apply all of the requirements of the standard SA8000, as well as all relevant national and international standards;
- define the roles, responsibilities and authorities of employees in a clear and documented manner;
- periodically analyse the effectiveness of the system and apply corrective or preventive actions, if necessary, with a view to continuous improvement;
- communication of performance results relevant to Social Accountability internally and to other social partners;
- ensure that all employees receive adequate training relevant to the requirements of the standard and that a system for monitoring the effectiveness of the SA8000 System is defined;
- appoint a Team that represents the necessities of all employees for that which regards the SA8000 requirements;
- select and evaluate suppliers based on their ability to meet the requirements of the standard;
- plan and apply appropriate corrective actions following the identification of non-compliance.

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Top Management undertakes to implement, support, and periodically verify the above-mentioned Policy, to disclose it to all persons that work for the company or on its behalf, through press releases and information leaflets. The same is also made available on its website www.althea-group.com available to everybody that, for any reason, interfaces with Althea Italia S.p.A.

Rome, 30/05/2020

The Chairman and CEO

Alessandro Dogliani

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