

Plan1Health

Medical Innovations for Life

SUPPLIERS CODE OF CONDUCT
Business ethics and compliance

CODE OF CONDUCT FOR PLAN 1 HEALTH SRL SUPPLIERS

A. SCOPE OF APPLICATION

The following standards apply to individuals / organizations who provide goods and services directly and/or indirectly to PLAN 1 HEALTH SRL, hereinafter P1H, chronically ill patients including, but not limited to, contractors, consultants, suppliers and other intermediaries on the procurement side, all of whom are herein referred to as "Suppliers".

P1H is a healthcare company that specializes in modern lifesaving technologies for infusion and vascular access.

The company's products and services are used to help care for critically and P1H relationship with Suppliers requires clearly defined prerequisites, exchange of information and sharing of mutual benefits.

B. GENERAL CONDUCT

In general, Suppliers to P1H have their own business standards. We expect that Suppliers will act according to international and local laws and regulations. We expect Suppliers to communicate the principles laid out herein to their subcontractors and sub-suppliers and to take these principles into account when selecting subcontractors and sub-suppliers. Our Suppliers are expected to comply with the standards of this Suppliers Code of Conduct regarding the protection of labor conditions, human rights, fair competition, fraud, anti-corruption, anti-money laundering and countering terrorism financing and environmental to encourage their subcontractors and sub-suppliers protection when fulfilling their contractual obligations. Integrity forms the basis of everything we do as P1H. If you need additional information or guidance on these standards or wish to report a potential violation you should contact P1H at info@p1h.it

C. REVIEW OF COMPLIANCE & TERMINATION OF AGREEMENTS

P1H will review Suppliers' compliance with the principles and requirements laid out in the Suppliers Code of Conduct.

In case of concerns P1H and its Suppliers will jointly work together to eliminate possible concerns. If P1H becomes aware of any actions or conditions not in compliance with the Suppliers Code of Conduct, P1H reserve the right to demand corrective measures. Moreover, we also reserve the right to terminate an agreement with any Supplier who does not comply with the Suppliers Code compliance with all applicable laws and regulations as well as the highest ethical standards as set out in this Suppliers Code of Conduct. We respect and support human rights as they are defined by international standards, such as the United Nations Universal Declaration of Human Rights and the Fundamental Principles as published by the International Labour Organization (ILO) and aim to fulfill them.

D. CODE OF CONDUCT

1. ANTI-BRIBERY AND ANTI-CORRUPTION

Suppliers shall perform their obligations under a possible contract only in full compliance with all applicable laws, rules and regulations, including the laws on fair competition, anti-corruption, anti-fraud, anti-money laundering and countering terrorism financing (ie Law 231). Without limiting the generality of the foregoing, in connection with the performance of its obligations under a possible contract, Suppliers will not, and will ensure that its employees, directors, officers, agents or other persons acting on its behalf do not, directly or indirectly, make any payment, contribution or gift to any public official, provider organization, customer or other person (any payoff, influence or facilitation payment, bribe, rebate or kickback) for the purpose of obtaining a favourable treatment in securing or maintaining business or any other concession. While P1H observes local business customs and market practices, we do not participate in any corrupt practices. We expect our Suppliers to act in a similar manner.

2. FAIR COMPETITION AND ANTITRUST

P1H is firmly committed to the ideas of free and competitive enterprise. Suppliers, agents and other individuals and businesses representing P1H are expected to comply with all applicable laws and regulation regarding fair competition.

We require a fair and open global marketplace. Suppliers confirm that they fully comply with all aspects of local, national and international competition and anti-trust laws as well as public tender laws, wherever they seek to do business

3. CONFLICTS OF INTEREST AND ILLEGAL PRICE AGREEMENTS

A conflict of interest arises when personal interests or activities may influence (or appear to influence) business and fair trade with P1H. Suppliers shall disclose actual or potential conflicts of interest and discuss them with P1H's management. Any activity that is approve despite the actual or potential conflict, must be documented. Suppliers must not enter into price agreements or any other arrangement with competitors which avoid fair competition. Suppliers further must not include any reimbursement money ("loser fee") in their prices and pay to any participating but unsuccessful bidder

4. ENTERTAINMENT AND GIFTS

P1H conducts itself in a manner that ensures that no personal dependencies, obligations or commitments arise. P1H's employees are not permitted to be influenced in their business decisions and actions by gifts, entertainment, hospitality or any other type of benefit or incentive. To this end, no employee of P1H must, in the course of his or her business activity, directly or indirectly, demand, accept, offer or grant incentives or rewards from Suppliers that would be illegal or unethical. Gifts and hospitality must not be lavish or offered frequently.

5. ACCURACY OF BUSINESS RECORDS

Suppliers should act in accuracy, fairness, objectivity and honesty in recording and maintaining accounting books and records following the law and standard accounting practices.

6. CONFIDENTIAL INFORMATION AND TRADE SECRETS

Confidential information includes facts, data and knowledge that have not been disclosed to the public. Suppliers shall safeguard by using appropriate technical and organizational measures and make only appropriate use of confidential information to ensure that all employees' and business partners' privacy, trade secrets and valid intellectual property rights are protected. All Suppliers requiring access to P1H's confidential information are required to complete a confidentiality agreement and/or receive written approval from P1H prior to accepting confidential information and to use appropriate technical and organizational measures to secure the confidential information.

7. DATA PROTECTION AND DATA SECURITY

Personal data means any information relating to an identified or identifiable natural person. We expect our Suppliers to share that responsibility.

This means that Suppliers will only process (e.g. store, manage, exchange) personal data if applicable data protection requirements are fulfilled. Further, it has to be ensured that appropriate safeguards, like Data Processing Agreements, Joint Controller Agreements, Controller to Controller Agreements, and/or EU Standard Contractual Clauses (for suppliers acting outside of the EU/EEA), are concluded prior to any processing of personal data, including transferring personal data from P1H to the respective supplier.

Any Supplier must obtain written approval about any sub-processor(s) (like cloud services providers) they use. Those sub-processors must fulfill the same level of applicable data protection requirements. Suppliers that process Personal Data have the obligation to take adequate security measures (technical and organizational measures). This is related, but not limited, to the logging of activities to identify potential data breaches, to access limitation, and to the use of encryption and pseudonymization techniques.

8. WHISTLEBLOWER ANONYMOUS COMPLAINTS

Suppliers shall create processes to ensure the protection of employee whistleblower confidentiality and prohibit retaliation against employees who refuse an instruction or activity that is in violation of the P1H Suppliers Code of Conduct. Suppliers shall provide an anonymous complaint process for workers and employees to report workplace grievances in accordance with applicable laws and regulations.

9. ILLEGAL DRUGS OR ALCOHOL

Suppliers are expected to perform work free from the influence of illegal drugs or alcohol or other substances, including prescription drugs, that may impair the ability to work, and in condition to perform their duties.

10. CHILD LABOR

P1H is dedicated to protecting children from exploitation. We strictly forbid using, supporting, or approving of exploitative and illegal child labor. Suppliers will not source, produce or manufacture goods or services using any form of illegal child labor and encourage their subcontractors and sub-suppliers to do the same.

11. FORCED LABOR

We do not tolerate the use or threat of violence, or any other form of coercion. We strictly forbid using, supporting, or approving of forced labor. We expect our suppliers to prohibit any kind of forced labor in their organization and encourage their subcontractors and sub-suppliers to do the same.

12. FREEDOM OF ASSOCIATION

P1H respects the freedom of association and the recognition of the right to collective bargaining. Our employees can join labor unions, seek representation and engage in collective bargaining in accordance with local laws. Our Suppliers are expected to respect the right of freedom of association and the right to collective bargaining in accordance with local laws.

13. EQUAL EMPLOYMENT OPPORTUNITY

P1H supports equal opportunities and takes a clear stand against discrimination. No one may ever be discriminated against, e.g. for their skin colour, race, gender, religion, political views, age, physical constitution, sexual orientation, appearance, or other personal characteristics. We also do not tolerate discrimination due to membership in unions or works councils. Suppliers are expected to comply with all applicable employment laws and regulations including statutes prohibiting discrimination in the workplace.

Suppliers shall not discriminate against any worker based on race, age, gender, color, sexual orientation, ethnicity, disability, political affiliation, union membership, national origin, religion or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, and termination. In addition, Suppliers shall not require employees or potential employees to undergo medical tests that could be used in a discriminatory way except where required by applicable laws or regulations or prudent for workplace safety.

All overtime shall be voluntary and should not exceed applicable legal limits. Under no circumstances shall work weeks exceed the maximum permitted under applicable laws and regulations.

14. WORKPLACE HARASSMENT

P1H does not permit intimidation or hostility and will not tolerate any behavior that might harass, disrupt or adversely interfere with another person's ability to work. Suppliers are expected to behave appropriately when working with P1H.

15. HEALTH AND SAFETY

P1H expects all Suppliers to fully comply with applicable national statutes governing health and safety at work. Suppliers should work on elimination of actual as well as potential health and safety

risks at work including emergency situations. Moreover, all Suppliers are expected to train their employees for the purpose of preventing accidents and occupational diseases. Suppliers working with P1H or onsite at a P1H location must work in a way that assures their own safety and the safety of others. Any emergencies must be reported promptly and appropriate responses made.

16. ENVIRONMENTAL PROTECTION

Suppliers are expected to conduct their operations in a way that minimizes the impact on natural resources and protects the environment, customers, and employees. They must ensure their operations comply with all applicable environmental regulations. Waste, hazardous substances, air emissions and water discharges must be managed, controlled and treated accordingly. Suppliers are expected to have knowledge about their actual and potential environmental impact including accidental spills and releases to the environment and in connection to this safeguard a continuous follow-up on their environmental performance.

Suppliers should encourage the development and diffusion of environmentally friendly technologies.

CONTACT

If you have any general questions, please use the compliance e-mail address:

 info@p1h.it