

Let's Make  
the World  
Feel Better.

## Code of Interdependence

Chiesi Value Chain Code of Conduct  
*co-created with our Ecosystem*





# Code of Interdependence 2025

## The Code of an Interdependent Value Chain

The Code of Interdependence is a set of values, objectives, and tools that comes from the collaboration between Chiesi and the companies within its ecosystem, representing a fundamental part of the evolutionary path towards full sustainability. The Code of Interdependence, hereinafter referred to as the "Code", was introduced in 2020. It has been updated in 2022 and is now presented in its revised form for the 2025 edition.

Through the Code, we recognise how necessary and urgent it is to act, with the awareness that each of us is essential to the other and that we are all responsible for future generations. We constantly monitor performances and practices that we adopt. Chiesi Farmaceutici became Società Benefit (Benefit Corporation) under the Italian law in 2018, by changing its bylaws to ensure that Chiesi always considers a stakeholder-driven perspective and the impact of its decisions on its workers, suppliers, partners, customers, the community, and the environment.

Chiesi USA, also became a Benefit Corporation in 2018. In 2021, Chiesi France became the first French "Société à mission" (SAM) in the health industry. Thanks to an iterative process, Chiesi France defined and published its purpose ("raison d'être") and how it intends to contribute positively towards all its stakeholders. Additional information on Chiesi sustainability commitment is available in the corporate website and Sustainability Report.

Chiesi is committed as well to full compliance with the laws, rules, regulations, and Chiesi principles and policies governing its activities. To reinforce principles, standards and behaviours to which it is committed, Chiesi developed this Code, and expects everyone within its ecosystem to comply with it.

We believe in interdependence, and we recognise that each organization can be at a different stage of evolution, but only through collaboration we can evolve to such model. Chiesi is the promoter of this common commitment to contribute to the improvement of the entire Value Chain, in a process of mutual learning and co-evolution.

Chiesi strives to conduct business with companies and other business partners that share our commitment to Benefit Corporation principles and high ethical standards, operating in a responsible and ethical manner, and expects its whole ecosystem to operate accordingly.

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# Code of Interdependence's foundations

Our operations have a global impact, so we decided to be inspired by global movements, principles and frameworks, acknowledging that only global scale movements can bring real benefits and shared value to the society and planet at large. The only option for us to have a material positive contribution to our business, planet and communities is to join forces, act as an inclusive business and move as a whole entity.

## Acknowledged, science-based standards

All business decisions and operations should be based on solid frameworks. For us, this means that science-based acknowledged evidence must be at the basis of their creation and that these frameworks must be concretely applicable and measurable, otherwise their materiality to our operations and ecosystem will lose relevance.

That is why, we let ourselves be inspired by the B Corp movement, United Nations Sustainable Development Goals (SDGs) and ILO (International Labour Organization (ILO), the Science-Based Targets initiative (SBTi), and by the industry-specific initiative PSCI (Pharmaceutical Supply Chain Initiative (PSCI).



### B Corp

The B Corp certification is a standard for companies committed to making a positive social and environmental impact, through measurement and continuous improvement. Certified B Corporations are for-profit businesses that leverage their operations to foster a more inclusive and sustainable economy.

Being a B Corp means becoming part of a global community of leaders, entrepreneurs, and employees dedicated to using business as a force for good. It provides an opportunity to collaborate with like-minded companies, share values, exchange ideas, and work together to address critical issues such as reducing inequality, fighting poverty, promoting environmental sustainability, building stronger communities, and creating high-quality jobs with dignity and purpose.

To maintain B Corp certification, companies must undergo a rigorous evaluation every three years through the B Impact Assessment (BIA), which assesses their sustainability performance.

Chiesi has been a certified B Corp since 2019, and the principles of B Corp certification are reflected in this document.

### PSCI

The Pharmaceutical Supply Chain Initiative (PSCI) is a group of pharmaceutical and healthcare companies who share a vision of better, social, environmental and economic outcomes in the communities where we buy. The purpose of the initiative is to bring together the pharmaceutical industry to define, implement, and champion responsible supply chain practices.

Collectively PSCI members can share knowledge and expertise, across the industry and continuously improve social, health, safety and environmentally sustainable outcomes for their supply chains.

We as Chiesi have adhered to PSCI since 2019, so we have applied the detailed PSCI principles all through this document.

## ILO

The International Labour Organisation (ILO) is the United Nations agency for the world of work. It sets international labour standards, promotes rights at work and encourages decent employment opportunities, the enhancement of social protection and the strengthening of dialogue on work-related issues. The ILO has a unique structure, bringing together governments, employers' and workers' representatives. We as Chiesi believe that the ILO work must be the basis of all prosperous human relations in business, outlining the minimal conditions under which the employer-employee relationship must be based on.

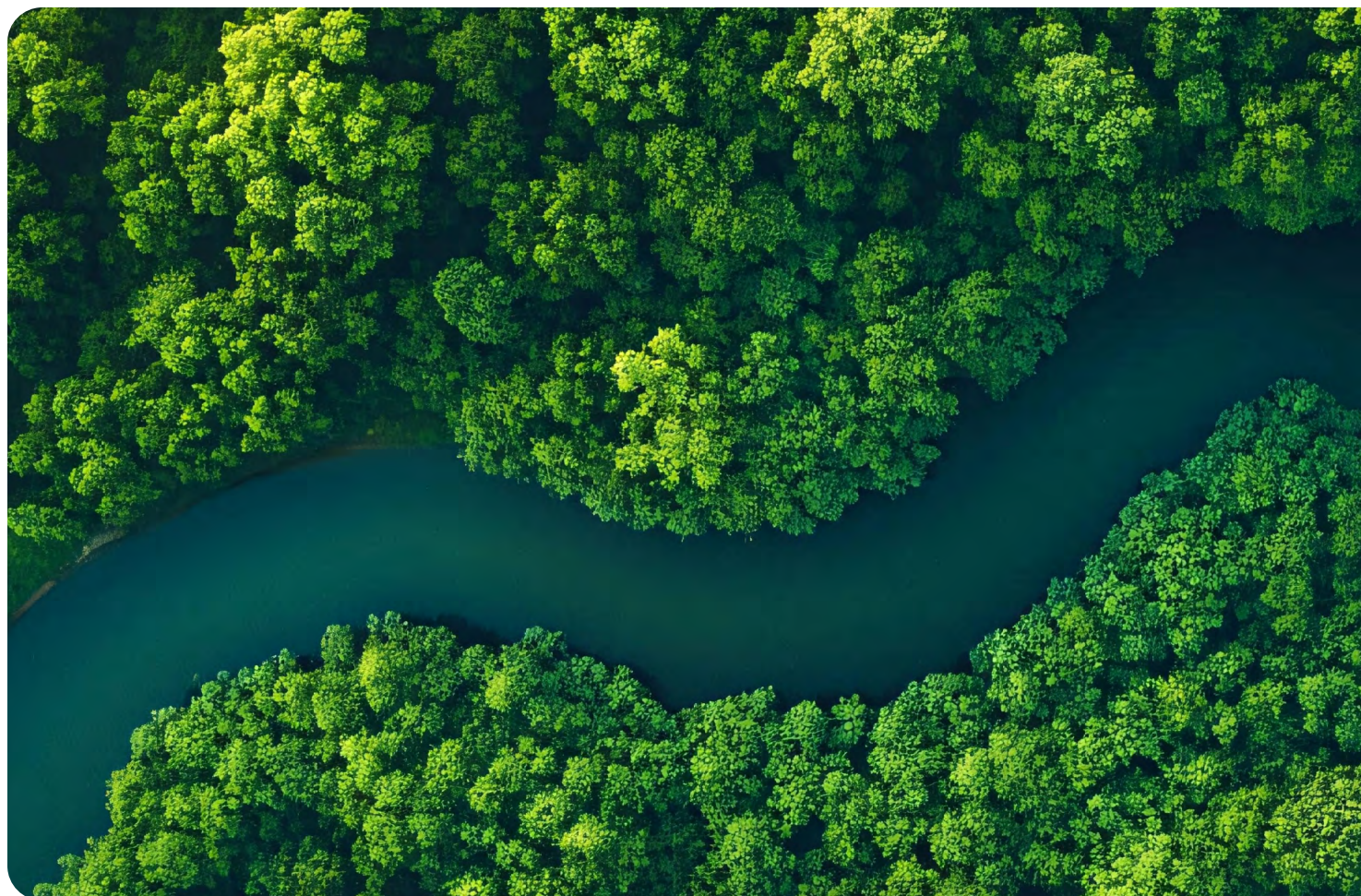
## Sustainable Development Goals

The 2030 Agenda for Sustainable Development, adopted by all United Nations Member States in 2015, provides a shared blueprint for peace and prosperity for people and the planet, now and into the future. At its heart are the 17 Sustainable Development Goals (SDGs), which are an urgent call for action by all countries developed and developing in a global partnership. They recognise that ending poverty and other deprivations must go hand-in-hand with strategies that improve health and education, reduce inequality, and spur economic growth – all while tackling climate change and working to preserve our oceans and forests.

## SBTi

The Science Based Targets initiative (SBTi) is a corporate climate action organization that enables companies and financial institutions worldwide to play their part in combating the climate crisis. It defines and promotes best practice in emissions reductions and net-zero targets in line with climate science.

In writing this document we adapted the inspirational movements and frameworks to the Pharmaceutical Industry, highlighting the industry-specific added value and implementation peculiarities.



# Design principles

As a B Corp and Benefit Corporation, Chiesi intends to generate value both for its business and for society and the environment. We have integrated specific purposes of common benefit into our bylaws, thus embedding the concept of creating shared value in our way of doing business.



## Guiding shared values

Chiesi underwent a collaborative engagement process involving its affiliates worldwide with the objective of setting out 5 values that should serve as guidance for the understanding and application of the principles set out in this document. The guidance values are:

- **TRUST:** we foster long term relationships based on trust
- **QUALITY:** we strive to reach and ensure quality without compromises
- **FAIRNESS:** we are always fair in the relations with all the stakeholders
- **ACCOUNTABILITY:** we are committed and take responsibility for our actions
- **TRANSPARENCY:** we foster commitment to transparency of information

## Bold commitment: Chiesi implements this Code of Conduct first

Chiesi is committed to implement the principles of this document first and acting accordingly.

The sustainability principles rooted at the heart of our company mission are detailed in this document, to share and spread their use throughout our Value Chain. We are aware that they represent our willingness to constantly improve our business towards a more inclusive and sustainable economy and society. We don't see this Code as an administrative step, but as a new way of working, collaborating, and growing together.

## Beyond the ordinary: co-creation with our business partners

Writing of this document has come together through a structured and collaborative process with our affiliates and our strategic partners: gathering and integrating various perspectives and contributions of all the companies that participated, respecting their unique nature.

We at Chiesi believe in collaboration, open communication and mutual learning to overcome difficulties and improve the sustainability level of our ecosystem in the most consistent possible way. That's how we define coevolution.

We expect all our partners to share our commitment by applying these principles to their businesses. That is why, when stating "we" and "our" we refer both to Chiesi and our partners.

### Applicability:

We acknowledge that we all operate in different environments, from a geographical, legal, and cultural perspective. This means that the applicability of some topics may be less relevant or challenging to implement. So, we leave it to each organization of the ecosystem to apply the principles of this document that fit its specific business.

# Structure of the document

## The UN SDGs embedded into the Code

At Chiesi, we firmly believe in the value of the United Nations Sustainable Development Goals and we put our best efforts into contributing to their achievement. Our commitment to SDGs stems from a deep sense of responsibility about our impact and, at the same time, an important awareness of the role of business in fostering the transition to a long-term sustainable economic system.

Our Code is written with the intention of creating and promoting an SDG-enabled ecosystem in the pharmaceutical industry.

We have selected 11 SDGs for which we believe we and our partners can have greater impact, contributing the most towards the 2030 Sustainability Agenda.

The SDGs are the most powerful framework reference for business and for governments and public institutions. The alignment of these organization is critical to have a material positive impact for our planet, society and economy.

## Structure of the document: SDGs, mandatory requirements and improvement actions

The principles within our Code are classified according to the relevant SDG and must be implemented at minimum according to the national regulations and local laws. If the principles differ from national laws, the highest standard must be considered and applied.

Furthermore, we aspire to go beyond compliance. We are committed, wherever possible, to go beyond basic regulatory standards, to challenge our business operations and create shared value.

This is why the principles of this Code are divided into two sections:

- **Mandatory requirements** representing the minimum level we all must implement while doing business;
- **Improvement actions** representing a guide for those of us that want to outperform, to direct future improvements of the principles outlined in this document.



*The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States.*



*We support goal 3*

# Good Health and Well-Being



# Good Health and Well-Being

## Ensure healthy lives and promote well-being for all at all ages

We have selected the relevant targets of SDG.3 that are applicable into our ecosystem:

- Reduce **premature mortality** from non-transmittable diseases through prevention and treatment and promote mental health and well-being.
- Achieve **universal health coverage**, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.
- Increase health financing and the **recruitment, development, training and retention of the health workforce** in developing countries, especially in least developed countries and small island developing States.
- Strengthen the capacity of all countries, in particular developing countries, for early warning, risk reduction and **management of national and global health risks**.

## Product safety

### Mandatory requirements

- We must promote the safe development, manufacturing, transport, use and disposal of our products as a priority, particularly where the potential for adverse consequences is known to exist.
- We must ensure that any area involved in storage, manufacturing and warehousing of raw materials and products is equipped with essential protective measures, including fire detection and suppression systems, spill containment structures, sources of ignition control, inert gas blanketing, etc.
- We must exceed the compliance with regulatory frameworks and local regulations and promote best practices about product safety, in particular regarding training of qualified employees, administrative procedures in place, benchmark of best practices, equipment and sensors, reviews of critical functions and resources, customer needs.

## Quality country regulations

### Mandatory requirements

- We must have systems in place to ensure full compliance with all applicable laws, country regulations and industry best practices concerning all aspects of quality governing our activities.



## Training and capacity building

### Mandatory requirements

- We must implement a comprehensive training program that equips the entire workforce with the necessary knowledge, skills, and competencies to fully comprehend and adhere to every aspect of this Code, and to fulfil the anticipated standards for responsible social and environmental conduct.

### Improvement actions

- We shall periodically review the training programs to measure the relative appropriateness and effectiveness through employee knowledge assessment.
- We shall develop global training tailored to specific cultural and country-specific contexts, and further refine it to address the particular characteristics of each service or product. All materials shall be available in different languages to ensure accessibility.





*We support goal 5*

# Gender Equality



# Gender Equality

## Achieve gender equality and empower all women and girls

We have selected the relevant targets of SDG.5 that are applicable into our ecosystem:

- End all forms of **discrimination against all women and girls everywhere**.
- Ensure women's full and effective **participation and equal opportunities for leadership** at all levels of decision-making in political, economic and public life.
- Undertake reforms to give women **equal rights to economic resources**, as well as access to ownership and control over land and other forms of property, financial services, inheritance and natural resources, in accordance with national laws.
- Enhance the use of **enabling technology**, in particular information and communications technology, to promote the **empowerment of women**.
- Adopt and strengthen sound policies and **enforceable legislation for the promotion of gender equality** and the empowerment of all women and girls at all levels.

## Gender pay gap

### Mandatory requirements

- We must ensure that compensation across all corporate levels is based solely on job role and responsibilities, without bias towards gender or other personal traits, and complies with applicable standards and regulations.

### Improvement actions

- We shall periodically analyse the internal payroll situation to ensure that gender equality is respected at all times and, in the event of inconsistency with this principle, provide and implement targeted and prompt corrective actions.
- In the measurement and monitoring activities, we shall refer to indicators periodically reviewed and updated.

## Gender representation at all levels

### Mandatory requirement

- We must regularly assess and monitor the gender ratio to keep oversight of the internal gender gap and address it as necessary.
- We must place particular attention on both the aggregate number of women relative to men and their distribution at different tiers of the organizational structure.
- When facing objective representation imbalances, we must draw up and implement remediation plans that enable the gap to be closed progressively and involve the achievement of intermediate steps with respect to long-term planning and continuous monitoring of the results achieved.

## Equal opportunities for professional development

### Mandatory requirements

- We must guarantee that all employees have access to the same opportunities for professional and career growth at all stages of their professional journey (including recruitment, career advancement and personal development, access to training etc.), with decisions made strictly on the basis of merit and without regard to personal characteristics like gender identity.
- We must support parenthood ensuring job protection and facilitating the return-to-work post-parental leave. We must implement dedicated guidelines.



*We support goal 8*

# Decent Work and Economic Growth



# Decent Work and Economic Growth

## Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

We have selected the relevant targets of SDG.8 that are applicable to our ecosystem:

- Achieve **full and productive employment and decent work for all women and men**, including for young people and persons with disabilities, and equal pay for work of equal value.
- Take immediate and effective measures to **eradicate forced labour, end modern slavery** and secure the prohibition and elimination of the worst forms of child labour in all its forms.
- **Protect labour rights and promote safe and secure working environments** for all workers.
- Achieve higher levels of economic productivity through **diversification, technological upgrading and innovation**.

## Fair working conditions, working hours, time off and leave

### Mandatory requirements

- We must uphold the highest recognized principles and standards of human rights, such as the international labour standards by the ILO, and treat all internal and external stakeholders with dignity and respect. We must regularly assess all adverse human rights we may cause or contribute to.
- We must ensure that the workforce is adequately equipped with the necessary skills and is of the right size to efficiently perform daily operations.
- All overtime work must be pre-agreed, infrequent, conducted respectfully, and communicated promptly. We must monitor any irregular or excessive overtime work.
- We must ensure that employees have reasonable breaks during their working day, at least one day of rest during the week, and we must pay reasonable vacation periods during the year. Public holidays do not count as vacation days. Employees can leave for health, public holidays as well as occupational diseases or injuries, upon proof of entitlement. The leave must be paid. Employees can also leave for serious family circumstances, upon proof of entitlement, and be paid according to national laws and contract with the employer.

## Wages and benefits

### Mandatory requirements

- We must pay all our employees a wage according to applicable wage laws (including minimum wages, overtime hours - which shall be voluntary - and mandated benefits) and agreed employment contracts. We must avoid any disparities in pay for equal work, ensuring that compensation is determined exclusively by job role and responsibilities, and is never influenced by gender or any other irrelevant personal characteristics.
- We must ensure that our employees receive a wage that is at least sufficient to cover the cost of living, including accommodation, health care, nutrition, and education for the employee and any dependent children.
- Wages, compensation and other types of benefits must not be withheld or used as an intimidating action, and all deductions not provided for by national laws must be included only upon the express authorisation of the worker. We must ensure that our employees are paid on a regular basis in a clear, prompt, direct and convenient way. Coupons, promissory notes or similar instruments must not be used on behalf of salary payment.

## Improvement actions

- We shall put in place practices to substantially exceed the minimum wage thresholds provided by national regulations.
- We shall periodically review wages and related policies and procedures against legal requirements and industry best practices.
- We shall implement a benefits program based on a meritocracy.

## Child labour and young workers

### Mandatory requirements

- We and our entire ecosystem of third parties must not rely on child labour in any form, committed to ensure adherence to all relevant laws and regulations designed to prevent child labour and safeguard the welfare of young workers. Employment of young individuals is permissible only if they have reached the legal age for employment or have completed compulsory education, whichever is stricter. Moreover, such employment must not interfere with their education or well-being. Specifically, young workers must not be assigned tasks that may compromise their health, such as exposure to hazardous substances, enduring heavy physical tasks, frequent night shifts, or any activity that violates the safe working standards established by the International Labour Organisation.
- We must assess officially recognised identity documentation, for example IDs, birth certificates, or passports, in order to verify the age of all our employees.
- We must not assign overtime nor any night shift to young workers (i.e. workers who are under the age of 18 but above the country's legal age for employment or the age established for completing compulsory education. See ILO convention 138 for more details).

### Improvement actions

- We shall cooperate with recognised international organizations that protect young workers rights, child labour or any other form of abuse.

## Inhumane treatment avoidance

### Mandatory requirements

- We must guarantee, through the application of the right policies and implementation mechanisms, that the rights and dignity of each individual person are preserved and respected at all times. To do so, we must favour the use of behavioural incentives rather than disciplinary actions.
- We must design and implement a reporting mechanism, which is clear and easily accessible, in order to allow our employees to report complaints and potential policy breaks without fear of reprisal, intimidation or other forms of coercion. Complaints must be considered in a serious, constructive and professional way, and followed by an unbiased and accurate investigation. In case disciplinary actions are needed, we must make sure that the consequent disciplinary actions are consistent with the infringement and fairly applied.

## Occupational health, safety and wellbeing

### Mandatory requirements

- We must ensure a working environment that prioritizes the health, safety, and overall wellbeing of our employees, both physically and psychologically. By cultivating a culture that values and promotes the welfare and safety of workforce, we support a positive and secure workplace for all.
- We must eliminate or mitigate risks due to exposure and/or interaction with chemical, biological, and physical hazards, including physically demanding tasks. Appropriate training, equipment, facilities and services must be provided to support all workers' health and safety in all the company's workplaces, facilities, and accommodation to promote a culture of safety.

- We must conduct comprehensive risk assessments and we must have effective emergency plans. We must review those on a regular basis, and implement the corresponding procedures to effectively manage and mitigate these risks.
- We must control hazards in all their forms. In case exposure to hazardous situations or substances cannot be mitigated with alternative means, we must provide our employees with the appropriate training and well-maintained protective equipment.
- We must design, implement, and keep updated training programs around health, safety, emergency situations, or other specific topics that are significant to the company operations and extend them to all our relevant employees.
- We must ensure that health and safety requirements are under the accountability of the senior management, who ensures the implementation of mechanisms to establish a safe work environment and to protect the health of workers.

### Improvement actions

- Wherever feasible, we shall automate all operations that can put at risk employees' health and fair working conditions.

## Modern slavery avoidance

### Mandatory requirements

- We must prohibit and combat all forms of forced, bonded, prison, indentured, or slave labour as well as all forms of human trafficking and labour practices that take advantage of people who are not in a position to consent to their actions or hinder the rights of human beings.
- We must not keep or destroy people's identity, passports, work permits or original immigration documents.
- We must comply with the principles of the most solid and internationally recognised frameworks regarding anti-slavery, such as the UK Modern Slavery Act and similar references.

## Freedom of association and right to collective bargaining

### Mandatory requirements

- We must respect the rights of workers, according to local laws, to associate and bargain freely, seek representation and join labour unions and/or workers' councils.
- We must encourage and facilitate the development of parallel means of free association in all countries where freedom of association or collective bargaining is restricted by law.
- We must put in place mechanisms that allow our employees to openly communicate and interact with the management about working conditions and compensations without fear of reprisal, intimidation or other forms of coercion and retaliation.
- In this sense, all employees that exercise, or have exercised in the past, even with another employer their right to associate in all its forms, must not be threatened, penalized, discriminated, inflicted discipline reprisals or coerced actions, nor refused to be hired.

## Incident monitoring

### Mandatory requirements

- We must work to avoid all forms of work-related incidents that jeopardize the welfare and safety of workers, including incidents related to psychological safety.

### Improvement actions

- We shall keep track of any incidents that occur under these assumptions and monitor its course over time, providing accessible and transparent data.

## Business continuity, risk management

### Mandatory requirements

- We must implement a structured process of analysis, management, and monitoring of risks (e.g., external/strategic, business/operational, legal and compliance, financial) on a regular basis and ensure that this process is updated to reflect the evolution of the company's overall risk profile and any significant changes.
- We must be responsible for the development and implementation of appropriate business continuity plans or change management models. In particular, when a potential risk arises, we must be able to implement mitigation plans to ensure the continuity of vital business operations and critical functions.
- We must be prepared in case of a force majeure event that potentially put at risk the operativity of the Value Chain, for example pandemics or other types of global-scale events.
- We must implement robust cybersecurity infrastructure and controls to safeguard our information and systems (also including Operation Technology Systems), adhering to industry-recognized frameworks that ensure the confidentiality, integrity, and availability of data and that systems are protected and comply with applicable regulations. Furthermore, we must have a comprehensive monitoring system to continually assess and improve the effectiveness of our cybersecurity measures. Such system shall include ongoing training for internal stakeholders and the development of both contingency and response plans to swiftly and effectively address potential incidents, such as data breaches.
- We must raise awareness on the risks to which the company is exposed and communicate risk assessment results to relevant stakeholders within the company and embed them into strategy, business plans and training.

## People engagement and satisfaction

### Improvement Action

- We shall continuously enhance the well-being and job satisfaction of our employees. To achieve that, we must put in place robust engagement mechanisms for gauging their contentment, including regular surveys. The goal is to foster an environment where employee satisfaction and personal fulfilment flourish.



A photograph of a modern building with a large glass facade and dark structural elements. In the foreground, there are two olive trees and a landscaped area with low concrete walls and yellow plants. The sky is clear blue.

*We support goal 9*

# Industry, Innovation and Infrastructure



# Industry, Innovation and Infrastructure

## Build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation

We have selected the relevant targets of SDG.9 that are applicable to our ecosystem:

- **Enhance scientific research**, upgrade the technological capabilities of industrial sectors in all countries, in particular developing countries, including, by 2030, encouraging innovation and substantially increasing the number of research and development workers per 1 million people and public and private research and development spending.
- **Support domestic technology development**, research and innovation in developing countries, including by ensuring a conducive policy environment for, inter alia, industrial diversification and value addition to commodities.

## Scientific research, technological capabilities upgrade

### Mandatory requirements

- We must foster the scientific research and the development of technological capabilities among our operations and ecosystem, with the objective of meeting, and if possible exceeding, customer expectations, competitive trends, and technological developments within our reference industry.

### Improvement actions

- We shall support scientific research, training and international cooperation projects that are relevant to our business.
- We shall invite scientists and researchers to submit proposals for high-level scientific research projects in specific scientific domains that are pertinent to our operations.

## Continuous improvement

### Mandatory requirements

- We must continually improve our business operations by designing clear strategies, setting performance objectives, and executing implementation plans.

### Improvement actions

- We shall measure our progress using adequate tools, assessments, inspections, audits or any necessary management review or process, and we shall take necessary corrective actions for all relevant discrepancies identified.
- We shall embed continuous improvement goals into the performance objectives and incentives of our managers.
- We shall promote the creation of shared value through common goals and incentives of any adequate form that encourages the continuous improvement.
- We shall put in place a regular process of external competitive benchmark of continuous improvement topics, targets, and methodologies that are relevant to our reference industry.



*We support goal 10*

# Reduced Inequalities



# Reduced Inequalities

## Reduce inequalities within and among countries

We have selected the relevant targets of SDG.10 that are applicable into our ecosystem:

- Empower and promote the **social, economic and political inclusion of all**, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.
- Adopt **policies**, especially fiscal, wage and social protection policies, and **progressively achieve greater equality**.

## Diversity & Inclusion

### Mandatory requirements

- We must champion diversity and foster an inclusive culture that actively supports empowerment and representation. It is our responsibility to ensure equitable professional growth opportunities for all, free from any form of discrimination.
- We must implement programs to support diversity and inclusion in the workplace.
- We must have in place mechanisms that allow our employees to openly communicate and interact with the company management about concerns over conduct breaches in the workplace without fear of reprisal, intimidation or other forms of coercion. We must investigate each concern or report with a formal unbiased and fair process and take corrective action if needed.
- We must provide training and capacity building to all our employees about diversity, inclusion and non-discrimination matters and how to manage potential difficult circumstances.

### Improvement actions

- We shall put in place mechanisms to measure the level of diversity within the company and monitor its evolution over time, investing energies and efforts into concrete actions aimed at remedying any problems of discrimination or inadequate level of representation.



## Equal opportunities and non-discrimination

### Mandatory requirements

- We must strive for equal opportunities and ensure that the work environment, all our policies and procedures, are fair, and free of harassment, discrimination and any other harsh or inhumane treatment.
- We must periodically monitor the ratio of top to bottom wages paid to workers and take action to ensure that the ratio remains reasonable, in order to contribute to an equitable distribution of wealth in society.

### Improvement actions

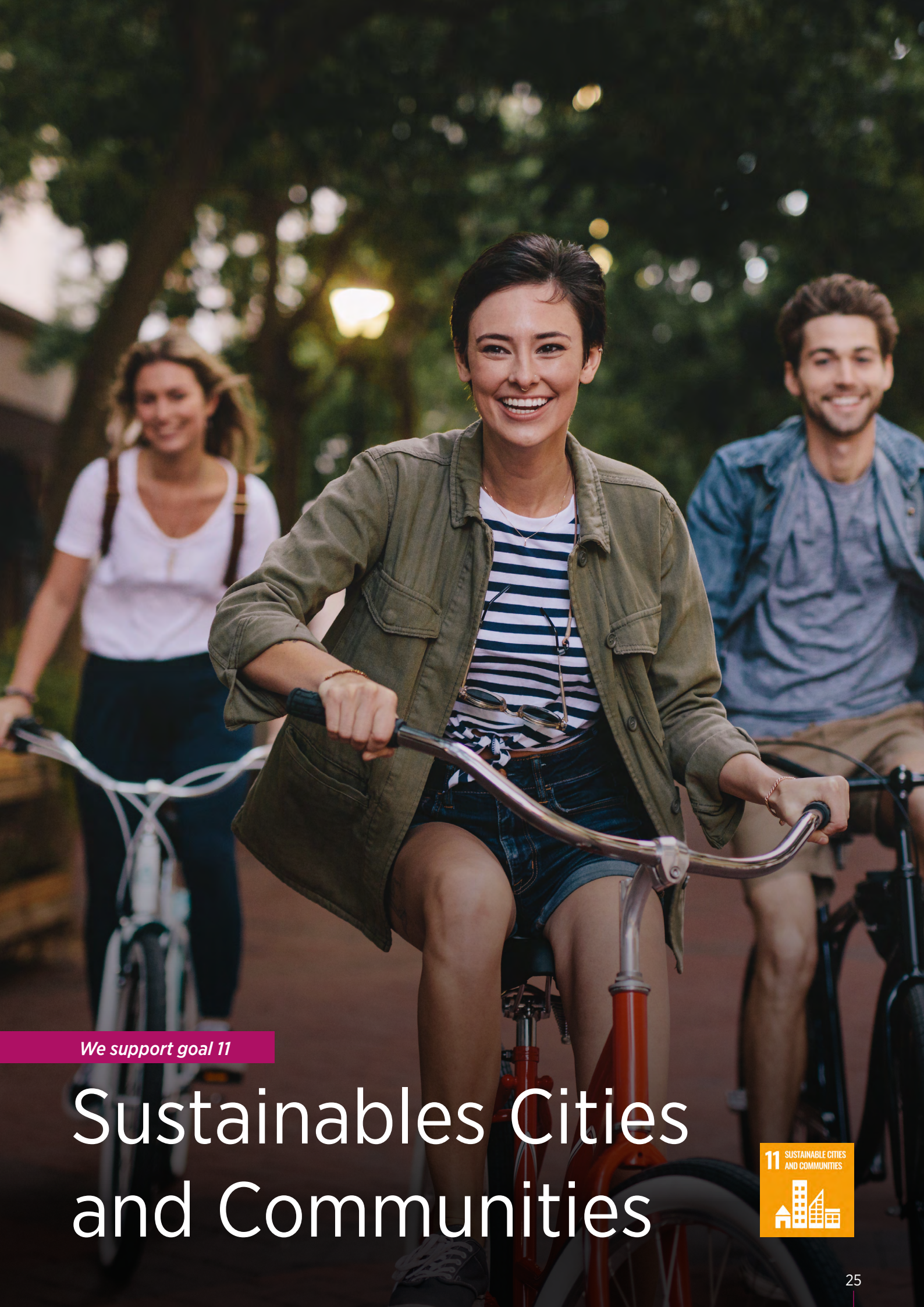
- We shall identify and train individuals who are responsible for applying diversity, equal opportunities and non-discrimination policies within the organization. These individuals should be available to openly communicate and interact with all employees.

## Anti-violence and harassment

### Mandatory requirements

- We must guarantee the safety, dignity and respect of all workers. In this sense, we are expected to play a role as caretaker of people who experience situations of subordination or who are more exposed to the risk of violence or harassment.
- We must adopt an Anti-violence and Harassment Policy. Such document shall be comprehensively and adequately communicated to all workers and be periodically updated.





*We support goal 11*

# Sustainable Cities and Communities



# Sustainable Cities and Communities

## Make cities inclusive, safe, resilient and sustainable

We have selected the relevant targets of SDG.11 that are applicable into our ecosystem:

- By 2030, enhance **inclusive and sustainable urbanization** and capacity for participatory, integrated and sustainable human settlement planning and management in all countries;
- By 2030, reduce the adverse **per capita environmental impact of cities**, including by paying special attention to air quality and municipal and other waste management;
- By 2020, substantially increase the number of cities and human settlements adopting and implementing **integrated policies** and plans towards **inclusion, resource efficiency, mitigation and adaptation to climate change**, resilience to disasters, and develop and implement, in line with the Sendai Framework for Disaster Risk Reduction 2015-2030, **holistic disaster risk management** at all levels.

## Community engagement

### Improvement actions

- We shall have an active role in relation to corporate citizenship, which translates into participation in community activities, philanthropy and volunteering actions, in order to support cultural and economic development.
- We shall work closely together with local stakeholders with the aim of guaranteeing the social inclusion of all people and their access to essential services.
- Where the category allows it, we shall give preference to local third parties, to foster the development of the local economy and make transportation related to the supply of materials more efficient and less impactful on the environment.

## Cultural heritage, green areas, and better buildings

### Mandatory requirements

- In carrying out our operations, we must take into account the impact that we have on the local territory and the community of reference.
- We must ensure the preservation of the cultural and environmental heritage that surrounds our sites, and we should invest in activities that enable its development over time.
- When considering the impact generated by the company, we must also include that of the buildings in which the company operates.
- We must respect the human rights, including the right to a clean and healthy environment, of the local communities around the sites where we operate.

### Improvement Action

- We shall pay particular attention to the efficiency of the buildings themselves, referring where possible to international best practices or recognized better building standards. This shall also be integrated into the parameters for the selection of buildings.



## Sustainable transportation

### Mandatory requirements

- We must have policies and guidelines that regulate human transportation, with a specific focus on business travel and company fleets, to minimize GHG emissions.
- When traveling for business, we must optimise our travel choices, reducing the number of trips and people involved and opting for alternative and more sustainable transportation solutions, whenever possible.

### Improvement Action

- We shall include in the selection of cars both hybrid and electric solutions, with the objective of gradually achieving a car fleet without fossil fuel-based engines (electric and/ or plug-in vehicles) and therefore, reducing the transportation Carbon Footprint to the minimum impact.





*We support goal 12*

# Responsible Consumption and Production



# Responsible Consumption and Production

## Ensure sustainable consumption and production patterns

We have selected the relevant targets of SDG.12 that are applicable into our ecosystem:

- Achieve the **environmentally sound management of chemicals and all wastes** throughout their life cycle, in accordance with agreed international frameworks.
- Significantly reduce their **release to air, water and soil** in order to minimise their adverse impacts on human health and the environment.
- Achieve the **sustainable management and efficient use of natural resources**.
- **Substantially reduce waste generation** through prevention, reduction, recycling and reuse.

## Waste treatment and emissions

### Mandatory requirements

- We must put in place processes and waste disposal that do not harm the environment and must minimise pollution of water, air and soil.
- We must have systems in place to appropriately control, store, manage, and recycle raw materials and waste that have the potential to adversely impact human health or the preservation of the environment (such as hazardous waste), as well as to abate air emissions.
- We must have systems in place to appropriately control and reduce air and greenhouse gas (GHG) emissions based on a hierarchical approach: avoid, reduce, substitute and remove.
- We must preserve natural ecosystems through environmental initiatives to protect and re-evaluate local resources as well as preserve local communities' good health and living standards.

### Improvement actions

- We shall promote actions to increase regarding sustainability attributes and footprint of the products and services, ensuring that customers and users know how the product should be properly and sustainably used, maintained, and managed at end-of-life.

## Hazardous chemicals, information & management

### Mandatory requirements

- We must be committed to the responsible use of chemicals, in order to prevent and minimize their potential effects on human health and the environment, selecting less hazardous chemicals wherever possible. We are aware that this commitment must be considered during the acquisition of new products developed by third parties.
- We must be committed to designing enclosed processes using effective containment strategies based on the best available practices and closed systems to avoid any potential environmental emission.
- We must ensure the responsible management of hazardous chemicals by applying consistent standards to our contract manufacturing operations.
- We must adopt a management strategy that employs banding categorization for New Chemical Entities in scenarios where a full toxicological characterization is lacking. It is crucial to ensure that employees are fully trained and comprehend the hazardous properties of materials they handle, including pharmaceutical compounds and pharmaceutical intermediate materials.
- We must provide our employees with training on the appropriate use, storage, handling and disposal of hazardous materials with which they work.

- We must provide and make accessible all chemical hazard information to the ecosystem organizations in order to facilitate the implementation of appropriate control strategies through risk management.
- We must be committed to openness and transparency with regard to hazardous chemicals management.

### Improvement actions

- We shall actively research more sustainable chemical processes while minimising environmental impact utilising the principles of green chemistry.
- We shall enforce the principles of green chemistry and process efficiency in process optimisation to minimise the use of chemicals and reduce associated waste and emissions.
- We shall explore opportunities for the use of bio-transformation (e.g. bio-catalysis).

## Water treatment

### Mandatory requirements

- We must have systems in place to ensure the safe management of wastewater discharges.
- We must have systems in place to appropriately manage, measure, control and treat, prior to release into the environment, any wastewater with the potential to adversely impact human health or environmental preservation.

### Improvement actions

- We shall invest in low-impact technologies, water-saving and recycling solutions.

## Efficient use of resources

### Mandatory requirements

- We must use resources and multimaterials responsibly, recognizing that their recycling is often complex and not always locally available. Therefore, we must prioritize solutions designed for easy recyclability and sustainability. We shall promote innovations in multimaterials that enhance performance, reduce material consumption, and minimize waste, addressing the challenges associated with recycling.
- We must limit as much as possible the use of finite resources, such as non-renewable energy sources including natural gas, petroleum, coal, and rare earth elements, as well as safeguard natural assets

### Improvement actions

- We shall invest in low-impact technologies and energy-efficiency systems, renewable energy production, resource-saving and recycling solutions.
- We shall encourage our employees to promote the reuse and recycling of materials as well as reduce emissions at all phases such as transportation, business travel, use of office space and equipment, personal life, and all applicable areas.

## Transparency - report on social and environmental KPIs

### Mandatory requirements

- We must gather, monitor, update and share our ESG performances and impact (including our maturity on climate change adaptation and mitigation), using globally recognized standards and relevant ESG tools.
- We must communicate any problems or difficulties in applying this Code.
- We must be available for external audits to verify the compliance with and implementation in practice of the principles reported in this document. We must work together to optimise the audits of our activities, facilities or laboratories through a transparent and continuous exchange of information. We generate clear and shared procedures and concrete application guidelines.
- We must share concrete goals to systematically improve our ESG practices.

### Improvement actions

- We shall develop and implement tools to monitor sustainable development impacts through a specific set of KPIs to be agreed among the relevant ecosystem organizations or by referring to internationally recognised frameworks such as the B Impact Assessment (BIA), the tool used by B Corps to measure their impacts.
- We shall report externally about our ESG impacts and targets.

## Sustainable products and services

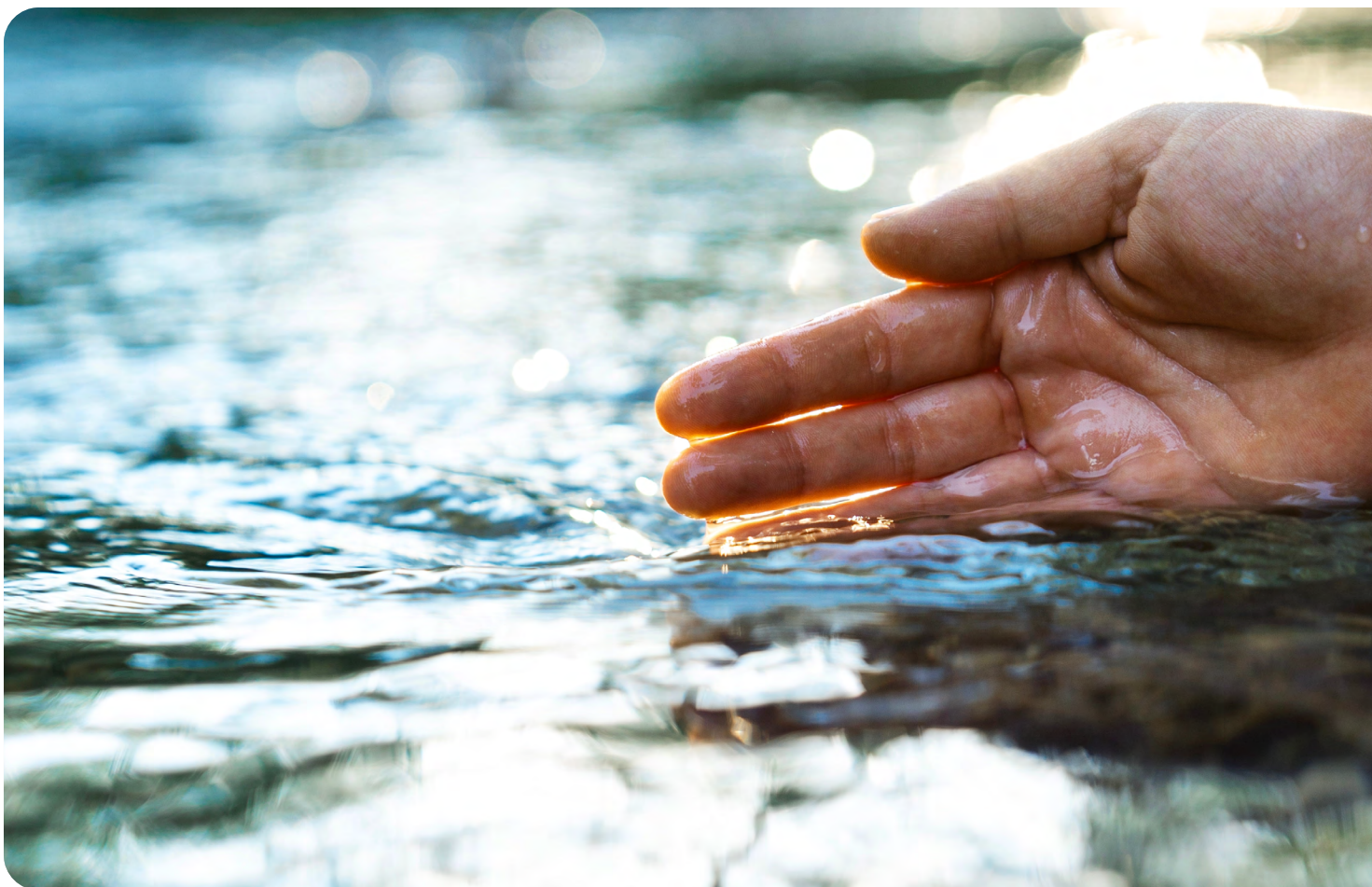
### Improvement actions

- We shall design our products or services embedding a life cycle approach, including circular economy principles. This means re-engineering our products and services according to sustainability principles, extending the approach not only to the product itself but also to its components, such as packaging choices. Moreover, we shall encourage third parties to take into consideration all materials, regarding the facilitation of disposal and reuse of components at end of life.

## Precautionary approach

### Mandatory requirements

- We must proactively implement safeguarding measures whenever our operations pose potential risks to human health or the environment.





*We support goal 13*

# Climate Action

13 CLIMATE  
ACTION



# Climate Action

## Take urgent action to combat climate change and its impacts

We have selected the relevant targets of SDG.13 that are applicable into our ecosystem:

- **Strengthen resilience and adaptive capacity** to climate-related hazards and natural disasters in all countries.
- **Integrate climate change measures** into national policies, strategies and planning.
- **Improve education, awareness-raising** and human and institutional capacity on climate change mitigation, adaptation, impact reduction and early warning.

## Climate Change

### Mandatory requirements

- We must have systems in place to map, monitor and reduce all Value Chain greenhouse gas (GHG) emissions in a transparent manner, wherever possible and follow relevant international standards and join recognized initiatives, such as the Science-based Targets Initiative (SBTi) and Carbon Disclosure Project (CDP), and those that may arise in the future.
- We must understand our climate and biodiversity impacts, working to reduce and mitigate our footprint wherever possible. We must also aim to progressively lower our carbon footprint to actively reduce global adverse climate impacts, according to science-based standards.
- We must develop a plan to reach emission reduction targets that does not count emission compensation as emission reduction towards the progress of near- or long-term targets (as per SBTi's Net-Zero Standard).
- The plan to reduce greenhouse gas (GHG) emissions must be based on setting scientifically-validated emission reduction targets and progressive advancement. Reducing emissions must be the main objective of the above plan, which must be implemented through process and consumption optimisation, paying particular attention to acting strategically in the most material areas for the company, such as energy consumption, logistics, travel, etc.
- We must have systems in place to monitor the progress of the plan on a periodic basis. The process must include the measurement and control of both direct and indirect emissions (Scope 1,2,3) and reliable and accessible information. The emission data must be disclosed transparently.
- We must encourage circularity (including reuse and recycle), taking measures to improve resource efficiency (such as water), favouring renewable and sustainable sources. We must design and implement a plan to invest in low-impact technologies, energy-efficiency systems and renewable energy production solutions.

### Improvement actions

- We shall design, submit and implement clear emission reduction targets or have an ambitious reduction plan according to the Science Based Target Initiatives (SBTi), with the ultimate goal of moving towards Net Zero.
- We shall rely on permanent carbon removal and storage to counterbalance the final 10% of residual emissions that cannot be eliminated (as per SBTi's Net-Zero Standard). In doing that, we shall purchase high-quality carbon removal credits by considering reliable international criteria and programmes.

## Energy efficiency

### Mandatory requirements

- We must minimize energy consumption, prioritize the purchase of certified renewable energy and, where possible, generate our own energy to meet our needs. The reduction of energy consumption must follow a progressive improvement plan that includes incremental targets and constant monitoring of the results, moving us towards a sustainable energy future.



We support goal 15

# Life on Land



# Life on Land

## Protect, restore and promote sustainable use of terrestrial ecosystems

We have selected the relevant targets of SDG.15 that are applicable into our ecosystem:

- Take urgent and significant action to **reduce the degradation of natural habitats, halt the loss of biodiversity** and protect and prevent the extinction of threatened species.
- Mobilise and significantly increase financial resources from all sources to **conserve and sustainably use biodiversity and ecosystems**.

## Responsible sourcing

### Mandatory requirements

- We must operate in an environmentally responsible and efficient manner and minimise adverse impacts on the environment. We must encourage the conservation of natural resources, reduction of greenhouse gas (GHG) emissions, preservation of biodiversity and clean water, minimization and control of the use of hazardous materials and multimaterials where possible, and the engagement in activities that reuse and recycle.
- We must have systems in place to carry out due diligence on our Value Chain to support legal and sustainable sourcing of any material that has an impact.
- We must identify, address and mitigate any risk related to the mining of minerals originating from regions at high risk.
- To select and evaluate collaborations or partnerships with other companies within our Value Chain, we must consider their sustainability profile and their alignment with the principles of this Code, and, as a key differentiator, their commitment to continuous improvement in line with the actions proposed in this Code.

### Improvement actions

- We shall put in place collaborations with our ecosystem's organizations, government bodies, international associations and local communities to raise awareness of conflict minerals and promote actions to mitigate the use of critical materials as well as programs to find alternative sourcing zones and products.

## Emergency preparedness and response

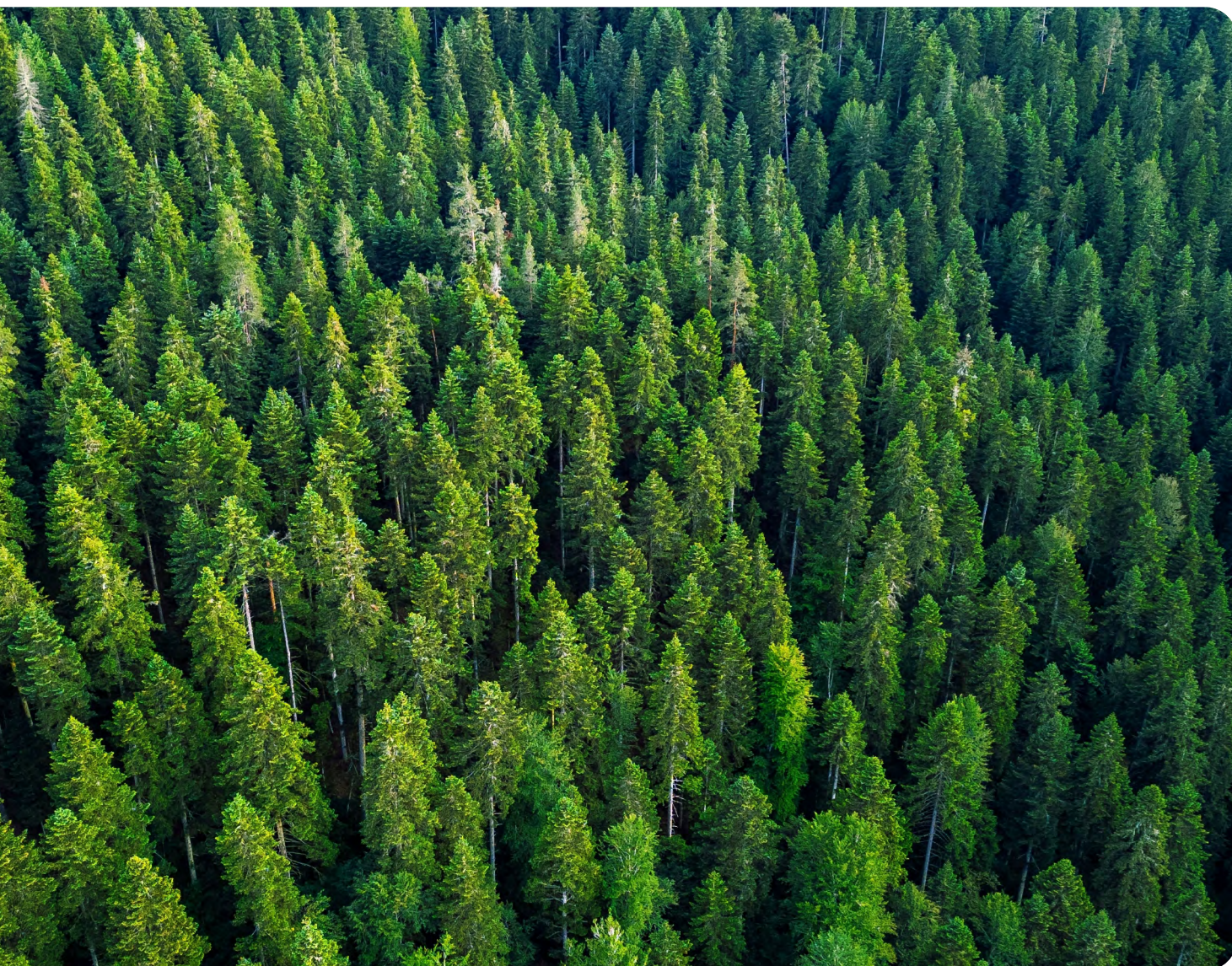
### Mandatory requirements

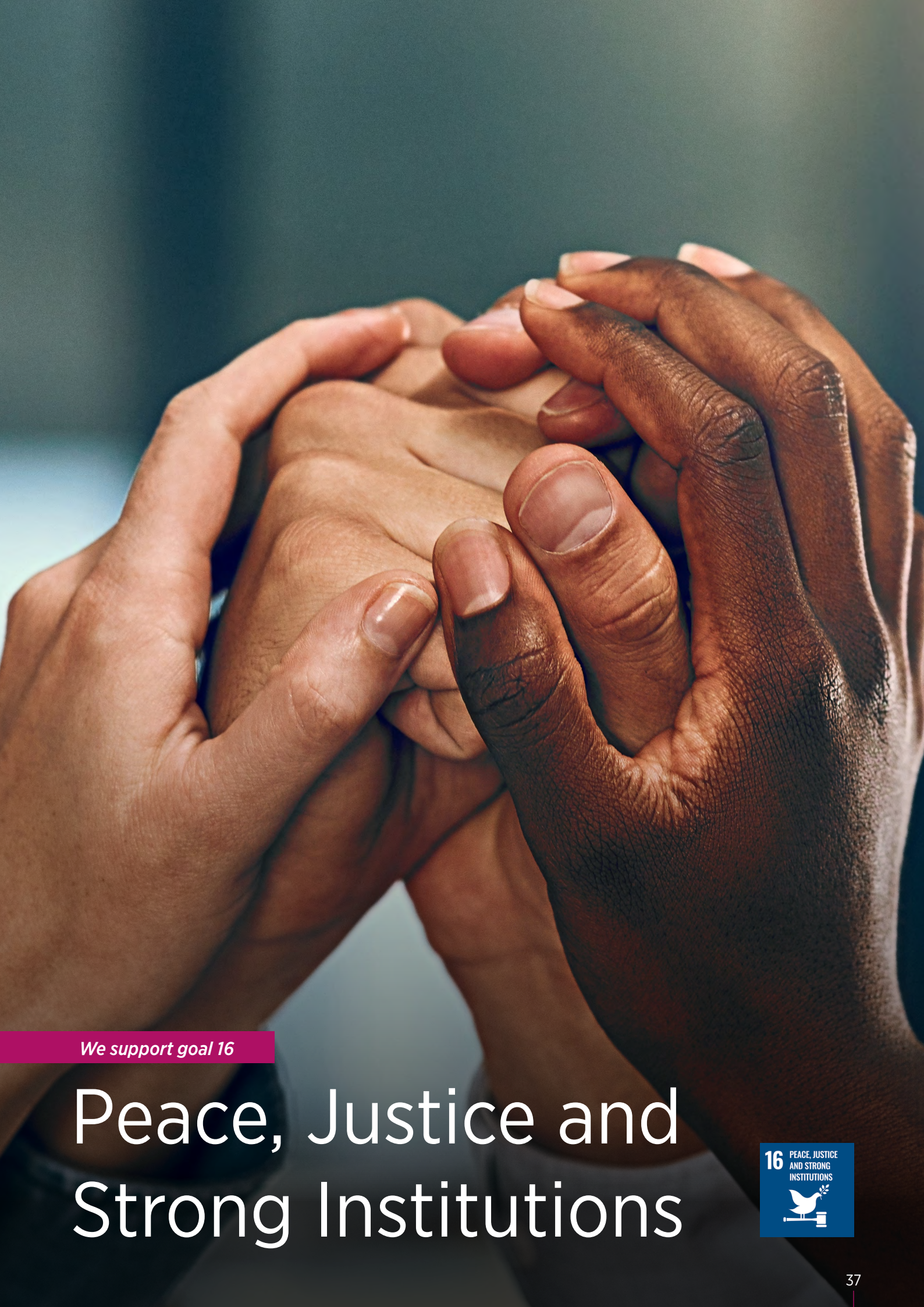
- We must have in place clear, effective and updated emergency plans and response procedures to prevent, manage and mitigate potential environmental emergencies such as accidental spills and releases into the environment.
- We must have in place emergency plans and countermeasure programs in case of accidental releases.
- We must enable relevant employees to be prepared and deal with accidental spills and releases in a professional way according to emergency plans and countermeasures.
- We must maintain and make accessible to our employees the proper emergency and containment equipment.
- We must identify all materials or processes that are potentially risky, and label and store such materials appropriately (e.g., containers, vessels, etc.).

## Animal welfare

### Mandatory requirements

- We must recognize the invaluable role that animals play in the advancement of our medical research and development. In light of this, we hold ourselves to the highest ethical and welfare standards, treating all animals with the utmost respect, and recurring to scientifically valid alternative solutions whenever possible. This commitment to animal welfare is not only a moral imperative but also a scientific necessity that informs and guides every action we take in our research.
- All companies conducting animal testing must promote animal welfare, by ensuring that all animals under their care are treated humanely: have access to food, water, adequate accommodation and minimized stress and pain. Our research facilities are designed and maintained to reliably provide animals with specific shelter, nutrition, care, and in environment conditions that allow for natural behaviours, with minimal stress or suffering.
- We must promote 3Rs programs (scientific and technological development) to support the Replacement, Reduction and Refinement of the use of animals wherever possible.
- We must ensure that all personnel involved in the care and use of animals are appropriately and continuously trained on responsible practices for animal welfare.





*We support goal 16*

# Peace, Justice and Strong Institutions



# Peace, Justice and Strong Institutions

## Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

We have selected the relevant targets of SDG.16 that are applicable into our ecosystem:

- Substantially **reduce corruption and bribery in all their forms**.
- Ensure responsive, inclusive, participatory and representative **decision-making** at all levels.
- Ensure public **access to information and protect fundamental freedoms**, in accordance with national legislation and international agreements.
- Promote and enforce **non-discriminatory laws and policies** for sustainable development.

## Ethics

### Mandatory requirements

- We must act with integrity and conduct our business in an uncompromised ethical way.
- We must identify, avoid, and manage promptly any conflict of interest, and notify all affected parties if an actual or potential conflict of interest arises.

### Improvement actions

- We shall design, put in place and clearly communicate to all our employees a comprehensive written Code of Conduct.

## Relevant requirements

### Mandatory requirements

- We must comply with all applicable laws, regulations, recognized standards and any other relevant requirements.
- We must design and implement programs or procedures to verify the compliance status and progress against legal or other relevant requirements.
- We must identify and effectively communicate to the relevant individuals within our organization all legal, customer-driven, local or voluntary performance obligations that are material to our perimeter of operations.
- We must have mechanisms to track employees or community complaints or non-compliance issues against internal and external obligations and commitments that are previously investigated and solved.

### Improvement actions

- We shall design and implement a reliable methodology to identify and track new changes in legislation, regulations and laws that are potentially material to our business operations.
- We shall establish open and clear communication to our employees and key stakeholders about fines and penalties in order to measure compliance and progress of regulatory obligations.
- When active in public affairs actions, we shall be enrolled (in accordance with local laws and regulations) in appropriate registers, for example the Transparency Register in the EU, that regulate through specific Codes of Conducts the main directions to follow on ethical and transparent advocacy and lobbying practices.

## Environmental authorisations

### Mandatory requirements

- We must comply with all applicable environmental regulations. In particular, we must obtain and keep records of all required environmental permits, licenses, information registrations and restrictions. We shall comply with the corresponding operational and reporting requirements.
- We must design and implement a set of comprehensive internal policies and procedures for managing all relevant environmental issues.
- We must design and implement systems to monitor environmental performance and manage all relevant obligations deriving from the adherence to recognised international norms as well as industry practices.
- We must report to the proper internal and external authorities any required routine report, violation or exception to environmental requirements.

### Improvement actions

- We shall understand, assess, control and mitigate in a proactive way all those activities that have a direct impact on environment preservation but do not require a permit or legal obligation.
- We shall maintain a local inventory of material consumption and discharges that have a potential impact to the environment.

## Fair competition among third parties

### Mandatory requirements

- We must adopt fair business practices and conduct our business consistent with fair competition and in compliance with all applicable antitrust laws.

### Improvement actions

- We shall put in place policy making activities to foster fair competition between third parties, engaging with relevant institutions and associations.

## Business integrity and grievance mechanisms

### Mandatory requirements

- We must prohibit all forms of corruption, extortion, embezzlement and facilitation payments. We must not pay or accept bribes or participate in other illegal inducements in business or government relationships or other activities to secure an unfair advantage. To achieve that, we must have adequate systems to prevent corruption.
- We must not offer or receive inappropriate financial or material benefits, such as expensive gifts, that could influence business decisions and/or may compromise the integrity and/or reputation of Chiesi and that could be considered, by a neutral party, as means aimed at deserving gratitude or gaining improper advantages.
- We must put in place and encourage grievance mechanisms that allow our employees to openly communicate and interact with the company management about concerns, breaches or illegal activities in the workplace without threat of or actual reprisal, intimidation or harassment. We must investigate any concern and/or incident with a formal, unbiased and fair process and take appropriate action where required. Throughout and following this process, we must ensure the confidentiality of the report, the reporter, the persons involved in the reported conduct, and we forbid any form of retaliation against the whistleblower: we commit to protect all whistleblowers against any form of discrimination and/or retaliation, in connection with any report made in good faith. That can be done through the implementation of a Whistleblowing Policy and the set-up of ad-hoc Committees.

## Ethical and responsible employment

### Mandatory requirements

- We must implement a fair and ethical system of hiring practices that is applied uniformly, either from the company itself or through a recruiter, hiring contractor or other external agents. We must prohibit and avoid forced, bonded or indentured labour, involuntary prison labour, or take part in any human trafficking or any form of modern slavery, and we forbid the employment of workers without regular work permits as required by local laws. We must ensure freedom of movement and we forbid payments for a job.
- We must provide to our employees a written copy of their employment contract or letter, written in a language familiar to both employer and employee and within the details of the terms and conditions of the collaboration.

### Improvement actions

- We shall periodically audit or verify compliance to employment policies, if deemed necessary with the support or involvement of a qualified third party. If deficiencies and discrepancies arise, we shall implement fair and prompt corrective actions.

## Ethical Marketing

### Mandatory requirements

- We must ensure that all information about the Company, its products, and activities is accurate and transparent, in accordance with ethical marketing standards and principles. We must provide balanced information and avoid any misleading claims.
- We must use appropriate communication channels, including digital ones and social media, to share relevant information, and we must act responsibly and transparently in doing so.
- We must ensure that all claims, including those related to sustainability and environmental/social impact, are based on up-to-date, verifiable, and referenced data and information.

## Data and intellectual property protection

### Mandatory requirements

- We must ensure that management and security systems protect intellectual property and any result of the business activity (i.e., products, components etc.) from the risk of adulteration, falsification, theft for the purpose of illegal resale.
- We must protect the privacy of our company, employees, patients, or any collaborator by safeguarding and make proper use of all confidential information in our possession.
- We must design, implement and regularly keep up-to-date policies, procedures, and tools to comply to best practices and compliance to privacy and confidential information requirements.
- We must grant access to confidential information and personal data only to individuals legally entitled to do so. These individuals are aware of all applicable laws, regulations and policies pertaining to privacy and confidential information handling.

### Improvement actions

- We shall put in place a training mechanism that enables our employees to clearly understand the information categories and records that should be treated as confidential.

A photograph of three people (two men and one woman) in a park setting, high-fiving each other. They are all smiling and looking upwards. The background is a lush green forest with sunlight filtering through the trees, creating a bokeh effect. The person on the left is a man with short dark hair, wearing a grey tank top. The person in the middle is a woman with curly brown hair, wearing a white tank top. The person on the right is a woman with dark hair, wearing a grey t-shirt. They are all reaching their hands up to high-five each other. The overall mood is positive and collaborative.

*We support goal 17*

# Partnership for the Goals

17 PARTNERSHIPS  
FOR THE GOALS



# Partnership for the Goals

## Strengthen the means of implementation and revitalise the global partnership for sustainable development

We have selected the relevant targets of SDG.17 that are applicable into our ecosystem:

- **Enhance the global partnership for sustainable development**, complemented by multi-stakeholder partnerships that mobilise and share knowledge, expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular developing countries.

## Responsible Value Chain

### Mandatory requirements

- We must broaden the perimeter of application of this Code by influencing other third parties and ecosystem to implement the principles included in this document. The purpose is to ensure that all partners and third parties can also initiate a program and live up to the principles of responsible sourcing standards.
- We must inform our Value Chain ecosystem on Chiesi standards set out in this Code. We ensure that all products and services meet these standards.
- We must support our Value Chain ecosystem on sustainability topics, with a focus on measuring climate impact and GHG emission reduction, to minimize adverse impacts on the environment.
- We must measure our progress using adequate tools, assessments, inspections, audits or any necessary management review or process, and we shall take necessary corrective actions for all relevant discrepancies identified, including the recording and reporting of near-misses, incidents, and incident prevention opportunities.

### Improvement actions

- We shall formally collaborate with one or more of our key strategic third party on a plan to improve their operations to meet the principles highlighted in this document.

## Culture, commitment, accountability & documentation

### Mandatory requirements

- We must demonstrate a clear commitment to the principles described in this document by allocating appropriate resources, incorporating relevant aspects into policies and procedures, thus contributing to the development of a culture of responsible practices.
- We must also maintain all necessary documentation, in a carbon friendly format as much as possible, on key issues, for example: audit findings, injuries, employee's benefits and payrolls, etc., to demonstrate commitment to the principles described in this document and compliance with all applicable regulations. All documentation methods and forms must be in the most suitable medium, for example paper or electronic, and be easily accessible for review or update.
- We must effectively communicate the principles of this document to relevant stakeholders, including own employees, third parties and local communities.

### Improvement actions

- We shall embed all relevant aspects of this document into annual business plans.
- We shall commit to the principles of this document by enhancing and promoting the implementation of highest standards and relevant third-party certifications (e.g., ISO).
- We shall embed all relevant topics of this document into job descriptions and performance measurement.
- We shall put in place external communication actions about any relevant topic of this document with the objective of demonstrating commitment and influence our ecosystem.

## Collaboration and partnerships

### Mandatory requirements

- We must collaborate with our partners to encourage the sustainable development, engaging our stakeholders in proactive policy making actions. We must collaborate with other companies to explore sector-specific initiatives that support the Sustainable Development Goals (SDGs). We must participate in and organize events and workshops to share best practices related to the SDGs.

### Improvement actions

- We shall gather feedback from our Value Chain to define initiatives for mutual continuous improvement.





## Code of Interdependence Workshop: a great opportunity for collaboration

Collaboration, co-creation and the exchange of ideas were at the heart of the Code of Interdependence workshop, held in September 2024 in Chiesi Headquarters. The event was an opportunity to strengthen the Chiesi Group's strategic collaboration and to promote innovative solutions from the perspective of Chiesi's partners.

Believing in the concept of interdependence, Chiesi has developed the Code together with its partners. The workshop brought together around 70 of the Chiesi Group's partners to review and discuss the key updates to the Code of Interdependence.

The workshop confirmed that the collaborative support of everyone is essential in addressing the challenges, risks, and opportunities on the journey towards a more sustainable future.



Scan the QR code with your smartphone or click on it to watch the video

# Internal & External References

**Please find below the list of key sources relevant for the Code's principles.**

## External sources

- Sustainable Development Goals (SDGs): <https://www.un.org/sustainabledevelopment>
- Science-based Targets Initiative (SBTi): <https://sciencebasedtargets.org/>
- Carbon Disclosure Project (CDP): <https://www.cdp.net/en>
- International Labour Organization (ILO): <https://www.ilo.org/international-labour-standards#intro>
- Pharmaceutical Supply Chain Initiative (PSCI): <https://pscinitiative.org/home>
- B Corp: <https://www.bcorporation.net/en-us/>

## Chiesi Farmaceutici sources

This Code incorporates a set of well-established sustainability principles, which are also reflected in Chiesi policies and positions. For additional details please visit: <https://www.chiesi.com/en/global-value-chain/sustainability-of-our-supply-chain/> where you can also find the most updated version of this Code.

