

**ETHICAL CODE**

# ETHICAL CODE

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## PREMISE

Arrow Diagnostics S.r.l. ("Arrow" or the "Company") is a company under Italian law operating in Italy since 2003 in the field of trade in diagnostic products and tools. Since the end of 2012, the Seegene Inc. company of Seoul - South Korea, a manufacturer of reagents and instrumentation, holds control of Arrow.

The Company represents world-famous multinational companies in the field of in vitro molecular diagnostics and is present nationwide with a wide range of high-tech products, mainly reagents for nucleic acid extraction and amplification using Real Time techniques (PCR, RT-PCR).

In particular, Arrow Diagnostics S.r.l. offers support in various diagnostic fields: molecular biology, microbiology, NGS sequencing, virology, pharmacogenetics, oncology and prenatal diagnosis.

Furthermore, Arrow Diagnostics S.r.l. provides technical assistance services including installation, testing, and electrical safety checks.

Since 2018 Arrow Diagnostics has started developing new diagnostic products with Next Generation Sequencing technology and has started a small production of these products at its headquarters.

The importance of the role played on the national market presupposes the commitment of those who work in Arrow Diagnostics, or anyway on its behalf, to adopt behaviors based on principles of loyalty, seriousness, honesty, competence and transparency as well the timely observance of the laws, of the market rules, of the inspiring principles of fair competition, respecting the legitimate interests and expectations of customers, suppliers, partners and anyone who comes into contact with company operations.

The Code is intended to constrain the behavior of all those who, in Arrow Diagnostics, hold functions of representation, administration or management, or who exercise the management and control of the Company, of all employees without any exception, of collaborators and anyone others entertain relationships with the Company, directly or indirectly, permanently or temporarily, or collaborate in various capacities (hereinafter the "Recipients of the Ethical Code" or more simply "Recipient" or "Recipients"). Compliance with the ethical values indicated in the Code is fundamental for the development of the company organization and relations with all third parties that collaborate with the Company: compliance with this Ethical Code is therefore extremely important for the proper functioning, the reliability, the reputation of the Company. Respect for the principles and commitments undertaken with the application of this Ethical Code is therefore an important tool for creating relationships based on trust, both with customers and with every other interlocutor of the Company. Arrow Diagnostics is also aware that the adoption of an ethical code is essential also in terms of prevention of the crimes provided for by Legislative Decree 8 June 2001 n. 231 ("Responsibility of legal entities"), in the belief that the concrete adoption of ethical rules can strengthen the organizational model adopted by the latter in compliance with the aforementioned Decree, protecting its image and reputation.

### ETHICAL PRINCIPLES

#### 1. OBSERVANCE OF LAWS AND REGULATIONS

Arrow Diagnostics operates in full compliance with the laws and regulations in force in the areas in which it operates.

Relations with the Authorities must be based on the utmost transparency and collaboration, in full respect of their institutional functions.

#### 2. CORRECTNESS

Every Recipient of this Ethical Code must be aware that fairness in business is a fundamental and indispensable value.

Any behavior not in line with the aforementioned correctness can compromise the integrity and reputation of Arrow Diagnostics.

In no case can the pursuit of the interest of Arrow Diagnostics justify a non-honest conduct.

#### 3. IMPARTIALITY

In decisions affecting relationships with its stakeholders, Arrow Diagnostics avoids any discrimination based on the age, gender, health, race, nationality, political opinions and religious beliefs of its interlocutors.

#### 4. CONFLICTS OF INTEREST

In conducting any activity connected to the exercise of the business activity, circumstances and situations must always be avoided in which the subjects involved are, or may even appear, in conflict of interests.

#### 5. CONFIDENTIALITY

Arrow Diagnostics ensures the confidentiality of information in its possession and refrains from systematically searching for confidential data.

#### 6. TRANSPARENCY AND COMPLETENESS OF INFORMATION

The Recipients of this Ethical Code are required to provide complete, transparent, understandable and accurate information, so that, in relations with the company, the parties concerned can make decisions independently and knowingly, to protect the interests involved, possible alternatives and relevant consequences.

#### 7. FAIR COMPETITION

Arrow Diagnostics intends to protect the value of fair competition by refraining from collusive and predatory behavior.

#### 8. QUALITY OF SERVICES AND PRODUCTS

Arrow Diagnostics aims its activities to the satisfaction and protection of its customers by satisfying the requests that may favor an improvement in the quality of its activities and services, in line with the quality management system certified according to the internationally recognized standard UNI EN ISO 9001.

#### 9. DILIGENCE IN THE COMPLETION OF FUNCTIONS

Contracts and work assignments must be carried out as agreed by the parties.

Arrow Diagnostics undertakes, with reference to the commercial negotiations, not to exploit the conditions of ignorance or inability of its counterparts.

## 10. RESPONSIBILITY TOWARDS THE COLLECTIVITY

Arrow Diagnostics is aware of the delicacy of the activity in which it operates and for this reason it pays due attention to the needs of both internal and external stakeholders.

## 11. VALUE OF HUMAN RESOURCES AND RESPECT FOR THE PHYSICAL AND CULTURAL INTEGRITY OF THE INDIVIDUAL

Arrow Diagnostics protects and promotes the value of human resources in order to improve and increase the assets, competitiveness and skills possessed by all human resources, guaranteeing their physical and moral integrity, also in compliance with current legislation.

## **PRINCIPLES OF BEHAVIOR**

### 1. BUSINESS MANAGEMENT IN GENERAL

Every operation and transaction completed or implemented for the benefit of Arrow Diagnostics must be carried out in compliance with the ethical principles mentioned above.

Depending on the kind of activity, some forms of gift that exceed normal commercial or courtesy practices, or in any case aimed at acquiring favorable treatment in the conduct of any activity connected to Arrow Diagnostics are not allowed.

In any case of real or potential conflict of interest it is necessary to immediately inform the responsible party in preferential position and the Supervisory Body.

### 2. HUMAN RESOURCES AND EMPLOYMENT POLICY

#### 2.1 Staff selection

Arrow Diagnostics, within the limits of available information, adopts appropriate measures to avoid favoritism, nepotism, or clientelism in the selection and recruitment phases (for example, avoiding that the selector is bound by kinship ties with the candidate).

#### 2.2 Establishment of the employment relationship

The staff is hired with a regular work contract; no form of irregular work is tolerated.

#### 2.3 Staff management

Arrow Diagnostics avoids any form of discrimination against its employees.

Staff management is based on maximum collaboration and involvement of workers in the performance of work and for the assumption of decisions that are functional to the achievement of company objectives.

#### 2.4 Interventions on work organization

In the case of work reorganization, the value of human resources is safeguarded by providing, where necessary, training and / or professional retraining.

#### 2.5 Health & safety

Arrow Diagnostics is committed to spreading and consolidating a culture of safety by developing awareness of risks, promoting responsible behavior by all and making available every resource necessary to protect workers' health and safety.

#### 2.6 Privacy protection

The protection of personal data processed by Arrow Diagnostics is guaranteed by compliance with current legislation.

#### 2.7 People integrity and protection

Arrow Diagnostics commits to protect the moral integrity of collaborators guaranteeing the right to working conditions that respect the dignity of the person and protecting workers from acts of psychological violence, against any attitude or behavior that discriminates or harms the person, his convictions and his preferences.

#### 2.8 Duties of workers, employees and external collaborators

The worker, employee and collaborator (including commercial agents who work with Arrow Diagnostics) must act loyally in order to comply with the obligations entered into in the employment contract or in the consultancy contract and as provided by this Code of Ethics, ensuring the required services.

#### 2.9 Agents' duties

In addition to the obligations set out in paragraph 2.8 above, as applicable according to the law, the agents must limit themselves to carrying out the activities indicated in the agency contract, always operating in compliance with the law and commercial practice, avoiding the implementation of any behavior that may be interpreted as intended to influence the judgment of one's interlocutor, in particular with reference to health professionals, be they public or private.

### 3. INFORMATION ON MANAGEMENT FACTS AND ACCOUNTING DATA

The accuracy, completeness, clarity and transparency of accounting data, reports and financial statements represent a fundamental value in relations with shareholders, with third parties who encounter Arrow Diagnostics, as well as with supervisory bodies (where involved).

### 4. RELATIONSHIPS WITH AUTHORITIES AND PUBLIC INSTITUTIONS AND OTHER REPRESENTATIVE ENTITIES OF COLLECTIVE INTERESTS

Recipients of this Ethical Code who maintain relations with national and governmental authorities on behalf of Arrow Diagnostics, with public institutions, both Italian and foreign, with community or supranational institutions, as well as with other subjects representing collective interests, and with individuals who represent them, must operate in constant and rigorous compliance with the regulations in force in Italy and in the country in which the relationship takes place, and must base their activity on the general principles of fairness and transparency.

### 5. MONEY RECYCLING PREVENTION

Arrow Diagnostics carries out its activities in full compliance with the current anti-money laundering legislation and the provisions issued by the competent authorities, to this end undertaking to refuse to carry out suspicious transactions in terms of fairness and transparency.

### 6. RELATIONSHIPS WITH POLITICAL ORGANIZATIONS AND TRADE UNIONS

Arrow Diagnostics does not directly or indirectly discriminate or favor any organization of a political or trade union nature and abstains from any form of financing other than those listed in the specific provisions of the law.

### 7. RELATIONSHIPS WITH PROFESSIONALS IN THE HEALTH SECTOR, WITH THE HEALTH ORGANIZATIONS AND WITH THE THIRD PARTIES

Arrow Diagnostics is committed to implementing ethical business practices and maintaining a socially responsible conduct in relation to interactions with health professionals. In particular, it undertakes to respect the obligation of professionals in the healthcare sector to make independent decisions.

### 8. CONTRIBUTIONS, SPONSORSHIPS, CONFERENCES AND CONGRESSES

Arrow Diagnostics is committed to supporting the training and updating in the health sector, in compliance with laws, regulations and the Code of Ethics of the Association to which it adheres.

### 9- HEALTH & SAFETY

Arrow Diagnostics promotes the spread of a culture of safety and risk awareness in the work environment to guarantee the integrity of its personnel, committing itself to ensuring safe working conditions and respectful of individual dignity.

With this in mind, the Company undertakes, also by ensuring appropriate training for its employees, to comply with the current accident prevention regulations and with the worker safety procedures, always requiring careful, responsible and respectful behavior, in order to contribute to the maintenance of personal and others' safety.

All Recipients are required, within their functions, to participate in the process of risk prevention, environmental protection and protection of health and safety of their colleagues and third parties, always adopting responsible behavior.

### IMPLEMENTATION AND RESPECT OF THE CODE OF ETHICS

This Ethical Code is approved by the Board of Directors of Arrow Diagnostics.

Any changes will take place in the same form.

Communication and formation of the Ethical Code

In order to pursue compliance with the principles set out in this Code, the Company ensures:

- the maximum dissemination and knowledge of this Code
- the interpretation and uniform implementation of this Code
- the carrying out of checks regarding news of violation of this Code and the application of sanctions in case of violation of the same, in compliance with current legislation
- the prevention and repression of any form of retaliation against those who contribute to the implementation of this Code
- the periodic updating of the present Code, according to the needs that occur from time to time, also because of the activities indicated above.

### Disciplinary and sanctioning system

Compliance with the provisions of the Code must be considered as an essential part of the contractual obligations of employees pursuant to and by effect of art. 2104 of the Civil Code. Violations of the rules of the Ethical Code may constitute a breach of the primary obligations of the employment relationship or a disciplinary offense, in compliance with the procedures established by art. 7 of the Workers' Statute, with all legal consequences, included the preservation of the employment relationship and may result in compensation for the damages deriving from them.

The observance of the Code must be considered as an essential part of the contractual obligations assumed by non-subordinate collaborators and / or subjects having business relations with the company. The violation of the rules of the Code may constitute non-fulfillment of

contractual obligations, with all legal consequences, including the suspension of activities and / or termination of the contract and / or the appointment and / or application of penalties and may also entail compensation of the damages deriving from it.

### Supervisory Body

The Arrow Supervisory Body has the task of supervising the implementation and compliance with this Code of Ethics, the Organizational, Management and Control Model pursuant to Legislative Decree 231/2001 and their effectiveness, adequacy and ability to maintain over time the functionality and solidity requirements required by current legislation.

In particular, the Supervisory Body:

- is responsible for expressing opinions regarding ethical issues that may arise in the context of corporate decisions and alleged violations of the Ethical Code referred to it;
- has the task of following the periodic review of the Ethical Code and of its implementation mechanisms also through the presentation of adaptation proposals to the Board of Directors.