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## ETHICAL CODE

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## Mission & Vision

JSB Solutions proposes alternative solutions to **GXP consultancy, CRO Services and Software Solutions in the pharmaceutical and safety sectors**. We assist our clients in managing company compliance in the critical moments and in improving their processes, through the development of software solutions and consulting methods – as well as through the consolidation of peer-to-peer relationships.

Enthusiasm sparks curiosity, curiosity generates innovation, innovation anticipates solutions. We are inspired by a precise objective: to dedicate yesterday's enthusiasm to tomorrow.

## Values & Behaviours

To assist our clients in improving compliance processes and developing IT solutions, we pay particular attention to client **care** and we create mutual **trust** based on respect for the values in each context and **respect** for the internal logic of each organization.

We are able to **empathize** with different companies and their specific needs thanks to our **versatility** and **preparation** that allow us to find the best solutions each and every time.

## Business lines

**JSB Solutions** is a consulting company founded in 2009 in response to a need for advanced services in the pharmaceutical sector. Our aim is to work with companies in the Pharmaceutical, Biotechnological and Advanced Therapies sectors that need to manage their procedures in compliance with Life Science international regulations. Headquarters are in Sesto Fiorentino, Florence and we have an operational office in Parma.

## 1. INTRODUCTION

**JSB Solutions Srl** (hereafter called “JSB” or “the company”) believes that ethics in conducting business is fundamental for company culture, and must be shared by all the men, women, employees, collaborators, partners, consultants and suppliers that work with the company.

This Ethical Code serves to regulate employee conduct in Italy and abroad, with the purpose of spreading and sharing the company’s principles and ethical values.

This Ethical Code is addressed to administrators, employees, collaborators, partners, consultants and suppliers or to anybody that carries out representation functions of the company, under any title (hereafter these subjects will be called “recipients”).

The company considers the Ethical Code a resource that enriches the company so that it can guarantee the harmonious development of all activities as well as maintain and enhance its reputation and credibility toward all stakeholders.

Stakeholders are all those that have an interest in the company and in the activities conducted by the company, such as members, clients, employees, collaborators, suppliers, business partners and consultants.

**JSB** is committed to sharing the present Ethical Code via company communication channels, delivering it to all recipients, requesting approval and providing the necessary training support for its full understanding.

The existence of the Ethical Code and its binding nature should be present in contracts or agreements with collaborators, consultants, partners and suppliers.

## 2. BASIC PRINCIPLES

### 2.1 Compliance with the law

#### *Conducting activities in compliance with the applicable legislation.*

**JSB** rejects any illegal practices and prosecutes, through a sanctioned system, any behaviour against legislation, based on the principles of the following Ethical Code or internal procedures.

Under no circumstances, can pursuing the interest of the company justify behaviour that disrespects existing legislation and does not comply with the following Ethical Code.

Any corruptive practice designed to promise or offer money or any other form of advantage toward public and private subjects in order to promote the company in any way is forbidden.

Accepting money or any other form of advantage from suppliers, consultants or partners in order to offer them a leading position in the company is forbidden.

### 2.2 Orientation and central role of the client

#### *Understanding the relevant market, the expectation and needs of clients and potential clients so as to satisfy them.*

**JSB** is constantly striving to meet customer needs and expectations, with respect to the ethical principles outlined here.

Contractual relationships and communication with clients are based on the following principles: honesty, professionalism, transparency and cooperation in order to find the most suitable solutions to their needs.

### 2.3 Quality and performance

#### *Constantly examining the quality of products, processes and services supplied.*

**JSB** wants to maintain a high level of commitment towards constantly improving performance, with respect to company procedures.

Everybody shall be actively committed to working together to achieve the company's goals.

## **2.4 Integrity, loyalty, honesty and fairness**

***Conforming one's conduct to the ethics of responsibility and the principles of integrity, loyalty, honesty and fairness.***

**JSB** precludes any situations of conflict of interest intended to obtain personal advantage, or contrary to the primary interest of the company's good performance.

Employees must not have any other form of work, collaboration or task, paid or not paid, with company clients or former clients or with other companies, except for cases provided by the established work contract/agreement or previously authorized by General Management.

The person in charge of accounting records is required to record each account in an accurate, complete, truthful and transparent manner and to allow any necessary audits by authorized internal and external parties.

## **2.5 Competition**

***Developing the value of competition through principles of fairness and transparency towards all market operators.***

**JSB** founds its competitiveness on the quality of the services provided and not by discrediting its competitors.

Any form of unfair competition that could potentially damage the position of the company is forbidden.

## **2.6 Confidentiality**

***Maintaining total confidentiality regarding information about the business.***

Using confidential information for purposes unrelated to the business and contrary to the company's interests is forbidden.

Spreading data, information and confidential news that are part of the company's know-how and may damage the company's position with its competitors is forbidden.

## **2.7 Enhancing human resources**

***Promoting the resource's professional development to guarantee personal growth and improvement in group performance.***

Exchanging know-how should be encouraged, as well as actively collaborating, participating in decision making and creating a work place which allows personal fulfilment.

Each person's attitude and behaviour contributes to the creation of a positive and pleasurable work environment.

Any form of discrimination or harassment that is detrimental to a person's dignity is forbidden.

## **2.8 Respecting company assets**

***Respecting and carefully preserving office assets.***

The unorthodox use of company goods and resources is not allowed.

Each employee is directly and personally responsible for the protection and legitimate use of goods and resources entrusted to them to carry out work duties (for example computers, laptops, company cars, mobile phones, etc.).

IT tools must be used within limits and for the sole purpose of carrying out duties, in compliance with established IT security procedures.

### **3. THE SANCTIONING SYSTEM**

The group adopts specific procedures to verify compliance with the rules of conduct in the present Ethical Code.

The severe and persistent violation of the rules of this Ethical Code damages the relationship of trust with the company and can lead to disciplinary actions and compensation for damages, while maintaining respect for procedures provided for by art.7 of L. 300/1970 (Worker's Statute) and the collective labour agreements referred to by the companies.

Compliance with the Ethical Code must be considered an essential part of contractual obligations for employees of JSB Solutions Srl pursuant to and for the purpose of Articles 2014 paragraph 2 of the Italian Civil Code.

For those who work as external collaborators, any conduct contrary to the guidelines set forth in this Ethical Code, may determine according to the specific contractual clauses in one's letter of appointment or agreements, termination of the contractual relationship, subject to any claim for compensation if such behaviour results in actual damage to the group.

All interested parties, both internal and external, are required to report any Ethical Code violations, verbally or in writing (not anonymously), directly to the General Manager, who is responsible for this Ethical Code.