



Communication on Progress

Year: 2019

STATEMENT OF CONTINUED SUPPORT

We hereby confirm our intention to continue to support the 10 principles of the Global Compact.

We joined the Global Compact on 11 January 2006; and we intend to continue to support you since we strongly believe in the principles you set forth.

Hippocrates Research S.r.l.'s commitment is, indeed, perfectly consistent with our corporate policy and with our intention to be an active part of the initiative, and provide all the support that a small business like ours can offer.

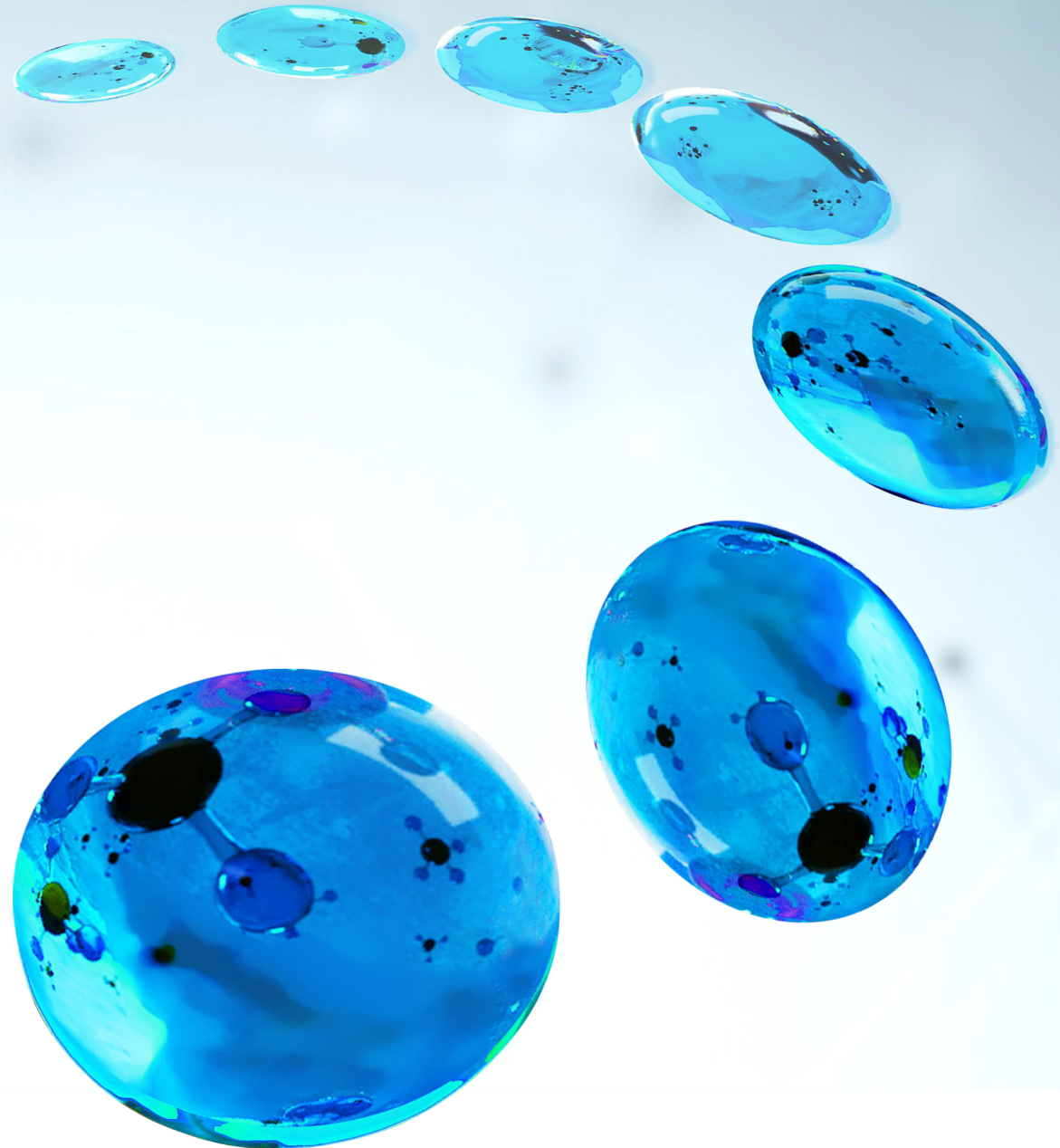
For this reason, as per your request, please find enclosed our COP for the current year (2019). Our COP will provide all our stakeholders with details of our activities and the accomplishments attained by promoting and applying the 10 principles of the Global Compact in which the main current topics are addressed.

Kindest Regards

Dr. Daniele Enotarpi
Legal Representative

Contact: Mrs Paola Mini
Email: global.compact@hippocrates-research.it
Phone: +39010545481 **Fax:** +39010/893.68.56

HIPPOCRATES RESEARCH



Our mission is Customer Satisfaction

Hippocrates Research

If Quality inspires your logic, Customer Satisfaction plays a key role in setting priorities and company policies.

Starting from our Sponsors' needs and relying on a tailored approach we integrate Key Performance Indicators (KPIs) in our workflow management and data management systems in order to completely adapt our structure to the objectives agreed upon with our Sponsors. We have been on the market since 1995 and are still willing to learn from young people because we believe in helping genuine talents to blossom.

Passion and enthusiasm for our work are our two guiding principles.

Hippocrates Research
is a full-service Contract
Research Organization



We have been in the future for twenty years

Here's why you should choose us

Understanding our Sponsors' vision is our starting point and from there we get underway from the selection and identification of a new molecular entity to feasibility and development studies, from Phase I to Phase IV clinical trials.

We operate in 16 countries and 3 continents.

ACCREDITED BY:

EMA

EUDRAVIGILANCE

ENCePP DATABASE

EUROPEAN NETWORK OF CENTRES
FOR PHARMACOEPIDEMIOLOGY AND
PHARMACOVIGILANCE

AIFA

AGENZIA ITALIANA DEL FARMACO
PRESSO IL REGISTRO
CRO – USEROSSC

**ISO 9001:2015
CERTIFIED**



We provide you with excellence

Exclusive services

Key strengths:

- Post-Authorisation Safety Studies (PASS)
- “First-in-Man” studies
- Clinical trials with GPs
- Creation and Management of Registries
- Medical Device Development
- Integrated Marketing Support
- Pharmacovigilance
- Strategic Partnership
- Long Term Archiving®
- Hearings with Regulatory Authorities
- Accreditation of Phase I Centers

Post-Authorisation Safety Studies (PASS):

we turn out to be trial best recruiters at European and international level, often competing with world leading players.

“First in man” studies:

HR has proven experience in managing operative and scientific issues of trials implying “first in man” new chemical entities.

Clinical trials with GPs:

a network of 400 General Practitioners with experience in interventional, regulatory and non-regulatory, observational and epidemiologic trials.

Creation and Management of Registries:

HR has contributed to the creation and management of a number of National Registers for patients with IBD, Lacrimal Dysfunction, Glaucoma, Migraine, Thromboembolism and more.

Medical Device Development:

We have been involved, for years, in the clinical development of Medical Devices of all classes under European Directive a 2007/47/CE.

Integrated Marketing Support:

We manage press conferences, observational and spontaneous trials, CME events, we draw up information material and brochures in support of product.

Pharmacovigilance:

HR is accredited by EudraVigilance. It provides services such as medical reviews, ICRSS data collection, literature reviews, global services, training, etc.

Strategic Partnership:

a broader definition of services includes communication, regulatory, and archiving competences which have been developed with Partners playing leading roles in their fields.

Long Term Archiving®:

HR is a European leader in long term archiving of clinical sites’ trial documents.

Hearings with Regulatory Authorities:

HR promotes and manages hearings and assists Sponsor in hearings with regulatory Authorities.

Accreditation of Phase I Centers:

Support for obtaining accreditation and compliance with the requirements for public health facilities, which carry out phase 1 trials, as set out in AIFA determines June 19, 2015.



A competitive attitude

Competitive edge

Open-ended contract staff

No freelance staff, low staff turnover, average length of service: 7 years.

Financial indexes

Financially reliable according to Basel 2. Bank references and certification available on request.

Professional liability insurance

Limit up to 10.000.000,00 €.

e-CRF

In accordance with the standards laid down in 21 CFR PART 11 FDA

Training and communication

Organization of events, seminars and congresses for trial support.

Pharmacovigilance

Accredited by EudraVigilance (EMA).

**Wherever the art of Medicine is loved,
there is also a love of Humanity.**

(Hippocrates, c. 460-370 BC)



PRINCIPLE 1**BUSINESS SHOULD SUPPORT AND RESPECT THE PROTECTION OF INTERNATIONALLY PROCLAIMED HUMAN RIGHTS****Actions realized**

HR considers its employees to be one of the indispensable factors for company development, for this reason we foster growth and professional development. The main objective is to increase the professional competencies of individual employees, in respect of existing applicable law, of personal rights and freedoms and in compliance with National Collective Labor Contracts (CCNL).

These principles, together with the safeguard of human rights, are implemented within all of our activities by upholding and applying the principles of the Declaration of Helsinki (1964 and subsequent revisions) as they apply to clinical research of medicinal products on human subjects, as well as the principles of the Universal Declaration of Human Rights adopted by the General Assembly of the United Nations in 1948.

Workplace safety and the safeguard of employee health are regularly monitored. The instruments to carry out this control are:

- ❖ Maintaining a healthy workplace by means of a yearly control of the premises and of workstations performed by the company physician.
- ❖ Issuing the Unified Document of Risk Assessment (DUVRI, Documento Unico di Valutazione dei Rischi) as mandated by existing applicable law
- ❖ Periodical evaluation of work related stress in order to prevent any form of harassing or mobbing
- ❖ Training specific staff members to be in charge of managing First Aid emergencies and Fire prevention. The staff members so appointed will periodically attend update courses
- ❖ Training of each employee by means of a specific “Course for Worker safety” (divided into a general and a specific module) at the end of which the actual level of learning of general safety rules is tested
- ❖ Enrollment of the company in the Fondo Est healthcare plan (supplementary healthcare assistance plan that provides healthcare coverage for all employees).
- ❖ Possibility of working from home, for individuals with specific needs, with a view to improving flexibility, collaboration and autonomy of personnel.

Hippocrates Research commits moreover to protecting the privacy of in-house Recipients and of Third-Party Recipients in compliance with existing applicable law, so as to avoid communicating or divulging personal data without the assent of the concerned party.

The Company, in conformity with existing applicable law and even subsequently to the cessation of the work relationship, complies with confidentiality in processing data, news and information that should come to its knowledge, and shall not divulge said data, news and information or use them for speculation purposes, on its own account or that of third parties.

Confidential information may be divulged within the company only to staff members who actually need it for work-related reasons.

The collection, processing, and the storage of personal information and data of subjects whose data are in the possession of the Company shall occur in compliance with procedures specifically established to prevent unauthorized persons or entities from gaining knowledge thereof.

Measurement of (expected) outcomes and value added for our company

None of the following events have ever been recorded at Hippocrates Research:

- Disciplinary measures
- Complaints by employees
- Cases of forced work and/or compulsory work or child labor.

The commitment for the future is to make all efforts necessary to guarantee a healthy and safe workplace by adopting the most appropriate measures to avoid risks related to performance of its corporate activities.

PRINCIPLE 2	BUSINESS SHOULD ENSURE THAT THEY ARE NOT COMPLICIT IN HUMAN RIGHTS ABUSES
Actions realized	
<p>We consider this control to be a part of our routine processes; all the staff, as well as the external collaborators and/or suppliers, must comply with existing applicable laws and rules. HR establishes work relationships only with partners who comply with the aforesaid principles.</p> <p>To this end, our Ethics Code extensively describes our corporate policy concerning safeguard and protection of Human Rights, providing directives for a clear management thereof.</p> <p>More specifically, as regards suppliers, HR does verify that suppliers adopt approaches that are effective and compliant with the aforesaid principles, mainly by means of identification procedures and periodical evaluation, a violation reporting system, a penalty system and by means of a dialogue with concerned parties. Moreover, a specific list of “Qualified suppliers” (SOP 030-M001) has been created. Any default by suppliers in meeting the indispensable requisites would entail issuing a Nonconformity (NC) note.</p>	
Measurement of (expected) outcomes and value added for our company	
<p>Hippocrates Research acknowledges the need to protect all forms of individual freedom. It rejects any expression of violence, especially if aiming at limiting personal freedom, as well as any personal discrimination.</p> <p>We commit therefore to fostering, within our activities and with our collaborators, the respect of same principles by constantly raising awareness so that those who work with us are aware of our policies concerning human rights and the due and proper upholding of the ten UN Global Compact principles.</p> <p>As regards suppliers, HR periodically performs an analysis of any Nonconformities detected. The data arising from this evaluation are notified to the process leaders and to the Management, and are used to instigate a Review by the Management</p>	

PRINCIPLE 3

BUSINESS SHOULD UPHOLD THE FREEDOM OF ASSOCIATION AND THE EFFECTIVE RECOGNITION OF THE RIGHT TO COLLECTIVE BARGAINING

Actions realized

Hippocrates Research guarantees freedom of association. Employees are allowed to:

- ❖ Freely express their beliefs,
- ❖ Join associations
- ❖ Carry out trade union activities

The company maintains a constant dialogue with all its employees and collaborators, is concerned as to their well-being, safety, and is mindful of the needs of its employees. Special attention is moreover focused on preventing any interferences or attacks to the privacy of our personnel.

Measurement of (expected) outcomes and value added for our company

The working conditions guaranteed by Hippocrates Research to all its employees are in conformity with the standards mandated by the industry's collective contracts and with the applicable provisions of law.

The Company not only upholds freedom of association and trade union rights but ensures conformity with all relevant provisions established by law and by national agreements.

All employees are guaranteed the right to freely form and join organizations, institutions, committees and associations, in order to ensure and maintain company growth and competitiveness. Moreover, periodical meetings of employees with trade union representatives who provide information concerning contracts and the law are allowed.

PRINCIPLE 4**BUSINESS SHOULD ENSURE THE ELIMINATION OF ALL FORMS OF FORCED AND COMPULSORY LABOUR****Actions realized**

All of our employees work under a permanent employment agreement in conformity with the specific CCNL collective national labor contract. Badge in and badge out times are flexible. In addition, to meet the needs of employees, personalized work hours were agreed upon based on individual needs.

It is HR's firm belief that the success of the company is the result of the activities of its people and this holds true in direct proportion to the degree of employee satisfaction. As they spend a significant portion of their days at the workplace, it is important for employees that there be a collaborative, calm and familiar atmosphere. A flexible work schedule should be a "must" in any modern company, since rigid work hours lead to distrust between the company and employees and impact efficiency and productivity. Flexible work hours are thus underpinned by a fiduciary relationship between the Management and collaborators. This element, together with the possibility of part-time work, the possibility of later entry or early exit from work for parents who have younger children, the possibility of a shorter workday on Fridays having had shorter lunch breaks on preceding days, etc., all are part of and progressive and democratic environment in which the flow of information aims at fostering the production chain, which in its turn leads to client satisfaction and good publicity for the company itself, as well as to the possibility of extension and development. This should be a parameter of the Company's good "health", as well as being an indicator of the efficiency of employees.

Hippocrates Research has always been unfailingly committed to:

- Reporting, and refraining from using child labor;
- Opposing any form of duress in the workplace; guaranteeing health and safety of its employees, in full compliance with existing applicable rules and laws;
- Guaranteeing the freedom to join union associations;
- Avoiding any form of discrimination against any employee;
- Establishing work hours in compliance with national law requirements;
- Establishing wages in compliance with the National Collective Labor Contract (CCNL, Contratto Collettivo Nazionale di Lavoro).

Measurement of (expected) outcomes and value added for our company

Hippocrates Research abides by the rules set forth by the National Collective Labor Contract, and pays its employees wages that are consistent with said agreements, and shall continue to explore other methods to increase the involvement of employees in pursuing company objectives.

PRINCIPLE 5

BUSINESS SHOULD ENSURE THE EFFECTIVE ABOLITION OF CHILD LABOUR

Global market companies such as ours must commit to supporting and promoting human rights, taking a firm stand against any kind of abuse or harassment, especially towards minors.
HR resolutely opposes these major issues and raises awareness concerning these issues with its employees and all subjects who collaborate with our Company.

Measurement of (expected) outcomes and value added for our company

Hippocrates Research commits to, and shall continue to do so in the future, fighting against exploitation of child labor and other forms of duress against its employees and all individuals.

PRINCIPLE 6**BUSINESS SHOULD ENSURE THE ELIMINATION OF DISCRIMINATION IN RESPECT OF EMPLOYMENT AND OCCUPATION****Actions realized**

Even though ethical and technological progress has brought about positive societal changes, many workers continue to experience discrimination in the workplace, with dramatic social and financial consequences. Direct and indirect discrimination indeed fosters distrust and social tension, effectively hinders global development, and is in violation of the provisions of art. 21 of Charter of Fundamental Rights of the European Union.

As it supports the aforesaid principles, HR condemns all forms of discrimination, and stipulates employment agreements in conformity with the CCNL (National Collective Labor Contract) and with principles of lawfulness, correctness and transparency. HR commits to guaranteeing that each staff member is treated equitably and that disability, race, gender, sexual orientation, marital status, nationality, religion work conditions, age or affiliation or not to a trade union do not factor in any employee evaluation.

This means that no person is penalized for one of the reasons listed above. HR employees must treat other people in an equitable and prejudice free manner, must value and respect other people ensuring that nobody be harassed, victimized or experience mobbing on the workplace. Each employee must moreover foster a work environment where everybody is free to report any harassment or privileges without this causing them any prejudice .

In contrast to the persistent and widespread nature of gender discrimination, HR's organization workforce shows a marked prevalence of women.

Measurement of (expected) outcomes and value added for our company

HR avoids any discrimination-based policies as regards selection criteria or wages between male and female personnel, Likewise, there is no treatment disparity for personnel belonging to legally protected categories.

Hippocrates Research, whose workforce has always included employees of different ethnicities - from Countries such as Bosnia Herzegovina, China, Spain and Sweden - promotes integration by maintaining this approach based on openness.

Our aim is to ensure that HR continues to be a company where employees may pursue opportunities for success, whatever their background of provenance. Our target is to incentivize talent and the potential of all our personnel, and therefore we foster diversity and tolerance so that different cultures may prosper, thus enriching and contributing experience to our company.

PRINCIPLE 7**BUSINESS SHOULD SUPPORT A PRECAUTIONARY APPROACH TO ENVIRONMENTAL CHALLENGES****Actions realized**

Hippocrates Research acknowledges the fundamental role that the protection of the environment plays in ensuring a consistent and balanced pursuit of growth; therefore HR commits to protecting the environment and to contributing to a sustainable development of local areas, also by using the best available technology and by constantly monitoring company processes, as well as by identifying industrial solutions that have the lowest environmental impact.

All of Hippocrates research activities are conducted therefore in conformity with existing applicable environmental law provisions. The pursuit of company interest is never justified if it entails or might entail a willful or unintentional violation of these rules.

Our objective is to maintain low energy consumption or, if possible and better yet, to decrease energy consumption for all activities. Therefore, particular attention is focused on:

- Purchasing efficiency class A products
- Periodically performing the correct maintenance of all work related equipment
- Preferring reusable rather than single use products;
- Encouraging employees to drink the free of charge water from the water coolers available in the office to limit the use of plastic bottles;
- Providing special water bottles to decrease the use of plastic cups
- Preferring eco-friendly products, such as recycled paper for printer;
- Using the double-sided printing modality;
- Informing and training personnel as regards compliance with recycling rules for waste materials in the company.
- Using energy-saving light bulbs
- Monitoring the rational use of air conditioning, in accordance with actual well-being requirements within the workplace.

Measurement of (expected) outcomes and value added for our company

The objective of our Company is to constantly strive to limit energy consumption. To this end, an employee is appointed to verify, at the end of the work day, that all electric and electronic equipment has been effectively turned off so as to avoid wasting energy because of equipment being in standby mode.

Moreover, the use of public transportation (for instance trains instead of cars) for work related transfers is incentivized, in order to significantly decrease the impact of CO2 emission.

PRINCIPLE 8	BUSINESS SHOULD UNDERTAKE INITIATIVES TO PROMOTE GREATER ENVIRONMENTAL RESPONSIBILITY
PRINCIPLE 9	BUSINESS SHOULD ENCOURAGE THE DEVELOPMENT AND DIFFUSION OF ENVIRONMENTALLY FRIENDLY TECHNOLOGIES
Actions realized	
<p>Striving to decrease environmental impact motivates each HR employee to conscientiously and rationally use resources and energy, restricting consumption of paper, batteries and printer toners.</p> <p>As regards the purchase of paper, our Company has for the past few years privileged sustainably manufactured paper.</p> <p>To raise awareness amongst collaborators, employees, suppliers, clients, Public Administration officials, all of our email messages include at the end the sentence <i>“Please consider the environment before printing”</i>, inviting recipients to reflect on whether it is actually necessary to print it out.</p> <p>Specific bins for waste recycling are placed in each of the offices and are used by all of the staff, including external collaborators, and clients who have been appropriately encouraged to recycle.</p> <p>Batteries are used mainly for keyboards and wireless mouse and their use has been decreased and is limited to only contingent work situations. Exhausted batteries are disposed of in special containers for recovery in conformity with existing applicable law.</p> <p>The disposal of toner cartridges is instead entrusted to a company specialized in recovery of cartridges.</p> <p>In conducting work activities, the consumption of energy and of paper are high environmental impact factors, as they are closely correlated to CO2 emissions, water consumption and deforestation.</p> <p>In order to decrease the amount of hardcopy documentation, HR has designed an efficient document sharing system by connecting each workstation to the internal company server, where all files are shared. This system allows to consult and update documents without having to print or fax them, thus significantly decreasing paper consumption.</p> <p>We wish to point out, with respect thereto, that as of 01 January 2019 HR is in compliance with the existing law that mandates the use of electronic invoicing.</p> <p>Notwithstanding its commitment to limiting their use, HR’s business activity does in any case require printers and photocopiers. For this reason, our Company uses only equipment that has the “energy-saving” mode when not in use, and said equipment is always turned completely off when the offices are closed.</p>	
Measurement of (expected) outcomes and value added for our company	
<p>In order to be able to decrease paper consumption as much as possible, Hippocrates research encourages its partners to archive documents electronically whenever possible. As regards paper usage at our offices, we privilege suppliers who allow us to purchase sustainably manufactured paper bearing the FSC certification (Forest Stewardship Council). This certification guarantees that the forests from which that paper derives are managed sustainably, and that the paper itself is totally chlorine-free (TCF).</p> <p>HR will continue in the future to uphold with ever-increasing attention its commitment to recycle batteries and toner cartridges and shall continue to implement separate waste collection for recycling (plastic, compost and landfill waste) using specific containers as it has been doing for many years. The Management of our Company has always privileged low environmental impact innovative technologies, to guarantee actual energy-saving, and shall maintain investments to decrease consumption of nonrenewable natural resources.</p> <p>Therefore, our aim is to continue promoting the electronic archiving of documents in order to further decrease the use of paper and printer toners.</p>	

PRINCIPLE 10**BUSINESS SHOULD WORK AGAINST CORRUPTION IN ALL ITS FORMS, INCLUDING EXTORTION AND BRIBERY****Actions realized**

One of the main principles upheld by Hippocrates Research is the transparency of its commercial transactions. For this reason we oppose money laundering and handling of stolen goods. Commercial transactions with contractual parties, even if the latter are part of the same Group, are therefore mandatorily subject to: upholding and compliance with principles of correctness, transparency and good faith. The Company thus adopts all of the instruments and measures that are appropriate to guarantee transparency and correctness. More specifically, the following fulfillments are mandatory:

- Appointments assigned to vendors or to natural persons are to be stipulated in writing, indicating the contents and the agreed-upon financial conditions;
- The relevant functions shall verify regularity of payments to all parties, even by verifying that the subject to whom the order has been made out and the subject to receives the payments are one and the same;
- Financial flows concerning relationships (payment/infra-group operations) with the companies of the Group be controlled;
- The criteria to assess offers are to be established;
- All necessary information concerning commercial or professional reliability of suppliers and partners must be requested and obtained;
- The utmost transparency must be guaranteed with respect to stipulation of any understandings concerning investments.

Hippocrates Research firmly opposes and rejects any type of national or transnational criminal organization, and adopts all measures that are appropriate to prevent the risk of an involvement of the company or of its employees in relationships and any type of activity with such organizations, whatever the purpose or modality.

To this end, no work or collaboration-related or commercial relationships are established with subjects – whether natural or legal persons –directly or indirectly involved in criminal organizations or are in any case bound by kinship or any relationship with subjects known to belong to criminal organizations, and similarly no activity that may be linked to such organizations is funded or facilitated.

HR acts in conformity with, and fully upholds the Italian laws which prohibit paying, offering or promising monies and/or valuable goods/services, either directly or indirectly, to officials of the Public Administration, for purposes of influencing an official act or securing an advantage for the Company’s business. The Company strives to cause all collaborators, employees, consultants, suppliers and clients to act in compliance with existing applicable law, as well as in respect of principles of transparency, verifiability, consistency and congruity.

When working for HR, all commercial Partners and subjects acting on behalf thereof are thus obligated to be aware of the extent to which laws, regulations or local operating procedures do establish limits, restrictions or transparency requirements for actions and the activities that entail payments, financial support, donations or gifts to public officials. Subjects who act on behalf of HR must take into account and respect such limits, restrictions and transparency requirements when performing activities in name, on behalf of, or in the interest of the Company. In conducting any negotiation and activity, our Company has always effectively avoided situations in which the subjects involved in the negotiations might have or appear to have a conflict of interest.

Measurement of (expected) outcomes and value added for our company

To uphold the principles of lawfulness, correctness and transparency, the Hippocrates Research Management adopts organization and management models that set forth measures to prevent any unlawful conduct.

For a correct and transparent management of relationships with institutions, policymakers and employees of Public Administrations, HR does submit specific documentation in support of any previous or ongoing activity in order to eliminate any potential risk of conflict of interest.

In order to optimize management and control methods, HR regularly updates its technology and IT systems so as allow for the real-time search and tracking of documents and information.

HR has moreover created a Company ethical code, which is periodically updated and disseminated to its personnel. This official document sets forth all the rights, obligations and responsibilities of the Company towards all its stakeholders (i.e., employees, vendors, clients, Public Administration), and intends to incentivize, promote, or prohibit specific conducts, in addition to and independently from the provisions of law.