



Communication on Progress

Year: 2020

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 (2020). 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

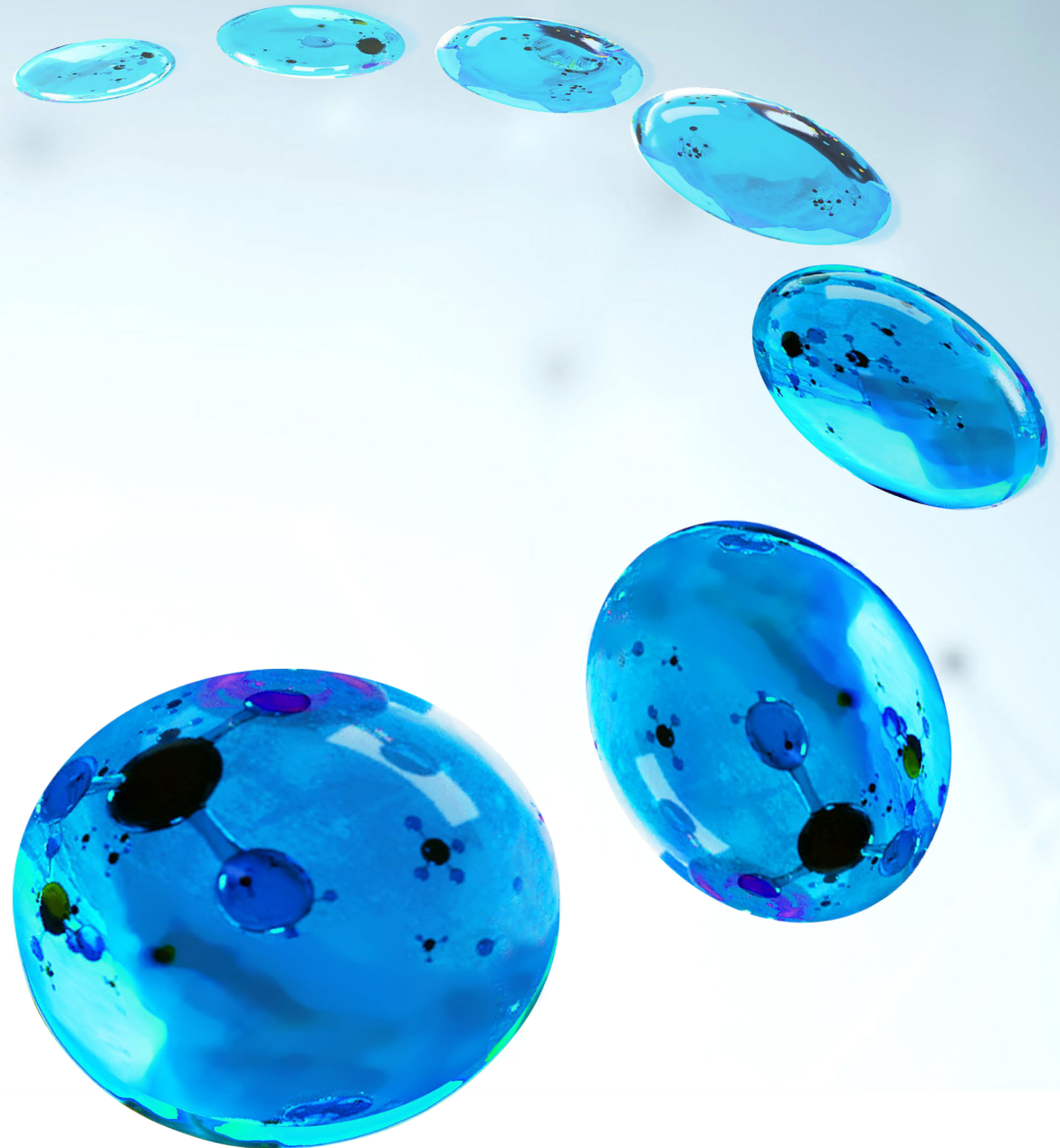
Contact: Mrs Paola Mini

Email: global.compact@hippocrates-research.it

Phone: +39010545481

Fax to mail : +390108936856

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**

The development of human resources is one of the main cornerstones of company growth.

This is the reason why in HR we foster and respect the universally recognized human rights, as it is our belief that protecting the growth and professional development of individuals is not only a winning strategy for us but also a genuine source of growth for the entire company. Because of this, in our Company, employees are not just workers performing tasks but also persons who play an important role in the related decision-making processes and actively take part in resolving issues.

Bolstering the professional competencies of individual workers, in respect of existing applicable law and of the rights of individual personalities as well as in compliance with national collective labor laws (CCNL), thus represents the means to achieve this ambitious goal.

Because our vision puts individuals at the center of the company's development, it is especially important to provide our employees with a healthy and safe workplace. To this end, our company physician regularly verifies workplace compliance with the necessary ergonomics requirements and with the spatial requisites set forth by law decree 81/2008, and that in these times of pandemic emergency, the necessary hygiene and well-being standards are maintained in the office premises.

In times of uncertainties due to the COVID-19 pandemic, we believe that it is necessary to implement the following safety procedures:

- ramping up the company's digital transformation by activating the "smart work" modality for all our employees, starting from the first day of lockdown.
- ensuring regular updates of competencies by means of high level distance learning activities, that may be accessed via a specifically created platform.
- stipulating for our personnel a special insurance policy that includes medical care and financial support.
- sanitization of the premises, distribution of disinfectant hand soap, disinfectant sprays for restrooms and workplaces.
- providing personnel with FFP2 masks, gloves and protective eye gear.
- providing our employees with the option to undergo NHS -approved swabs and serology tests to detect the presence of anti-COVID-19 antibodies
- ensuring that employees and any guests visiting the premises have access to any measure against COVID-19 that has been implemented, avoiding any form of discrimination
- preparing a special protocol setting forth the safety measures implemented.
- setting up a Committee for application and verification of the rules of the above protocol in addition to the normal controls which were already being regularly performed.
- providing employees with timely information, upon consent of the concerned parties, of any potential source of contagion to which they may have been exposed, providing an explicit communication (name of the employee with a positive swab or with high risk exposure status) if the latter gives his/her consent, or if the employee prefers his/her identity not to be divulged, anonymously – to the extent it is possible –in the understanding that our priority is to adequately informing our employees of any risk of contagion

To further guarantee the foregoing, Hippocrates Research has appointed a DPO (Data Protection Officer) in January 2021 to perform the following tasks: education, training, consultation and surveillance of fulfillment of privacy obligations. Our Company policy indeed contemplates the protection 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, as per existing applicable law and even after 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

In order to avoid ever being, albeit indirectly, complicit in human right abuses, our normal processes mandate the preventive and periodical verification of external collaborators and/or suppliers. Indeed, they and our entire staff must mandatorily conform to existing applicable human rights laws and rules.

Hippocrates Research establishes work relationships only with partners who abide by the principles indicated above, and moreover refrains from establishing relationships of any kind, even if indirectly or through a third party, with subjects (natural or legal persons) who are known to or suspected of being part of or carrying out activities that in Italy or other countries support in any way criminal organizations of any nature involved in human trafficking or exploitation of children labor or arm trafficking. To this end, the integrity of suppliers and their respect of human rights are verified by means of identification procedures and periodical evaluation that includes a violation reporting system, a penalty system and 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.

Our Conduct Code exhaustively describes our policy concerning safeguarding protection of Human Rights together with clear directives for management of these issues.

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

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.

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.

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

PRINCIPLE 3

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

Actions realized

Hippocrates Research does not favor or discriminate, either directly or indirectly, any political or trade union organization and ensures that employees enjoy freedom of association. Moreover, the company refrains from providing any contribution, whether direct or indirect and in any form, to political parties, movements, committees and organizations.

Employees may freely express their beliefs, join associations and/or carry out union activities. The company's concern is the well-being and safety of each employee and collaborator, and for this reason maintains a constant dialogue with them, focusing on each individual's requests and preventing any interferences with or attacks to our personnel's privacy. In this respect, the update courses regularly attended by employees include also periodical information sessions on the rights of workers held by representatives of several trade unions.

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 persons who are part of it, 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 therefore guarantees the physical and moral integrity of employees, work conditions that ensure the dignity of each individual and the respect of conduct and good manners rules, and ensures that the workplace is safe and healthy, rejecting any sort of discrimination or work exploitation. Moreover, the Company attributes the utmost importance to safeguarding minors and repressing any behavior of exploitation or crimes of any nature to which they may be subjected.

HR resolutely opposes these major issues and raises awareness concerning these issues with its employees and all subjects who collaborate with our Company.

This year, and notably in this pandemic emergency, HR has spontaneously gave a charitable donation to the “Giannina Gaslini Childrens’ Hospital”.

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 based on age, gender, background, education, nationality, religion, physical appearance and sexual orientation, 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 the Charter of Fundamental Rights of the European Union.

As it supports the aforesaid principles, HR condemns all forms of discrimination, starting from the selection process that is indeed conducted in respect of equal opportunities and without any discrimination with reference to the candidates personal life and opinions. During the evaluation process, Hippocrates Research verifies that persons hired match the profiles required based on the Company's needs, avoiding favoritism or privileges, and the choice is exclusively based on criteria of professionalism. The information requested during the selection phase therefore ensure respect of the candidate's privacy and opinions, in respect of equal opportunities for all subjects involved, and are strictly linked to the ratification of the characteristics set forth in the professional role needed.

At the time of hiring, HR and employees enter into a work contract that conforms to the CCNL (National Collective Labor Contract) Contratto Collettivo Nazionale del Lavoro) and respects principles of lawfulness, correctness and transparency; disability, race, gender, sexual orientation, marital status, nationality, religion work conditions, age or affiliation to a trade union do not factor in any employee evaluation.

This means that no person is penalized for any 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 communities, 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 printers;
- Using the double-sided printing modality;
- Informing and training personnel as regards compliance with recycling rules for waste materials in the company.
- Disposing of exhausted toners, ink cartridges and similar articles through qualified vendors;
- Using energy-saving light bulbs
- Monitoring the rational use of air conditioning, in accordance with actual well-being requirements within the workplace.
- Because of the COVID-19 emergency, HR promotes and encourages smart working, decreasing the impact that travel has on the environment, especially during rush hours, and significantly decreasing CO2 emissions.
- In such a context, employees who do smart working are invited to adopt energy-saving policies also at their own homes.

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

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.

As regards the purchase of **paper**, our Company has for the past few years privileged sustainably manufactured paper.

To raise awareness amongst collaborators, employees, suppliers, clients, Public Administration officials, all of our email messages include at the end the sentence *"Please consider the environment before printing"*, inviting recipients to reflect on whether it is actually necessary to print it out.

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.

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.

The disposal of toner cartridges is instead entrusted to a company specialized in recovery of cartridges.

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.

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.

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.

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.

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

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).

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.

Therefore, our aim is to continue promoting the electronic archiving of documents in order to further decrease the use of paper and printer toners.

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

HR has always stated its commitment to the fight against corruption. One of our cornerstone principles is indeed transparency in commercial transactions. We therefore firmly condemn any money laundering and receipt stolen goods. Commercial transactions with contractual parties, even those belonging to the same group, are mandatorily subject to: guaranteeing compliance with principles of correctness, transparency and good faith. In order to guarantee the foregoing, the Company verifies that:

- Appointments assigned to vendors, whether corporate or natural persons, are to be stipulated in writing, indicating the contents and the financial conditions agreed upon; the competent functions control regularity of payments made to all parties, also by verifying that the subject to whom payment order is made out matches the subject receiving related sums;
- The financial flow regarding the relationships with the companies of the Group (infragroup payments/operations) is 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;
- in case agreements are stipulated for investments, the utmost transparency be guaranteed.
- In this period of pandemic emergency, ethically distributed/sold personal protection products and devices are to be preferred, thus discouraging corruption in all its forms including above market prices or inadequate packaging that would impact efficacy;
- consolidation of procedures prevent corruptions and that might involve the company, with particular focus on the areas of greater risk and vulnerability;
- a climate of neutral collaboration and trust be maintained within the organization, fostering integrity of action and transparency of communication at all corporate levels

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 thus 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.