# SUPPLIER CODE OF ETHICS

NAMED GROUP

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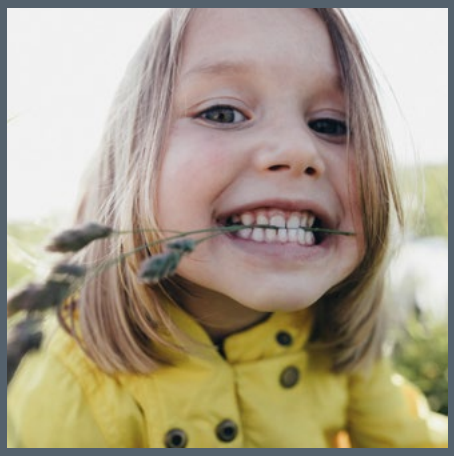
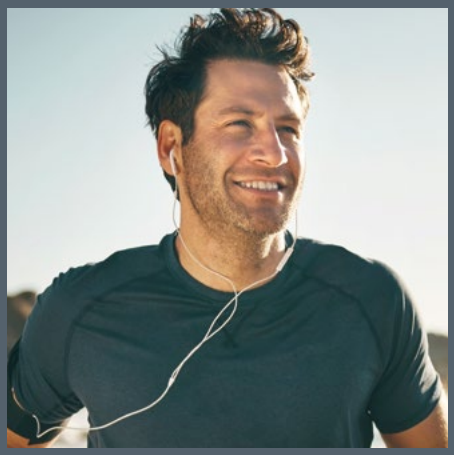




## INTRODUCTION

**NAMED GROUP** is the leading natural health company in Italy, formed by the union of Italian companies Specchiasol, Named, Phyto Garda, Wellmicro, Farma-Derma, Namedsport, INCO, and LIFe-Laboratorio Italiano Fermentati. The Group focuses on research, development, production, promotion, and commercialization of nutraceuticals, sports nutrition supplements, ketogenic diet products, cosmetics, medical devices, molecular microbiome analysis kits, and naturally fermented foods.

**NAMED GROUP** combines tradition, passion, and innovation to provide people with safe and effective solutions for taking care of their health and maximizing their natural potential at every stage of life.

To ensure the highest standards for individuals and health professionals who rely on us daily, **NAMED GROUP** operates transparently and in full compliance with applicable laws and regulations, rejecting all forms of exploitation, corruption, fraud, and unfair competition. Additionally, NAMED GROUP considers respect for labor and diversity as fundamental values to be upheld in its business activities. These values form the foundation of an ethical and sustainable business model.

## 1 WHY A SUPPLIER CODE OF ETHICS?

Essential to **NAMED GROUP**'s success are its suppliers, who allow us to take care of people by developing safe and increasingly precise solutions for every need. This Supplier Code of Ethics was developed to foster an ethical business model based on respect for human and environmental rights, recognizing that this goal can only be achieved through shared commitment.

**NAMED GROUP** builds supplier relationships on transparency, mutual trust, and shared core values. We believe this Code of Ethics will serve as a reference point for developing new business relationships and strengthening existing ones.

## 2 WHO ARE THE RECIPIENTS?

This Code of Ethics applies to all suppliers of companies within **NAMED GROUP**, whether providing raw materials, finished products, or services. These suppliers must ensure compliance with this Code among their employees, internal and external collaborators, subcontractors, and any other parties involved in **NAMED GROUP**'s supply chain.

## 3 PRINCIPLES AND RULES OF CONDUCT

### 3.1. ETHICS AND COMPLIANCE WITH THE LAW

**NAMED GROUP**'s growth is guided by ethical and moral standards, along with honesty, transparency, and responsibility, which are key to the company's integrity. Since acting with strong ethics is a priority for **NAMED GROUP**, all suppliers are required to act in compliance with the legal provisions and regulations applicable to them according to the sector in which they operate, as well as the commitments made with the Group.

#### 3.1.1. LEGISLATIVE DECREE 231/2001 AND SUBSEQUENT INTEGRATIONS

All companies belonging to **NAMED GROUP** adopt their own Organization, Management, and Control Model pursuant to Legislative Decree 231/2001, which can be consulted on each company's official website. Additionally, the Group has its own Code of Ethics, available for consultation at www.namedgroup.com.

**NAMED GROUP** therefore requires each supplier, in the context of their business relationships with the companies within NAMED GROUP, to adhere to the principles of the Model, comply with the provisions of the Group's Code of Ethics and this Supplier Code of Ethics, and refrain from any conduct or behavior that could constitute an offense under Legislative Decree No. 231/2001 (and subsequent amendments).

In this context, suppliers are required to pay particular attention to compliance with the applicable regulations concerning **money laundering, self-laundering, and private-to-private corruption (I), as well as fraud in commerce and crimes against industry and commerce (II),** identified as risk areas in the sector. Specifically, (I) suppliers are required to manage payment methods transparently (timing, origin of financial flows, etc.) and ensure regularity in issuing invoices; and (II) certify the origin of supplied goods to guarantee product quality and prevent offenses related to the importation and sale of counterfeit products and receiving stolen goods.

Furthermore, suppliers must report to NAMED GROUP the existence of any potential and/or actual conflicts of interest with the companies within the Group. The term "conflict of interest" refers to any situation in which a supplier's interest of any nature (family ties, business relationships, professional relationships, personal relationships, or other) interferes, may interfere, or is in any way in conflict with the interests of NAMED GROUP.

#### 3.1.2. UNFAIR COMPETITION

For NAMED GROUP, fair and sustainable competition is a tool to improve the quality of the products and services offered. NAMED GROUP ensures compliance with competition laws in the markets in which it operates, refraining from collusive behavior and abuse of a dominant position. NAMED GROUP prohibits the collection of information about competitors through illegal or unethical means.

In light of these principles and values, NAMED GROUP requires its suppliers to comply with applicable competition laws and to adopt behaviors characterized by good faith, integrity, and ethics, including in the awarding of supply contracts.

### 3.1.3. HEALTH AND SAFETY IN THE WORKPLACE

**NAMED GROUP** safeguards the health and safety of the employees of each company within the Group and considers compliance with applicable laws and regulations essential for building an ethical and responsible supply chain.

Therefore, all suppliers are required to comply with labor laws and workplace health and safety regulations, paying particular attention to industry-specific regulations relevant to their sector. Each supplier must also ensure that these regulations are respected by their internal and external collaborators, subcontractors, and any other parties involved in **NAMED GROUP**'s supply chain.

**NAMED GROUP** reserves the right to conduct periodic inspections at supplier facilities to verify effective compliance with current workplace health and safety regulations.

### 3.1.4. REGULAR WORK CONDITIONS

As part of creating an ethical and sustainable supply chain, **NAMED GROUP** pays particular attention to the working conditions of its employees.

For this reason, each Group supplier is required to hire its employees and collaborators (both internal and external) under a formal written contract that fully complies with all provisions of national and industry collective agreements. Each supplier is also responsible for verifying that these rules are followed by their subcontractors and any other entities that may be part of **NAMED GROUP**'s supply chain.

### 3.1.5. PROHIBITION OF WORKER EXPLOITATION

**NAMED GROUP** condemns all forms of labor exploitation, strictly prohibiting its suppliers, as well as their collaborators and subcontractors, from engaging in unfair practices that violate workers' dignity. This prohibition is a fundamental and non-negotiable element of **NAMED GROUP**'s supply relationships.

The commission of even a single offense related to labor exploitation and forced labor—particularly illegal labor intermediation and worker exploitation ("caporalato")—grants each company within the Group the right to immediately terminate any relationship with the supplier.

### 3.1.6. PROHIBITION OF CHILD LABOR

**NAMED GROUP** respects children's rights to safeguard their growth and proper, harmonious development as individuals, condemning all forms of exploitation and illegal child labor. Therefore, all **NAMED GROUP** suppliers are required to refrain from any form of child labor in accordance with applicable regulations. Specifically, except for legally permitted exceptions such as school-to-work programs, no minor may be employed by the Group's suppliers unless they have completed mandatory schooling and are at least 16 years old.

Suppliers must also ensure that this prohibition on child labor is respected by their subcontractors as well as by collaborators of any kind, both internal and external.

### 3.1.7. PERSONAL DATA PROTECTION

Suppliers must ensure full compliance with personal data protection regulations, committing to implementing appropriate technical and organizational measures to guarantee a security level adequate to the risk.

## 3.2. RESPECT FOR HUMAN RIGHTS

Respect for human rights is a fundamental principle for **NAMED GROUP**, both regarding employees and collaborators as well as consumers who rely on us. All **NAMED GROUP** suppliers are required to uphold human rights and are encouraged to adopt and promote internal mechanisms that allow their employees to report suspected violations in this regard.

### 3.2.1. INCLUSIVITY

The contamination of different experiences and backgrounds, and the creation of a shared and inclusive environment where everyone has equal opportunities, are the key to **NAMED GROUP**'s success.

**NAMED GROUP** believes that the diversity of each of its employees and collaborators contributes to the excellence of its products. For this reason, **NAMED GROUP** encourages its suppliers to create an inclusive and dynamic working environment where each employee is valued for their skills, and where age, gender, sexual orientation, and religious diversity are considered an asset, not an obstacle.

## 3.3. ENVIRONMENTAL SAFEGUARDING AND RESPECT

**NAMED GROUP** is actively committed to ensuring that its products and their production process are environmentally respectful, considering the environment as a common resource to be safeguarded. In this context, the Company is dedicated to minimizing the negative environmental impact of its products and services throughout their entire life cycle.

With the goal of creating a sustainable supply chain, **NAMED GROUP** requires all its suppliers to make a real and constant commitment to the implementation of product and service supply processes that are increasingly respectful of the natural environment and the ecosystems in which they operate; particularly through the adoption of internal policies that ensure:

- Efficient use of natural resources;
- Preference for energy from renewable sources;
- Proper waste disposal, particularly concerning the production supply chain;
- Reduction of greenhouse gas emissions.

All suppliers are also required to comply with current legislation regarding the protection and prevention of environmental crimes, as well as adhere to regulations on the management of both hazardous and non-hazardous waste, water withdrawals, and discharges.

## 3.4. QUALITY AND TRACEABILITY

**NAMED GROUP** constantly works to offer safe products that meet the highest quality standards. For this reason, the Group pays the utmost attention to the safety and traceability of the raw materials and components used in the supply processes.

All Group suppliers are required to ensure the traceability of both raw materials and finished products and to comply with national and European regulations applicable to the category of product manufactured (e.g., REGULATION (EU) 2017/745).

Suppliers of raw materials and finished products are also committed to closely monitoring the production processes, both internal and outsourced, ensuring that European and industry standards are always met at every stage. Regarding the provision of services, the Group requires that these be carried out in accordance with the highest quality standards, using traceable products and, where possible, eco-friendly ones.

Suppliers of raw materials, food supplements, special foods, cosmetics, and medical devices are also required to comply with the provisions of the "Supplier Quality Manual", which is specific to each company within **NAMED GROUP**.

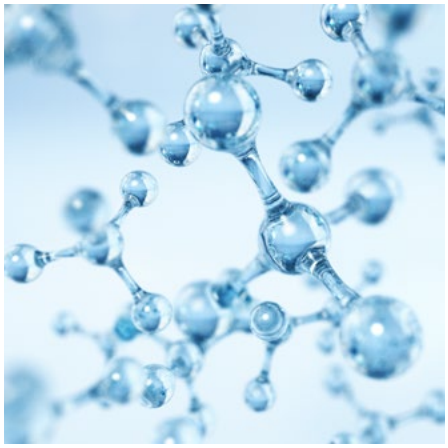
### 3.4.1. RAW MATERIALS

Raw materials constitute the fundamental element for ensuring safe and effective products for those who turn to **NAMED GROUP** daily to care for their health in a natural way.

For this reason, all companies within the Group require their raw material suppliers to adhere to specific and additional criteria, in particular:

- Guaranteeing for each batch a certificate proving the expiration date and quality certifications, along with any other documentation necessary to ensure proper and complete traceability;

- Providing, periodically, complete analyses conducted by an independent laboratory certifying the quality of the supplied product and its compliance with contractual specifications and the best quality standards on the market.



## 4 IMPLEMENTATION METHODS

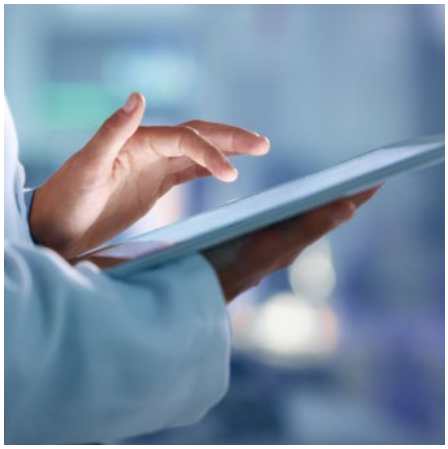
All **NAMED GROUP** suppliers are required to comply with and ensure that their employees, collaborators (both internal and external), subcontractors, and any other parties involved in the supply process to the Group adhere to the principles and rules of conduct outlined in this Supplier Code of Ethics.

To this end, all suppliers are required to return, via certified email (PEC), to each of the companies belonging to **NAMED GROUP** with which they have a supply relationship, the declaration of commitment attached to this Code.

## 5 MONITORING ACTIVITIES

In order to ensure compliance with the processes outlined in this Code of Ethics, **NAMED GROUP** reserves the right to carry out monitoring activities of its suppliers, either directly or through third parties, both at the time of selection and throughout the supply relationship. These monitoring activities may include the simple submission of documentation and/or completion of questionnaires, as well as conducting audits at the supplier's premises.

Monitoring activities may also be conducted at the premises of collaborators and subcontractors to ensure the compliance of **NAMED GROUP**'s supply processes with the provisions established in this Code.



### 5.1. NON-COMPLIANCE

In the event that non-compliance by suppliers with the provisions of this Supplier Code of Ethics is detected during monitoring activities, or if such non-compliance is reported directly to the Group by third parties, suppliers are required to do everything possible to correct their operations in order to comply with the rules and principles outlined here. The methods and timing for corrective actions will be agreed upon on a

case-by-case basis between the supplier and the Group.

**NAMED GROUP** reserves the right to immediately terminate the supply relationship under Article 1456 of the Civil Code in the event of:

- Serious and repeated violations of this Supplier Code of Ethics;

- Failure of the supplier to align their operations with the provisions of the Supplier Code of Ethics within the methods and timelines agreed upon with the Group;

- Failure to cooperate during monitoring activities (e.g., failure to submit documentation after reminders, denial of access to certain supplier premises without valid justification, etc.).

## 6 REPORTING

Any non-compliance with the Supplier Code of Ethics by suppliers and any offenses falling within the scope of Legislative Decree 24/2023 may be reported through the whistleblowing procedure and the dedicated channel available via the "Whistleblowing Reports" link on the official website of each company within **NAMED GROUP**.

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