

Elma Research is a market research institute specialized in the pharmaceutical sector and operates in the national and international market. In order to meet the needs of Customers and all interested parties, the Management of Elma Research S.r.l., has set itself the goal of consolidating its commitment to promoting sustainable growth and in line with the context of the market in which it operates.

To achieve this goal, Elma Research is inspired by the principles contained in the UNI ISO 26000 standard.

Our commitment to legality and corporate responsibility

Elma Research S.r.l. is committed to pursuing its objectives through conduct based on ethical principles and professionalism, both within the Company and in relations with customers, people involved in market research, suppliers and collaborators. In order to demonstrate its commitment to transparency and compliance with applicable legislation, Elma Research S.r.l. has adopted an Organizational Model compliant with Legislative Decree No. 231/01.

The Code of Ethics is an integral part of the Organizational Model, shared with its employees and collaborators and suppliers. All operational activities are managed according to procedures distributed to all employees, in compliance with contractual conditions, internal regulations, personal data security and strategic information for the business. All employees are involved in training activities aimed at sharing ethical principles, company regulations and operating practices.

The constant monitoring of the legislation applicable to the market research sector, regulatory requirements and commitments entered into with customers and all stakeholders is the basis of our business model. Elma Research S.r.l. faithfully applies the articles of ephra (European Pharmaceutical Marketing Research Association) and transposes the Code of Conduct. He is also a member of the European Society of Marketing and Research (ESOMAR), an organization that outlines strict guidelines to ensure the anonymity and confidentiality of respondents and participants in their surveys.

Elma Research strictly prohibits any corrupt practice and does not tolerate any violation of relevant laws and regulations on corruption, as reported in the Code of Ethics and the Organizational Model.

In order to ensure reliability in data and information management, Elma Research adopts an Information Security Management System compliant with ISO/IEC 27001:2013 whose principles are also applied in the definition of the qualification criteria of its suppliers and collaborators.

All personal data from Elma Research S.r.l. or from its suppliers and collaborators are processed in the context of business activities are managed in accordance with the European Regulation 679/16 - GDPR.

Our commitment to ensuring adequate and sustainable working conditions

The employees of Elma Research S.r.l. constitute a heritage to be preserved. To this end, Elma Research S.r.l. believes that a flexible working model able to reconcile work needs with private life can increase the motivation of its employees and the company's competitiveness.

All employees are involved in an annual training plan, in order to promote their professional growth, encourage the involvement of all and enrich the know-how of the entire working group.

All company activities are carried out in compliance with the requirements of D.Lgs. 81/08 and related regulations on Health and Safety at work, with the support of an external RSP, in order to prevent possible accidents or occupational diseases. All employees are involved in OSH training.

Within the Code of Ethics Elma Research recalls the commitment to respect the principle of correctness, which implies the respect, by all, in the performance of their functions, of the rights of every subject involved in their work and professional activity. Elma Research S.r.l. is committed to:

- complying with all commitments and legislative requirements related to the reference contract,
- ensuring adequate safe and healthy workplaces and implementing measures to prevent occupational accidents and diseases;
- respecting the right of workers to join trade union organisations;
- not encourage the employment or support of child labour or forced labour;
- not discriminate against staff on any grounds whatsoever;
- not use or support any verbal abuse contrary to respect for the dignity of each individual.

In order to sensitize all employees to the issues related to inclusion and the enhancement of diversity, Elma Research S.r.l. is committed to establishing the Elma Attitude Committee, with the aim of improving the listening skills of its employees and all the people involved in the activities of Elma Research S.r.l.. See more details in the document "POL 03_Working condition and human right policy"

Our commitment to protect the environment

In order to reduce the environmental impact of its activities, Elma Research has adopted organizational solutions for the reduction of emissions from employee mobility, through remote work organization. The digital solutions adopted are also aimed at reducing paper consumption in business documentation management. Elma Research promotes the reduction of the use of plastic in company refreshment areas. Elma Research promotes sustainable mobility through the use of public transport. All employees are made aware of the responsible use of available resources. The company's equipment is constantly renewed in order to adopt more efficient solutions and reduce consumption and emissions. See more details in the document "POL 02_Environmental Policy".

Our commitment to stakeholder and community involvement

As part of the company activities, Elma Research S.r.l. collaborates with Hospital Companies and Patient Associations, in order to promote awareness campaigns aimed at improving patient care and quality of life. As part of the intervention issues related to market research, Elma Research S.r.l. supports and promotes projects on gender equality and inclusion through communication campaigns and support of projects promoted by Associations and Hospital Companies.

Our commitment to Continuous improvement

With the support of the entire company, the Management has as its objective the continuous improvement of the sustainable approach and defines measurable and re-examined improvement objectives with a view to continuous improvement.

Milano, 30/09/2022

Massimo Massagrande – Founder & CEO

Elma Research is an independent market research company specializing in the healthcare industry and works both at national and international level.

Elma Research believes that the sustainability of its supply chain is a core value to meet the expectations of all stakeholders involved in the market of interest.

To maintain this goal, Elma Research is committed to establishing and disseminating practices and procedures aimed at:

- purchasing goods and services in line with international principles and standards for the promotion and protection of Human Rights, as recognized by the principles of the United Nations Global Compact (defined by the Universal Declaration of Human Rights) and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- including sustainability criteria as part of its supplier selection and evaluation process, encouraging and promoting agreements with Suppliers that have incorporated ethical and sustainable practices within their organization;
- purchasing goods and materials based on appropriate and recognized environmental standards, avoiding potentially environmentally harmful products when a less harmful alternative is available;
- preferring suppliers who support local products or "Made in Italy" products, bringing value to the national territory;
- developing services in order to reduce the environmental impact of their processes;
- encouraging solutions to recycle equipment and materials at the end of their life cycle where possible and - where not possible - to ensure disposal in the most appropriate way for the environment.
- promoting awareness of sustainability, both within the company and throughout the supply chain.

This Policy applies to all purchases made for Elma Research S.r.l., Elma Research L.t.d. and Elma Academy S.r.l..

This Policy is integrated in and brings together all other adopted Policies and Guidelines and is distributed to all employees, contractors and suppliers.

This Policy is reviewed annually during the Management System Review to ensure that it is in line with the company's mission and vision.

Continuous improvement

Company management aims - with the support of the entire company - to continuously improve the sustainable approach and sets specific measurable improvement goals that are reviewed annually.

Milan, 30/09/2023

Massimo Massagrande – Founder & CEO

Elma Research is an independent market research company specializing in the healthcare industry and works both at national and international level.

Among its values, Elma Research includes respect for the environment and reduction of environmental impact of its activities in order to ensure a responsible growth.

To maintain this goal, Elma Research is committed to establishing and disseminating practices and procedures aimed at:

- managing all activities in compliance with the current environmental legislation;
- promoting the most sustainable mobility solutions as defined by the Travel Policy;
- purchasing goods and materials based on appropriate and recognized environmental standards, as defined by the Sustainable Procurement Policy;
- reducing paper waste through awareness among employees and print-saving solutions;
- reducing plastic consumption through good business practices and where possible the reuse of containers;
- encouraging solutions to recycle equipment and materials at the end of their life cycle where possible and - where not possible - to ensure disposal in the most appropriate way to benefit the environment;
- decreasing home-work travel in favor of smart-working for at least 40 percent of working days;

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Milan, 30/09/2023

Massimo Massagrande – Founder & CEO

1. Presupposition

Elma Research is an independent market research company specializing in the healthcare industry and works both at national and international level. This Policy represents the set of rules to be adopted in respect of employees, collaborators and the entire supply chain, in compliance with Elma's Code of Ethics and all applicable regulations.

2. Diversity and Inclusion

Elma believes that diversity is the main ingredient for success and the creation of value.

For this reason, it is committed to ensuring that at all employees can feel welcomed and heard at every stages of working life, without any discrimination on the grounds of race, gender, nationality, disability, sexual orientation, social status, physical appearance, religion and political orientation.

In this regard, "Elma Attitude" was created. This Committee for Diversity & Inclusion promotes and fosters the culture of diversity and inclusion with initiatives focusing on the rights of LGBTI+ community, disability, gender-based violence, cultural and gender differences.

3. Discrimination and harassment

Furthermore, Elma is committed to preventing discriminatory situations deriving from skin color, religion, political affiliation, disability, sexual orientation, gender identity, or any other element not relevant to job performance.

Elma does not tolerate any form of intimidation, mobbing or violence in the work environment, as stated in the internal regulations shared with all employees and collaborators, particularly the Company Regulations and the IT Systems Regulations.

4. Working conditions

Elma protects the physical and moral integrity of its employees and collaborators, ensuring working conditions that respect individual dignity, in safe and healthy working environments, in compliance with legislation.

In this regard, Elma fully and impartially applies the national collective bargaining agreement to all employees, paying the stipulated salary on time and paying all relevant social security, welfare and insurance contributions

Similarly, clear and fair working conditions are defined for external freelancers and trainees.

With respect to workers' conditions, Elma is committed to:

- planning training activities on occupational health and safety;
- planning periodic monitoring in full compliance with the requirements of Legislative Decree no 81/08;
- prohibiting child labour or any form of forced labour;
- respecting freedom of association and the right to collective bargaining;
- adhering to contractually defined working hours that comply with applicable regulations.

5. Emphasis on human resources

Welcome kit

Each employee is welcomed with a Welcome Kit, which can be found in a specific area of the company intranet, in which guidelines and procedures for new hires are available. Specific induction and training pathways are provided for each role.

Refreshments and travel expenses

Based on contractual status, Elma guarantees food vouchers that can be easily spent in neighboring areas. Employees are provided with refreshment areas complying with hygiene and occupational health and safety regulations. In case of travel, travel allowances are recognized and adequate accommodations are guaranteed in accordance with the Travel Policy.

Listening and discussion

Elma is committed to providing constant feedback with its employees and contractors through individual interviews and team meetings. In particular, an annual feedback interview with the CEO takes place to assess the goals, expectations and needs that have emerged.

There is also a year-end meeting combined with a major company event – the so-called One Elma, where the board of directors communicates its goals and strategies with the purpose of combining work discussion with fun.

Career development

Ensure employees' professional development through shared goals and objectives in the career plan.

Work-life balance

Depending on the contractual framework, smart-working was signed with employees in order to be able to balance their private lives with their professional activities.

Elma also provides working flexibility to protect parenting through initiatives assessed according to the needs of each individual worker.

Termination of employment

In case of termination of employment, Elma ensures being compliant with applicable regulations and to clearly communicate with the resigning employee/collaborator through a feedback interview that provides all necessary information for the handover.

6. Checks

This Policy applies to all purchases made for Elma Research S.r.l., Elma Research L.t.d. and Elma Academy S.r.l..

A penalty system against workers who violate contractual and/or regulatory rules exists. Any reports may be communicated anonymously for evaluation by the Supervisory Board.

7. Continuous improvement

Company management aims - with the support of the entire company - to continuously improve working conditions respect human rights, and sets specific measurable improvement goals that are reviewed annually.

Milan, 30/09/2023

Massimo Massagrande – Founder & CEO