

1. Introduction

FAES FARMA, S.A. and all the companies in its group (hereinafter, "FAES Group") consider their goods and service suppliers, distributors, licensees, co-marketers, collaborators and commercial partners (hereinafter "Third Parties") to be an essential part of their activity, therefore recognizing the key role of Third Parties in achieving the mission and vision of the FAES Group.

The Third Parties Code of Ethics and Conduct (the "Code") is understood as an extension of the FAES Group's General Code of Ethics and Conduct, which defines the ethical principles comprised in the Group's corporate culture and which must be observed by the Third Parties in their relation with the FAES Group.

It also embodies the Group's commitment to applying the principle of due diligence in matters of ethics and integrity. Due diligence refers to the set of procedures and practices established by the FAES Group to prevent, detect and, where appropriate, eradicate irregular conduct that may occur in the organisation and in its supply chain.

2. Scope of application

This Code will be applicable to all Third Parties that have a direct or indirect relationship with the FAES Group.

3. Current legislation

Third Parties must comply with the applicable legislation of the countries in which they operate, as well as with the rules and regulations applicable to them in accordance with the highest ethical standards, therefore avoiding any conduct that, even without violating the law, could harm the reputation of the FAES Group.

4. Human Rights

4.1 Prohibition of forced labour

Third Parties will not allow any form of forced or involuntary labour and will at all times respect the minimum conditions of hiring and employment established by regulations in force.

4.2 Prohibition of child labour

Third Parties will expressly reject child labour in their organization and in all cases will respect the minimum ages of employment in accordance with applicable law and International Labour Organization (ILO) Convention No. 138 on minimum age, and they must have adequate and reliable mechanisms in place for verifying the age of their employees.

4.3 Prohibition of discrimination

Third Parties will treat their employees with dignity and respect and will not tolerate discrimination of any kind, including discrimination based on gender, race, sex, sexual orientation, religious beliefs, political opinions, nationality, social origin or disability.

4.4 Respect for freedom of association and collective bargaining

Third Parties will respect the freedom of trade union association and the workers' right to collective bargaining, subject to applicable laws in each case and without any reprisals arising from the exercise of such rights.

4.5 Prohibition of abuse or inhumane treatment

Third Parties will expressly avoid and reject the abuse of authority, workplace violence and any kind of harassment, whether physical, psychological or moral, as well as any other conduct that may create an intimidating, offensive or hostile work environment.

4.6 Health and safety at work

Third Parties will ensure a safe and suitable working environment for their workers and, in particular, will ensure strict compliance with the law on occupational safety and occupational risk prevention.

4.7 Payment of wages and working hours

Third Parties will pay their employees in accordance with applicable wage laws, including minimum wages, overtime and social benefits. The working day may not exceed the maximum permitted by applicable legislation.

4.8 Regular work

Third Parties undertake to ensure that all employment arrangements they develop are included within applicable local legislation and undertake to exercise due diligence to prevent the illegal employment of workers.

5. Environmental commitment

Third Parties will maintain an environmental commitment in the attempt to reduce the environmental impact of their activities, to the extent possible, in strict compliance with applicable legislation in all their areas of operation and with a commitment to the social development of the territories in which they operate.

Third Parties will promote environmental respect and responsibility in the performance of their activities, consequently seeking a rational use of resources; minimising the generation of waste;



promoting the prevention, elimination and reuse of waste; and preventing or safely mitigating any waste, wastewater or emissions that have an adverse impact on the environment.

6. Confidentiality of information

Third Parties are obligated to preserve the integrity of the confidentiality of the information they receive from the FAES Group. They may not disclose confidential information related to processes, methods, strategies, projects or data of a technical, commercial, economic or any other nature.

Third Parties acknowledge and accept that FAES FARMA, S.A., is a company listed on the Spanish stock market and that, therefore, confidential information may be considered inside information in accordance with current legislation. Consequently, the improper use thereof may constitute a crime of insider trading, as defined in Article 285 of the Spanish Criminal Code.

7. Corruption and bribery

The FAES Group has a policy of “zero tolerance” towards any type of corruption and considers essential that this position is shared by its Third Parties.

The directors, managers and employees of Third Parties may not, in any case, make, promise, authorise, offer, request, accept or receive, directly or indirectly, any benefits, hospitality, gifts or presents in cash or any which, due to their value, characteristics or circumstances, may reasonably alter the conduct of the commercial, administrative or professional relations in which they participate.

The directors, managers and employees of Third Parties must refrain from making facilitation or expediting payments, consisting in the delivery of money or other items of value, regardless of the amount, in exchange for securing or expediting the course of a procedure or action before any judicial body, public administration or official body.

8. Subcontracting

Third Parties will make every effort to ensure that their own collaborators, suppliers and contractors comply with action principles that are similar to those contained in this Code.

9. Reporting of irregularities

The FAES Group has a whistle-blower channel that allows all persons related to the Group, including Third Parties, to report any potentially significant irregularities they notice in any company of the Group.

Reporting should be done through the enabled confidential and secured internal whistleblowing channel. This channel is managed through the EQS INTEGRITY LINE platform and is accessible through: <https://faesfarma.integrityline.com/>

Complaints will be received and analysed by the FAES Group’s Ethics Committee, under the supervision of the Audit and Compliance Committee.

The confidentiality of all complaints received is guaranteed, while always respecting the rights of the complainant and of the accused.

10. Marketing and commercial practice

The FAES Group is committed to responsible and patient-centred commercial practices in accordance with most high ethical, medical and scientific standards determined by law and regulation, promoted by industry associations and embraced by the company.

The FAES Group expects its Third Parties interacting with health care professionals and healthcare or patient organisations to adhere to similarly high standards. This includes, at a minimum, Third Party complying with all applicable ethical codes of practice, industry codes and legal and regulatory requirements in the countries in which the Third Party operates.

11. Compliance

Compliance with this Code is mandatory for Third Parties. Third Parties can consult all modifications and updates to the same on the FAES Group website at www.faesfarma.com

12. Acceptance and adherence

The Third Party acknowledges having read and understood the terms and conditions set forth in the Code and confirms their acceptance, adherence and commitment to the same.

Company	
Representative	
Position	
Date	
Signature	

