

1. Introduction

The Faes Farma Group considers its suppliers of goods and/or services, distributors, licensees, co-marketers, collaborators and business partners (hereinafter the “Third Parties”) to be an essential part of its business, recognising their key role in achieving the Group’s mission and vision.

The Code of Ethics and Conduct for Third Parties (the “Code”) is intended as an extension of the Faes Farma Group’s General Code of Ethics and Conduct, which sets out the ethical principles that form part of the Group’s corporate culture and which must be observed by Third Parties in their dealings with the Faes Farma Group.

It also reflects 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 Farma Group to prevent, detect and, where necessary, eliminate any misconduct that may occur within the organisation and its supply chain.

2. Scope of application

This Code shall apply to all Third Parties who have a direct or indirect relationship with the Faes Farma Group.

3. Applicable legislation

Third Parties must comply with the applicable legislation of the countries in which they operate, as well as the rules and regulations applicable to them in accordance with the highest ethical standards, avoiding any conduct which, even if not in breach of the law, may damage the reputation of the Faes Farma Group.

4. Human Rights

4.1 Prohibition of forced labour

Third parties shall not permit any form of forced or involuntary labour and must at all times comply with the minimum recruitment and employment standards laid down by current regulations.

4.2 Prohibition of child labour

Third Parties shall expressly reject child labour within their organisation, respecting in all cases the minimum recruitment ages in accordance with applicable legislation and International Labour Organisation (ILO) Convention No. 138 concerning the minimum age, and shall have adequate and reliable mechanisms in place to verify the age of their employees.

4.3 Prohibition of discrimination

Third Parties shall treat their employees with dignity and respect and shall not tolerate any form of discrimination, including that 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 shall respect workers’ freedom of association and the right to collective bargaining, subject to the applicable regulations in each case and without any reprisals arising from the exercise of these rights.

4.5 Prohibition of abuse or inhumane treatment

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

4.6 Health and safety at work

Third Parties must ensure a safe and suitable working environment for their workers and, in particular, must ensure strict compliance with the law regarding occupational safety and the prevention of occupational risks.

4.7 Payment of wages and working hours

Third Parties shall pay their employees in accordance with the applicable wage laws, including minimum wages, overtime and social benefits. Working hours shall not exceed the maximum permitted by the applicable legislation.

4.8 Regular employment

Third Parties undertake to ensure that all forms of employment they engage in comply with applicable local legislation and to exercise due diligence to prevent the illegal employment of workers.

5. Environmental commitment

Third Parties shall maintain an environmental commitment to endeavour to reduce, as far as possible, the environmental impact of their activities, in strict compliance with applicable legislation in all their areas of operation and in line with their commitment to the social development of the territories in which they operate.

Third Parties shall promote respect for and environmental responsibility in the conduct of their

operations, ensuring the rational use of resources, minimising waste generation, promoting the prevention, disposal and reuse of waste, and preventing or mitigating, under safe conditions, waste, wastewater or emissions that have an adverse impact on the environment.

6. Confidentiality of information

Third Parties are obliged to preserve the confidentiality of the information they receive from the Faes Farma Group. They shall not disclose confidential information relating to processes, methods, strategies, projects, or technical, commercial, financial or any other type of data.

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 regulations; its improper use may constitute the offence of insider dealing on the stock market, as defined in Article 285 of the Criminal Code.

7. Corruption and bribery

The Faes Farma Group maintains a 'zero-tolerance' policy towards any form of corruption and considers it essential that this policy is shared by Third Parties.

The directors, managers and employees of Third Parties shall not, under any circumstances, directly or indirectly, make, promise, authorise, offer, solicit, accept or receive benefits, hospitality, gifts or cash or anything which, by virtue of its value, nature or circumstances, could reasonably influence the conduct of the commercial, administrative or professional relationships in which they are involved.

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

8. Subcontracting

Third parties shall use all means at their disposal to ensure that their own employees, suppliers and contractors adhere to principles of conduct similar to those set out in this Code.

9. Reporting of irregularities

The Faes Farma Group has a whistleblowing channel that allows all persons associated with the Group, including Third Parties, to report any potentially significant irregularities they observe within any Group company.

Reports must be made via the designated internal confidential reporting channel. This channel is managed via the EQS INTEGRITY LINE platform and can be accessed at: <https://faesfarma.integrityline.com/>

Reports will be received and analysed by the Faes Farma Group Ethics Committee, under the supervision of the Audit and Compliance Committee.

The confidentiality of reports received is guaranteed, and the rights of both the whistleblower and the person reported are respected at all times.

10. Marketing and commercial practices

The Faes Farma Group is firmly committed to responsible, patient-centred business practices in accordance with the highest ethical, medical and scientific standards as defined by law, promoted by industry associations and adopted by the company.

The Faes Farma Group expects third parties that interact with healthcare professionals and/or healthcare or patient organisations to adhere to standards of a similar level. This includes, at a minimum, compliance by third parties with any ethical codes of conduct, industry codes and regulatory requirements of the countries in which the third parties operate.

11. Compliance

This Code is mandatory for Third Parties. Third Parties may consult any amendments and updates to the Code published on the Group's website www.faesfarma.com

12. Acceptance and Adherence

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

Company	
Representative	
Position	
Date	
Signature	