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FAES FARMA

Passion for health

Code of Ethics and Conduct

July 2025



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A. Introduction

1. Context

At the Faes Farma Group (“Faes Farma” or “the Group”), we combine science, innovation and a passion for what we do, with the aim of transforming people’s health. This purpose defines who we are, inspires how we act and guides every decision we make with responsibility, rigour and a firm ethical commitment.

We work with an integrated approach to health and an international vision, where the patient is always at the centre of our activity, animal nutrition and health form part of people’s wellbeing, and where we operate within a framework of environmental preservation and care.

We strive to find innovative, honest and high-quality solutions for the comprehensive care of health and life. We research, manufacture and market prescription medicines, healthcare products and animal nutrition products.

This Code of Ethics and Conduct (“Code”) sets out the values, guiding principles and standards of conduct that guide and inspire our actions and constitutes a mandatory practical reference for our actions, decision-making and, in general, for the conduct of all our activities as part of the Faes Farma Group.



A. Introduction

2. Our Purpose, Mission, Vision and Values

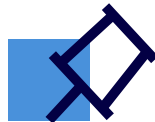
Purpose

We combine passion, science and innovation to transform people's health



Vision

To be a leading pharmaceutical group renowned for excellence and innovation, transforming people's health and wellbeing



Mission

We develop and provide innovative products to transform people's health, striving for excellence and fostering talent within our teams



Values that define us

which express how we work, how we interact and how we make decisions

**THE PATIENT, OUR
PRIORITY**



**WE ARE
INNOVATORS**



**WE CARE FOR
PEOPLE AND THE
ENVIRONMENT**



**EXCELLENCE
THAT TRANSFORMS**



WE AIM FOR MORE



Values that define us

1

THE PATIENT, OUR PRIORITY

- We are committed to understanding **patients' needs** and actively seek solutions that have a **positive impact** on their lives and on society.
- We prioritise the **patients' best interests** at **the heart** of our decision-making.
- We fulfil our commitments with rigour, putting the **patient at the centre**.



Values that define us

2

WE ARE INNOVATORS

- **We are not satisfied** with existing alternatives.
- We seek **creative, innovative and flexible solutions** in all areas.
- **We innovate to improve** and meet unmet needs.



Values that define us

3

WE LOOK AFTER SMALPEOPLE AND THE THE

- We work as a **team** with **respect for diversity**, creating an environment where everyone can develop and give their best.
- We are committed to building **relationships based on trust** through active listening, respect and a spirit of **creating value**.
- We act responsibly towards the environment, minimising our environmental impact and promoting **sustainable practices** in our day-to-day work.



Values that define us

4

EXCELLENCE QU E TRANSFORMS

- We make **decisions with ethics and integrity**, even when this involves taking on challenges or questioning the status quo.
- We execute ideas effectively and with impact, with a mindset of **continuous improvement**.
- We actively seek **to learn from every experience**, incorporating new knowledge to **develop** both professionally and personally.



Values that define us

5

WE AIM FOR MORE

- We set ourselves **challenging goals** and strive to exceed them with **focus and commitment**.
- We step outside our comfort zone, **tackling challenges with courage**, initiative and determination.
- **We take action** and take calculated risks.



A. Introduction

3. Scope and application of the Code

This Code applies to each and every professional working for the Faes Farma Group, regardless of their position, rank, department or geographical location, including directors, managers, employees and contractors.

Similarly, we expect the companies and third parties with whom we interact to apply these principles by accepting the Third-Party Code of Ethics.

This Code does not aim to cover every situation and scenario that may arise in practice, but rather to establish general guidelines for conduct to guide our actions in the professional sphere; these guidelines should be complemented by the prudence and good judgement of each of us as we carry out our activities.



In cases where we find ourselves in ***situations of doubt***, we must ask ourselves the following questions before making a decision:

- Is my decision or conduct in accordance with the law, this Code and Faes Farma's internal regulations?
- Is my decision or conduct in line with our company's principles and values?
- Would I feel comfortable explaining my decision or conduct to my line manager, colleagues, family or friends?
- Would I feel comfortable if the details of my decision or my behaviour were made public?

If any of the answers is "NO", we must avoid this course of action or consult our line manager or the Ethics Committee before making the decision.

A. Introduction

4. Key responsibilities

As professionals at Faes Farma, we must behave ethically and avoid actions that could damage the Group's reputation or adversely affect its interests, and we must be sufficiently familiar with the relevant regulations that apply to our professional activities.

We all have a duty to understand and comply with the commitments set out in this Code, although there are certain differences depending on our responsibilities.



All Group professionals must:

- Be familiar with, understand and comply with the behavioural commitments set out in this Code.
- Help to ensure awareness of and compliance with this Code.
- Consult your line manager or the Ethics Committee in case of doubt.
- Report any instances of misconduct.
- Contribute to the effective functioning of internal control systems.

additional responsibilities are:

- To be an example and a benchmark in matters of ethics and integrity.
- Help to promote, understand and comply with the Code. Support professionals who, in good faith, report irregular conduct.
- Monitor the conduct of third parties who may to represent Faes Farma, ensuring that its conduct is in accordance with the Code.

A. Introduction

5. Relationship with internal and external regulations

a. Current legislation

The Faes Farma Group operates in various countries, and we are therefore obliged to be familiar with and comply with the regulations applicable to our business in each of them. This Code must therefore be understood in conjunction with the other regulations applicable to each of the Group's companies. In the event of any discrepancy between local regulations and the Code, we will apply the stricter standard.

b. Professional Codes

As a pharmaceutical group with a presence in various countries and business areas, we are committed to complying with the ethical and professional standards that govern our activities in each jurisdiction. Each company within the Group must adhere to the Codes of Conduct and Good Practice established by the professional associations and regulatory bodies relevant to its geographical and sectoral scope.

In the case of Faes Farma, S.A., as a member of Farmaindustria and the European Federation of Pharmaceutical Industries and Associations (EFPIA), the Code of Good Practice for the Pharmaceutical Industry applies. Similarly, in other regions or business units —such as Animal Nutrition and Health— the principles established by the relevant professional associations in each context will be followed.

c. Internal regulations

Faes Farma has internal policies and procedures that complement the provisions of this Code. Specifically, the Anti-Corruption and Anti-Bribery Policy and the Code of Conduct for the Use of IT Tools, which are attached as appendices, as well as other policies and procedures that we are required to be familiar with and comply with insofar as they apply to our role.



A. Introduction

6. Internal Reporting System

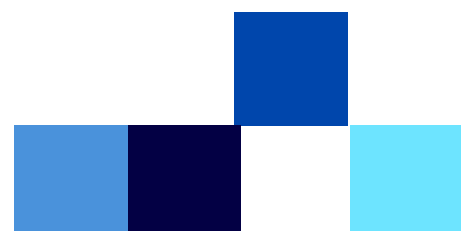
Within the Group, we have an internal reporting system through which we can:

- Report to Faes Farma any regulatory breaches of which we are aware (whether of legislation or internal corporate regulations) committed by a member of Faes Farma or by third parties who are in contact with the company in the course of their work or professional activities.
- Submit to Faes Farma any queries regarding the scope, compliance with and interpretation of the regulations applicable to Faes Farma.

To this end, we have an internal confidential reporting channel that is secure and complies with the strictest regulations regarding whistleblower protection and data protection. This internal channel is managed via the EQS INTEGRITY LINE platform and can be accessed via our [website](#), the [intranet](#) or the following link:

<https://faesfarma.integrityline.com/>

Therefore, if you have reasonable grounds to believe that a Group professional is breaching the Code or external or internal regulations, you must report this immediately via this Internal Reporting System, for which the Ethics Committee is responsible.



B. Principles of Ethics and Conduct

1. Working at Faes Farma

a. Respect, dignity and the prevention of harassment

All professionals within the Faes Farma Group must treat one another with respect, professionalism and kindness, so as to create a working environment that encourages people to give their best and fosters a positive social atmosphere. Likewise, we must strive to be open, honest and respectful when sharing ideas and receiving input from others.

Our relationships with suppliers, contractors and other partner companies must at all times be based on respect and collaboration.

We 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.

We have an Anti-Harassment Policy which we are obliged to be familiar with and comply with. If we become aware of, or have reasonable grounds to suspect, that any form of harassment, discrimination or inappropriate behaviour is taking place, we must report the matter immediately to the Ethics Committee via the Internal Reporting System:

<https://faesfarma.integrityline.com/>

Question:

There is a person in my department who, over the last few months and on a repeated basis, has been spreading malicious rumours about a colleague, making insinuations about their lack of professionalism and joking about aspects of their personal life.

Should I report this to the Ethics Committee?



Answer:

Yes. This behaviour constitutes harassment, and any form of harassment is considered a serious or very serious offence. Faes Farma has a zero-tolerance policy towards such situations.



B. Principles of Ethics and Conduct

1. Working at Faes Farma

b. Equal opportunities and non-discrimination

At Faes Farma, we do not tolerate any form of discrimination on the grounds of ethnicity, race, gender, sexual orientation, gender identity or expression, age, marital status, religious beliefs, political opinions, nationality, social background or disability.

The selection and promotion of staff is based on equal opportunities, merit, and objective and transparent criteria and assessments.

We have policies in place that promote equal opportunities for the Group's staff in all areas (recruitment, training, promotion, remuneration, etc.) and encourage a healthy work-life balance.

The Group is committed to providing the necessary resources to support the training of all staff and to ensure that their knowledge and skills in order to facilitate the professional development of each employee and the creation of value for the Group.

In this regard, all professionals undertake to make the most of the resources made available to us to improve our knowledge, aptitudes and skills.



Did you know that:

unconscious biases can sometimes create inaccurate impressions of a person and can influence behaviour, which may be discriminatory?

In recruitment or promotion processes, we must assess candidates fairly and equitably, focusing on their ability to meet the job requirements.





B. Principles of Ethics and Conduct

1. Working at Faes Farma

c. Collaboration and teamwork

Faes Farma fosters an environment of cooperation and teamwork to make the best use of all its capabilities and resources.

All professionals within the Group must act in a spirit of collaboration, making our knowledge, skills and talent available to those who need them in order to contribute to the achievement of the Group's interests and objectives.

To this end, we must work efficiently during the working day, making the most of the time and resources the organisation makes available to us.



How can I help foster an environment of cooperation and teamwork?

- *By fostering open, clear and honest communication among all members of my team, as well as between different departments and subsidiaries within the Group.*
- *Expressing my ideas and concerns in a constructive manner at all times.*
- *Recognising the team's achievements and valuing each member's contributions.*
- *Resolving any conflicts that may arise in a constructive and respectful manner.*

What does working efficiently mean?

It means prioritising tasks according to their importance and urgency, minimising distractions during working hours. In this way, we reinforce our commitment to excellence, contributing to the Group's success and showing respect for our colleagues.

B. Principles of Ethics and Conduct

1. Working at Faes Farma

d. Health and safety at work

Faes Farma's commitment in this area is based on strict compliance with applicable regulations in all the areas where it operates, and on providing its staff with the necessary resources and knowledge to enable them to carry out their duties safely and in a healthy environment.

For our part, as professionals within the Group, we are responsible for strictly complying with occupational health and safety regulations, ensuring our own safety and that of those affected by our activities. We must also share our knowledge and best practices in this area with colleagues and subordinates.



Question:

I have noticed that my colleague has not put on the protective equipment that our manager recently INSTRUCTED us to wear. What should I do?

Answer:

Any issues relating to health and safety at work must be reported immediately to the company via our line manager.



B. Principles of Ethics and Conduct

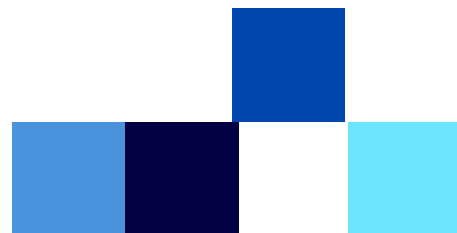
2. Internal information control and asset protection

a. Use of resources and protection of assets

All Faes Farma employees must protect and make appropriate use of the resources and assets made available to us by the Group, and use them responsibly to prevent damage, loss, theft or misuse. Unless Faes Farma determines otherwise, these resources must be used exclusively for the performance of our assigned duties.

All equipment and information systems made available to us by the Group are the property of the Group and, therefore, their content may be subject to review.

Faes Farma has a Code of Conduct for the Use of IT Tools (appended to this Code) which sets out the rules for the use of these assets, and we are obliged to be familiar with and comply with it.





B. Principles of Ethics and Conduct

2. Internal control of information and protection of assets

b. Inside information

Faes Farma, S.A. is a company listed on the Spanish stock market, so all Group professionals must take particular care when handling inside information.

Inside information is defined as non-public information which, if disclosed, could significantly influence investors' decisions or affect the value of Faes Farma shares.

example, inside information includes details of new products, R&D&I projects, ongoing negotiations regarding corporate transactions, business plans, as well as financial information on results, etc.

Under the Law, it is prohibited to carry out or attempt to carry out transactions using this information, to recommend or induce a third party to do so, or to unlawfully disclose this information to third parties.

Furthermore, members of the Board of Directors and other senior management and employees who may have access to inside information are subject to [the Internal Code of Conduct on activities relating to the securities market](#) and are therefore obliged to be familiar with and comply with the provisions of that Code.

Question:

As an employee of the Group, I am aware that a new Faes Farma product is due to be approved shortly, which is expected to have a significant positive impact on the Group's results. May I buy Faes Farma shares or recommend that someone else do so in order to benefit from the likely rise in the share price that will occur once the information becomes public?

Answer:

No. The law and our Internal Code of Conduct prohibit any trading or recommendation to trade in Faes Farma shares when inside information is available.





B. Principles of Ethics and Conduct

2. Internal control of information and protection of assets

c. Confidentiality of information

All Group professionals undertake to maintain the confidentiality of any information to which we have access in the

We are required to carry out our professional duties and to handle such information discreetly and in accordance with the regulations. We must not disclose it to others until it has been made public, restricting access to those who do not need to know it. Furthermore, we must not make duplicates or copies, nor make any use of it beyond what is necessary for the performance of our duties.

In general, and unless otherwise instructed, the information to which we have access in the course of our professional duties must be treated as confidential.

The obligation to maintain the confidentiality of information remains in force even after our professional relationship with Faes Farma has ended.

Similarly, all professionals, and in particular new recruits, undertake not to introduce sensitive third-party information into the organisation.

Finally, we must all comply with current legislation on data protection, including that relating to personal data.

Question:

A new colleague has recently joined my department from a rival pharmaceutical company, and we have asked them to tell us about their former employer's business strategy and to provide us with details of its main clients. Is it right for them to give us this information?

Answer:

No, we must not request or use this information as it constitutes sensitive third-party information.



B. Principles of Ethics and Conduct

2. Internal control of information and protection of assets

d. Intellectual and industrial property

The term 'intellectual property' encompasses: trade secrets and/or business secrets (research and development projects, trials, etc.), commercial secrets (lists of customers and suppliers, financial information, business plans, etc.), patents and rights relating to specialised technical knowledge, trademarks, trade names and domain names, as well as copyright, reproduction rights and similar rights.

Intellectual property is one of our most important assets; therefore, we are all obliged to comply with the laws and internal regulations in this area, to make proper use of it, and to follow the established controls to avoid risks related to intellectual property. In this regard, processes and decisions in this area may be subject to internal and/or external review and must therefore be documented and traceable.

Question:

I am preparing a Faes Farma publication (on the website/in a blog/in an article) in which I plan to include a photograph I found on the internet. Can I use this photograph freely as it is available on the internet?

Any intellectual and/or industrial property arising from our work as employees of the Group, including that resulting from scientific collaborations, and which relates to Faes Farma's current and/or future business, shall be the exclusive property of the latter.

With regard to the intellectual or industrial property of third parties, it is expressly prohibited to make any kind of copy, or to use material (photos, images, texts, drawings, etc.) without proof that the Group has acquired the corresponding rights and/or licences.



No. The fact that a photograph is on the internet does not mean that it is not protected by copyright and that we can use it freely. We may use photographs provided we have the author's express consent, if they are in the public domain, or if they are licensed under a Creative Commons (CC) licence, and always provided we credit the author.

B. Principles of Ethics and Conduct

2. Internal control of information and protection of assets

e. Control of financial information, non-financial information and taxation

At Faes Farma, we comply with the requirements set out by the Spanish National Securities Market Commission regarding internal control over financial and non-financial information in listed companies, and we uphold transparency, reliability and strict compliance with applicable regulations as guiding principles.

In this regard, we are committed to clearly and accurately recording transactions, facts and events in the company's records, paying particular attention to the reliability of financial and non-financial information.

Under the supervision and with the support of the Board of Directors, we ensure compliance with controls and the regular monitoring of the effectiveness of the internal control system over financial and non-financial information.



Any internal or external communication must be made by authorised persons or with their approval and must be truthful and complete, as well as complying with the applicable legal and regulatory requirements.

We strictly comply with our tax obligations and cooperate fully with the tax authorities in each jurisdiction in which we operate, where required.



Question:

A friend who works in the media has asked me for clarification on the latest financial figures published by Faes Farma so he can finish an article that we know will convey a positive message about the Group. Can I provide him with this information?

Answer:

No. In the case of financial information, the authorised channel is the Investor Relations department.

B. Principles of Ethics and Conduct

3. Business Integrity

a. Corruption and bribery

At Faes Farma, we have a zero-tolerance policy towards corruption, and we therefore categorically reject any practice that could be considered as such.

Bribery is defined as the act of giving, receiving or promising (or authorising or using a third party to give, receive or promise) anything of value with the intention of unduly influencing a person or entity in order to obtain an advantage.

In this regard, it is strictly prohibited to:

- To resort to unethical practices to influence the decisions of third parties with the aim of obtaining some benefit for Faes Farma or for ourselves.
- Giving, offering or receiving cash gifts.
- To give, offering and accepting gifts that by their value may reasonably affect the course of the relationship with the person receiving or making the payment.
- Making facilitation payments, regardless of the amount, in order to ensure or expedite the processing of a procedure.

At Faes Farma, we have an Anti-Corruption and Anti-Bribery Policy, appended to this Code, which we are all obliged to be familiar with and comply with.

In our dealings with healthcare professionals, patient organisations and healthcare organisations in Spain, we strictly adhere to the standards set out in the Code of Good Practice for the Pharmaceutical Industry; in other territories, we comply with the applicable regulations in each case.



Question:

We are close to obtaining an important authorisation from a public body, and the official we are dealing with has hinted that paying a small sum would significantly speed up the process. If the amount is reasonable and within my budget, can I make the payment to expedite the process for the benefit of Faes Farma?

Answer:

No. Regardless of the amount, this constitutes a facilitation payment and is not permitted under any circumstances.

B. Principles of Ethics and Conduct

3. Integrity in business

b. Irregular transactions and money laundering

Money laundering occurs when money or other assets are obtained directly or indirectly from a criminal activity, or when their illicit origin is concealed so that they appear to come from legitimate sources.

In order to avoid this risk, we must remain vigilant regarding cases where there may be indications of a lack of integrity on the part of the individuals or entities with whom we have professional dealings.

In general, we shall avoid:

- Unusual cash payments
- Payments made by bearer cheques or those made in currencies other than the one previously agreed
- Payments made to or by third parties not mentioned in the relevant contracts.

And we shall pay particular attention to payments made to accounts that are not the usual ones used in dealings with a particular entity or person, to those made to accounts held in tax havens, and to those made to entities where it is not possible to identify the ultimate beneficiary.



B. Principles of Ethics and Conduct

3. Integrity in business

c. Conflict of interest

A conflict of interest arises when our personal interest, whether direct or indirect, interferes with our obligation to act in the best interests of any of the companies forming the Faes Farma Group.

The following are examples of situations in which a conflict of interest may arise:

- The procurement of services provided by a supplier run or managed by a relative or friend.
- The employment of a family member or friend without first disclosing our relationship or kinship.
- Being in a position of hierarchical dependence on a person with whom we have a romantic relationship.
- Being a shareholder or having a financial interest in companies that are competitors, customers or suppliers of the Group.
- Providing services as a consultant, director, manager, employee or adviser to a competitor of the Group.
- Taking advantage for personal gain of opportunities of which we have become aware through our position as employees of the Group.



All Group professionals must act loyally towards the organisation, basing our professional decisions exclusively on objective criteria without allowing ourselves to be influenced by personal interests or relationships.

If we find ourselves in a situation involving a potential conflict of interest, we must report it to our line manager or the Ethics Committee via the Internal Reporting System so that it can be assessed and, where appropriate, the necessary measures taken.



Question:

My brother works for a company that is bidding to become a supplier to Faes Farma, and I have some influence over the decision regarding the selection of the supplier in question. How should I act?

Answer:

I must inform my line manager or the Ethics Committee of the conflict of interest and, as far as possible, refrain from participating in the decision.



B. Principles of Ethics and Conduct

3. Integrity in business

d. Free competition

At Faes Farma, we uphold the principle of free competition in the markets and comply with the relevant laws.

We compete fairly, promoting a fair and free market.

We do not participate in agreements or practices that restrict free market competition and, therefore, we do not share sensitive information such as: prices, costs, strategies or commercial terms or other confidential information, nor do we gather data on our competitors in an improper or unlawful manner.



Question:

During an industry meeting attended by representatives from competing laboratories, several attendees begin to share sensitive information about their products' prices

*How should I proceed? **Answer:***

Sharing pricing information with competitors may breach competition laws, so we must politely but firmly interrupt the discussion and refrain from providing or confirming any information about Faes Farma.



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B. Principles of Ethics and Conduct

3. Integrity in business

e. Export and international trade

Faes Farma markets its products in many countries around the world, either directly or through business partners. It also imports raw materials for its production processes.

In this regard, we strictly comply with import and export regulations and are committed to cooperating with the relevant foreign authorities where necessary.

We apply due diligence procedures with regard to the third parties with whom we engage.

f. Political neutrality

We maintain a strict policy of political neutrality, without interfering in or participating in the political processes of the countries in which we operate.

Under no circumstances do we make donations to political parties or their representatives.

Faes Farma recognises the right of the Group's employees to exercise their freedom of expression and participate in public life, provided that this does not interfere with the performance of their work duties and does not imply that the Group is associated with any particular political stance.



B. Principles of Ethics and Conduct

4. Commitment to society, the environment and other stakeholders

a. Human rights

Among the standards that Faes Farma uses as a reference are the International Bill of Human Rights, the fundamental conventions of the International Labour Organisation (ILO) and the OECD Guidelines for Multinational Enterprises.

We are committed to the protection and respect of human rights and comply with the applicable regulations in this area, particularly regarding working hours, remuneration and working conditions.

We do not tolerate human trafficking, child labour, forced labour, or labour carried out under abusive or illegal conditions.



Question:

During the process of selecting a future supplier, I have become aware that one of them does not comply with the applicable human rights regulations, specifically with regard to child labour. However, this supplier offers the best financial terms and the quality of their product is proven. Can I overlook their failure to comply with human rights regulations in order to secure a better price and, therefore, greater profit for Faes Farma?

Answer:

No. Faes Farma does not tolerate child labour, forced labour or labour carried out under abusive or illegal conditions under any circumstances, including amongst the third parties with whom it works; therefore, this supplier must be ruled out.



B. Principles of Ethics and Conduct

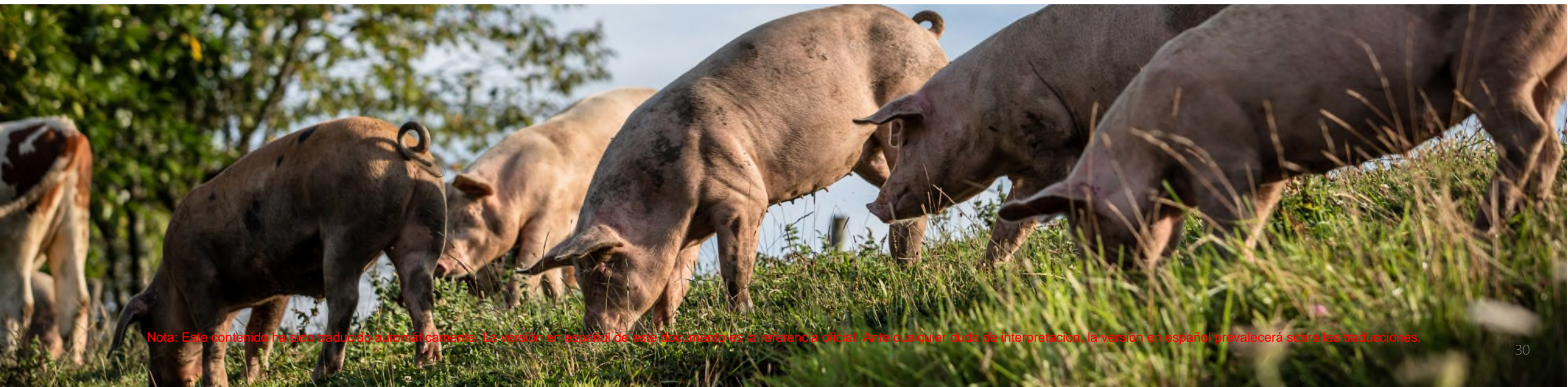
4. Commitment to society, the environment and other stakeholders

b. Commitment to the environment

We base our actions on respect for the environment, the responsible and efficient use of resources, and contributing to the fight against climate change.

We comply with the regulations of national and international regulatory bodies relating to environmental control and protection.

We use the necessary resources responsibly and, mindful of the environmental impact we generate throughout the entire value chain and the urgent need to take action in this regard, our efforts focus on measuring our performance and taking steps to reduce our impact and contribute to the planet's global goals.



B. Principles of Ethics and Conduct

4. Commitment to society, the environment and other stakeholders

c. Commitment to patients and customers

Our mission is to develop and provide innovative products to transform people's health, striving for excellence and nurturing the talent of our teams. We prioritise the benefit of patients in our decision-making.

We guarantee the quality of our products throughout the entire production and supply chain, adhering to the highest quality standards at every stage of the process.

In the field of animal nutrition and health, we focus on meeting the needs of the animal feed sector by offering the best products and services and integrating technological innovation and research based on the needs of each customer.



B. Principles of Ethics and Conduct

4. Commitment to society, the environment and other stakeholders

d. Commitment to suppliers and business partners

In the selection of suppliers and business partners, we are obliged to act with objectivity and impartiality, avoiding any conflict of interest in their selection.

In our relationships with suppliers and business partners, we are committed to putting the principles set out in this Code into practice.

Faes Farma has a Third-Party Code of Ethics which must be respected by all suppliers and business partners working with us.



B. Principles of Ethics and Conduct

4. Commitment to society, the environment and other stakeholders



e. Commitment to shareholders and investors

Our shareholders are a fundamental part of Faes Farma and, as such, we are committed to providing them with accurate, transparent and comprehensive information regarding our operations and results.

To this end, and in compliance with current regulations and best corporate governance practices, we have a Policy on Communication with Shareholders, Investors and Proxy Advisors which sets out the principles governing communication and contact with these stakeholders, and which we are all obliged to be familiar with and comply with.

The Investor Relations department serves as the direct channel of communication between the Group and its shareholders and investors.

B. Principles of Ethics and Conduct

4. Commitment to society, the environment and other stakeholders

f. Commitment to local communities

We recognise the importance of contributing positively to the well-being of the local communities where we operate, and we are therefore committed to acting responsibly and respectfully towards these communities, seeking at all times to generate a positive and sustainable impact.

g. Commitment to animal welfare

As part of our commitment to animal welfare, we strictly comply with all regulations relating to the use of animals in the research phase.





C. Validity

This Code was approved by the Board of Directors of Faes Farma on 23 July 2025 and has been in force since then, rendering previous versions of the Code null and void.

The Code will be reviewed periodically by the Ethics Committee, which will propose any necessary amendments resulting from regulatory changes or significant changes to the Group's structure or activities, or other relevant factors.







Anti-Corruption and Anti- Bribery Policy

July 2025



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- H. Breaches
- I. Final provision



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A. Introduction

At the Faes Farma Group (“Faes Farma” or the “Group”), we believe that business ethics is a fundamental value that must govern the way we conduct our business; consequently, all our activities must always be carried out within the bounds of the law and ethics. We oppose any unlawful action, even if it results in financial or other benefits for the Group.

For this reason, the Group adopts a zero-tolerance stance towards corruption, bribery and influence peddling, in any of their forms.

This Anti-Corruption and Anti-Bribery Policy is consistent with the United Nations Convention against Corruption.

B. Scope and application

This policy applies to each and every professional providing services to the Faes Farma Group, regardless of position, rank, department or geographical location, including directors, managers, employees and contractors.

Similarly, we ensure that the companies and third parties with whom we do business apply the principles set out in this policy by accepting the Third-Party Code of Ethics.

Corruption and bribery may be considered criminal offences and may even result in Faes Farma being held criminally liable as a legal entity; we must therefore be aware that we may be investigated and/or sanctioned by Faes Farma should we fail to comply with the provisions set out in this policy.

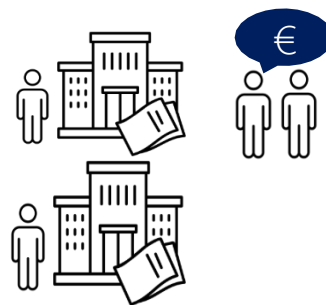
This policy cannot anticipate every situation or scenario we may face, so it is our responsibility to consult our line manager or the Ethics Committee if in doubt.



C. Corruption, bribery and influence peddling

Corruption, bribery and influence peddling are acts aimed at obtaining a benefit for oneself or a third party through the use of unlawful techniques or schemes. These acts are punishable by law and may result in prison sentences for those who commit them.

We may find ourselves in a situation involving corruption or bribery when interacting with public officials or private individuals.



Influence peddling, however, can only occur when we interact with public officials.



We define a public official as any person who, by direct provision of the law or by election or appointment by a competent authority, participates in the exercise of public functions.



Corruption or Bribery

A situation of bribery or corruption arises when we attempt to unlawfully influence the conduct of a public official or a private individual in order to obtain a benefit.

That is to say, when we offer, give or promise to a public official or a private individual, or when we request or receive from them, a financial advantage or something of value, of any kind, with the aim of influencing them to carry out a specific action, or when we use a third party to carry out these actions on our behalf.

Influence peddling

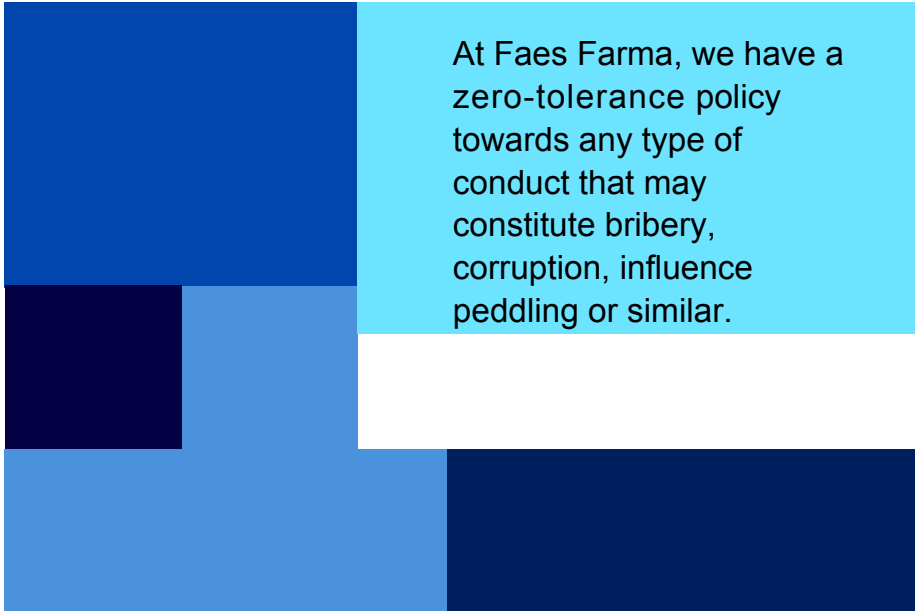
We are engaging in influence peddling when we use our relationship with a public official to, directly or indirectly, secure a decision or action that benefits us.

C. Corruption, bribery and influence peddling

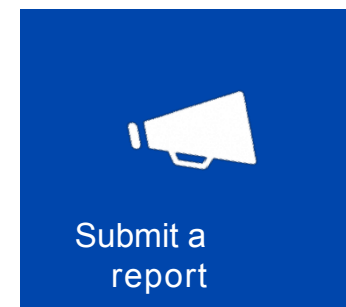
Corruption can take various forms and does not always involve the exchange of money for favours; therefore, we must be cautious and, if in doubt, ask ourselves whether our action could be interpreted by a third party as a case of corruption or whether that action pursues an unlawful purpose. If so, we must avoid the action and immediately consult our line manager or the Ethics Committee on the best course of action.

If we are aware of or witness a situation in which there are indications of bribery, corruption or influence peddling, we will immediately report it to the Ethics Committee via the internal confidential reporting channel, which is secure and complies with the strictest regulations regarding whistleblower protection and data protection. This Internal Channel is managed via the EQS INTEGRITY LINE platform and can be accessed via the following link:

<https://faesfarma.integrityline.com/>.



At Faes Farma, we have a zero-tolerance policy towards any type of conduct that may constitute bribery, corruption, influence peddling or similar.



D. Giving or accepting gifts, gratuities and hospitality

We cannot offer, promise or provide gifts, benefits personal benefits, financial compensation or any other unjustified gratuity or advantage to third parties, including customers, partners, suppliers, public officials, competitors, etc., except in cases expressly authorised by the Ethics Committee and, in any event, always in compliance with applicable regulations.

Included within these exceptions is reasonable hospitality offered to healthcare professionals in a professional scientific context, provided that, due to its frequency or value, it cannot influence the healthcare professional's decision-making capacity and provided that it complies with the requirements set out in Farmaindustria's Code of Good Practice for the Pharmaceutical Industry or in the analogous regulations of the country in which we operate.

Furthermore, as a general rule, we may not accept gifts, personal benefits, financial compensation or unjustified advantages from any client, partner, supplier, competitor or, in general, any natural or legal person seeking to establish such a relationship with Faes Farma. An exception is made for the acceptance of gifts that fall within customary practices and courtesies, provided we comply with the following procedure:

Supposed

- Gifts from the same sender with a total annual value of less than €100.
- Gifts from the same sender with a total annual value of more than €100 but less than €300.
- Gifts from the same sender with a total annual value exceeding €300.

Action

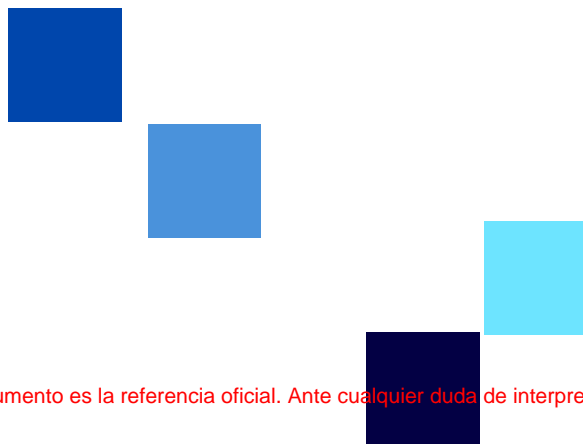
No action is required on the part of the recipient.

They must be reported to the Ethics Committee, which will confirm whether it is appropriate to accept the gift.

They must be reported to the Ethics Committee and returned to the sender, explaining that this is being done in compliance with the rules set out in the Group's Code of Ethics.

To determine the total amount, we will take the calendar year into account.

If we have any doubts, before offering (or accepting) any type of gift, gratuity and/or hospitality, we must consult the Ethics Committee.



E. Interactions with healthcare professionals and public officials

Our interactions with public officials must always be conducted in accordance with current regulations and applicable codes of conduct. We may only engage in interactions with public officials, including healthcare professionals, where we have a legitimate business purpose.

As Faes Farma, S.A. is a member of Farmaindustria and, consequently, of the European Federation of Pharmaceutical Industries and Associations (EFPIA), we must adhere to the standards of conduct established by the industry in each jurisdiction in all our dealings with healthcare professionals, healthcare organisations and patient organisations.

We shall not engage in interactions that interfere with the normal performance of their duties, nor shall we exert undue influence on them with the aim of obtaining a benefit for the Group.



F. Donations

Our donations must be made in a spirit of generosity and must under no circumstances be intended to unduly influence the recipients or final beneficiaries thereof.

Donations are not permitted to political parties, trade unions, or business organisations, associations, foundations or any other entities directly or indirectly dependent on the aforementioned, nor to individual healthcare professionals.

G. Contracting with suppliers

Our supplier procurement policy is based on the pursuit of impartiality and efficiency, for which we must follow clear and transparent processes for the selection of suppliers that include objective criteria, such as quality, financial terms, previous experience, ESG criteria, etc.

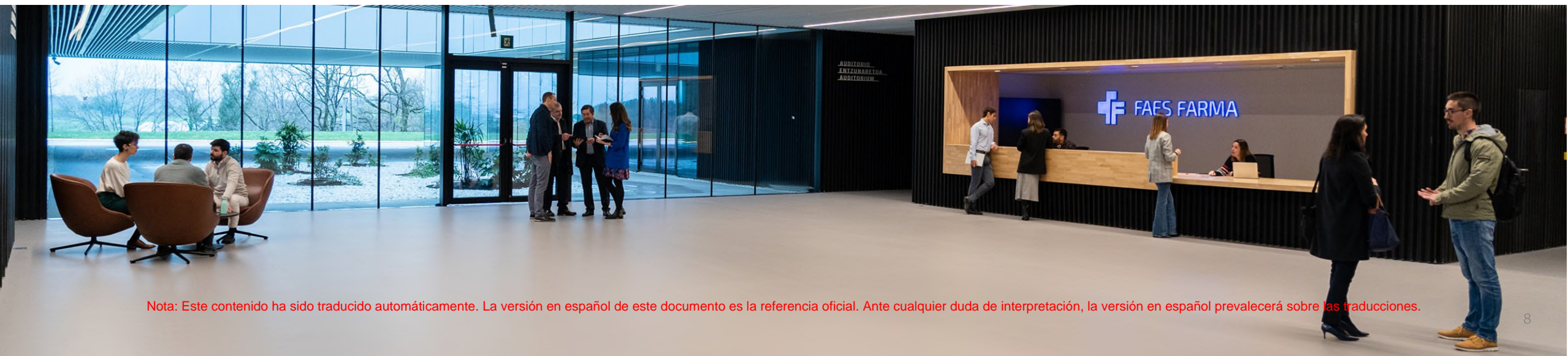
Our personal interests must not be a decisive factor in the contracting of a supplier. Therefore, prior to contracting a supplier, we must bring to the attention of the Ethics Committee any circumstances that may compromise our impartiality in such contracting.

H. Breaches

Any breach of this Policy may be regarded as a breach of good faith in the contractual relationship, which, where applicable, would result in the imposition of the appropriate penalty, as well as the initiation of the procedure for handling, investigating and resolving reports received regarding possible breaches.

I. Final provision

This policy was approved by the Board of Directors of Faes Farma on 23 July 2025 and has been in force since then, rendering previous versions of the same null and void.







Code of Use of IT Tools

July 2024

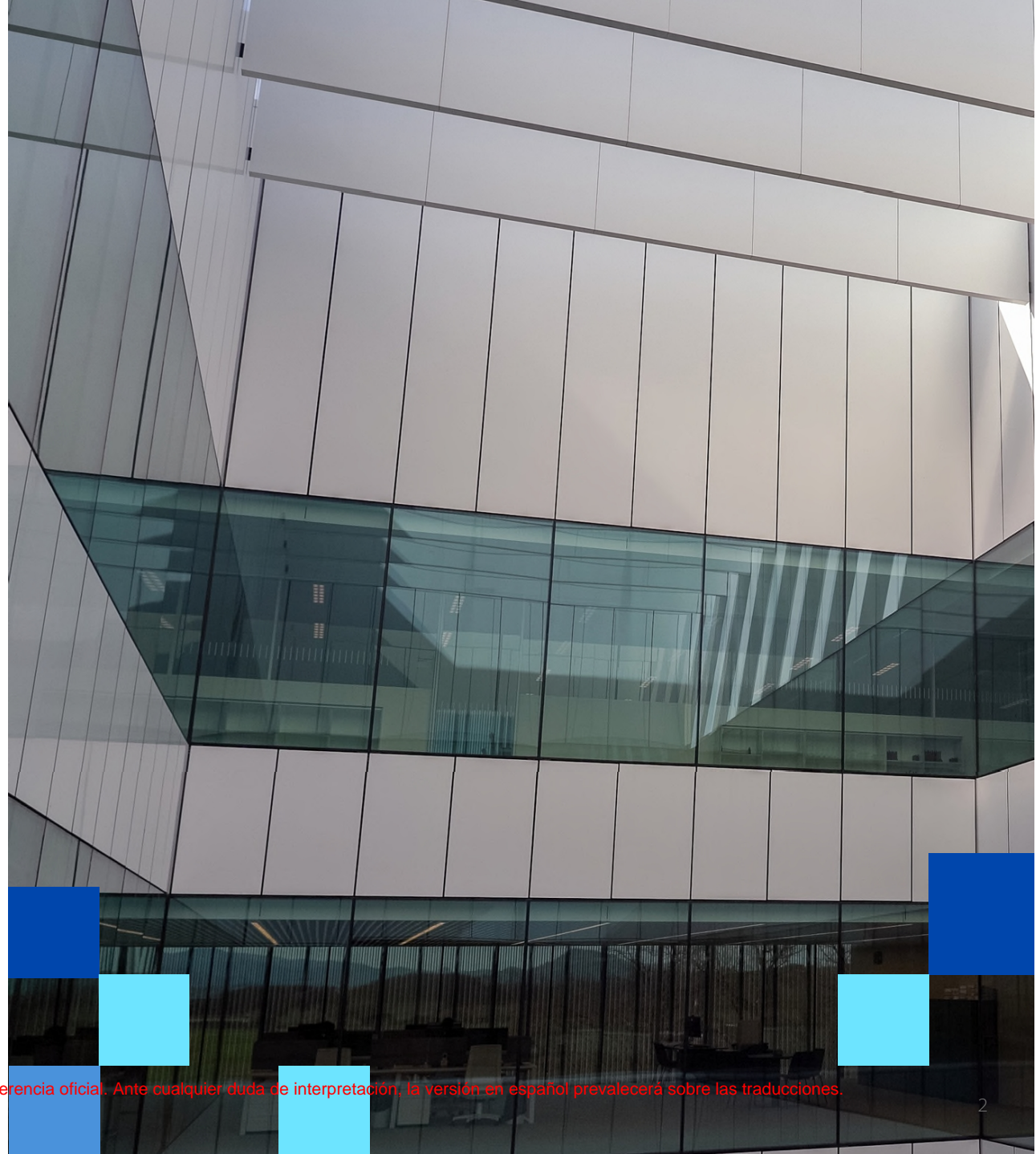


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A. Scope and application

This Code applies to each and every professional providing services to Faes Farma, S.A. and its group of companies (“Faes Farma”, “Faes Farma Group” or the “Group”), regardless of their position, rank, department or geographical location, including directors, managers, employees and contractors.

Its aim is to ensure that all Group professionals make appropriate, responsible and lawful use of the technological resources made available to us and act in accordance with the relevant internal policies.

The term “user” or “users” used throughout the Code refers to the Group’s staff and management, regardless of their position, rank, department or geographical location.

For the purposes of this Code, any digital resource or device, including hardware (computers, mobile phones, tablets, etc.), software, applications, network systems and similar, shall be considered a Technological Resource.

The technological resources available to Faes Farma are tools designed to support the Group’s objectives, enabling users to carry out their professional duties. This is why these resources are made available to users; consequently, Faes Farma must monitor their use, given that they are work tools.

It should be borne in mind that technological resources are an important asset insofar as they enable efficient and productive work, but their improper use may cause damage to the Group that could be extremely serious, including criminal liability for Faes Farma.

The use of Faes Farma’s IT systems by any other authorised user who is not a member of the Group’s staff or management shall be governed by the Code of Conduct for the Use of IT Tools applicable to third parties.



B. Purpose of the Code

The purposes of this Code are as follows:

- (a) To promote the use of Technological Resources in a manner geared towards meeting the Group's needs.
- (b) To prevent the use of Technological Resources to engage in conduct that harms individuals or Faes Farma, including the following:
 - Harassing or discriminating against any person.
 - Disclosing confidential information or breaching data protection regulations.
 - Threatening the security of Faes Farma and its tangible and intangible assets (property, intellectual or industrial property rights, reputation, good image, etc.).
 - Transmitting, distributing, storing, downloading, installing, copying, viewing, sending or receiving any kind of offensive or discriminatory content, particularly if its possession or use constitutes an illegal act.
 - Engaging in any other conduct contrary to the law (including criminal, administrative and civil offences, etc.), this Code or other regulations in force within the Group, as well as any other conduct that may damage the image and reputation of Faes Farma.
- (c) To enable Faes Farma to exercise its right and duty to verify that users are complying with their obligations and, should it be found that the technological resources have been misused, to put an end to such prohibited conduct and to sanction the users responsible.

As the Code is essential for the proper conduct of professional relations, it is imperative that all users read its contents carefully. Furthermore, users may contact the Head of the Group's Information Technology (IT) Team or the person designated by them (hereinafter, the IT Team) to resolve any queries that may arise in relation to this Code.



C. Rules for the use of all technological resource:

All users must take due care of the IT equipment assigned to them, preventing unauthorised access to our work tools and ensuring that they are used in accordance with the rules set out in this code. In line with the above, we must not access IT equipment assigned to other users, unless expressly authorised by the IT Team and solely for the Group's business needs.

As technological resources are work tools, they are not made available to us for the purpose of distributing, storing, downloading, installing, copying, viewing or sending content unrelated to the performance of our professional duties. Whilst Faes Farma is aware that, in line with social norms, personal use of these resources may occasionally occur, even though they belong to the Group, it is necessary to bear in mind the following matters of the utmost importance:



- Pursuant to Article 20.3 of the Workers' Statute, Faes Farma has the right to monitor and ensure that the technological resources provided to users as work tools are used without engaging in the prohibited uses set out in this Code.
- Pursuant to Article 31 bis of the Criminal Code, Faes Farma has a duty to monitor and ensure that no criminal offences are committed within the organisation.
- The right and duty set out in the preceding points imply that monitoring and control by the Faes Farma Group of the use of the media is necessary and unavoidable.
- We, the users, are aware that, since Faes Farma's right and duty to monitor and control the use of the resources is necessary and unavoidable, such use is subject to possible monitoring and, therefore, there are no expectations of privacy, confidentiality or secrecy of communications, even when we are using them for non-work-related purposes.

C. Rules for the use of all technological resources

Specific rules relating to:

1 Access to systems

2 Hardware and software

3 Storage media

4 Users of the email or instant messaging systems provided by the company

5 Use of the internet

6 Access to systems via the network

7 Use of social media

8 Use of instant messaging applications.

9 Use of Artificial Intelligence applications.

C. Rules for the use of all technological resource:

1

Access to the systems

Access to technological resources generally requires the prior allocation of a user account and the granting of the necessary permissions, which shall be granted in accordance with the principle of least privilege for the performance of the assigned tasks.

Registration, deactivation and changes to access rights will be managed by the user's line manager, and the Human Resources and IT teams.



It is our responsibility as users to make proper use of our account, which is non-transferable, and among other things, we must:

- Maintain the security and confidentiality of our credentials, notifying the IT Team of any suspicion of a breach or unauthorised use of the account by third parties.
- Set secure passwords in accordance with the policies implemented and configured in the systems, changing them at the specified intervals or whenever requested by the IT Team (e.g. following a security incident).
- Apply advanced authentication controls to the devices provided to us, if we receive such instructions from the IT Team or our line managers.
- We must generally refrain from using other users' credentials and from accessing the information and technological resources made available to them. In exceptional cases, and solely for organisational purposes, we must obtain the necessary authorisation through the managers of both users, subject to the oversight of the IT Team.

C. Rules for the use of all technological resource:

2

Equipment and software

As a general rule, users may not make any changes, alterations or modifications to any technological resources provided by Faes Farma without the express authorisation of the IT Team.

The installation of new equipment on the technological resources provided by Faes Farma (e.g. monitors, external hard drives, USBs, mobile phones, etc.) must comply with the minimum security requirements communicated by the IT Team at any given time. Outside of these circumstances, any installation or connection of such devices must be expressly authorised by the IT Team.

Every piece of technology provided by Faes Farma to the user will contain the applications and programmes (“software”) necessary to enable the intended users to perform their duties correctly. Any request to download additional applications or programmes must be submitted to the IT Team, who will have the final say on whether or not to approve them.

The use of any Faes Farma programme or application (e.g. Outlook, the Intranet’s Private Area) on personal devices is generally prohibited.

Exceptionally, and subject to prior authorisation from the IT Team, the use of Faes Farma programmes or applications on personal devices will be permitted provided they meet the minimum cybersecurity requirements. The IT Team must verify compliance with these requirements prior to the use of such programmes or applications.

In addition to the conduct generally prohibited in this Code, the following is prohibited:

- Installing, without authorisation from the IT Team and on one’s own initiative, any computer programme or application whose minimum cybersecurity requirements have not been verified by the IT Team.
- Accessing and using unlicensed or “pirated” software (an unlawful act that entails serious criminal and civil liabilities, as well as posing a clear risk to both computer equipment and the information it contains) via Faes Farma’s technological resources.
- Installing digital certificates on devices that could be used to represent Faes Farma without prior authorisation from the IT Team and the holder of said certificate.
- Allow the use of equipment and/or software or applications by third parties who are not part of Faes Farma.

C. Rules for the use of all technological resource:

3 Storage media

The use of storage media is subject to the following rules:



- As a general rule, information should preferably be stored on corporate systems (such as applications, databases or network drives) and, where necessary, removable media provided by the Faes Farma IT Team should be used.
- The mass and indiscriminate storage of business information on our computers' hard drives must be avoided.
- Where the use of third-party removable storage media not controlled by the Faes Farma IT Team is required, such media must not be connected to corporate computers without first ensuring that they are virus-free or not malicious ("fake USBs").
- The storage of corporate information on removable or portable storage media must be authorised and shall be subject to cryptographic controls validated by the IT Team. As with computer equipment, users must ensure the device is kept secure at all times.
- Should the need arise to send any removable or portable storage media, the instructions set out by the IT Team must be followed, which, amongst other things, shall include:
 - Proper packaging to protect the medium from physical damage and conceal the contents.
 - The use of certified courier or transport services that guarantee secure delivery to the intended recipient.
- When storage media are to be reused, particularly for shared use, we must follow the IT Team's instructions regarding the use of secure erasure tools and techniques.

C. Rules for the use of all technological resource:

4

Users of email or provided by the company

Users shall only access the email address or addresses assigned to them.

In accordance with the General Rules of this Code, Faes Farma has the right to monitor and ensure that the technological resources provided to us as work tools are used in accordance with this Code.

The proper use of the email service or any other instant messaging system provided by the company means that we must not use it for any of the actions generally prohibited in this Code, nor for the following:

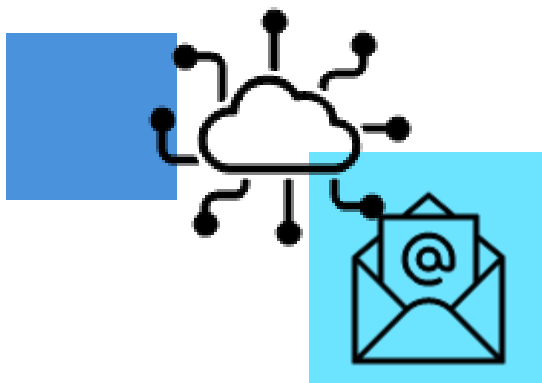
- Falsifying, concealing, deleting or substituting the sender's identity in order to impersonate another person or to pretend to belong to an entity other than Faes Farma.
- Using private email accounts offered by any internet service provider for professional purposes related to Faes Farma, unless expressly authorised by the IT Team.
- Using email as a personal storage space; instead, use the storage units or file-sharing tools made available to us by the IT Team, which may offer sharing capabilities.
- Sending or requesting messages, files or materials containing explicitly sexual or discriminatory content, or which may be offensive, defamatory, threatening or insulting to any person.
- Subscribing to any website, platform or application that has no connection with the user's professional duties.
- Sending or forwarding mass emails, unless you have express authorisation regarding a specific group or groups of recipients, and using distribution lists for this purpose or, failing that, the blind carbon copy (BCC) field, so as to avoid revealing the identities of all recipients of the message.
- Interacting with suspicious messages by clicking on external links, opening attachments that may contain malicious code, or simply replying to the sender, as this could confirm our identity and the validity of the email account. The sender's identity must always be verified, and any suspicions must be reported to the IT Team.

C. Rules for the use of all technological resource:

4

Users of email or provided by the company

In addition we will continue the the following guidelines when using email:



- Signatures must be configured in accordance with corporate guidelines to ensure correct identification by recipients.
- Particular care will be taken to check recipients' accounts before sending messages to prevent any unauthorised disclosure of information.
- Wherever possible, the sending of sensitive documentation as email attachments shall be avoided; if strictly necessary, the required security measures shall be applied (such as document or email encryption using passwords). Preference shall be given to exchange tools which, amongst other features, allow for recipient authentication, as well as access level controls and time-based access restrictions.

Email forwarding

Unless expressly authorised by the IT Team and in exceptional circumstances, it is prohibited to redirect (or forward) emails received in corporate email accounts to non-corporate email accounts and vice versa; that is, the automatic redirection or forwarding of emails received in non-corporate email accounts to corporate email accounts. In the event that we or the head of our department need to redirect emails, we must request authorisation from the IT Team, which will be responsible for carrying out the redirection.

We, the users, are aware that the IT Team may, subject to authorisation from the HR department, redirect and forward emails from corporate accounts for organisational reasons or when necessary to safeguard Faes Farma's business. For example, redirection will be permitted in cases of long-term sick leave or during the processing and/or implementation of redundancies.

C. Rules for the use of all technological resource:

5

Use of the internet

Access to the internet from Faes Farma's computer equipment must be authorised, will be monitored by the IT Team, and its justification will be determined by the requirements of the role.

All users with internet access are responsible for the material they view and download from the internet, as well as for their general use of this resource. We must therefore use the internet responsibly and lawfully, in accordance with the following rules of use:

- The internet may only be accessed via the browsers and tools made available by the IT Team, and no settings or security measures may be altered without their authorisation.
- It is prohibited to access, speak or write on social media, forums, chat rooms or similar applications, unless there is a direct and demonstrable link to the performance of our duties, as detailed in point 7 of this document.
- It is also prohibited to use file-sharing software or peer-to-peer (*P2P*) file-sharing software, as well as any other software for downloading music, films, videos and/or games.
- In relation to the previous point, the downloading of very large files without clear justification for business purposes is prohibited, particularly at times when network congestion could affect Faes Farma's operations.
- Accessing and downloading content or programmes that are illegal is also prohibited.



C. Rules for the use of all technological resource:

5

Internet use



Artificial Intelligence Tools

Notwithstanding the foregoing, please be advised that the use of Artificial Intelligence tools available on the Internet may result in the disclosure of Faes Farma's confidential information, as well as compromise Faes Farma's compliance with other legal obligations. Such tools include not only chat systems, but also any other tool that utilises Artificial Intelligence techniques for its operation. The use of such tools shall be governed by the provisions of point 9.

Cloud services

The use of cloud services intended for the exchange of information, team collaboration or, in general, the performance of professional activities, is restricted to those expressly authorised by the IT Team, and which therefore meet the minimum security requirements of the business. Their approval will be managed through the relevant area or department managers.

Internet access from external networks

Furthermore, please be aware that connecting to networks outside Faes Farma, including open Wi-Fi networks, may compromise the security of Faes Farma's systems and information. Therefore, any connection to external internet networks outside Faes Farma that are not trusted is prohibited. Furthermore, when connecting to a network external to Faes Farma for the purposes of our professional duties, the connection must always be made via a VPN.

C. Rules for the use of all technological resource:

6

Access to systems via the network

The use of Faes Farma's data networks must be governed by the proper use of the resources comprising them, and the following activities are expressly prohibited, in addition to those generally prohibited in the Code:



- Attempting to access, read, delete, copy or modify other users' files without the knowledge and consent of the author, or where applicable, the organisation.
- Attempting to access restricted areas of the computer systems of Faes Farma, its other users or third parties, unless authorised by the IT Team.
- Destroying, altering, rendering unusable or damaging the data, programmes or electronic documents of Faes Farma, its other users or third parties.
- Attempting to increase a user's privilege level within the system; this prohibition applies to IT department staff as well, and requires the express authorisation of the user's line manager.
- Deliberately obstructing other users' access to the organisation's equipment and systems through the excessive consumption of IT and telecommunications resources, as well as carrying out actions that damage, interrupt or cause errors in said equipment and systems.
- Introducing programs, viruses, macros, applets, ActiveX controls or any other device that causes or is likely to cause any kind of alteration to IT resources.
- Introducing, reproducing or distributing computer programs not expressly authorised by the organisation, or any other type of work or material whose intellectual property rights belong to third parties.
- Making the equipment and software supplied by Faes Farma available to unauthorised third parties.

All users must use corporate antivirus software and its updates on their computers to prevent material downloaded from the Internet or provided by a third party from destroying or corrupting computer data.

C. Rules for the use of all technological resource:

7

Use of social media

As employees of Faes Farma, when using any social media platform, we must act in accordance with this Code and refrain from any action that may breach the provisions of this Code or harm Faes Farma.

In particular, we shall refrain from:



- Carrying out any kind of promotional activity regarding Faes Farma products, and in particular, regarding any Faes Farma medicine subject to medical prescription.
- Publishing content, whether directly or indirectly (e.g. by sharing, retweeting, etc.), that is inappropriate or that may damage the image and reputation of Faes Farma, or any content that may compromise Faes Farma's regulatory compliance.
- Expressing opinions or identifying yourself using the names or active ingredients of products to which Faes Farma holds rights, or logos, images, colours, promotional slogans, etc.
- Publishing or linking to content – whether in style or tone – that could damage Faes Farma's reputation.
- Participating online in events or initiatives that could damage the reputation of Faes Farma or the products it sells.
- Making comments that may be offensive, derogatory or in poor taste.
- Disclose any information that could be considered confidential information belonging to Faes Farma.

C. Rules for the use of all technological resource:

8

Use of instant messaging applications

Faes Farma authorises the installation of instant messaging applications on mobile phones provided by Faes Farma, subject to authorisation by the IT Team.

The use of these messaging systems is justified by the need to make communication simpler and more fluid, facilitating coordination with various colleagues. However, this communication system does not replace email as a corporate communication tool.

To ensure this communication channel is useful for everyone, it is necessary to follow some basic rules. All users of messaging systems must comply with the general rules for the use of all technological media, as well as the following guidelines:

- Do not share confidential or sensitive information via these tools, bearing in mind that they are external to Faes Farma. When adding any data, comments or information, it is assumed that this may be viewed and analysed by the owners of the application, as well as by Faes Farma if the device is required.
- Users are responsible for their contributions and for any consequences to their image and reputation arising from their use of messaging services.
- It should be borne in mind that messages may be forwarded to a third party without the author's knowledge.
- These applications are a means of exchanging information, but they are not the appropriate forum for exchanging private or confidential information. Such information must be channelled through the specific channels established by the Group for that purpose.
- You must treat other users with respect; use appropriate and correct language and behave as if you were in the other person's presence.
- Before adding someone to a messaging group, you must ask for their permission.

Users can contact the IT team to resolve any queries they may have regarding these matters.

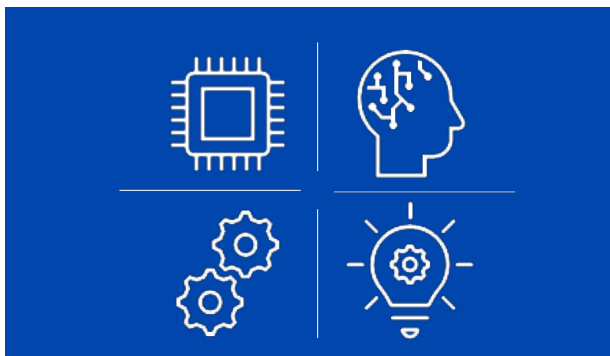


C. Rules for the use of all technological resource:

9

Use of Artificial Intelligence applications

Faes Farma is committed to the diligent and ethical use of Artificial Intelligence tools. In particular, when using such tools, Faes Farma must observe the following precautions:



- Use transparent and explainable Artificial Intelligence algorithms and models that generate high-quality content.
- Not to feed these Artificial Intelligence systems with biased or discriminatory information that could influence the results and damage Faes Farma's reputation and/or its relationship with customers.
- Implement measures to ensure the transparency of the decision-making processes of the Artificial Intelligence used within the company. As far as possible, the criteria and processes used to make decisions shall be clearly documented and communicated.
- Continuously improve the artificial intelligence systems you use, incorporating technological advancements and best practices in the field.
- Avoid excessive reliance on Artificial Intelligence technology that could replace employees' critical thinking, creativity and problem-solving skills, as well as limit their critical decision-making ability.
- Train and adapt the professional skills of its staff in the use of such tools.
- Appoint responsible personnel to ensure human oversight of high-risk Artificial Intelligence systems.

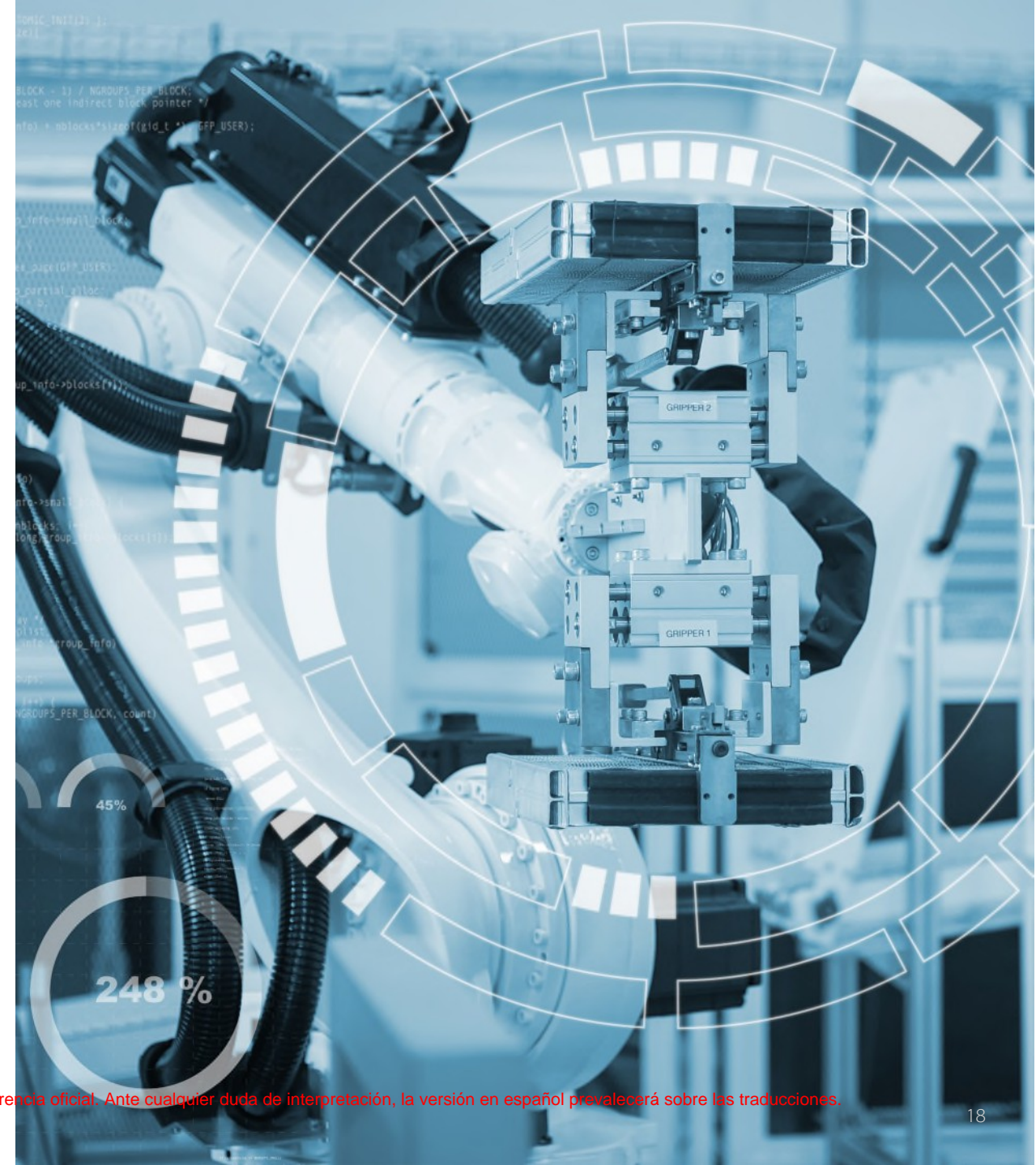
C. Rules for the use of all technological resource:

9

Use of Artificial Intelligence applications

Users may only use Artificial Intelligence tools that have been previously approved by the IT Team, which must:

- Comply with applicable laws, regulations, standards and the ethical principles set out in this Code.
- Not discriminate against any person or group on the grounds of race, gender, sexual orientation, religion, ethnic origin or other protected characteristics.
- Not infringe the copyright or other intellectual property rights of third parties.
- Do not upload any non-public information or documents, confidential information, trade secrets, source code or any intellectual property belonging to Faes Farma, nor any personal data.



D. Reporting incidents

Should we detect any anomaly in the IT systems (unavailability or general malfunction) or any event that may be associated with or lead to a security incident, we must immediately inform the IT Team, which will duly record it and escalate the matter to the necessary response teams and managers.



The following events, without limitation, are considered security incidents that affect or may affect the Group's IT system:

- Misuse of passwords by other users.
- Unauthorised access by a user within the organisation to a file or document for which they do not have permission, thereby exceeding their profile.
- Loss of IT media containing relevant Group data. The loss of any device or item, including personal ones, containing Faes Farma applications or programmes constitutes a security incident.
- Loss of data due to misuse of computer applications.
- Attacks targeting networked systems, seeking to cause congestion or intrusion.
- Infection of information systems by viruses or other harmful elements.
- Unauthorised physical access to restricted-access rooms, with particular emphasis on server rooms, communications rooms or rooms containing paper documentation.

E. Industrial and intellectual property

Information or content published or disseminated on the Internet or other media is protected by national and international intellectual and industrial property laws.

Faes Farma complies with these laws; therefore, to avoid incurring liabilities that could harm the Group, all users must verify, before using such information or content, whether, in accordance with the aforementioned laws and the licences and authorisations obtained, we may effectively make use of such information. In case of doubt, we shall refrain from using it or contact the Legal Department to confirm whether the use of such information or content complies with current legislation.

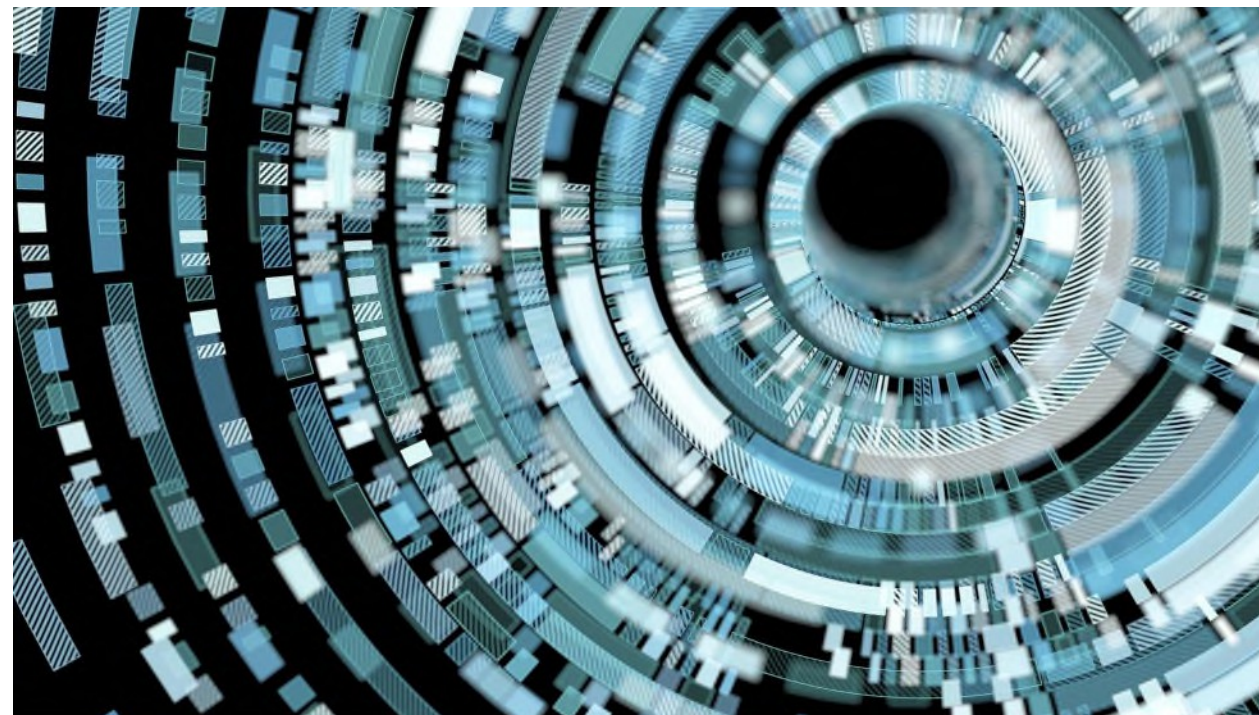
It is prohibited to copy programmes, applications, documents or any type of material owned by Faes Farma onto private computers or storage media.



F. Right to monitor the proper use of technological resources

Any breach by a user of any rule set out in this Code may cause significant harm to Faes Farma and may even result in criminal offences, and constitutes a breach by the user of their contractual obligations, in which case the Faes Farma Group is entitled both to require the user to cease such actions immediately and to take any disciplinary or other appropriate measures in accordance with applicable regulations.

Faes Farma may access, monitor and control all technological resources and their use, always in accordance with the applicable law at any given time and with full safeguards for the right to honour, to personal and family privacy, and to users' personal data, in order to ensure compliance with the provisions of this Code and applicable legislation, to supervise work and to sanction or take action against employees and other users who engage in prohibited conduct, and to be able to substantiate such conduct before the courts or other authorities.



G. Termination of the relationship with the user

The provision of the Technological Resources to users for the performance of their professional duties shall only remain in force for the duration of the relationship with Faes Farma; therefore, in the event of termination of the relationship with the Faes Farma Group, we must return the resources made available to us. From the moment the relationship with the organisation is terminated for any reason, access to said resources shall be denied.

The above provision may apply in the event of disciplinary proceedings being initiated against a user who is an employee of Faes Farma for committing a very serious offence, where the nature of the alleged offence is related to the conduct prohibited in this Code.

H. Final Provision

This Code was approved by the Board of Directors of Faes Farma on 29 July 2024 and has been in force since then, rendering previous versions of the same null and void.



