

Code of Ethics



September 2021

ABOUT US

LABORATORIOS MEDICAMENTOS INTERNACIONALES, S.A. (hereinafter, MEDINSA) and **ARISTO IBERIA PHARMA IBERIA, S.L.** (hereinafter, ARISTO IBERIA) are two Spanish entities fully owned by the German company ARISTO PHARMA GmbH.

MEDINSA is a private company that does business both domestically and internationally in the field of manufacturing, researching and developing pharmaceutical products, with a history that dates back to 1946.

ARISTO IBERIA is dedicated to the sale and distribution of medicines, with a broad portfolio of generic products and self-care products.

All **MEDINSA** and **ARISTO IBERIA** personnel are fully committed to contributing everything they have to restore people's health and improve quality of life. In undertaking this task, we want to follow the highest standards that we have set for ourselves concerning quality, effectiveness, safety and environmental suitability. Above all, we strive to ensure respect for the different social, legal and political conditions that apply to pharmaceutical products.



PURPOSE

The Code of Ethics represents the highest standard in the Company's internal governance framework and inspires internal policies, protocols and processes that the Company implements.

The purpose of the Code is to provide the main guidelines of conduct that all people who have a direct or indirect link to **MEDINSA** or **ARISTO IBERIA** must follow, as well as the principles and values that have inspired, inspire and must continue to inspire the daily work of all those who are part of the companies.

Furthermore, we strive to position **MEDINSA** and **ARISTO IBERIA** as sustainable companies that are models nationwide in the development, production and distribution of drugs. We also aim to undertake all our actions with due excellence toward our customers, prioritising the safety and professional and personal development of our employees and partners.

FIELD OF APPLICATION

This Code of Ethics implements the values, principles and standards that must govern the behaviour of all **employees** who are part of the companies, as well as of the companies' **executives and administrators** in the relationships established with their suppliers, customers, public administrations and third parties in general.

Likewise, the Code will apply to **temporary workers** and to **contractors and subcontractors** who maintain permanent or temporary professional relationships with the Company and have any employment relationship with the Company.

Furthermore, the values and principles described in this Code must serve as a guide for all our **suppliers and business partners** on how to carry out their professional work.

These individuals (hereinafter, the parties) are required to comply with this Code and must understand and confirm their full compliance with it. Any breach of the provisions set forth in this Code could lead to the relevant disciplinary, contractual or legal measures being adopted.

MISSION

MEDINSA and **ARISTO IBERIA**, with their daily responsibility and commitment, aim to contribute positively to society, with a special emphasis on our stakeholders.

VISION

Our vision is to become a sustainable group of companies that is a benchmark both domestically and internationally.

We aim to be a model in terms of innovation and enjoy prestige from large firms, institutions and public and private companies as well as drug developers, manufacturers and distributors.

The Company boasts a great team of qualified, committed and responsible individuals who are proud to be part of the Company and are always available to help. Furthermore, **MEDINSA** and **ARISTO IBERIA** are strongly committed to people's safety, to contributing positively to society through their corporate social responsibility activities and to ensuring environmental protection.

VALUES

The values that inspire the actions of **MEDINSA** and **ARISTO IBERIA** are as follows:

Commitment

We take on responsibilities to achieve the Company's goals and thus generate long-lasting satisfaction for our customers. This responsibility also binds us to our projects, colleagues, society and the environment.

Quality and Excellence



Quality is at the heart of everything we do and is an essential requisite for manufacturing, developing and marketing our medicines in order to improve patients' health and well-being.

We consider ongoing improvement in our processes as the foundation for achieving Excellence. We trust in our teams and their commitment, perseverance and ability to learn and innovate in order to respond to our customers' needs.

Integrity

Integrity is the core element that gives us credibility and strengthens the other values. Integrity requires us to keep our promises even in difficult situations, building trust, commitment and enthusiasm to align with our Company's mission.

Respect

We promote tolerance, diversity, inclusion, creativity, equality of opportunities and teamwork among our employees. Everyone must be considered as an individual, respecting their dignity and recognising their value. Furthermore, we ensure that all our actions are respectful of people, society and the environment. We work to create a climate of openness, trust and respect among all our stakeholders.

EQUALITY PLAN

MEDINSA and **ARISTO IBERIA** declare their commitment to the principle of effective equality among men and women, as well as to respecting this principle in all actions carried out by the Company. In this sense, every Provider must agree to and state that they respect this principle, and consequently adopt the following commitment:

- a) To govern their activity in accordance with the **principles of equality of treatment, equal opportunities and respect for diversity**, and to promote these principles.
- b) To integrate **different gender perspectives**, positive action, and eliminate sex-based roles and stereotypes in their actions.
- c) To ensure balanced representation among suitably talented, skilled and well trained women and men in their managerial bodies and associations.
- d) To use non-sexist language and images in all formats.
- e) To prevent sexual harassment and harassment for reasons of sex through a protocol that includes preventive actions, as well as corrective and punitive actions for these behaviours that violate and limit people's freedom and dignity.
- f) To promote the work-life balance for the people who make up the organisation

g) To spread good practices at the organisational level in terms of equality of opportunities implemented in the organisation.

h) To develop a culture that encourages equality, raises awareness throughout the organisation and encompasses all the objectives of the Equality Plan and allows these objectives to be met.

LABOUR AND HUMAN RIGHTS MATTERS

We guarantee and protect internationally recognised Human Rights, aiming to not be complicit in any form of abuse or violation within our sphere of influence and/or action.

We forbid any kind of child or forced labour in all its forms. Consequently, forced or involuntary labour, slavery, servitude, involuntary prison labour and long-term contracts with no termination clause are prohibited.

We also respect and comply with labour laws allowing the right of association and organisation, and we pay all our staff in accordance with the applicable laws. As per these laws, the working day does not exceed the maximum allowed period and employee remuneration includes minimum wages, overtime, due compensation and mandatory benefits. Salaries are paid on time, and they are sufficiently fair and competitive to provide a dignified standard of living for employees and their families.

CODES OF CONDUCT

Compliance with the law

Everyone subject to this Code must respect internal regulations, the Spanish legal system, as well as all European and international laws that are

applicable to the activity that the Company undertakes. All illegal conduct is expressly prohibited and rejected by **MEDINSA** and **ARISTO IBERIA**.

Health and safety

The safety of all **MEDINSA** and **ARISTO IBERIA** employees is an essential value for properly conducting the Company's business, and the Company will promote measures that protect the health of its employees, as well as providing ongoing training on the prevention of risks in the workplace.

All Company personnel must promote and ensure compliance with safety measures, as well as with implementing a prevention mindset in all the activities carried out in the organisation.

Likewise, we expect our suppliers to commit to safety in the workplace and protect their employees' health by implementing suitable internal standards and safety policies.



Commitment to the environment

Respect for the environment is one of the Company's highest priorities. Therefore, **MEDINSA** and **ARISTO IBERIA** are committed to developing processes and implementing the necessary controls to minimise the environmental impact of their activity.

Furthermore, we are committed to involving our suppliers in strengthening transparency and collaboration, and we encourage them to support and promote initiatives that fight against climate change.

Preventing corruption and other illegal behaviours

The Company, in its commitment to wholly rejecting any type of corruption and bribery, has implemented a Corruption Prevention Policy that defines the principles to be followed to prevent the risks arising from practices that may be considered corrupt in carrying out its relationships with third parties.

Corruption is understood as the use of illegal practices that aim to obtain any benefit, for example bribery or influence peddling.

Zero tolerance for any act of violence or discrimination

MEDINSA and **ARISTO IBERIA** resolutely reject any type of discrimination, whether motivated by reasons of sex, religion, race, political choice, sexual orientation or any other reason. In the same vein, the Company rejects both verbally and physically violent behaviours.

Should the Company become aware of any type of violent or discriminatory behaviour by any person related with these entities, all the necessary measures will be taken to end said conduct and solutions will be put in place to prevent them from happening again.

Relationship with suppliers

The Company promotes long-lasting business relationships based on mutual trust, quality, commitment, professionalism and the experience of its suppliers.

Suppliers will be selected based on objective and impartial criteria, seeking long-term collaborations based on trust, professionalism and transparency.

Likewise, local suppliers will be favoured in order to generate positive impacts on local communities. The Company will also positively value suppliers who hold certifications recognised by independent entities in the fields of Social and Environmental Sustainability.

The Company requires its suppliers to comply with its ethical principles in their relationships with **MEDINSA** and **ARISTO IBERIA**, as well as understanding and respecting the provisions contained in this Code of Ethics at all times. Therefore, the Company undertakes to make the content of this Code known to all its suppliers, reserving the right to evaluate them in order to guarantee compliance with the matters included in this Code of Ethics.

Confidentiality of information and personal data processing

The parties bound by this Code who, due to their activity, access confidential information that either belongs to the Company or to third parties are obliged to protect it, undertaking to maintain secrecy concerning the information and to use it exclusively for the professional purposes for which it has been authorised. Furthermore, the parties bound by this Code must comply with the confidentiality clauses to which they are expressly bound, and said parties shall in no case use any type of information that belongs to the Company for personal purposes or disclose it to others. These commitments remain binding even after the end of the professional relationship.

Moreover, the Company undertakes to respect the private and confidential nature of the personal information provided by its employees in the framework of labour relationships, as well as to preserve the integrity and confidentiality of the data in accordance with the current data protection legislation.

The Company shall not disclose the personal data of its professionals, customers, suppliers or collaborators, unless it has the express consent of the data subjects or if said disclosure is required by current legislation, such as in judicial or administrative proceedings. In no case shall the personal data of

professionals be processed for purposes other than those which are legally or contractually established.

Intellectual and industrial property



reproduction rights and copyrights, among others).

The Company and the parties bound by this Code must respect the intellectual and industrial property rights of the Company and of third parties (patents, brands, software

Accounting and invoicing

The Company guarantees the veracity and utmost transparency of its financial information in accordance with the accounting principles set forth in Spanish and international standards.

Furthermore, the Company's employees and executives, in their relationships with customers and suppliers, commit to ensuring the truthfulness of the information and must respect the internal policies, protocols and processes concerning invoicing and payments.

Appropriate use of IT resources

In accordance with the Company's Code on the Use of IT Resources, employees must use the IT equipment provided to them to carry out their

activity responsibly, and must comply with the applicable internal regulations in this regard.

Preventing conflicts of interest

All parties bound by this Code must clearly differentiate between their own interests and those of the Company, thereby preventing conflicts of interest. Consequently, no activity or transaction will be carried in which

personal interests prevail over those of the Company or its customers.

ETHICS INBOX FOR MEDINSA AND ARISTO IBERIA

All messages related to a possible violation or breach of the Code of Ethics detected by employees or other collaborators bound by this document must be sent to the Compliance Officer confidentially, without fear of reprisals, through the following channels:

- i. By post addressed to the compliance officer and sent to the Company's offices at **calle Solana, 26, 28850 Torrejón de Ardoz (Madrid), Spain**. Be sure to mark the envelope as "CONFIDENTIAL".
- ii. By email addressed to **compliance@medinsa.com** and/or **compliance@aristo-iberia.com**, which will be received by the Compliance Officer.

DO YOU HAVE ANY QUESTIONS?

Remember that if you have any questions about how to interpret and/or apply the contents of this Code of Ethics, you can contact the Compliance Office directly by sending your questions to the email or postal addresses indicated above.



