



## **1. INTRODUCTION**

This EUROMED Group Code of Conduct for Business Partners aims to ensure that EUROMED Group and its business partners always act in compliance with current legislation, and that they undertake to conduct their business in accordance with a set of ethical principles, to maintain long-lasting and stable business relationships.

This Code of Conduct shall be applied in accordance with the laws and regulations applicable at any given time, as well as in accordance with the other regulations that EUROMED Group may decide to apply to its activities.

## **2. ETHICAL PRINCIPLES**

### **2.1. SOCIAL RESPONSIBILITY: HUMAN RIGHTS, EMPLOYEE WELLBEING AND EMPLOYMENT RIGHTS**

#### **2.1.1. COMPLY WITH ALL APPLICABLE LAWS, RULES AND REGULATIONS**

The business partner undertakes to comply with all applicable laws, rules and regulations governing its professional activity.

The business partner undertakes to avoid any conduct that may be detrimental or potentially detrimental to EUROMED Group and that may compromise its interests, reputation or image.

EUROMED Group shall monitor, by any means it deems appropriate, the business partner's knowledge of this Code of Conduct, always ensuring that it has in its possession an updated version of the Code of Conduct.

#### **2.1.2. TREAT ITS EMPLOYEES WITH DIGNITY AND RESPECT**

The business partner is committed to respect the human rights of its employees and to treat them with dignity and respect, as reflected in the principles contained in major international declarations, such as the Universal Declaration of Human Rights and the International Labour Organisation (ILO) Declaration.

#### **2.1.3. AVOIDING CHILD LABOUR**

EUROMED Group does not tolerate child labour. The business partner may not employ children under the legal school leaving age and may not under any circumstances employ children under the age of 14 (or in accordance with national law if the minimum age is higher).

#### **2.1.4. AVOIDING FORCED LABOUR AND ANY OTHER FORM OF MODERN SLAVERY**

EUROMED Group does not tolerate any form of involuntary work or work exacted under threat of penalty or other sanctions, including compulsory overtime and work obligations. We therefore also expect our business partner to take measures to avoid forced labour, any form of modern slavery or other forms of domination or oppression in the workplace.

#### **2.1.5. PROHIBIT ANY DISCRIMINATORY OR HARASSING BEHAVIOUR**

The business partner shall prohibit any conduct that may amount to discrimination of any kind or that may be considered an abuse or offence. Likewise, it will not tolerate any aggressive behaviour or behaviour that could lead to moral or sexual harassment.

#### **2.1.6. HEALTH AND SAFETY IN THE WORKPLACE**

We expect our business partner to provide a safe and healthy working environment for their employees and to comply with all applicable occupational health and safety legislation. In addition, appropriate measures must be implemented to prevent work-related accidents and health hazards.

#### **2.1.7. FAIR WAGES AND FAIR WORKING HOURS**

Employees must be paid in accordance with applicable national and local laws, including minimum wage requirements, overtime pay and mandatory fringe benefits (e.g. social security contributions). Working hours must be in line with applicable law.

#### **2.1.8. FREEDOM OF ASSOCIATION**

Within the scope of applicable law, we expect our business partner to respect the rights of employees to freely associate, form and join trade unions, appoint employee representatives, form a works council and actively participate in collective bargaining. Employee representatives are not discriminated against or subject to reprisal for forming, joining or being a member of a trade union, and they are afforded the opportunity to exercise their representative functions in the workplace.

#### **2.1.9. RESPECTING LAND RIGHTS**

When acquiring, developing, building on or otherwise using land, we expect our business partner to observe the prohibition on unlawful eviction and dispossession of land, forests and bodies of water, particularly where their use secures a person's livelihood.

### **2.1.10. DEPLOYING SECURITY PERSONNEL**

If a business partner deploys private or public security personnel to safeguard business projects, it must adequately instruct and monitor such personnel to ensure that they do not resort to torture, cruelty, unreasonable violence, inhuman or degrading treatment, endanger life or limb.

## **2.2. ENVIRONMENTAL RESPONSIBILITY: CLIMATE PROTECTION**

### **2.2.1. MINIMISING THE ENVIRONMENTAL IMPACT OF THEIR ACTIVITIES**

We expect our business partner to make efforts to reduce emissions, wastewater, waste, and avoid excessive water consumption. Particularly, it should be ensured that the environmental impacts do not impede access to clean drinking water and sanitary facilities or endanger human health.

The business partner must make every effort to ensure that the handling, storage, transportation, reuse, recycling and disposal of all types of waste and wastewater are carried out safely and in accordance with applicable regulations.

### **2.2.2. COMPLIANCE WITH SPECIFIC ENVIRONMENTAL CONVENTIONS**

Where relevant to their business activities, our business partner must treat persistent organic pollutants (POPs) and mercury-containing substances in accordance with the provisions of the Stockholm Convention on Persistent Organic Pollutant and the Minamata Convention on Mercury. This also applies to the handling of waste, emissions and wastewater which may contain mercury or POPs. The business partner must also ensure that waste generated in their operations is managed in accordance with official regulations and the requirements of the Basel Convention, particularly in connection with cross-border shipment or commerce.

## **2.3. INTEGRITY AND ETHICAL CONDUCT**

### **2.3.1. AVOIDING CONFLICTS OF INTEREST**

The business partner shall avoid all situations that may lead its employees into having a conflict of interest between their personal interests (or those of any member of their family) and those of their Organisation and shall always make decisions in an objective manner.

### **2.3.2. PREVENT CORRUPTION AND BRIBERY**

The business partner shall not permit any act, action or conduct that may be related to trading in influence or corruption, in accordance with the applicable law at any given time. And shall ensure that its employees do not offer, promise or give any benefits to EUROMED Group employees, or to third parties on behalf of EUROMED Group.

Finally, the business partner undertakes to complete the Anti-Money Laundering Charter which EUROMED Group will send to him/her.

### **2.3.3. RESPECT FREE COMPETITION**

The business partner undertakes to compete in the market fairly and without infringing the applicable rules on unfair competition and anti-trust behaviour, which are the guarantee for the proper functioning of the market. In addition, it shall ensure that the fundamental principles of anti-trust law are respected in all the contracts or agreements it enters, or to which it is a party.

The business partner shall not disclose to competitors EUROMED Group's strategic decisions, or the commercial, pricing or promotional policies it adopts or intends to adopt.

### **2.3.4. PROTECT PRIVACY AND CONFIDENTIAL INFORMATION**

The business partner shall comply with all applicable rules on the protection of personal data and shall refrain from making any use of personal data to which it may have access for purposes other than the exercise of its functions or activities.

On the other hand, the business partner has the duty to protect and use information and/or documents belonging to EUROMED Group in a confidential manner. The use of this information and/or documents shall be strictly necessary for the performance of its functions or tasks, and shall not be provided to third parties, including family members or friends, except where (i) required by applicable law, (ii) authorised by EUROMED Group.

Finally, the business partner's duty of confidentiality shall survive the termination of its contractual relationship with EUROMED Group.

### **2.3.5. COMPLIANCE WITH FOREIGN TRADE LEGISLATION**

The business partner must have appropriate safeguards in place to ensure that transactions with third parties do not violate applicable economic embargoes or trade regulations, import and export controls or provisions to combat the international financing of terrorism.

### **3. ETHICAL CHANNEL**

An Ethics Channel has been set up where any person who has or has had an employment or professional relationship with EUROMED Group can report any infringement observed during EUROMED Group's activities that is contrary to the law or its internal regulations. The Ethics Channel has the following internal communication channels:

E-mail:

denuncias@euromed.es

Postal mail:

A/A Compliance Officer (confidential),  
C/ Rec de Dalt, 21-23, Pol. Ind. "Can Magarola", 08100 - Mollet del Vallès (Spain)

Web:

<https://dermapharm.integrityline.com/frontpage>

Communications (anonymous if desired) can be made in writing or by voice message.

In addition, communications can also be made through the external information channel of the Independent Authority for Whistleblower Protection, or through the corresponding regional authorities or bodies, either directly or after communication through the EUROMED Group's Ethical Channel. In the design and application of the Ethical Channel, the legal framework in force will be fully respected, ensuring the informants' right to anonymity, the absence of reprisals, and the guarantee of confidentiality and information to the informant.

### **4. INFRINGEMENTS AND VERIFICATIONS**

Infringements of this Code of Conduct adversely affect EUROMED Group and, in general, all third parties with whom it has a business relationship.

The business partner is responsible for complying with the principles expressed in this Code of Conduct. EUROMED Group reserves the right to verify compliance with this Code of Conduct either by its own employees or independent third parties. During the verification, the business partner is expected to cooperate and provide the necessary information.

## **5. SCOPE**

This Code of Conduct applies to all business partners of EUROMED Group.

## **6. RESPONSIBILITIES**

The Sustainability Department of EUROMED Group will be responsible for the Code of Conduct review and the EUROMED Group's business partner will be responsible for complying with the principles outlined in this Code of Conduct.

## **7. SANCTIONS FOR VIOLATIONS OF THIS CODE OF CONDUCT**

EUROMED Group treats violations of the obligations, requirements and provisions of this Code of Conduct as a breach of contract and will therefore consider taking appropriate (legal) actions in individual cases. Where necessary, actions to be taken may include conducting audits or due diligence checks, training and instruction, suspending or even terminating business relations with the business partner. If violations are identified, the business partner will be given the opportunity to take appropriate remedial action.

## **8. REVIEW**

This policy has been approved by EUROMED Group's board. The document in question will be reviewed annually or as needed.