



## **CHAPTER 1.- INTRODUCTION**

This EUROMED Group Code of Conduct for Business Partners aims to ensure that the 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, in order 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 the EUROMED Group may decide to apply to its activities.

## **CHAPTER 2.- ETHICAL PRINCIPLES**

The EUROMED Group expects its business partners to comply with the following principles:

- Comply with all applicable laws, rules and regulations.
- Respect the human rights of its employees and treat them with dignity and respect.
- Prohibit any discriminatory or harassing behaviour.
- To avoid conflicts of interest.
- Prevent corruption and bribery.
- Respect free competition.
- Provide a safe and healthy working environment.
- Minimise the environmental impact of their activities.
- Protect privacy and confidential information.
- Guarantee the highest quality of products and materials.

The content of each principle is detailed below.

### **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 the EUROMED Group and that may compromise its interests, reputation or image.

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

## **RESPECT THE HUMAN RIGHTS OF ITS EMPLOYEES AND TREAT THEM 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.

## **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.

## **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.

## **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 the EUROMED Group.

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

## **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 into, 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.

### **PROVIDE A SAFE AND HEALTHY WORKING ENVIRONMENT**

The business partner undertakes to provide a safe and healthy working environment, including accommodation if it is also provided to its employees, a fair wage and reasonable working hours. On the other hand, the trading partner will prohibit all forms of forced and child labour.

### **MINIMISE THE ENVIRONMENTAL IMPACT OF THEIR ACTIVITIES**

The business partner shall use natural resources in a manner that promotes their preservation, and shall comply with all mandatory legal requirements related to environmental aspects.

In addition, the business partner shall establish the necessary control measures and processes that serve to prevent or reduce the risks of environmental impacts, taking into account its specific sector of activity, functions, products or services.

### **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 the 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 the EUROMED Group.

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

### **GUARANTEE THE HIGHEST QUALITY OF PRODUCTS AND MATERIALS**

One of the EUROMED Group's objectives is that the products it manufactures and markets meet the expectations and needs of its customers, and must therefore be of optimum quality. In this regard, the materials and products supplied by the business partner to the EUROMED Group shall comply with the applicable legislation applicable at any time.

### **CHAPTER 3.- ETHICAL CHANNEL**

An Ethics Channel has been set up where any person who has or has had an employment or professional relationship with the EUROMED Group can report any infringement observed in the course of the 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.

## **CHAPTER 4.- NON-COMPLIANCE AND VIOLATIONS**

Infringements of this Code of Conduct adversely affect the 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.

## **CHAPTER 5.- SCOPE**

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

## **CHAPTER 6.- RESPONSIBILITIES**

The Sustainability Department of EUROMED Group will be responsible for the Code of Conduct review.

The EUROMED Group's business partner will be responsible for complying with the principles outlined in the Code of Conduct. Should any violation or irregularity be detected, the company may terminate the contract and take appropriate legal action.

## **CHAPTER 7.- REVIEW**

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