

ETHICS CHANNEL USAGE POLICY

1. Introduction

Galenicum Ecosystem (hereinafter also referred to as the Company) has set up an internal mechanism to communicate possible breaches (Ethics Channel) in accordance with the provisions of the Spanish Law 2/2023, of February 20, regulating the protection of persons who communicate breaches of regulations and the fight against corruption, as well as to communicate doubts and queries regarding the interpretation and application of its Compliance Model.

1.1. What can be communicated through the Ethics Channel?

- Any breach of the Code of Ethics or other internal regulations, processes and controls that make up the Compliance Model.
- Any violation of the applicable legislation in force.
- Any contingency that may pose a risk to the reputation of Galenicum Ecosystem.
- Doubts or queries regarding the application of the Compliance Model.

In any case, the content of the communication must be related to conducts or facts committed by members of the Company or collaborators, suppliers, contractors, subcontractors and other third parties with whom Galenicum Ecosystem is professionally relate or linked.

1.2. What does the Ethics Channel consist of?

Galenicum Ecosystem's Ethics Channel consists of a specially enabled platform accessible through the following link: galenicum.integrityline.com

2. Essential principles and guarantees for the use and management of the ethics channel

- **Guarantee of confidentiality:** Galenicum Ecosystem guarantees that (i) the identity of the persons making a communication; (ii) the identity of any other person affected or mentioned in the communication; and (iii) the actions taken, will be confidential and may not be disclosed or communicated to unauthorized persons.
- **Anonymity:** communications may be made anonymously, that is, without the need to identify oneself.
- **Prohibition of retaliation:** Galenicum Ecosystem will not adopt any kind of retaliation or negative consequence towards persons who make a communication in good faith.
- **Management of the communication in a diligent and impartial manner:** the communication shall be handled in accordance with the requirements of the Spanish Law 2/2023, in an objective manner and avoiding possible situations of conflict of interest.
- **Right to communicate through a face-to-face meeting** with one or more of the members of the Compliance Committee: it must take place within a maximum period of seven (7) calendar days from its request. The face-to-face meeting must be documented in any case (i) by a recording of the conversation or (ii) through a complete and accurate transcription of the conversation. The recording/transcription may be listened to / read, corrected and accepted by signature.

- **Right to appeal to the Independent Authorities (external channel):** the external channels that the governmental authorities may provide for this purpose can also be used.
- **Personal data protection rights** in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, Organic Law 3/2018 of 5 December on the Protection of Personal Data and Guarantee of Digital Rights and Law 2/2023 of 20 February regulating the protection of persons who communicate regulatory infringements and the fight against corruption.
- **Other rights** set forth in Law 2/2023, regulating the protection of persons who communicate regulatory violations and the fight against corruption.

3. Guide for the use of the ethics channel

Without prejudice to the guarantees and rights described in the previous section, it is important to highlight the following points regarding the use of the Ethics Channel:

- The **Ethics Channel is managed by the Ethics Channel Manager**, Pol Orriols, Global Legal, Risk & Compliance Director of Galenicum Ecosystem, who is the person in charge of promoting the management of the Ethics Channel and the diligent handling of any internal investigations.
- The following persons **shall have access to the communications received** through the Ethics Channel: (i) the Ethics Channel Manager; (ii) the members of the Compliance Committee; (iii) in the event of having to sanction, the head of the People, Talent & Culture Office Management Department or the person or body competent to adopt disciplinary measures; (iv) in the event of having to adopt legal measures, the head of the Legal, Risk & Compliance Department; (v) if applicable, the data processors/controllers that may be appointed, such as internal or external advisors or managers; and (vi) if applicable, the data protection officer.

- The Ethics Channel may **only be used to communicate** the facts or queries referred to above (see point "What can be communicated through the Ethics Channel?").
- **Misuse of the Ethics Channel** may be sanctioned in accordance with the Collective Labor Agreement in force and the applicable labor legislation. For example, in case of communicating false facts or in bad faith.
- All members of Galenicum Ecosystem **have the obligation to communicate any non-compliance** with the Compliance Model or applicable legislation.

4. Personal data protection rights

1. Responsible for the treatment

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2. Purpose of processing

The personal data provided in the communication will be processed for the purpose of attending to and analyzing the communication, investigating the facts communicated and taking the appropriate corrective measures, whether disciplinary or contractual, to comply with Galenicum Ecosystem's due diligence and control.

3. Categories of personal data

The personal data that Galenicum Ecosystem will process are those provided by the communicant through the communication, as the rest of the data that may be collected

as a result of the investigation that may be launched in accordance with the procedure indicated for Galenicum Ecosystem's Ethics Channel.

4. Anonymity and confidentiality

The communicant could identify himself/herself, but may also communicate any fact anonymously. In either case, both personal data and information will be treated confidentially.

The communicant may also identify himself/herself at a later point in the process or provide additional documentation or information at a later point in the process.

The interventions of witnesses and affected parties shall be strictly confidential.

5. Anonymity and confidentiality

The basis of legitimacy for the processing of data by Galenicum Ecosystem of data subjects is the public interest (art.6.1.e RGPD) and compliance with a legal obligation (art.6.1.c RGPD).

6. Conservation

The data facilitated through the ethics channel will be kept for the time necessary to decide whether to initiate an investigation into the communicated facts and, where appropriate, for the additional period necessary to comply with applicable legal or internal regulations.

The personal data of the individual making the communication and of all the parties involved will be kept in the Ethics Channel only for the time necessary to decide whether to initiate an investigation into the facts communicated, which will never exceed three (3) months from the sending of the communication. Once this maximum period has elapsed, the personal data will be deleted from the Ethics Channel, except in case the

conservation and processing of such data is to leave evidence of the good operation of this channel.

If it is proven that the information provided or part of it is not truthful, it must be immediately deleted from the moment there is evidence of said circumstance, unless said lack of truthfulness may constitute a criminal offense, in which case it will be kept for the necessary time during which the judicial procedure is processed.

7. Data communication

- a) Authorities that may be involved in the investigation or possible legal proceedings.
- b) Persons who may be involved in the investigation itself.
- c) State Security Forces and competent Courts.
- d) Third parties on which Galenicum Ecosystem can rely to manage the Ethics Channel, for example: data hosting platform, tool that supports the Ethics Channel, people to whom the investigation can be delegated in detail, lawyers or other advisors, among others.

8. Exercise of rights

- a) **Rights of the communicant:** The communicant may at any time exercise his/her rights of access (to his/her own personal data, but not to those of other possible participants or those affected by the investigation), rectification, suppression, opposition, limitation and portability with respect to the personal data he/she has provided, by sending a letter to the address indicated above or to protecciondedatos@galenicum.com, identifying him/herself as a user of the Ethics Channel service, within the limits established in the applicable regulations.
- b) **Rights of the person involved in the communicated facts:** The right to be informed as soon as possible that he/she is involved in an investigation process, as a result of a communication concerning him/her or his/her actions. The aforementioned communication will have the following minimum content: the body in charge of the

management, the facts communicated, the rights to which he/she is entitled and the procedure for processing the communication, as well as all the information relating to the processing of his/her data listed in the previous section. The right of access to the recorded data, except for the identity of the communicant and the personal data of other persons affected by the file, and the right to rectify any inaccurate or incomplete personal data. It shall also have the right to be informed of the resolution or closure of the alert, as the case may be. When the communication to the person involved in the communicated facts that he/she has been the subject of a communication jeopardizes Galenicum Ecosystem's ability to investigate or collect evidence effectively, due to the risk of destruction or alteration of evidence by the person affected by the communication, Galenicum Ecosystem may delay such duty of information.

The person concerned by the facts communicated may exercise other rights provided by the regulations on data protection: deletion (in accordance with the time limits for the conservation of personal data provided by the legislation in force), limitation and portability with respect to their personal data by mail to the address indicated or to the mail: protecciondedatos@galenicum.com identifying themselves as being concerned by an internal investigation, provided that this is compatible with the good purpose of the aforementioned investigation.

In case of considering their right to data protection violated, any of them, you may file a complaint with the Spanish Data Protection Agency (www.aepd.es).