

Galenicum. Code of Ethics

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believe in life



1. INTRODUCTION

Galenicum or the **Company** is a corporate group in the pharmaceutical and phytosanitary sector. The purpose of Galenicum Ecosystem is to improve the quality and affordability of medicines (and related products) globally and this is reflected in the slogan "**believe in life**". This Code of Ethics (the "**Code**") is intended to reflect the ethical guidelines and principles of INTEGRITY that should guide all actions in the Company, being the foundation of Galenicum's corporate culture and compliance.

2. SCOPE OF THE CODE

This Code does not establish an exhaustive list of all the policies and obligations to be fulfilled, but it defines the course of action to be followed by the Company.

The Code applies to all Members of Galenicum, regardless of their position, relationship or location and governs the ordinary activities they carry out, as well as those performed during or outside working hours on behalf of the Company or which could impact on its business image and reputation. Galenicum expects that the third parties with whom it deals also proceed in an honest and ethical way. Therefore, the Company will seek to ensure that customers, contractors and suppliers promote the provisions set forth herein.

The values and policies of this Code are applicable in all countries where Galenicum conducts business.

3. PRINCIPLES AND VALUES

The commitment of Galenicum is to go beyond strict compliance with current legislation by adopting high ethical standards in conducting its business.

3.1 Integrity and Commitment

Integrity and commitment in business are ensured through compliance with the Law and the adoption of high ethical standards.

Galenicum conducts its activities with integrity, honesty, professionalism and commitment, as the main objective of the Company is not only to make profit, but also to improve the quality of life of the people by following the ethical standards of the pharmaceutical industry and taking into account the environmental impact of its activity.

3.2 Fair and ethical competition

Galenicum competes in the market in a fair way. Thus, the Company does not use illegal or unethical practices to compete, but offers, in a truthful and transparent manner, the best possible conditions. In addition, the Company makes use of its own trademark and image, rather than resorting to imitation, misinformation or other prohibited or unfair practices.

3.3 Environment, Safety and Health

Galenicum is committed to improving the health and lives of people by fulfilling environmental, health and safety (EHS) objectives for its products, processes and workplace safety. To this end, the Company minimises the use of hazardous materials and ensures their safe treatment and disposal by providing the necessary resources, facilities and training, in accordance with the regulations applicable to each territory.

3.4 Employment policies

Galenicum is an open and accessible community that fosters a positive work environment. Therefore, no person shall be discriminated against on the basis of race, religion, nationality, ethnic origin, color, sex, gender, ideology, sexual orientation or age, in any of the Company's own areas of work in compliance with fundamental human rights.

3.5 Cooperation

Galenicum understands that its results are the consequence of a long and elaborate process carried out by many of its Members. Therefore, co-operation among them is essential to share their diverse knowledge and skills.

3.6 Company Resources

In its effort to be a leading company in the pharmaceutical industry, Galenicum offers its Members a wide array of resources, as needed, such as computers, mobile phones, laboratory equipment, or other tools.

3.7 Research and development

Galenicum aims to develop all kinds of products, from generic medication to those requiring innovation, to meet the changing needs of society. To do so, the Company follows the values of quality, innovation, commitment, teamwork, excellence and passion in its daily work.

4. EXTERNAL RELATIONS

In their external relations, the Members of the Company shall abide to the following guidelines:

- In relations with customers and suppliers, Members shall follow the principles of courtesy, respect, dignity and fairness, taking into account the sensitivities of individuals. They shall not instigate or contribute to situations that may negatively affect the reputation, the quality of performance or harm the interests of the Company.
- The Members of Galenicum represent the Company. Therefore, they must act in a way that respects and maintains people's trust, and are encouraged to actively contribute to the social development of their community.
- Media is a useful tool, but it should be handled with care. Members shall not communicate any strategies, announcements or information about the Company's products, business, structure or plans. Nor should they answer questions from the media, the public or third parties without prior consent from their supervisors. Information disclosed must be accurate, reliable and factual.
- The Company's promotional materials and communications must be relevant, objective, accurate, not misleading, balanced, justified, scientifically rigorous and in accordance with medical and legal standards.
- Galenicum studies its competitors through the use of public information and legal research, in no case through unethical and illegal means. Rivalry with the Company's competitors is compatible with corporate ethics, good manners, integrity and cordiality.
- Galenicum considers communications with authorities that are open, honest, transparent and active dialogues as fundamental. All Members interacting and working with public authorities must ensure that all their communication actions are honest, accurate, transparent and comply at all times with the applicable regulations, especially on anti-corruption and anti-bribery. Galenicum declares its absolute rejection of any practice linked to corruption.

5. COMPLIANCE MODEL

5.1 Risk prevention

Galenicum is committed to comply with its professional, ethical and legal obligations. To this end, it has a **Compliance Model** to prevent, detect, mitigate and sanction possible crimes and other risks of non-compliance.

The Compliance Model is integrated, among other components, by a Compliance Manual, protocols, policies and procedures for the prevention of crimes and risks that may occur in Galenicum.

All the documents that make up the Compliance Model are mandatory for all Members of the Company.

5.2 Compliance Committee and Ethics Channel

In order to supervise the proper and effective operation of the Compliance Model, Galenicum Ecosystem has a **Compliance Committee**. Galenicum also has an ethical channel (compliance@galenicum.com) through which both its **Members** and **third parties** can **report, confidentially and securely, those breaches of regulations** of which they have become aware.

When the communication directly or indirectly affects one or more members of the Compliance Committee, the following channel will be used: galenicum@molins.eu.

6. COMPLIANCE WITH THE LAW AND PREVENTION OF CRIMINAL RISKS

Galenicum is committed to comply with all laws and regulations in the regions where it conducts business.

6.1 Bribery and corruption

Galenicum is committed to strictly comply with the applicable anti-corruption provisions, both nationally and in those countries in which it conducts business. In the latter case, for example, with the United States Foreign Corrupt Practices Act (FCPA).

All Members of Galenicum shall abide by the provisions of the Anti-Corruption Policy and the current and applicable legislation.

6.2 Competition Laws

Competition laws regulate the conduct and organisation of commercial corporations to promote fair competition and protect free enterprise by rejecting anti-competitive and monopolistic behaviors. Galenicum Ecosystem will adjust its actions to the provisions set out in these regulations.

6.3 Money laundering and terrorist financing

The Members of the Company, especially those involved in commercial business operations, shall pay special attention to those transactions which, because they are considered unusual or suspicious, could constitute an act of money laundering or terrorist financing, and shall immediately report them internally.

6.4 Fraud prevention

The Company, in order to avoid potential fraud situations and to convey a reliable and transparent image at all times, will treat and disclose information accurately, completely, in an exact, reliable and comprehensible manner.

6.5 Imports and exports

The vocation of Galenicum is to globalise and diversify the Company. Galenicum will ensure that its worldwide supply chain is not interrupted under any circumstances. Therefore, the facilities of the Company will be properly maintained and it will comply at all times with global trade rules, especially those concerning trade restrictions.

6.6 Zero tolerance of unfair labour practices

The Company condemns illegal labor practices such as child labor, non-compliance with immigration laws, physical and/or psychological punishment or any practice contrary to the Universal Declaration of Human Rights. In this sense, these behaviors will not be tolerated neither in its structure, nor in that of third parties with whom it conducts business. Therefore, if Galenicum becomes aware of such practices, it will terminate its commercial or service relationship immediately.

6.7 Confidentiality and privileged or reserved information

Galenicum shall guarantee the full protection of confidential information and its proper use. Information concerning Galenicum as well as information of third parties entrusted to the Company shall be treated as confidential. The duties of the Members of the Company in this matter shall remain in force even after the termination of their employment or business relationship with the Company.

In addition, the Company complies with data protection regulations regarding the confidentiality and identity of its Members and third parties.

6.8 Public health

Galenicum ensures that the whole process of manufacturing, importing, marketing or even storage of medicines and ingredients and raw materials for the food sector is carried out with the required authorisations and in strict compliance with all applicable regulations. The information provided in the framework of any communication shall not contravene applicable legislation and the Company's internal regulations.

6.9 Intellectual and industrial property

Intellectual and industrial property represent the cornerstone of all research and development activities in Galenicum. The Company will respect at all times the current regulations on intellectual and industrial property, avoiding any activity that may involve the usurpation or infringement of the exploitation rights of their legitimate owners.

6.10 Conflicts of interest

The relations of Galenicum must be based on loyalty and trust in the common interest of the Company. Therefore, Members shall avoid any activity which, being affected by a conflict of interest, may go against the interests of Galenicum.

6.11 Political activity

Galenicum conducts its business without any political considerations or interests. The relations with authorities and governments in all countries are guided by commercial criteria of transparency, legality and neutrality.

Galenicum respects the freedom of thought and opinion of its Members as long as it does not involve the Company, interfere with its activities or could be offensive to third parties. However, no Member is allowed to make, in the name or on behalf of the Company, donations to political parties.

6.12 Commercial and Accounting Information

The Company maintains true, accurate and precise records of financial, legal, regulatory and management information. To this end, it ensures that accounting books and other supporting documents are kept up to date and available. In addition, the information reported will be true, complete, fair, accurate, timely and understandable.