

CODE OF CONDUCT

MESSAGE FROM THE GENERAL MANAGER	2
1. CODE OF CONDUCT	3
2. SCOPE.....	3
3. OUR VALUES	4
4. STAKEHOLDERS	5
5. STANDARDS OF CONDUCT	6
5.1. Compliance with applicable rules and internal regulations	6
5.2. Respect for Human Rights.....	6
5.3. Workplace Health and Safety	7
5.4. Zero Tolerance to violence at work	7
5.5. Environmental Responsibility	8
5.6. Anti-corruption and fight against Fraud	9
5.7. Prevention of Money Laundering and Financing of Terrorism	9
5.8. Conflicts of Interest	10
5.9. Treatment of Confidential Information.....	11
5.10. Data Privacy.....	12
5.11. Use and Protection of Normon's assets.....	12
5.12. Media and social networks	13
5.13. Promotional activities	13
5.14. Defense of Competition.....	14
5.15. Quality and Safety of Normon's products	14
6. ETHICAL CHANNEL	15
7. BREACH OF THE CODE AND DISCIPLINARY REGIME.....	16
8. COMMUNICATION AND DISSEMINATION OF THE CODE	16
9. APPROVAL, UPDATE AND AMENDMENT OF THE CODE	16

MESSAGE FROM THE GENERAL MANAGER

For more than 80 years, at Normon we have been committed to a set of principles and values that have been indispensable for the development and growth of our company. For us, it is essential to perform our activities in a professional, honest, respectful, responsible and transparent way.

This is the reason why all of us who are part of this great family must safeguard these principles and transfer them to all of those with whom we interact in the framework of our professional activities.

We consider that Normon is an exemplary company, and this is why we have decided to update our Code of Conduct, in order to promote it, transmit it among colleagues and put it into practice on a daily basis in our activities in Normon. It is of great importance to achieve the targeted results and objectives, but it is also essential the way in which we achieve them. We count on all of you to guarantee its compliance

I would like to thank you for your trust in Normon, and the attention given to this Code, which helps us to continue growing and improving.

D. Jesús Govantes Estesó
General Manager



1. CODE OF CONDUCT

Normon's Mission is to contribute to improving people's health and well-being around the world thanks to cutting-edge technology and through innovation, development, production and marketing of high-quality medicines at reasonable prices, on a sustainable basis and with marked social and environmental commitment.

This Code of Conduct (the "**Code**") is an instrument that is intended to be used as a guide to understand what our responsibilities are and where we must orient our decision making in order to achieve our objectives and Normon's Mission. Therefore, the Code **establishes the basic principles and rules that inspire the professional, ethical and responsible behavior of all of us who are part of Normon.**

2. SCOPE

This Code is applicable to Laboratorios Normon, S.A. and any other company in its group that formally adheres to this Code (hereinafter, "**Normon**") and it is **mandatory for all the members of the Board of Directors, managers and employees**, regardless of their function, rank, position, hierarchy, seniority, type of employment contract or of the geographical place in which they perform their work, as well as for all of those who act in the name or on behalf of Normon (hereinafter the "**Professionals**").

Likewise, we will inform about this Code to third parties, such as customers, suppliers, subcontractors, sector associations, public and private entities, organizations, healthcare professionals, patient organizations and other stakeholders that maintain relations with Normon for professional reasons or of business (hereinafter, the "**Partners**"). **We have the commitment and firmness to interact only with those third parties that adopt standards of ethical conduct that are similar to ours**, and we are committed to encouraging our Partners to develop and implement ethical programs that are consistent with our standards, and to take appropriate action when we believe that our Partners have not complied with this Code and/or their contractual obligations.

Normon operates in different countries, where there may be rules and regulations whose content differs from what is established in this Code. Should discrepancies arise between local rules, laws and regulations and this Code, the rule that is stricter will preferably apply.

This Code, by its nature, does not cover all possible situations, but it establishes the basic ethical principles of Normon, with the purpose of guiding the conduct of our Professionals and Partners. Likewise, this Code may be updated to adapt it to the needs of Normon and of the market, when deemed appropriate.

The recommendations contained in this Code do not substitute any provision established by any Convention, Law, Regulation or legal provision of application. In this sense, the Code does not replace other internal policies, and must be applied in conjunction with the rest of the procedures and protocols that Normon has implemented in order to be able to respond to as many situations as possible.



3. OUR VALUES

Our origins date back to 1937 as a family business and our way of seeing things emanates from our founders' own principles: closeness, pride in what we do and a commitment that goes beyond words. We look to the future, without forgetting that our history is what has brought us to the place Normon is today. Therefore, our values may be summarized as follows:



SECURITY: Security is one of the pillars on which Normon's business strategy is based. Responsibility and the search for a better future are present in our decision making. Security for our Professionals both in their daily work and for their future. Security for our customers thanks to the constant search for the highest quality and excellence.



EXCELLENCE: Our obligation is to always perform our work in the best possible way. We use the necessary resources to be proud of our way of working as well as with our way of relating with the environment. Excellence is present in our facilities, in continuous process improvement, in our daily work and, of course, in our products.



CLOSENESS: We work with passion, which we aim to transmit every day to all our stakeholders. Outwards of the company with a clear vocation of customer orientation; and internally stimulating interdepartmental relationships, teamwork and the sense of belonging.



PEOPLE: All of us who take part of Normon must take care of those around us, our co-workers, our suppliers and our customers. We look for talent and work as a team, it is just as important to have good professionals as good people. The happier we are able to make others, the happier we will be.



TRUST: Among all those who are a part of Normon, developing mechanisms to promote teamwork, transparent communication, critical thinking and responsibility in decision-making.



INNOVATION: It is present in all areas of Normon; in the access to the most modern technologies, the digitalization of the company, product development, the analytical and decision-making processes and in the search for new solutions.



4. STAKEHOLDERS



Professionals

We want to give a close and familiar treatment to our Professionals, promoting stable and quality employment in a safe environment. We consider essential to guarantee respect for labor rights, a place of work free from harassment, health and safety at work and equal opportunities.



Ownership/shareholders

We have a strong commitment to value creation and profitability while always maintaining sustainability and a long-term business vision.



Suppliers and Contractors

We always work with our suppliers and contractors based on mutual trust, quality and excellence. It is important to share with them our culture of ethics and sustainability in order to establish productive and reciprocal relationships.



Health Care Professionals

Our relations with Health Care Professionals are essential for the promotion and improvement of public health. We always exchange experiences and opinions transparently and in compliance with applicable laws and associative codes.



Patients and Consumers

Our commitment is to improve the lives of patients and ensure they have access to high quality medicines. Patients are the center of our work and of decision-making.



Clients and Strategic Partners

We treat our clients and strategic partners in an integral way, anticipating their needs and providing quality products and services, offering fair and proper treatment, attention, respect, honesty and service, and taking into account the different cultural sensitivity of each person and individual needs.



Public Administrations and Authorities

As a regulated sector, our relationship with the Public Administrations is of great importance. Coordination and collaboration with the different administrations is essential for the proper functioning of the company. Our relations with administrations and authorities must be transparent, collaborative, sincere and honest.



Society

We have the commitment towards society to contribute to health and welfare by supporting technological progress, national industry, access to medicines for the population and through responsible taxation. Always with the utmost respect to the applicable laws and seeking to minimize environmental impact, paying special attention to trends in the fight against climate change, the circular economy and resource management.

5. STANDARDS OF CONDUCT

5.1. Compliance with applicable rules and internal regulations

We shall develop our professional activity by guaranteeing **strict compliance with regulations and legislation applicable** in the countries where we operate, taking into account their spirit and purpose, and observing in all our actions an ethical behavior. In addition, **Normon's internal standards, rules and procedures** must be followed.

Standards of Conduct

- Carry all our trainings required by the company in order to know the applicable regulations and procedures.
- Always comply with the spirit of the rules and procedures, avoiding any elusive interpretations.
- Ask questions in case you have any doubts regarding a standard or procedure.



5.2. Respect for Human Rights

We must **support and promote respect for Human Rights** recognized in both national and international legislation in accordance with the UN Universal Declaration of Human Rights (UDHR), the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, the principles of the UN Global Compact, the conventions of the International Labor Organization, the Sustainable Development Goals (SDGs) approved by the UN, as well as the documents and texts that may replace or complement the aforementioned.

Standards of Conduct

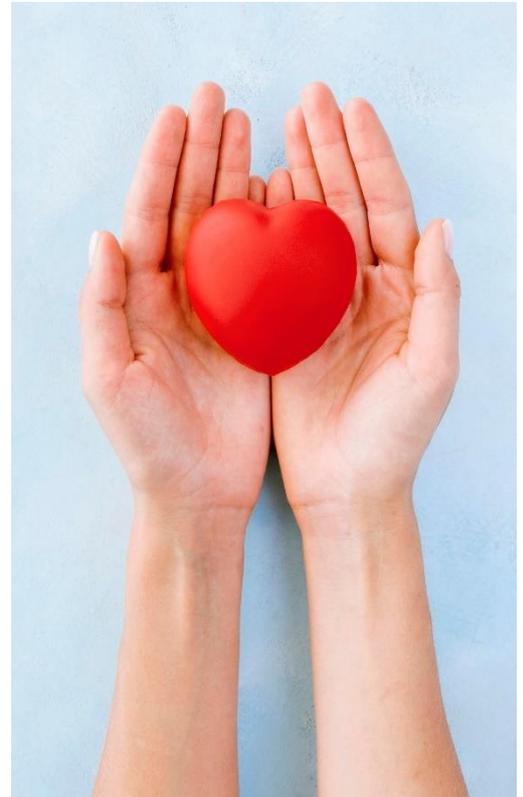
- Respect and comply with labor standards, allowing the right to assembly, association, affiliation and collective bargaining.
- Prohibit any type or form of child, forced or enslaved work, carried out under threat or reprisal.
- Prohibit any form of harassment or discrimination based on race, age, gender, sexual condition, nationality, marital status, social origin, ideology, union affiliation, religion, disability or health status, guaranteeing the absence of any type of modality of harassment or punishment, whether physical, sexual, psychological or verbal towards anyone.
- Promote equality of opportunities between men and women in a fair manner, with dignity and respect.
- Remunerate in accordance with the applicable laws, taking into account the minimum wages, overtime hours and benefits required by the applicable law in each case.

5.3. Workplace Health and Safety

We must promote a **preventive culture oriented to ensure the right to protection of the health** and integrity of all professionals and people who access our facilities and work areas. When we have to make decisions, it is a fundamental requirement to prioritize the health and safety of people.

Standards of Conduct

- **Contribute to complying with the obligations on security and know our responsibilities** on health and security matters. We must participate and attend **trainings** and any formative activities required and pay attention to all informative messages.
- Use in a responsible and correct way the means and **protective equipment** and/or safety devices provided by Normon, in accordance with the instructions received.
- **Communicate** the limitations and impediments that may arise in the performance of our tasks and that may endanger our safety or the safety of third parties.
- **Respect** the limitations, prohibitions and restrictions on both work and access that have been established around the position or the work area, communicating any incident.
- **Cooperate** with Normon so that it can guarantee working conditions that are safe and do not entail risks for the safety and health of any person.
- **Never work under the influence of drugs or alcohol.**
- Immediately **inform** our direct manager and/or the Prevention Service about any situation that could lead to a risk to health and safety. A suggestion box is enabled for this purpose: iniciativas.prl@normon.com.



In Normon we count with an [Occupational Health and Safety Policy](#).

5.4. Zero Tolerance to violence at work



In Normon it is expected that **we always treat our co-workers, superiors, subordinates or third parties** with whom we develop our professional activity in a **respectful, fair and professional manner**.

In Normon there is **no room for situations of physical violence, work-related psychological harassment and/or sexual harassment**. We have zero tolerance for any situation of workplace violence, and we have adequate and effective mechanisms and procedures in terms of prevention, resolution and monitoring of this type of behavior.

Standards of Conduct

- **We will not tolerate**, thus, the following conducts are prohibited: insults, humiliating comments, intimidating emails, threats, comments of racist, homophobic, sexual or derogatory content, unwanted physical contact, or any other form of verbal or physical aggression.
- **Show empathy** with whom you have by your side and **analyze your own conduct and ask yourself** whether you may cause any conflict or misunderstanding.
- Say “no” when deemed necessary **and solve the difficulties and conflicts constructively**, suggesting alternatives and recognizing the contributions of the rest of the team.

- If you have personnel under your charge, **communicate in a clear and direct way the objectives and work plan** to be followed, avoiding any confusion which may lead to frustration.
- If you are overflowed with any issue, **ask for help and help others** when requested. The teamwork is essential in Normon.
- If you are concerned with any situation you cannot openly solve, communicate it to HR and activate the Protocols.
- **Do not turn into an accomplice** of a situation of harassment. Show how the values of the Company and the Code are applied and contribute to the sensitivity on equality and harassment prevention matters.



We have two protocols to stop harassment:

- [Protocol for the prevention and action in cases of sexual harassment, harassment based on sex and discriminatory harassment.](#)
- [Protocol for the prevention and action in cases of moral or psychological harassment \(Mobbing\).](#)

5.5. Environment Responsibility

We must carry out our activities in a responsible manner with the environment, trying to minimize possible negative impacts, complying with the applicable regulations and following the specific policies on the environment implemented internally by Normon.



Standards of Conduct

- Comply with all laws and regulations applicable in matters of the environment, as well as internal procedures.
- Strive to **minimize the** direct and indirect **impact** on our activities, as well as the derivative in the use of the facilities, equipment and resources we have.
- Try to **minimize the use of paper** in the workplace, reduce **the power consumption** (e.g., using the air conditioning, turning the lights on, etc.), water (e.g., taps and water fountains) and **food waste**.
- Contribute and comply with **measures which pursue the recycling** of materials and waste.
- **Promote environmental sensitivity** in the workplace. Show how the values of the Company and the Code are applied and contribute to the sensitivity on environmental matters.
- Have all the **permits and licenses** when performing the professional activities assigned.
- Comply with the systems and procedures that ensure the safe handling, transfer, storage, recycling, reuse or administration of waste, air emissions and wastewater discharges.
- Follow the internal procedures focused on the **prevention and mitigation of accidental leaks** in the environment.

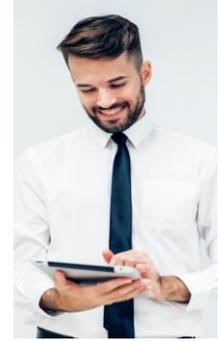


We have implemented an Integrated Quality and Environment System in accordance with the UNE-EN-ISO 19001 and UNE-EN-ISO-14001 standards. We count with internal procedures necessary for the conservation and respect for the environment and a [Quality and Environment Policy](#).

5.6. Anti-corruption and fight against Fraud

We must carry out our business activity with **honesty and integrity**, and we have the duty to prevent any type or form of corruption or fraud that may take place within the performance of our professional activities.

We will not tolerate, allow or be involved in any type of corruption, extortion, bribery or fraud in the performance of our business activities. In Normon exists a preventive culture based on the principle of **“zero tolerance” towards corruption and business fraud**, in all of its forms.



Standards of Conduct

- **We will not tolerate**, thus, the following conducts are prohibited: bribery, corruption, facilitation payments, extortion, influence peddling and fraud.
- **All payments to third parties must be made through a financial payment system approved** by Normon, through means that record their completion.
- Ensure that all fees and expenses paid to third parties are **appropriate and justified**.
- **We shall not fake or alter documents, records or books**.
- Ensure, prior to accepting or giving any gifts or invitations, that these abide by the [Policy on Gifts of Normon](#). Under no circumstances, these gifts or invitations can take place with the intention of influencing a third party in order to obtain or maintain a business or obtain an undue benefit or advantage.
- Follow the internal procedures on **donations, sponsorships and collaboration agreements**. They must be destined for legitimate purposes and must never be offered or provided for an improper purpose, or in a manner or under conditions that may have an undue influence on the recipient.
- **Exercise extreme caution when interacting with a Public Official**, acting always under the principles of transparency and equality of competition.
- **Exercise extreme caution when interacting with the Public Sector** (Health Care Professionals, Health Care Organizations, Patient Organizations), and comply with the associative codes applicable to Normon.
- Follow the **selection, hiring and promotion procedures** based on respect for the principles of equality, merit, capacity, publicity, concurrence, transparency, confidentiality and non-discrimination, and never taking into consideration particular interests.
- Maintain commercial relations with **suppliers and contractors qualified, trustworthy and with integrity**.



In the [Anti-Corruption Policy](#), you may find described in more detail our standards of conduct in order to avoid corruption and fraud.

5.7. Prevention of Money Laundering and Financing of Terrorism

We shall take into account that money laundering and financing of terrorism are legislated by intricate regulations, thus, it is of great importance to comply with the internal procedures regarding registration and payments to third parties. The consequences derived from breaking these regulations are highly severe, not only due to the social impact, but also for the penalties associated.

- **Money Laundering**: is the set of mechanisms or procedures aimed at giving the appearance of legitimacy or legality to assets or assets of criminal origin.
- **Terrorism Financing**: it consists on the supply, deposit, distribution or collection of funds or goods by any means, directly or indirectly, with the intention of using them or with the knowledge that will be used in whole or in part for the commission of a crime of terrorism.

Standards of Conduct

- We do business only with **suppliers and customers who have been registered in our system** according to our internal procedures.

- We do business only with customers or suppliers willing to give us adequate information so that we can determine if the payments are adequate.
- Comply with all internal procedures on procurement and contract signature.
- Unless authorization has been given by the Finance Management in accordance with the internal procedures, **we do not accept payments in cash**, those of an extraordinary nature not contemplated in agreements or contracts, those made to third parties or by third parties not mentioned in a contract or agreement, or payments or debits in an account that is not the usual or when the destination of the funds transferred is unknown, as well as payments to entities in which, due to its legislation, it is not possible to **identify the parties or final beneficiaries**.
- We must know that the acts of money laundering/financing of terrorism **committed by recklessness** are also punishable by law.
- **Immediately inform** the Finance Department, the Area of Compliance or the Legal Department should you have any doubts or suspicion that an irregular payment or an act of money laundering has taken place.

5.8. Conflicts of Interest

We must be impartial and autonomous during the performance of our professional responsibilities, and especially when making decisions. **Although a conflict of interest by itself is not necessarily negative or reprehensible, if it is not properly managed it can impair our ability to make the right decision from a professional point of view and is likely to jeopardize the work environment, the company culture, our image and integrity.**

Although we cannot include in this Code each of the situations that may give rise to a conflict of interest, from Normon we establish the following guidelines:



Standards of Conduct

- Always make **business decisions in the interest of Normon**.
- Do not use **goods, facilities, materials, resources or information** of Normon for own-benefit or for the benefit of a relative/friend.
- Do not perform an **external job or activity** that directly or indirectly harms Normon's interests, nor participate in business or activities that, directly or indirectly, compete or interfere with Normon.
- Inform in the case where we are going to make an **investment in a competitor, a supplier or a client** of Normon.
- Do not take part in the decision to contract a supplier/provider with whom we have or may have personal interests.
- Do not receive **remuneration and/or advantages** from suppliers, competitors or customers for our own benefit or for the benefit of a relative/friend.
- **Do not use our position** in Normon to obtain personal advantages (including, among others, economic advantages or business opportunities); or advantages for the benefit of a relative/friend.
- Do not participate or influence the requirements, **negotiations and decision processes** with customers or suppliers with whom we have a personal, direct or indirect relationship, or any other interest other than Normon, for which any of them can obtain a personal benefit.

 **In order to communicate and manage Conflict of Interest situations that may take place within the company we count with a [Conflict of Interest Communication and Management Procedure](#).**

5.9. Treatment of Confidential Information

In the course of our activities at Normon, we may have access to confidential information related to Normon, our co-workers, our customers, suppliers or third parties. We must all exercise the utmost care and diligence when dealing with such confidential information.

We have the **obligation to comply with the internal regulations regarding the security of information**, as well as the duty to **respect the measures implemented by Normon** to prevent third parties, Partners and Professionals from having access to information and/or data for those who are not authorized



As an example and by way of illustration, it is considered as Confidential Information any piece of information that is not public and has been obtained through the performance of our professional activity, such as:

- ✓ Accounting and financial information.
- ✓ Employee records, information on remuneration and other personal data of the Professionals.
- ✓ Business and/or strategic plans.
- ✓ Operations related to financing.
- ✓ Business policies and practices.
- ✓ Extrajudicial, judicial, or administrative disputes.
- ✓ Research and development of new products.
- ✓ Manufacturing techniques and processes.
- ✓ Personal information of professionals, clients, partners, etc.
- ✓ Industrial and intellectual property, such as industrial secrets, registered trademarks, patents, etc.
- ✓ Customer lists, suppliers, and pricing policies.
- ✓ Prices of services and goods.

Standards of Conduct

- **Protect the information** and knowledge generated or obtained within Normon.
- **Refrain from using any data**, information or document obtained during the exercise of our work for **personal benefit**.
- **Do not reveal or communicate confidential information of Normon** to third parties, except in compliance with applicable legislation, internal regulations or when we have been expressly authorized to do so by a person entitled by Normon for that purpose.
- **Do not use confidential information of third parties without obtaining authorization** from its legitimate owners, being prohibited to take possession of written or electronic documents, computer supports or other means to discover confidential information of said third parties.
- Maintain confidentiality and **make use in accordance with the internal regulations** in the matter, of any data, information or document obtained during the exercise of our responsibilities in Normon. In general, and unless otherwise indicated, the information to which we have access must be considered confidential and shall only be used for the purpose for which it was obtained.
- **Do not copy or share confidential information without first being sure of being authorized to do so.**
- Both **industrial and intellectual property** created by Professionals at work or through Normon resources belong to Normon and cannot be used for personal purposes.
- The **obligation of confidentiality persists once our relationship with Normon is over** and will include the obligation to return, at the time of termination, any material related to Normon that we have in our possession.
- Do not take **photographs or videos** of the facilities unless you have been granted the needed permits and authorizations.



We have implemented an Information Security Management System (ISMS) based on ISO 27001. The [Policy on Security of Information](#), the [Document of Security](#) and the associated procedures describe in more detail the standards of conduct on this matter.

5.10. Data Privacy

What does “Personal Data” mean? Any numerical, alphabetical, photographic, acoustic or any other information concerning identified or identifiable individuals, both the one related to their identity (such as name and surname, address, filiation, a photograph or video, etc.) and the one relative to their existence and occupations (studies, work, illnesses, etc.). E.g.: postal addresses, email accounts, ID, medical discharge and leave, financial and fiscal information or political affiliation.

We must **respect the right to privacy** of our co-workers and/or any other person on whose personal information may have been obtained in the performance of our professional activities. Any use or treatment that is made on personal data in Normon must be in accordance with the applicable laws and with the internal policies of Normon.

Standards of Conduct

- **Protect Personal Data** to which we have access against unauthorized or accidental disclosures, modifications, destructions or misuses.
- **Do not collect more Personal Data than necessary** for the purpose for which it is intended to be used and for the necessary time.
- If we use devices or supports (CD, pen drive, etc.) that contain Personal Data, we must keep them in a safe place.
- Consult with the **Data Protection Officer** (lopd@normon.com), if we have any doubts in the matter, in the event of an incident that affects the security of the data, or, if by legal imperative the regulatory authorities or any third party asks us for personal information about the Professionals or other personal data.

5.11. Use and Protection of Normon’s assets

We must use **adequately** and in a responsible manner the **assets/goods** made available to us, and protect them against misuse, abuse, sabotage or loss. These assets include those of a material nature, such as computer systems, fixed or mobile telephony, machinery, tools, installations, equipment, materials, furniture; and other less tangible such as information, intellectual property, corporate image or Normon's reputation.

Standards of Conduct

- Protect Normon's assets against the risks of **accident, loss, deterioration, damage or misappropriation**, using them responsibly and appropriately.
- Do not use the assets placed at our disposal, including the assigned electronic means, such as mobile phones, laptops and e-mail, for our own benefit or for personal purposes, being linked **exclusively to employment** and in accordance with the policies on Security of Information.
- **Preserve the image and reputation of Normon** in all our professional activities.
- Comply with **internal security rules and policies and access controls**.
- Comply with **all policies and procedures regarding informatic security** (e.g., not installing information products in the Normon information system, not making incorrect use of external media (CD, USB, etc.), not modifying the configuration of browsers, do not download illegal content, do not share passwords of the computer system, do not neglect portable equipment or mobile devices owned by Normon, etc.)
- **It is strictly prohibited** to make graffitis, throw cigarette butts to the floor on the spaces enabled for smokers and other barbaric attacks against the goods of Normon’s facilities.

5.12. Media and social networks

Normon needs to have a unique and accurate voice in the information it provides to the public. We are committed to **always establish a respectful, professional, accurate and truthful communication**, complying with the regulation and based on the basic principles of transparency and objectivity.

We must be cautious when writing communications that can be published online. If we participate in Internet forums, blogs, newsgroups, chat rooms or bulletin boards, we must think carefully before pressing the "send" button. As well, although social networks (e.g., Facebook, LinkedIn, Twitter, Instagram, etc.) are a very useful tool to exchange experiences and opinions, they should be used with **caution and with common sense**.

Standards of Conduct

- Never give the impression that we speak on behalf of Normon in any personal communication, including speeches and presentations or social networks, unless we are authorized to do so.
- If we identify ourselves as employees of Normon, do so in a responsible and prudent manner and making sure that our comments and opinions are expressed in a personal capacity.
- Abstain from using social media to talk about issues that contain sensitive and confidential information.
- Do not create alternative Normon profiles.
- Do not intervene in a possible crisis of social networks.
- Do not use the corporate email account to open profiles and accounts on social networks.
- Do not use logos or corporate material on behalf of Normon, unless authorized.



5.13. Promotional activities

We must promote our products and services through truthful, reliable, transparent information and always in compliance with the law and the applicable associative codes.

Additionally, we will only provide third parties and the markets truthful and reliable information about our company, activities, businesses, financial statements and non-financial statements.

Standards of Conduct

- We shall not publish fake, incorrect or misleading data regarding the company, its business or activities.
- We must be transparent with the prices and conditions offered regarding our products. When we negotiate on behalf of Normon, we shall provide information in a complete, transparent, comprehensible, exact and precise manner.
- We must know that regulations concerning the advertising of medicinal products are intricate and its breach may lead to penalties. We shall not promote medicinal products unless we know in depth the applicable rules and that specific promotional material is in line with the legislation. In particular, we must refrain from "sharing", giving "like" or adopting similar conducts concerning publications related with medicinal products on the social media.
- We must follow our internal procedures on the approval of promotional materials.

5.14. Defense of Competition

We must **interact in general in the market and in particular within the pharmaceutical sector in a loyal and honest way**. Our competitive advantage comes, among others, from the continuous investment in technology, a wide portfolio of products, an excellent level of quality and making our products accessible to everyone, but never limiting free competition or through unethical or illegal business practices.

We observe the rules and principles of free competition in all the markets in which we operate. We behave loyally, **avoiding any conduct that has the purpose of preventing, restricting or distorting competition**, as well as any other that threatens free and healthy competition. Competition rules are quite complex, but we can point certain restrictive practices that must be avoided at all costs: agreeing prices, sharing markets/customers, or exchanging strategic information with competitors, and abusing a dominant position in the market.



Standards of Conduct

- Do not **conspire** with competitors, suppliers, customers, or restrict trade or market transparency and fairness.
- Do not sign agreements with competitors on **price fixing, customer distribution or markets distribution**.
- Do not **exchange trade secrets with competitors**, such as prices, discounts, market shares or strategic plans.
- **Never use threat or deception to try to alter prices** that would result from the game of free competition.
- If during a **meeting of the pharmaceutical sector (which gathers competitors)**, an event or even an informal conversation, sensitive competition issues are addressed (e.g., exchange of trade secrets) we shall leave the meeting, making sure that this has been duly included in the record, or end immediately the conversation and inform as soon as possible the Compliance Officer.
- If you participate in **public tenders**, you must reject and avoid the coordination with other bidders (e.g., comparison of offers, the abstention agreements to bid or send, non-competitive offers, etc.)
- Do not fix **final sales prices** to distributors/resellers of Normon products.
- Do not apply a **different or discriminatory treatment to clients if it is not economically justified**.
- Do not try to eliminate competitors by using **predatory practices** (e.g., provide a product below cost with the intention of eliminating or harming a competitor, trying to recover the losses later by increasing prices, once the competitor has been eliminated or harmed).
- Do not agree upon **linked contracts** (force customers to accept products or services that they do not want or need- abusing of a position of power and strength in the market).
- **Inform** the Compliance Officer about any potentially anti-competitive activity.

5.15. Quality and Safety of Normon's products

The health and safety of patients is an absolute priority for Normon. That is why we manufacture our products with the experience of the best professionals, rigorously complying with all applicable regulations, with the best quality standards, and with the highest technology.

We must comply with all applicable laws, regulations and other standards throughout the life cycle of the products, including internationally recognized good practices, such as Good Manufacturing Practices (**GMP**), Good Distribution Practices (**GDP**), Good Clinical Practices (**GCP**), Good Laboratory Practices (**GLP**) or Good Pharmacovigilance Practices (**GVP**). Furthermore, we shall respect the consumers' rights.

Standards of Conduct

- **Report to Normon's Pharmacovigilance Department**, within a period of no more than 24 hours, of any direct or indirect knowledge of negative effects on our own health or on the health of third parties after the

administration or application of any product manufactured or marketed by Normon. Likewise, we must know the regulations that apply to us in terms of Pharmacovigilance and receive the **training** that Normon provides in this matter.

- **Comply with inspections, audits and requirements of authorities** in a transparent and accurate manner.
- Comply with all **hygiene and safety measures** when entering Normon's facilities.
- Comply with **all internal GMP procedures** and attend the training sessions to which we are invited.
- **Do not take products out of the legal channel.**
- Inform the Manager/Responsible for our Unit, Department Director and/or the Compliance Officer of any information, situation or circumstance that could affect or impact the quality of our products.



6. ETHICAL CHANNEL

Any Professional who has knowledge of situations or facts related to **infractions, breaches** or conducts that are in conflict with this Code **has the obligation to communicate it in the most immediate way possible** through one of the following enabled channels:

ETHICAL CHANNEL



- **Email address:** canal.etico@normon.com
- Through the **platform enabled** in the following address: <https://channel.globalsuitesolutions.com/normon>
- During a **face-to-face meeting** requested previously to the Compliance Area in the email address canal.etico@normon.com.

Partners may enter the Ethical Channel through the following link: <https://channel.globalsuitesolutions.com/normon>

Complaints may be anonymous or not. In any case, the confidentiality of communications is guaranteed, and a regulated procedure will be followed for their review and processing.

No kind of retaliation will be admitted against any person who, in good faith, reports actions inconsistent with our Code, or against anyone who collaborates in an investigation into an alleged irregular action.

Communications "in good faith" imply providing information in an honest, complete and accurate manner, even if it is subsequently shown to be unfounded or erroneous. Any information found to have been provided in bad faith could result in disciplinary consequences.

As for the Professionals' queries related to Compliance matters, these may be raised directly to the Compliance Area through an email sent to compliance@normon.com

7. BREACH OF THE CODE AND DISCIPLINARY REGIME

The Professionals and Partners who violate our Code may be subject to disciplinary measures, which could include the termination of the contract, as well as other possible actions and legal sanctions.

Breaches of this Code will be analysed on a case-by-case basis and will be sanctioned in accordance with the internal procedures, conventions and applicable laws.

Neither the lack of reading of this Code nor the absence of its signature will exempt Professionals from its compliance.

No one, regardless of their level or position, is authorized to request that a Professional or a Partner commits an illegal act or that contravenes the provisions of this Code. In turn, no Professional can justify improper conduct, illegal or that contravenes the provisions of the Code under the order of a hierarchical superior.

8. COMMUNICATION AND DISSEMINATION OF THE CODE

Normon will adopt the pertinent measures to disseminate and communicate the content of this Code, especially through the following means:

- Delivery of a copy of the Code to each Professional and to the new incorporations, having to sign an acknowledgment form, confirming that they have read this Code and agree to comply with its provisions.
- Dissemination through Normon's home website, Intranet and the Normon Employee's Portal.
- Through any additional communication plan considered appropriate.

Normon may request Professionals and Collaborators, formally and with documentary support, to periodically confirm compliance with the Code. Likewise, ethics and compliance issues may be included in training programs, performance evaluation processes and/or evaluation of potential candidates or third parties.

9. VALIDITY, UPDATE AND AMENDMENT OF THE CODE

This Code has been approved by Normon's Board of Directors in their meeting held on the 12th November 2019 and is effective from the day of its approval. Its last revision was carried out on the 30th of November, 2023, this being Version No. 5 of the Code.

The Compliance Officer will be responsible for its implementation, monitoring and updating, proceeding to its review and continuous improvement, especially when regulatory, social, business or any other circumstances require it. In any case, it will be subject to annual review.

