



# SUPPLIER CODE OF CONDUCT

1. PURPOSE.....	2
2. SCOPE .....	2
3. COMMITMENTS AND PRINCIPLES OF ACTION .....	2
3.1. Respect for the Law.....	2
3.2. Human Rights.....	2
3.3. Security, Health and Protection .....	3
3.4. Environmental Responsibility.....	3
3.5. Anticorruption, fight against fraud and conflict of interest.....	3
3.6. Confidentiality and Data Protection.....	5
3.7. Fair Competition .....	5
3.8. Quality.....	5
4. RESPONSIBILITY AND COMPLIANCE .....	6
5. BREACH OF SUPPLIER'S CODE .....	6
6. ETHICAL CHANNEL .....	6
7. APPROVAL, REVISION AND UPDATING OF THE SUPPLIER CODE OF CONDUCT .....	6

## 1. PURPOSE

The purpose of this Supplier Code of Conduct (hereinafter, “**Supplier Code**”) is to set out the basic minimum principles and values that must be known and fulfilled by Suppliers who wish to establish and maintain commercial relationships with Laboratorios Normon S.A. and any other company in its group that formally adheres to this Supplier Code (hereinafter, “**Normon**”).

Despite our Suppliers are independent organizations, they play a fundamental role in our value chain. For this reason, Normon promotes, encourages and expects that its Suppliers comply with minimum standards of ethics and responsible behavior, being the present Supplier Code a framework that establishes the minimum requirements according to which Normon expects them to act.

## 2. SCOPE

The Supplier Code is applicable and addressed, among others, to all those suppliers, contractors, agents, subcontractors, representatives, distributors, manufacturers, consultants, partners and intermediaries who establish a business relationship with Normon for the provision of services, supply of raw materials, finished products or other products to Normon, regardless of the country in which they carry out their activities (hereinafter “**Suppliers**”).

## 3. COMMITMENTS AND PRINCIPLES OF ACTION

### 3.1. Respect for the Law

Our Suppliers shall **respect the laws, rules and regulations** of the countries where they carry out their activities. They will not perform practices or behaviors that endanger legality or fundamental ethical principles. Our Suppliers must avoid all conducts that may harm the environment, Normon and/or damage its reputation.



### 3.2. Human Rights

Our Suppliers shall **respect the dignity and human rights** of each individual. Our Suppliers shall specifically:

- **Guarantee and protect the internationally recognized Human Rights** within their sphere of influence, including the UN Universal Declaration of Human Rights (UDHR) making sure they are not complicit in any form of abuse or violation thereof.
- Respect and comply with **labor standards** allowing the rights of assembly, association, affiliation and collective bargaining.
- **Ban any form of child labor, either forced or enslaved**, carried out under threat or reprisal.
- **Ban 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 and guarantee the elimination of any type of harassment or punishment whether physical, sexual, psychological or verbal towards anyone.
- Promote **equal opportunities** between men and women in a fair manner, with dignity and respect.

- **Pay** their workers in accordance with the applicable laws, considering the minimum wages, overtime and benefits required by laws in each case.

### 3.3. Security, Health and Protection

Our Suppliers shall grant a **healthy and safe work environment** for all of its employees and for anyone who works or visits its facilities and work areas, promoting the compliance with health & security rules and policies, which grant:

- **Compliance with applicable laws** related to health and safety at work.
- Promoting awareness of responsible conduct to **prevent and minimize occupational risks**.
- The **protection of its personnel** from overexposure to chemical, biological, and physical hazards and tasks that demand physical effort in the workplace.
- The **identification and evaluation of potential** risk situations in the workplace and the minimization of their possible impact.
- Making all safety **information available** to its staff (for the purpose of educating, training and protecting), as well as the necessary **means and protections** to minimize occupational risks.
- Workspaces **free of workplace harassment** in all its forms (mobbing, discriminatory, sexual).

### 3.4. Environmental Responsibility

We expect our Suppliers to carry out their **activities in an environmentally responsible manner**, trying to minimize possible negative impacts, complying with applicable regulations and establishing specific policies and preventive measures in environmental matters. In particular, they must:

- **Comply with all applicable laws and regulations** in matters of the environment.
- Strive to **minimize the direct and indirect environmental impacts** on its activities.
- Contribute and comply with the measures aimed at **recycling** materials and waste.
- Promote **environmental awareness** in the workplace.
- Have all the **permits, licenses, information records** and restrictions that are required in relation to the environment
- Have systems that ensure the safe handling, transfer, storage, recycling, reuse or management of waste, air emissions and wastewater discharges.
- Have systems designed to **prevent and mitigate leaks** and accidental spills into the environment.



### 3.5. Anticorruption, fight against fraud and conflict of interest

Normon does **not tolerate, does not allow nor engage in any type of corruption, extortion, bribery or fraud** in the performance of its business activities, and expects that its Suppliers act in the same way. To this extent, we expect our Suppliers to follow the following rules:

- **Ethical and upright behavior** when establishing business relationships and contacts with stakeholders, whether they are private or public entities.
- **Zero tolerance** for corruption, extortion, bribery and fraud.
- **Prohibition** of offering, accepting, paying, authorizing or participating, by action or omission, in any type of **corruption, bribery or fraud** that could materialize by any professional, representative or collaborator acting on their behalf in the framework of commercial relations with Normon.
- Maintain **payment and financial systems** that record transactions in a correct manner.

- **Prohibition of falsifying or altering documents** or records.
- Have mechanisms that identify and resolve any situation of **conflict of interest**.



("Professionals").

Additionally, our Suppliers must take into consideration Normon's internal [Gift Policy](#). Although the acceptance and offering of Gifts and Invitations has been and still is a consolidated business tradition in the business world, it is also a sensitive area in which conflicts of interest and misunderstandings can give rise to responsibilities and non-desired consequences for Normon, for our employees and our Suppliers.

To avoid the existence or even appearance of any inadequate relationships with our Suppliers, we have established within our company the following rules regarding the offering and acceptance of Gifts and Invitations, which we kindly ask you to take into consideration within the professional relationships you maintain with our employees, directors and Board

Gifts/Invitations must comply simultaneously with the following conditions:

- ✓ They should **comply with applicable laws**, both in the country in which they are offered and in the country in which they are received.
- ✓ They should **comply with the practices normally accepted in the world of business** and within **Normon's internal policies**.
- ✓ They shall be delivered or received **without expecting reciprocity**, this is, that they are not carried out with the intention of influencing third parties, to obtain or maintain a business, or to obtain an undue business benefit or advantage.
- ✓ They should be **socially acceptable**, this is, that the Gift / Invitation is **reasonable within the social uses** and can be communicated to third parties without fear of social reproaches. They must be able to be offered / accepted **openly and transparently**.
- ✓ They should be **occasional, reasonable and not excessive**.
- ✓ They shall **not be Gifts in cash, money, gift cards, shopping vouchers or similar**.

#### Normon's employees when ACCEPTING Invitations / Gifts:

- ❖ Can accept **working lunches** (lunches, meals, dinners) and **small hospitalities** (e.g., coffee, breakfast, soda, etc.), within the framework of professional and work relationships; and whenever the people who offer and receive them are present. In no case, said meals and small invitations will be extended to companions of employees or to third parties outside the commercial or business relationship.
- ❖ **Events:** can accept the invitation to events (e.g. cocktails, shows, conferences, courses, professional meetings, entertainment events, sport tournaments, cultural events...) only if they have the authorization of the Director of their Department.
- ❖ Can accept **gifts of insignificant value and promotional materials** that promote the image and brand of our Suppliers and Collaborators (e.g., pens, calendars, articles engraved with a logo of little value, etc.). They cannot accept gift deliveries to private homes or provide personal addresses for this purpose.

Any acceptance of Gifts / Invitations that is not included in the previous sections will be prohibited for Normon Professionals, so we require our Suppliers not to offer them.



### 3.6. Confidentiality and Data Protection

**Non-public information and/or confidential information** provided from Normon to its Suppliers, even if provided before the commercial relationship, or which has been developed during the commercial/contractual relationship shall be **considered as “confidential” and shall not be used or disclosed**, directly or indirectly, in self-profit or for the benefit of third parties, unless previous and express consent of an authorized person in Normon.

For the fulfilment of this duty, Normon may require its Suppliers to sign a Confidentiality Agreement, and Suppliers shall be responsible for adopting adequate security measures to protect the confidential information and to ensure that all of its members, within the framework of the relations that they maintain with Normon, comply with said duty.

We require that our Suppliers **comply with all regulations and laws in force regarding data protection and privacy** applicable in the countries in which they operate. Said information must be kept secure and may only be used for the specific purpose for which it was made available and authorized by Normon. Suppliers agree not to disclose, transfer or share personal data of Normon to third parties without prior written consent of Normon.

### 3.7. Fair Competition

Normon respects and encourages **free, fair and honest competition**. Therefore, we expect our Suppliers to manage their companies and carry out their activities in a fair manner and respecting at all times the applicable rules on competition, complying with all applicable laws, regulations, codes and conventions. Accordingly, we require our Suppliers not to enter into any agreement or understanding (either express or implied) or engage in any action that unlawfully or improperly restricts commerce or competition or that violates antitrust and competition laws.

### 3.8. Quality

Our Suppliers will guarantee at all times that the product delivered, or the service provided complies with the **quality standards** set by the applicable laws, rules and regulations, as well as any aspect set directly in a contract with Normon.



## 4. RESPONSIBILITY AND COMPLIANCE

Suppliers, while maintaining the aforementioned condition, recognize and accept that they are solely responsible for full compliance with this Supplier Code, and must ensure that their directors, officers, employees, agents, representatives, suppliers, subcontractors and other business partners understand and comply with the requirements established in this Supplier Code or, where applicable, have their own policies that respect the principles contained in this Supplier Code, in order to guarantee complete integrity in the supply chain. However, Normon may require from its Suppliers the documentation or information that demonstrates and proves compliance with the requirements contained in the Suppliers Code.

**Suppliers will be responsible for ensuring that their own suppliers and subcontractors are subject to principles of action equivalent to those of this Supplier Code.**

Likewise, notwithstanding the fact that Normon keeps its Suppliers informed in the event of any modification of this Suppliers Code, they must be up-to-date on its amendments and updates on the Normon website [www.normon.es](http://www.normon.es).

In the event that this Supplier Code enters into conflict with any contractual terms agreed between Normon and the Supplier, and such contractual conditions are more restrictive than this Supplier Code, Suppliers must comply with such contractual conditions.

## 5. BREACH OF SUPPLIER'S CODE

The breach of this Supplier Code may have a negative effect on the Supplier's relationship with Normon. Depending on the severity of the breach, these can range from a mere warning to its disqualification as a Normon Supplier or termination of the contractual relationship; without prejudice to other legal or administrative actions that may be applicable.

Breaches of this Supplier Code are analysed on a case-by-case basis and will be sanctioned in accordance with all applicable internal procedures, agreements and legal requirements.

## 6. ETHICAL CHANNEL



Normon makes the "Ethical Channel" platform available to its Suppliers through the following link: <https://channel.globalsuitesolutions.com/normon> as well as through the email [canal.etico@normon.com](mailto:canal.etico@normon.com) in order for them to inform Normon's Compliance Area of any circumstance or action of which they are aware that supposes, or may suppose, a violation of this Supplier Code of Conduct, be constitutive of a serious or very serious criminal or administrative offense, or even breaches of European Union Law in accordance with Directive (EU) 2019/1937 on the protection of persons who report breaches of Union Law, and/or with the Spanish national Law regulating the protection of people who report on regulatory violations and the fight against corruption

## 7. APPROVAL, REVISION AND UPDATING OF THE SUPPLIER CODE OF CONDUCT

This Code has been approved by the Board of Directors in their meeting held on the 12<sup>th</sup> November 2019 and is effective from the day of its approval. Its last revision has been made on the 14<sup>th</sup> of December of 2023, being this Version n°5 of the Supplier 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.