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## 1. FOREWORD

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The LABIANA Group is a group currently comprising: (i) Labiana Health, S.A. as the parent company; (ii) Labiana Life Sciences, S.A.U.; (iii) Labiana Pharmaceuticals, S.L.U.; (iv) Ecuador Labiana, S.A.; (v) Labiana de México, S.A.; (vi) Labiana Development, S.L., Sociedad Unipersonal; (vii) Serbian Company Veterinarsky Zavod Subotica DOO; and (viii) Turkish Company Zoleant İlaç A.S (hereinafter, "**LABIANA**"), is a corporate group whose origins go back to 1958. It has a long track record in the pharmaceutical-veterinary industry. It has been carrying on its commercial activity both nationally and internationally, offering integrated manufacturing services to third parties for the human and veterinary pharmaceutical industry and manufacturing its own products, therefore playing a fundamental role in the health care area.

The main commitment of LABIANA is to guarantee that all products and services that it offers are developed, manufactured, and marketed in full compliance with applicable national and international regulatory requirements, and meeting the highest standards of quality and security. In order to archive this objective, LABIANA is strongly committed to fully comply with all regulations and guidelines directly and indirectly applicable to it in view of its activity and the market where it operates, and to promote and ensure that every employees share, respects and develops their daily duties and responsibilities in a honest and professional way, maintaining an attitude of opposition to any breach, irregularity or unlawful act that they detect or may detect within LABIANA, regardless of its nature or the person causing it.

In line with the above, the approval of this Code of Ethics for LABIANA means that the principles and values that should guide its activity and operations at all times, both internally and externally, are specified, and the main rules of conduct that the members of LABIANA should respect in all cases are established, providing all members of LABIANA with a frame of reference on the basis of which they must act, and which should guide their conduct.

In any case, being aware of the limited reach of this Code of Ethics and the impossibility of it being able to contemplate and regulate each and every questionable situation that may arise in LABIANA, this will ensure that all members of LABIANA are offered the assistance and advice that they may need relating to any situation that they may consider uncertain as to its legality, honesty or appropriateness.

Therefore, the Code of Ethics is a binding norm, a text that must be complied with by all the parties listed below, and particularly by its Directors and executives, who must demonstrate ethical leadership.

## 2. SCOPE OF APPLICATION

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This Code of Ethics applies to all the members of LABIANA, without exception. In this respect, all employees of the companies belonging to its corporate group, irrespective of their rank or position, including temporary staff or trainees, managers, and members of its Board of Directors, and associates, subcontractors, and intermediaries, are within its scope.

This Code of Ethics must be complied with, and all professionals are obliged to report, using the established channel for that purpose, any practices or irregularities which they became aware of, and which are contrary to this code or the principles it is based on, which will remain strictly confidential at all times.

Likewise, where possible, the Code of Ethics will be enforceable for suppliers, clients, and any third party that has commercial relations or of any other nature with LABIANA. LABIANA will promote the adoption of the principles of action among its suppliers, in line with the ones contemplated under this Code of Ethics or the principles it is based on. All of the above will be related to the principles of this Code as applicable to them, and any other internal policy or protocol derived from the Code of Ethics that may apply to them.

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## 3. INTERPRETATION OF THE CODE OF ETHICS

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The Compliance Committee is created as the body responsible for interpreting the Code of Ethics. Its interpretation criteria are binding for all LABIANA employees, and its functions and powers are regulated under Title 6 of this Code.

Likewise, the Committee of Compliance has own regulations of organisation and performance, approved by the Governing Body of the company.

The conduct criteria set out in this Code are not intended to cover all situations or circumstances that LABIANA professionals may encounter, but rather to establish the general principles of conduct that should govern their actions in the course of their professional activities.

Any doubts of the employees of LABIANA about the interpretation of this Code of Ethics will be consulted with his or her immediate superior, who may, in turn, refer the matter to the Compliance Committee if circumstances so require.

#### 4. MAIN VALUES OR ACTION STANDARDS

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LABIANA, as a group providing products and services for human and animal welfare, is strongly committed with the quality of the product and services offered, the environment, sustainability and security, conducting its business in a professional, honest, transparent and environmentally and socially responsible manner. In particular, LABIANA endeavours to comply at all times with the requirements and regulations applicable in its sector to detect and assess the possible environmental effects that may arise from its activity, preventing any potential side effects and offering proper answers at any time.

In the light of the above, the main values and performance standards that LABIANA guarantees and promotes at all times are the following:

##### A. MAIN CONCERN: PATIENTS AND USERS OF PRODUCTS AND SERVICES

###### 1. Human and animal welfare

The main commitment of LABIANA is no other than to address the interest of the clients and offer secure and quality products and services, constantly and continuously improved, to achieve the highest possible level of human and animal health and welfare.

LABIANA demands meticulous respect for current legislation in the field of animal research. The wellbeing of the laboratory animals is a priority for LABIANA. We have the moral responsibility with the animals that are used for research, and we are highly committed to the responsible treatment of animals.

###### 2. Research and development of products and services

Maximum welfare can only be achieved when the products and services offered are of the highest possible quality and safety. To this end, LABIANA is always in continuous pursuit of excellence and carries out important research and development activities to gain new registrations and to improve and update its products to ensure their adaptation and compliance with new regulations or regulatory requirements.

Along the same lines, all projects developed by LABIANA are assessed by a broad group of experts from a series of science fields (pharmaceutical, chemical, biological, biochemical...) with the purpose of offering an efficient service to its clients.

##### B. QUALIFIED, COMPETENT AND HONEST PROFESSIONALS

###### 1. Professionalism and experience

LABIANA ensures that all its members are competent professionals, with the training and experience required and sharing its objective of commitment and quality. To this end,

LABIANA guarantees that hiring of all its staff is completed on an objective basis, considering their training, skills, experience and suitability and it does not offer an unfair advantage in respect of persons having a family or friendship relationship with any member of LABIANA. Likewise, LABIANA has implemented a performance progress system for each and every one of its employees to make sure that their actions are consistent with the excellence level that LABIANA wishes to achieve.

2. Respect, protection and equality of the staff hired

Completing and providing quality services requires not only competent and trained professionals but, additionally, professionals who can complete their activities in a labour environment that is dignified, professional, respectful and sociable, with fair, equal and suitable labour conditions, commensurate with their professional performance.

LABIANA safeguards and ensures at all times that personal dignity, integrity, privacy and other personal rights are protected for all of its employees, offering a work environment free from discrimination or harassment. Conduct which involves or may be considered discriminating is not tolerated under any circumstances, be it in respect of the gender, nationality, ethnicity, religion, political membership or sexual orientation and neither are any intimidation, offence, violent, verbal or physical harassment conducts permitted under any circumstances, or those involving an abuse of power.

To ensure these ends, LABIANA has placed a mechanism at the disposal of all of its members or a reporting channel which is suitable to allow any victims, affected parties, or witnesses of conduct which is or could involve an act of discrimination or harassment to notify it through this channel with guaranteed confidentiality and an absence of reprisals.

3. Labour environment, work safety and Social Security

Rights of workers of LABIANA are guaranteed at all times and the enforceable responsibilities as to Social Security are complied with:

- o In respect of rights recognised to workers under legal provisions, a collective agreement or a labour contract.
- o In respect of freedom of association and the effective recognition of the right to collective bargaining through workers' representatives who are freely elected by such workers, in addition to strike rights.
- o Fostering a good labour environment, where dignity of workers is respected.
- o Firmly opposing any kind of forced labour, as well as child labour.
- o Respectfully fostering and guaranteeing transparency and truthfulness of information contained in work offers made, as well as labour contracts.
- o Stringently following occupational risk prevention rules applicable to LABIANA.

- o Compliance with any obligations that must be fulfilled in respect of the Social Security.
- o Making the means required available to the members of LABIANA to prevent the occurrence of events that could be criminal offences against their workers or the Social Security.

4. Honesty and Integrity

All members of LABIANA must carry out their duties in with honesty, integrity, respectfully, loyally, consistently and in a morally-correct way, not only in relationships and situations in respect of other LABIANA employees, but also in relationships with other third parties, including clients, suppliers, Public Authorities, etc.

5. Gifts, favours and hospitality

LABIANA utterly objects to the acceptance of any gifts, facilitation payments, economic compensation, social events or other personal benefits offered by any client, supplier, individual or organisation without a justified cause, which is inappropriate in the light of the circumstances and/or which seeks to influence its workers in their professional decisions.

**C. SHAREHOLDERS AND INTERNAL CONTROL**

1. Transparency and financial integrity

The activities carried out by LABIANA are also performed prioritising and placing quality of its products and services above other aims, sparing no expenses and not adopting the cheapest solution if there is no benefit arising for such products and services. However, LABIANA implements all of its commercial transactions in a fully conscious and analysed way and never compromises its financial integrity and is prudent in respect of its economic situation. For these purposes, the shareholders of LABIANA, including direct and indirect shareholders, are periodically informed about the financial details that are most relevant to allow them to verify and ensure that there are responsible practices and management of the resources of the firm.

The economic and financial information of LABIANA, in particular concerning annual financial statements and tax reports will offer a faithful reflection of its economic, financial and equity situation, complying with generally accepted accounting principles and the financial information rules applicable to it. To this end, no professionals will conceal or misrepresent the information of the accounting records and reports of LABIANA, which will be complete, precise and truthful. To do this, the financial and accounting information will be subjected to an appropriate internal control system and the accounting records will be available to external auditors.

As a company that is listed and for the benefit of the financial markets, the general public and our community, LABIANA is transparent with all of its communications and transactions. LABIANA is committed to the compliance with all legal requirements arising out of applicable securities market rules.

2. Procurements of suppliers, consultants and other third parties

It is guaranteed that the procurement of suppliers, consultants and other service providers for LABIANA is conducted at arm's length, ensuring that all expenses, payments and commissions carried out are reasonable given usual professional practices and that these are in agreement with the internal protocols and policies implemented at LABIANA, in particular concerning the selection and hiring of suppliers as well as financial controls.

Likewise, the choice of suppliers of LABIANA is conducted based on objective criteria, that is, prioritising their professionalism, skills, commitment, quality and responsibility, all of the above with the goal of guaranteeing that the products and services ultimately offered by the supplier are of the highest possible quality.

3. Money laundering

LABIANA develops tools and conduct rules to prevent that its structure and financial systems can protection actions relating to money laundering and terrorism financing. This includes, inter alia, the following steps:

- o Any kind of relationships with third parties with doubtful integrity or who are involved in illegal or opaque activities are avoided.
- o To the extent possible, the use of money in cash or bearer cheques is avoided.
- o Special attention is paid to any operations that may be regarded as risky, due to their amount or their very nature.

4. Confidentiality and security of information

LABIANA regards that information is one of its most valuable assets. Information not disclosed that is property of LABIANA will be regarded confidential and the subject of professional secrecy. Confidential information cannot be placed at the disposal of third parties without gaining the express consent of the person in charge of the department concerned, and the necessary legal agreements before facilitating any information.

All information, irrespective of its nature, to which LABIANA had access and which is regarded sensitive or private is duly protected and safeguarded in a suitable and diligent way. In this connection, all members of LABIANA from their respective offices, are committed to ensuring the confidentiality of any information they may have had access to in performing their duties and to not disclose, duplicate or reproduce such information, save in cases where this is legally permitted.

This obligation remains, even after the relationship of the employee with LABIANA terminates.

5. Use and protection of assets

All persons to whom this Code of Ethics is applicable are responsible for the proper use of the resources and assets made available to them by LABIANA to carry on their professional



activity. They must further ensure that all resources are used exclusively for professional and non-personal purposes and responsibly avoiding the damage, loss or theft of the above.

6. Intellectual and industrial property rights

All those at LABIANA are aware of, accept and recognise the various companies of LABIANA as the sole and exclusive holders of any industrial and intellectual property rights that are generated by or arise out of such company as a consequence of the delivery of their activities or services.

In particular, any rights recognised under any applicable intellectual or industrial property regulations concerning patents and patentable inventions, utility models, trademarks and other items that could arise due to the work completed by the employees of LABIANA at their time at this company, even due to scientific collaborations with other entities, will remain the exclusive property of the respective companies of LABIANA, as the case may be, and will be construed as having been assigned to such companies, to the broadest extent that is legally permissible.

For these purposes, any assignments of rights to LABIANA will be understood as having been completed to the extent that the rights arise, that is, as these rights are created, irrespective of the state of implementation of the work and research conducted.

The professionals at LABIANA will be respectful as concerns the protection of own and third-party intellectual and industrial property. No professionals will allow the plagiarism of third-party products, or the transformation or amendment of the above without gaining the due authorisation of the holder of the rights.

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7. Conflict of interests

As we said above, the proper and optimal offer of products and services requires a stable, committed and honest environment. In this connection, at all times we prevent business or action decisions adopted in respect of LABIANA from being influenced by the personal interests of shareholders, directors, executive or employees, and/or that these are adopted for their own benefit and/or to the detriment of the interests of LABIANA.

**D. A BENCHMARK COMPANY IN SOCIETY**

1. Compliance with the law. Quality and security

LABIANA is totally committed with the compliance with all laws, regulations, guidelines, rules of conduct, protocols and internal procedures, irrespective of their nature, including criminal ones, which are applicable to it in respect of the activities it undertakes, the services it offers and the market in which it operates, all of the above with the objective of offering products and services respecting and complying with the compulsory regulatory standards and requirements.

In particular, LABIANA binds itself to strict compliance with any rules, guidelines, standards or recommendations applicable to it in connection with the manufacturing of pharmaceutical products, as well as the best practices of the industry.

To this end, LABIANA guarantees and ensures that all of its members are aware of and understand any regulations and provisions applicable to them, either directly or indirectly, and it fosters and supervises that the above always act in line with these regulations and the provisions laid down under this Code of Conduct. It does not tolerate and it is not prepared to compromise with any activity carried out, for the benefit of an individual or of LABIANA which infringes or is incompatible with the rules, guidelines and guiding principles mentioned above, irrespective of the nature, scope and consequences of the above. Likewise, it is the job of executive to foster a culture of compliance, that is to say, to disseminate, with the assistance of the Legal Department, any laws, obligations and internal policies and procedures of LABIANA to all the persons under its management, in particular, to the remaining members of the organisation, as well as ensuring that these principles and rules are strictly complied with.

Likewise, LABIANA encourages all of its members to have a positive attitude in cases of detecting or suspecting that an illegal event is happening at the company, and they are encouraged to report this as soon as possible to allow the company to take appropriate action and adopt the corresponding disciplinary measures.

Notwithstanding the above, all professionals at LABIANA should also prevent any conduct which may not be against the law but can harm the reputation of LABIANA or negatively impact its interests.

2. Anti-corruption and anti-bribery

In line with the honesty and integrity that must guide all actions completed by employees of LABIANA, there is no tolerance to any of the members offering, accepting or tolerating, either on behalf of another employee of LABIANA or a third party, any incentives, inducements or payments to act in a given way at or for LABIANA, either for their own benefit or the benefit of LABIANA itself, irrespective of whether this action could be considered acceptable. In any case, control is in place to ensure that the functions and responsibilities carried out by every member of LABIANA are carried out honestly, without the above being conditioned or linked to gaining preferential advantages or treatment.

3. Relationship with Public Authorities

LABIANA has the aspiration of becoming a transparent organisation acting with integrity in all of its relationships, in particular the relationships that it may have with the Public Authorities. These relationships are guided by respect of legal provisions and transparency. It is expressly prohibited to make any gifts or provide incentives to representatives of the Public Authorities.

LABIANA ensures that the public funds it may receive are solely devoted to the purposes and

activities for which they were granted, and to guarantee that their concession is not the result of procedures in which there may be deceit or concealment of information.

In any event, the staff at LABIANA will collaborate in any inspection or administrative verification.

#### 4. Relationship with Suppliers

Respecting the law, quality of service and good faith in contracts are the basis of the relationships between LABIANA and its suppliers. We demand quality, seriousness, commitment and excellence from our suppliers, which are a source of support to our activity and one of the assets of LABIANA.

LABIANA is a company listed on the Spanish stock exchange and, in some cases, the confidential information of LABIANA can be regarded privileged information under applicable regulations. In this connection, suppliers should have implemented appropriate policies and mechanisms preventing their employees from using privileged information for their own benefit or for the personal benefit of others, using the confidential information of LABIANA.

#### 5. Environment and sustainability

The corporate social responsibility of LABIANA, understood as its social and environmental commitment is also part of its business model. LABIANA undertakes its activity fully respecting the environment, complying with the regulations applicable to it in manufacturing products. It also fosters and ensures that its members act at all times following the criteria of sustainability and respect and that they undertake their work following best environmental practices.

All professionals and, especially, those with responsibilities in areas subject to laws concerning security or the environment will immediately inform about dangerous situations or scenarios leading to risks for health, safety or the environment, so as to minimise accidents and for suitable measures to be adopted.

#### 6. Protection of personal data

Any personal data that LABIANA gathers, from its employees, clients, suppliers or other stakeholders are always obtained with due consent and the information on the reason for the request and the destination of the above, and will not be used for other purposes.

Personal data will not be assigned to third parties without gaining the consent of the data subject and in any case, the following rights are guaranteed: access, rectification, erasure, portability and objection of the data subjects as provided under current regulations on data protection.

LABIANA respects the principles of privacy, specifically encompassing accuracy, limitation of storage, integrity and confidentiality and, therefore, it meticulously selects any third-party processing or accessing the personal data that LABIANA is responsible for.

7. Clients. Trade and marketing practices

Clients embody LABIANA's main asset. In relations with clients, in any event, the principles of trust, transparency and integrity should prevail. The members of LABIANA will ensure that the products offered to clients fulfil the standards of quality and reliability agreed.

The products and services offered by LABIANA are promoted, advertised and distributed in a transparent and honest way, in compliance with the rules, regulations and other own guidelines of the industry. In any event, the advice, information or documents disseminated with these purposes will always be true, adequate and complete information, including the concrete technical specifications and avoiding any misrepresentation or concealment of information whose knowledge is deemed to be relevant.

8. Market and competitors

LABIANA is committed to competing on the markets loyally, respecting all competitors and in compliance with all applicable laws on competition and user rights.

LABIANA respects the rules of competition law, fostering loyal and equal competition among its suppliers. Specifically, the participation in agreements relating to price-fixing, market distribution, taking part in public tenders or failing to take part therein, and, in general, any unfair practices preventing free competition from taking place is prohibited. Therefore, professionals will not engage in behaviour intended to prevent, restrict or misrepresent competition.

LABIANA undertakes to gain information on the market, on competition or on third parties, always legally and ensuring the licit source of the above.

## **5. SUPERVISION, COMMUNICATION, AND CORRECTION OF UNDUE CONDUCT**

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Breaches of this Code of Ethics will not be tolerated under any circumstances, and any such breaches may lead to the adoption of disciplinary measures depending on the degree and the characteristics of this breach, always observing the principle of proportionality.

5.1 Supervision and control

LABIANA, through the corresponding compliance body, ethics committee or body responsible designated for these purposes, undertakes the following responsibilities in respect of this Code of Ethics:

- a) Ensuring the fostering, comprehension, and implementation of and compliance with the principles and standards of action set out under this Code of Ethics.

- b) Managing the reporting system or communication channel at LABIANA in respect of the irregularities, breaches or suggestions notified through the above, as well as starting and managing any investigation into the event notified and adopting, as the case may be, the applicable disciplinary measures.
- c) Periodically reviewing the Code of Ethics and amending and updating it as applicable.

## 5.2 Notice of irregularities

Notwithstanding the work of LABIANA itself or the corresponding compliance body for the follow-up and verification of the compliance with the Code of Ethics by all members of LABIANA, any employees who are aware of or suspect a potential breach or irregularity of this Code or any action contrary to the law, must do the following:

- d) Informing and reporting, in good faith, this event using the channels made available to you by LABIANA for these purposes;
- e) Collaborating in any potential investigations carried out, attending the corresponding compliance body.
- f) Keeping the strictest confidentiality in respect of the matter detected or suspected, leaving the adoption of the appropriate measures in the hands of the corresponding compliance body.

To these ends, the following communication channels are made available to you:

- HR Department
- Reporting Channel or Communication Channel

In no event will any reprisals or discrimination be tolerated in respect of the persons making use of the communication channels facilitated by LABIANA to notify any irregularities or suspicions of breaches, and the confidentiality, dignity and honour of the person concerned will be monitored at all times.

## 5.3 Correction of irregularities

Any irregularities or breaches of the Code of Ethics notified or made apparent will be investigated and, where these are confirmed, the applicable disciplinary measures will be adopted, all of the above in compliance with the provisions laid down under the applicable internal and external regulations.

## 5.4 Guiding principles of the Reporting Channel or Communication Channel

Employees at LABIANA who have reasonable suspicions that an irregularity is being committed or an act contrary to the law or the action rules of this Code of Ethics should inform about the above using the Reporting Channel.

In any case, these communications must be truthful and proportional, and this mechanism cannot be used for purposes other than those seeking the compliance with the law and the rules

of this Code of Ethics.

The identity of the person informing about an anomalous action through the Reporting Channel will be considered confidential information and, therefore, this information will not be reported without consent to the party that is the subject of the report. This means that the confidentiality of the identity of the reporting party will be guaranteed and any kind of response from the party that is the subject of the report to the reporting party due to the report will be prevented.

LABIANA undertakes not to adopt any reprisals, including direct or indirect reprisals, against the employees making adequate use of the Reporting Channel due to the use of the above in compliance with the provisions laid down under this Code of Ethics.

Notwithstanding the above, the details of people effecting the communication may be provided both to the administrative and court authorities, to the extent that these are required by such authorities as a consequence of any procedure arising from the subject matter of the report and also to the persons involved in any subsequent investigation or court procedure commenced as a consequence of the investigation. This assignment of data to the administrative or court authorities will always be conducted fully complying with any personal data protection laws.

#### 5.5 Processing communications submitted to the Reporting Channel

The processing of reports made using the Reporting Channel is the duty of the Compliance Committee. If the report related to a member of the Compliance Committee, such party may not be involved in the processing of the report.

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Any investigation will guarantee rights to intimacy, defence and the presumption of innocence of the persons being investigated.

## 6. THE COMPLIANCE COMMITTEE

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### 6.1 The Compliance Committee

- 6.1.1 The Compliance Committee is the collegiate body with responsibility in the scope of the compliance with the Code of Ethics.
- 6.1.2 The Compliance Committee must supervise the functioning of and the compliance with the Code of Ethics and it has autonomous powers of initiative and control.
- 6.1.3 All employees must collaborate with the Compliance Committee as required to ensure the appropriate exercise of its duties.
- 6.1.4 The Compliance Committee will have the material and human means required to carry out its functions.

6.1.5 The Compliance Committee will inform (at least annually and whenever this is deemed necessary and it is asked to do the above) the Governing Body of LABIANA on the measures adopted to foster the awareness of and ensure the compliance with the Code of Ethics.

6.1.6 The Compliance Committee will convene at regular intervals, at least every six months, and, in any event, whenever this is ordered by the Chairperson of the collegiate body, who is responsible for calling it, or at the request of any of its members.

## 6.2 Responsibilities of the Compliance Committee

6.2.1 The Compliance Committee will be vested with responsibilities including but not limited to the following:

- a) Defining the monitoring and control measures integrating the Criminal Risk Prevention System of LABIANA.
- b) Fostering the dissemination and knowledge of and compliance with the Code of Ethics and all measures forming part of the Criminal Risk Prevention System of LABIANA.
- c) The binding interpretation of the Code of Ethics and the remaining measures required for the suitable implementation of the Criminal Risk Prevention System of LABIANA.
- d) Ensuring the application of the Code of Ethics and the remaining measures included within the Criminal Risk Prevention System of LABIANA.
- e) Resolving any queries or doubts arising in connection with the contents, interpretation, application or compliance with the Code and the remaining measures within the Criminal Risk Prevention System at LABIANA.
- f) Fostering the procedures of verification and investigation of the reports received and issuing the appropriate resolutions on the files processed.
- g) The annual assessment of the degree of compliance with the Code and the remaining measures comprising the Criminal Risk Prevention System of LABIANA.
- h) Fostering the protocols needed for the implementation and development of the Criminal Risk Prevention System of LABIANA.
- i) Informing the Governing Body about the compliance with the Code, and the remaining measures for the prevention of Criminal Risks at LABIANA.

6.2.2 The Compliance Committee will have autonomous powers of initiative and control in exercising its duties and it will guarantee the following:

- a) The confidentiality of all data and background details used and in respect of the actions completed unless the law or court orders mandated the submission of information.

- b) The comprehensive analysis of any data, information or documents on the basis of which its actions are fostered.
- c) The instruction of a suitable procedure given the circumstances of every case, whereby actions will always be carried out independently and fully respecting rights of audience and the presumption of innocence of any affected parties.
- d) The indemnity of any reporting parties as a consequence of the presentation of files or reports sent in good faith to the Committee.

### 6.3 Regulations of the Compliance Committee

The makeup and operation of the Compliance Committee will be governed by the Regulations that must be approved following an agreement of the Governing Body of the company, considering the following:

- a) The Compliance Committee will comprise no less than three members and no more than five members, as established by the Governing Body of LABIANA.
- b) The members of the Compliance Committee will be appointed by the Governing Body of LABIANA for a five-year term, which may be renewable. Should vacancies arise for any reason prior to the termination of the term of office, this will be covered by the persons appointed by the Governing Body for a term equal to that remaining for the compliance with the termination of this term of validity, notwithstanding the opportunity for new members to be renewed in the office for the ordinary term.
- c) The members of the Compliance Committee cannot be removed or terminated by the Governing Body if there is no justified cause which is not related to the exercise of their duties.

### 6.4 Disciplinary System

When the Compliance Committee establishes that a professional at LABIANA has completed activities contrary to the provisions laid down under the law or set out under this Code of Ethics, it will entrust the Management with applying any corresponding disciplinary measures applicable following the system of breaches and sanctions laid down under the collective bargaining agreement or under the applicable labour law.

## 7. **DISSEMINATION AND TRAINING**

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To the extent that the provisions laid down under this Code of Ethics must be known by all members of LABIANA and by third parties affected by them, access to the Code must be ensured at all times. Furthermore, a copy will be handed to all members, collaborators or third



parties who may be affected by the Code, either a hard copy or an electronic one.

LABIANA will ensure, through the Human Resources Department, that all persons at the company have read and understood the Code of Ethics, and that they commit to comply with it.

Likewise, to ensure the effective knowledge of the Code of Ethics by all of the affected subjects, specific training will be delivered on its contents and other measures that may be established in this connection.

Annex. Confirmation of receipt and awareness of the Code of Ethics

**Labiana Pharmaceuticals, S.L. C/**  
**Casanova 27-31**  
**Corbera de Llobregat 08757**

**Labiana Life Sciences, S.A.U.**  
**C/ Venus 26 Can Parellada Industrial**  
**Terrassa 08228**

23 de September de 2022

Dear Sirs:

I hereby acknowledge today that I have been handed a copy of the Code of Ethics on which is in force at LABIANA Group. I further acknowledge and accept the nature, contents and purposes of the above, notwithstanding my rights to submit any questions or comments in the future, using the channels established and provided by LABIANA which I am aware of.

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Yours faithfully,

**Name:**

**Department:**

**Position:**