

# CODE OF CONDUCT MEDICHEM





**THE CODE OF  
ETHICAL AND  
LEGAL CONDUCT  
TO BE FOLLOWED  
AT MEDICHEM**

## LETTER FROM THE DIRECTORS

The Directors of Medichem have decided to update the company's Code of Conduct so that the ethical and legal framework in which the company performs its activities is adapted to the new requirements regarding compliance.

This Code sets out the basic principles and rules of conduct at Medichem and is in line with the legal requirements regarding corporate responsibility. In particular, it outlines the ethical commitments and responsibilities that all Medichem employees must undertake, regardless of their post or duties.

Medichem is aware that its external image (as well as its internal image, aimed at all those belonging to the company) depends, to a large extent, on the actions of all its employees. Therefore, this Code of Conduct helps in ensuring that Medichem activities are properly and suitably rendered and based on

the responsibility, respect and professionalism that characterises the company, which is a key factor in achieving our success.

With no distinctions or exceptions, this Code of Conduct is applicable to all Medichem employees and is of mandatory compliance for them.

The Directors and management of Medichem are committed to compliance and ethical leadership. They will act in an exemplary manner, comply with the standards of this Code of Conduct and other applicable ethical and regulatory standards. The Directors will promote regular updating of the Code of Conduct will be promoted and the necessary tools will be provided to ensure it is implemented.



Yours sincerely,

ELISABETH STAMPA  
DIRECTOR

ARTICLE **GENERAL PRINCIPLES, OBJECT AND RECIPIENTS OF THE CODE OF CONDUCT**

01

The principles and provisions in this Code of Conduct are general obligations that must be fulfilled by all Medichem employees, who are expected to conduct themselves in accordance with the general principles included in this Code. Medichem's general obligations are based on the company's corporate values.

These values are as follows:

- Teamwork
- Respect
- Transparency & Communication
- Reliability & Responsibility
- Continuous Change

The Code of Conduct is applicable to all Medichem employees. In this respect, the Management ensures that the principles and provisions included in this Code are known, read and understood by everyone.

ARTICLE **COMMITMENT TO LEGAL COMPLIANCE, PROFESSIONALISM, INTEGRITY AND RESPONSIBILITY**

02

Medichem's business and professional activities are performed in strict compliance with the applicable laws.

Medichem executives and managers are knowledgeable of the regulations applicable to their respective business areas and ensure that all members of Medichem receive suitable training to understand, respect, fulfil and ensure these regulations are fulfilled. Medichem executives and managers must carry out their duties with integrity and treat all those associated with Medichem with the utmost professionalism, ensuring that they receive fair treatment based on objective and transparent management criteria.

At Medichem, we act with professionalism and integrity, making the best use possible of the resources available and taking responsibility for the duties assigned to us.

ARTICLE **COMMITMENT OF THE DIRECTORS**

03

The Directors will provide all the resources required to encourage and promote the values set out in the Code of Conduct.

Medichem's Directors, executives and managers serve as an example in its conduct and set a high compliance standard of the Code of Conduct and other ethical and regulatory compliance standards.

ARTICLE **IMPARTIALITY AND CONFLICT OF INTEREST**

04

Conflicts of interest arise when personal interests directly or indirectly interfere in the interests of Medichem.

Medichem acts impartially in all its relationships with third parties. For such purpose, there are mandatory provisions and internal reporting mechanisms in place in order to avoid any conflict of interest at all levels in the company.

All the company's employees must keep their private interests separate from those of Medichem and avoid any conflict in this respect in all areas, including, but not limited to, decisions about recruiting staff, business relations with third parties and selecting suppliers. Any situation of conflict of interest must be immediately reported to their superior.

ARTICLE **CONFIDENTIAL INFORMATION****05**

Medichem complies with all laws and regulations in force regarding personal data protection and guarantee of digital rights.

At Medichem, any information about customers, employees and business partners is protected according to the principles of confidentiality and privacy. Medichem keeps all the information, data or documents that it may legally or contractually access strictly private and confidential. All Medichem employees are obliged to not disclose or use, for their own benefit or the benefit of third parties, any information or documents to which they have access to when performing their duties, unless they have obtained prior written consent from Medichem.

ARTICLE **PRINCIPLES OF LOYALTY AND TRUSTWORTHINESS****06**

Medichem has a mutual trust and loyalty relationship with all its employees. The obligation of trustworthiness implies the prohibition of performing activities that are against the interests of Medichem or that are incompatible with the job duties.

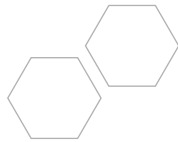
ARTICLE **HUMAN RESOURCES****07**

Medichem considers that human resources are a key factor in the development of its business strategy. Medichem human resources policy is based on talent management and creating a professional environment in which ethics and respect are essential values and in which people can develop their professional skills. Medichem does not accept any kind of discrimination and strictly observes the laws and regulations in force regarding recruitment and social security.

ARTICLE **PROTECTION OF HEALTH AND SAFETY IN THE WORKPLACE****08**

Medichem provides its employees with a safe and secure environment and adopt the required measures to prevent work-related accidents in accordance with the applicable regulations, which include regular, documented training within the scope of health and safety in the workplace.

All employees must observe the work safety measures applied by Medichem and undertake to protect their own health and safety, as well as that of the other employees with whom they share their work spaces and environment.



The following is absolutely prohibited:

- The possession, consumption, purchase, sale, attempted sale, distribution or manufacturing of drugs in the workplace, as well as the consumption of alcohol while performing work-related activities.
- Concealment of accidents or very serious incidents at work and the falsification or occultation of safety records.

ARTICLE **FAIR TREATMENT AND NON-DISCRIMINATION**

**09**

Medichem ensures a work-environment that is free from discrimination and any situation of harassment.

All of the company's employees are treated with dignity, consideration and respect; therefore, psychological abuse, offensive or degrading actions or conduct, or any behaviour that could make anyone to feel threatened, humiliated or intimidated, are absolutely unacceptable at Medichem and will be considered very serious offences.

Medichem ensures that the company's employees who could suffer workplace harassment can file complaints, which will be handled confidentially through the procedure determined for such purpose.

These principles are also applicable to third parties having any business relationship with Medichem.

ARTICLE **EQUAL OPPORTUNITIES AND PROMOTING A WORK-LIFE BALANCE**

**10**

Medichem has an equality plan that outlines, among others, equal opportunities so that all Medichem employees, whether male or female, carry out their professional activity on the basis of merit. Decisions on selection and promotion are always based on objective assessments.

Medichem promotes a work-life balance for its employees as it recognises the benefits that this balance implies both for its employees and for Medichem.

ARTICLE **TRANSPARENCY AND ACCURACY OF INFORMATION**



**11**

Medichem guarantees the truthfulness of the information as a basic principle in all business actions. In particular, Medichem applies high standards of accuracy and transparency in relation to economic transactions, accounting and economic-financial information.

All Medichem's economic-financial information is a true reflection of the economic and financial situation of the company and complies with the applicable accounting principles and international financial reporting standards.

ARTICLE **ASSETS PROTECTION**

**12**

Medichem provides its employees with the material resources required to perform their professional work.

Medichem employees are responsible for protecting the material resources assigned to them. Employees must observe the operating procedures for their use and protection and refrain from making any use that could diminish their efficiency. Employees must implement Medichem's policies and safety procedures in order not to compromise the functionality or protection of the company's assets.



ARTICLE **USE OF IT SYSTEMS****13**

The use of IT and telematic resources by Medichem employees must comply with all the internal security rules and procedures.

It is forbidden to install unauthorised programs or devices, deteriorating, erasing, altering or deleting company data, information or IT programs or accessing third parties' IT systems in order to damage or obstruct their functioning or for any other purpose.

ARTICLE **ENVIRONMENTAL PROTECTION****14**

Medichem respects the environment. The manufacturing activities are consistent with environmental protection and are in strict compliance with the requirements of ISO 14001 certification for the environmental management of activities.

Medichem is committed to improving its manufacturing processes for minimising the environmental impact of its operations.

ARTICLE **BUSINESS CONDUCT****15**

Medichem develops business based on the principles of legality, loyalty, correct conduct, and transparency. The company further undertakes to comply with competition law and will avoid any behaviour that could limit or restrict competition.

Medichem employees must develop business relationships based on the values of availability, respect, cooperation and professionalism. Medichem employees must avoid adopting, accepting or favouring any behaviour that is not in compliance with the laws and regulations in force or the principles of this Code of Conduct.

All Medichem employees must ensure that they provide true information when promoting Medichem's products and services and must not allow any incomplete or misleading information to be provided to customers.

Medichem undertakes to ensure the quality of its services and products and to provide all of the company's employees with the required resources to develop the most suitable quality management systems.

ARTICLE **RELATIONSHIPS WITH SUPPLIERS AND CUSTOMERS****16**

In its relationships with suppliers and customers, Medichem acts according to the principles of loyalty, transparency and mutual cooperation.

Medichem does not accept corruption in its relationships with suppliers or customers. The selection of suppliers and the definition of purchase conditions are determined based on an objective and transparent assessment that takes into account the price, ability to provide and supply products or services of a suitable level in compliance with the necessary requirements or specifications.

At Medichem, it is not permitted to request or provide products, services, goods or unjustified favours in exchange for more favourable treatment within the scope of a relationship with suppliers and/or customers.

Offering or receiving gifts is allowed whenever it does not compromise the integrity of any of the involved parties. Any gift received or provided must be proportional and socially acceptable in the circumstances. Medichem has designed a Protocol for gifts and hospitality based on the principle of transparency.

ARTICLE **RELATIONSHIP WITH PUBLIC AUTHORITIES****17**

In its relationship with Public Authorities, Medichem strictly observes the provisions in the regulations in force and the company's internal regulations, applying the principle of transparency.

Therefore, it is absolutely forbidden to offer advantages that could jeopardise the impartiality and proper functioning of Public Authorities.

Medichem absolutely rejects any corruption practice. Each company's employee who has relationship with the Public Authorities is aware that corruption is rejected and obliged to verify the accuracy of the statements made in the name of Medichem.

ARTICLE **ACCEPTANCE AND FULFILMENT****18**

This Code of Conduct is mandatory for all Medichem employees. The management and the Ethics and Compliance Committee must ensure the Code of Conduct is known to all employees.

Any query regarding the interpretation or implementation of the Code of Conduct must be addressed to the Ethics and Compliance Committee.

Medichem strictly forbids any request for an action that would infringe the provisions in this Code of Conduct. Therefore, Medichem employees may not justify an infringement of the Code of Conduct based on having received an order from a superior or due to the lack of knowledge about the Code of Conduct.





ARTICLE **ETHICS AND COMPLIANCE COMMITTEE****19**

Medichem has designed a Compliance Program and set up an internal monitoring committee that is responsible for ensuring compliance with this Code of Conduct and other internal regulations related to compliance at Medichem. This internal monitoring committee is the Ethics and Compliance Committee.

The Ethics and Compliance Committee reports directly to the Directors unless otherwise specified. This Committee comprises professionals from the following departments: Legal, Administration and Finance, and Human Resources of Medichem, S.A.

The members of the Ethics and Compliance Committee undertake to process all the information to which they have access when performing their duties with the strictest confidentiality.

The Ethics and Compliance Committee must ensure independence and professionalism when assessing the actions of the company employees at any level.

ARTICLE **DUTIES OF THE ETHICS AND COMPLIANCE COMMITTEE****20**

The duties of the Ethics and Compliance Committee are as follows:

- To assess the suitability of the documents included in the Compliance Program.
- To adopt decisions related to possible significant infringements of the Code of Conduct and other internal regulations.
- To regularly review the Code of Conduct and other internal regulations of Medichem.
- To guarantee that the Code of Conduct and other internal regulations of Medichem are known by all employees.
- To ensure that the Code of Conduct and other internal regulations are updated, and propose any improvements that may be required.
- To settle disputes that could arise when applying the Code of Conduct and other internal regulations.
- To deal with events reported through the Whistle-Blowing Channel.

The Ethics and Compliance Committee may obtain the support of professionals from other departments of Medichem depending on the matter involved.

ARTICLE **WHISTLE-BLOWING CHANNEL****21**

In order to enable the detection and investigation of infringements of the law or the Code of Conduct, Medichem has provided a whistle-blowing channel that enables the company employees who are aware of any infringement to report such situation to the Ethics and Compliance Committee.

All Medichem employees undertake to report any infringements of this Code of which they might be aware to the Ethics and Compliance Committee.

All reports submitted in good faith will be protected against any kind of penalty and handled with the utmost confidentiality including the identity of the whistle-blower, subject to legal obligations and protection of the rights of persons unfairly or maliciously accused.

Medichem employees who report an infringement or alleged infringement of the Code of Conduct or an internal protocol must submit the report to [comite.etico@medichem.es](mailto:comite.etico@medichem.es).

Receiving a substantiated claim will lead to an internal investigation, which will be conducted in full respect to the constitutional rights and the legal framework for labour rights. (★)

ARTICLE **PENALTIES****22**

The provisions in this Code of Conduct are an integral part of the contractual obligations of all Medichem employees.

If, as a result of an internal investigation, it is confirmed that an infringement of the Code of Conduct, or any other applicable internal regulation, has been committed, Medichem will impose penalties proportional to the seriousness of the event, to the person responsible for the infringement and those who, having the duty to prevent it, failed to do so. Any person who is aware of any infringement of this Code of Conduct should report it. Otherwise penalties might be imposed.

Violations of the principles of the Code of Conduct will be deemed disciplinary infringements, for which penalties stated in both in the applicable labour collective agreement and the labour laws in force may apply.





(\*) Medicchem, S.A is the Controller in charge of the treatment of personal data of the interested party and hereby informs you that this data will be treated in accordance with the provisions of current regulations on the protection of personal data, Regulation (EU) 2016/679 of April 27, 2016 (GDPR) and Organic Law 3/2018, of December 5 (LOPDGDD), to manage the whistle-blowing channel and, if appropriate, the processing and resolution of the report received. The basis of the legitimacy of the processing of personal data is to fulfil a mission carried out in the public interest as well as the fulfilment of a legal obligation. The data will only be stored for as long as it is essential to adopt a decision on whether or not the reported facts should be investigated. In any case, once three months have elapsed, counted from the date the data are entered, the data will be deleted from the whistle-blowing system. The data may continue being processed by the competent authority and body if there is an investigation into the reported facts, but they will not be stored in the whistle-blowing system per se. Data will only be communicated to third parties when it is necessary for the adoption of disciplinary measures or to process judicial proceedings, if any, notwithstanding the need to notify the competent authority of any events that imply a criminal or administrative offence. Moreover, you are hereby informed that you may exercise your rights of access, rectification, portability and deletion of your data, and the limitation or opposition to its treatment by sending a letter to MEDICHEM, S.A. at C/ Fructuós Gelabert, 6-8 - 08970 Sant Joan Despí (Barcelona), Spain. Email address: [dataprotection@medicchem.es](mailto:dataprotection@medicchem.es). You can also submit a claim at [www.aepd.es](http://www.aepd.es).



**COMPLIANCE WITH  
MEDICHEM'S CODE  
OF CONDUCT  
PROMOTES OUR  
TEAM'S EFFECTIVE  
PERSONAL AND  
PROFESSIONAL  
DEVELOPMENT**





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