

Code of Conduct for Third Parties





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Introduction

With the launch of the "Caring for the Future" project, the MEDICHEM GROUP, (hereinafter referred to either as MEDICHEM or the Group), has embarked on a journey of commitment to sustainability with the aim of integrating these principles across our entire value chain.

At MEDICHEM, we recognise the fundamental role of our suppliers, distributors, customers and other third parties with whom we have relationships, and therefore we hereby present this Code of Conduct in the expectation that they will apply the principles contained therein and comply with all applicable rules and regulations.

It is understood that the methods used by our suppliers, distributors, customers and other third parties to meet these expectations may vary and must be adapted to the laws, values and cultural expectations in different societies around the world.



General Requirements for Conduct



Ethics



Occupational Health and Safety



Human and Labour Rights



The Environment

Ethics

Compliance with the applicable regulations

MEDICHEM is firmly committed to complying with all the applicable regulations in the performance of its activities. Therefore, all MEDICHEM's suppliers must comply with the applicable regulations in the same manner. Suppliers should also, as far as possible, seek to ensure that their business partners, agents or collaborators also adopt this commitment to regulatory compliance when acting in their name or on their behalf.

Prevention of corruption

All suppliers must make a clear commitment to avoid any behaviour that could be considered corrupt. In this regard, MEDICHEM will not tolerate any conduct aimed at offering or facilitating unfair advantages, remuneration, gifts or favours in exchange for any kind of improper or unjustified benefit.

In particular, all the suppliers must take suitable measures to avoid any kind of undue influence, payment or consideration in current or potential contractual procedures with MEDICHEM. Facilitation or grease payments, consisting of small payments in exchange for securing or expediting any process, procedure or decision must also be prohibited in those countries or territories where they are not allowed.

In addition, efforts must be made to always manage potential conflicts of interest appropriately. This includes, for example, early identification and reporting of such conflicts and prompt action to ensure they are appropriately managed.

Confidentiality of information

All suppliers must ensure the maximum protection of information and its confidentiality. In particular, if suppliers have access to confidential or sensitive information belonging to MEDICHEM, they must undertake to:

- Limit the use of and access to such information.
- Adopt sufficient security measures to protect the confidentiality of the information.
- Prohibit any inappropriate access, use or disclosure of MEDICHEM's information.
- Comply with and ensure compliance with the provisions on the protection of personal data at all times.

MEDICHEM will not tolerate any conduct aimed at offering or facilitating unfair advantages, remuneration, gifts or favours in exchange for any kind of inappropriate or unjustified benefit.

Human & Labour Rights

Respect for human and labour rights

All suppliers must always respect the fundamental human rights recognised in the Universal Declaration of Human Rights adopted by the United Nations General Assembly.

They must also ensure that the labour rights of the employees working for the supplier are respected.

In particular, but not limited to, all suppliers are required to:

- Zero tolerance for forced labour.
- Zero tolerance for the exploitation of children.

- Zero tolerance for discrimination based on gender, age, origin, religion or any other social or personal condition.
- Respect the freedom of association and the right to collective bargaining.
- Respect for the fundamental labour rights applicable according to their jurisdiction.
- Promotion of equal conditions and opportunities.

In this regard, MEDICHEM may carry out actions aimed at verifying that the supplier acts in a manner consistent with Human Rights.



Occupational Health & Safety

Health and safety protection in the workplace

All suppliers must adopt and implement appropriate measures to prevent occupational hazards arising from their activities. In particular, they must ensure an adequate level of safety at all its facilities and for the products and services provided to MEDICHEM.

To this end, MEDICHEM's suppliers must implement the following measures, including, but not limited to, those required by current legislation or, more generally, those necessary to ensure the health and safety of their employees in the course of their work:

- Occupational risk assessments.
- Action or limitation plans for occupational emergencies.
- Specific safety measures for the work to be performed safely, (protective equipment, among others).
- Training and awareness-raising on occupational hazards and risks.

MEDICHEM is authorised to carry out the necessary verifications to confirm that the suppliers apply sufficient measures to prevent occupational risks in order to ensure an adequate level of safety in the performance of their services.

In the event that the supplier carries out its activity on MEDICHEM's premises, it must be aware and strictly comply the applicable safety standards and guidelines applied by the Group.

It is also prohibited to conceal occupational accidents or very serious incidents or to falsify safety records in the activities carried out on MEDICHEM's premises.



The Environment

Respect for the environment

All the suppliers must strive to carry out their activities in such a way as to minimize any negative environmental impact and to make efficient use of resources. MEDICHEM will not tolerate the deliberate practice of activities that harm the environment.

In this respect, all suppliers must always act according to the applicable regulations, certifications and requirements and adopt good practices that ensure respect for the environment. Suppliers should also seek to ensure, to the extent possible, that their business partners, agents or employees share the same commitment.



Responsibility for Compliance

This Code of Conduct is binding and must be read and accepted by the Third Party. In this respect, MEDICHEM may conduct such assessments and take such assurance measures it deems appropriate to verify the Third Party's compliance with this Code of Conduct.

Should the Third Party breach any of the provisions or conduct guidelines contained in this Code of Conduct, MEDICHEM shall be entitled to adopt and require the appropriate remedies and corrective measures.

Should the Third Party fail to rectify its non-compliant status with the provisions set forth in this Code of Conduct, MEDICHEM will be entitled to terminate its relationship with such non-compliant Third Party, without any liability towards said Third Party and without prejudice to the right to claim compensation from the Third Party for any damage that may have been caused to MEDICHEM.



Whistleblowing Channel

MEDICHEM has set up an internal mechanism for reporting possible violations (Whistleblowing Channel), and for submitting any doubts and queries regarding the interpretation and application of its Compliance System.

In particular, the Whistleblowing Channel consists of an external platform accessible via the following link:

<https://medichem.integrityline.com>

Any supplier may use MEDICHEM's Whistleblowing Channel to report the following:

- Any breach of this Code of Conduct and other MEDICHEM's internal regulations, as well as the values, policies or rules of conduct contained herein.
- Any violation of applicable law.
- Questions or queries regarding this Code of Conduct.

In all cases, the content of the report must relate to conduct or acts committed by employees and/or third parties with whom MEDICHEM has a professional or business relationship.



