

CINFA GROUP
Code of Conduct





Message from the President

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Since the creation of our company Infarco, the holding company of the Cinfa Group, in 1964, the values of people have been fundamental to its evolution.

That's why, a few years ago, wanting to take a step forward in terms of responsibility and transparency, and to guarantee the correct actions of all the people who make up this group of companies, we created a "Compliance System" or "Corporate Compliance", which ensures a correct control of both the legal regulations in force and those that reflect our essence, embodied in this Code of Conduct and in the policies that implement it.

We are aware of the importance of professional ethics, especially when our area of activity is directly related to people's health.

We also believe that assuming the responsibility to behave ethically guarantees us the trust of the stakeholders related to our company; patients, employees, shareholders, customers, suppliers, the healthcare sector, public administrations and society in general. In doing so, we want to ensure fairness and respect in how we treat others, equity in our decision-making, the duty to offer quality products to our patients, the sustainability of our companies, francial integrity and a commitment to society and the environment.

Enrique Ordieres President



The real needs of the patient guide the development of our products and services: we focus on providing the best and most innovative solutions to meet these needs, while guaranteeing their safety, quality and efficacy.

We develop, manufacture and market high quality products that meet all the regulatory requirements required in each country, striving to exceed the standards demanded for both our products and our processes.

Our pharmacovigilance system works to detect, evaluate, understand and prevent adverse effects or any other drug-related problem from happening. It prevents the harm that may arise from adverse reactions to the use of products both in and out of the scope of the authorized indications, and promotes the safe and effective use of medicines by providing up-to-date indications, and promotes the safe and effective use of medicines by providing up-to-date indications and promotes the safe and effective use of medicines by providing up-to-date and the control public.

As a Group in the healthcare sector, we are committed to improving patient access to our healthcare solutions by developing, manufacturing and marketing high-quality products at competitive prices, promoting the use of generic drugs, whilst also supporting healthcare professionals and pharmacies, in particular, with services and training. Thus, we are working to ensure that citizens perceive pharmacies and pharma-

cists as advisors for their health.

We propose accessible and quality healthcare solutions that satisfy the real needs of patients



Employees: the person at the centre

We consider and treat our employees in a fair, equitable and respectful manner, promoting mutual respect, and we do not tolerate any form of harassment or discrimination.

Diversity is a value; we work to create a work environment that favours the inclusion of all employees, so that they can contribute to their best ability and develop to their full potential.

We attract, retain and develop talented, positive and open-minded people who share the Group's values.

We ensure that working conditions are fair, ethical and safe. We respect people's right to privacy, without prejudice to the duty of surveillance and control established by law.

We work on continuous improvement to assure the safety and health of workers,

integrating risk prevention at all levels and in all activities

We reward our staff, with a focus on internal equity and external competitiveness.

The selection criteria are professional, ensuring the objectivity of the processes. There is no discrimination in the selection or promotion processes, and any recommendations by stakeholders are ignored, thus guaranteeing equal opportunities.

We strive to train people continuously and with the highest possible quality training, in order to prepare them for present and future responsibilities.

Leaders are the main agents for motivating, developing and transmitting values in their teams, providing each person with the greatest possible autonomy in the exercise of his or her responsibilities and seeking to ensure that each person gives their best. All people in the organization will be informed of their manager's assessment of their work, recognizing their achievements and establishing a constructive dialogue about opportunities for improvement and development needs.

We guarantee the right to freedom of opinion and expression, as long as these are expressed in accordance with the provisions of this Code of Conduct and do not prejudice the fulfillment by each employee of their work responsibilities. We respect the right of association as long as the laws are respected, maintaining the necessary communication with the staff and their representatives.



We are committed to our shareholders to ensure the sustainable and profitable growth of the Group, always acting with integrity

Infarco's Board of Directors oversees the achievement of the strategic goal of sustainable and profitable growth, guiding the activities of the companies that make up the Group in an ethical manner.

Communication with our shareholders is comprehensive, accurate and transparent. We prepare our financial reports rigorously to ensure a true and fair view of our transactions and financial statements.

We do not compromise our financial integrity. Financial operations and commercial transactions are properly reviewed and approved. Personal interests do not influence our business judgement or decision-making, and any actual or potential conflicts of interest must be disclosed.

We protect our assets (employees, reputation, industrial property, information, products, etc.) from threats and ensure their proper use and preservation, ensuring that they are used for legitimate business purposes.

We protect our industrial property rights and respect the legitimate industrial property rights of third parties. Industrial property created, developed or obtained by the Group's employees within the framework of their employment relationship belongs to the Company.

We ensure the continuity of our operations as part of our responsible management practices, with a commitment to make every effort to ensure the continuity of supply of key products and services in the event of an emergency or a significant disruption to our operations.





We aspire to be the preferred partner of our customers in the area of healthcare

We work to maximize our customers' satisfaction, listening to their needs and expectations in order to create quality products and services that allow them to maintain competitive economic conditions, and providing them with an excellent service in all aspects of the business relationship.

We compete fairly and honestly, complying with all of the applicable laws that regulate commercial competition in each country. We do not agree with competitors to divide up or allocate customers, markets or territories.

We do not admit any form of corruption to achieve our business purposes. We are aware of the importance of develoring a reproprise advertising active accordance with the nature of our products, which is why we respect the laws that respect the laws that expect the laws that and exhere to the strictest ethical standards exhere the third and other self-care products. These products, These products, These products, and other self-care products, These products, and other self-care are made at both behaviorable activities, which are aimed at both behaviorable professionals and at the general public, in any territory, are lawful and truthful.

We are committed to the development of pharmacists in pharmacies as integral professionals, supporting them in their role as health professionals, with products and services that facilitate them in their task of providing pharmaceutical care and advice, and which generate financial benefits by providing quality products pursuant to competitive economic conditions.



No employee may accept, in general, any gift, personal benefit or financial compensation from any supplier, or any natural or legal person, in general, who claims to have such status, and especially if the responsibility for awarding the contract depends on such employee.

We ensure that our suppliers remain permanently in a position to supply their products and services with the required quality price and service. We verify its continuous improvement and enter into quality agreements to guarantee that the product meets the agreed specifications and complies with current legislation throughout its life cycle.

We require our suppliers to abide by the laws of the countries in which they operate, to be socially and environmentally responsible, and to respect human rights and ethics in their business practices, pursuant to this Code.

We manage everything in an orderly and transparent way, always seeking bids from several potential suppliers so as to ensure fairness and efficiency

We value our suppliers according to objective criteria, at all times maintaining the transparency of the process, both internally and towards the suppliers themselves, with whom we seek to establish long-term collaborative relationships insofar as possible.

We build relationships of mutual trust while maintaining the utmost rigour and professionalism



The Cinfa Group companies operate in the healthcare sector and maintain ongoing relationships with healthcare professionals, patient associations and healthcare organizations, sharing the ultimate goal of benefiting patients.

These relationships are governed by strictly professional criteria, are duly documented, comply with all applicable ethical and legal standards and are governed by the principle of transparency.

In this regard, transparency in interactions between Group companies and healthcare professionals, healthcare organizations and patient associations helps to prevent inappropriate or unethical behaviour.

Consequently, the Group reports transfers of value made to these healthcare sector agents, in accordance with the terms set out in the applicable codes of conduct.

Collaboration with public administrations

The pharmaceutical sector is subject to stringent regulation by the authorities that extends to multiple aspects of healthcare products (high quality standards in manufacturing, pricing, advertising, competition, etc.).

For this reason, the Group's companies maintain ongoing relations with the government and autonomous community administrations in Spain, as well as with the administrations of the many countries in which they operate.

These relationships are guided by professional criteria, and under no circumstances may any type of benefit or incentive be offered to members of public administrations for the purpose of obtaining competitive advantages.

The Cinfa Group is committed to complying with all regulations in the healthcare sector and to collaborating with the public administrations in the jurisdictions in which it operates.



We believe that companies are called upon to play an active role in shaping society and that, furthermore, their long-term business resulfs improve if they maintain non-opportunistic relationships with the different stakeholders involved in their business activities: patients, employees, shareholders, customers, suppliers, the healthcare sector, public administrations and society.

We are guided by ESG (Environment, Social and Governance) criteria in corporate management, formalizing policies and management systems in these three fields, ensuring transparency of information and external scrutiny of the results achieved.

We pay attention to the expectations that our different stakeholders have with respect to our behaviour, acting in the following three aspects: Environment, Social and Governance, aimed at complying with universally accepted principles in the areas of human rights, employment, environment and anti-corruption (United Nations Global Compact Principles).

We are committed to acting in solidarily with society and to the development of the countries in which we operate, carrying out, our pharmaceutical activity with the aim of providing a wide-ranging service to society. This appration is reflected in the positive impact of our provides on the oppositions health and development, on the generation of employment and investments, and on the formation of intellectual capatal, transferring technologies and know-how when feesible

We respect the environment as a priority issue that is reflected in our environmental policy, complying with the most demanding standards in this area and certified by internationally renowned entities.

The sustainability objective is consolidated thanks to the maturity within the company of an environmental management model based on continuous improvement, focused on the good use of natural resources, the self-generation of photovoltaic energy, and a correct waste management, which includes the recovery and recycling of materials wherever possible, and communication to achieve an adequate internal and external waveness.

Commitment to society



When in doubt, ask yourself:

- Do my actions comply with the law and internal regulations?
- Does my conduct inspire confidence in my colleagues, patients, shareholders, customers, suppliers, the healthcare sector, public administrations, or society in general?
- Will my actions have negative consequences for the Group's reputation.
- Who else may be affected?
- Would I like to be treated the same way?
- Is there an alternative solution that does not constitute an ethical conflict?
- If I have suspicion or knowledge of a violation, should I report it so that it can be corrected, or should I continue to allow such conduct?

If in doubt, consult with us:

· Corporate Compliance Officer:

- Carlos Iribarren Goni
 Information and whistleblower channel:
- https://whistleblowersoftware.com/ secure/CanaldenunciasCINFAGROUP

Every employee should know and understand not only the guidelines contained in this Code, but also the values on which they are based. However, it is not enough to know and understand; you must also comply with the letter and spirit of this Code and the policies and procedures that implement it, consistently and appropriately, while also helping others to do so.

Where any non-compliance is suspected, steps will be taken to investigate and, if appropriate, remedy the situation. Therefore, any concerns should be reported and expressed honestly and respectfully, providing the necessary information through the information and reporting channel indicated below. The person reporting any violation (whistleblower) may choose to remain anonymous or have his or her identity kept confidential and known only to the Compliance Officer. In addition, the confidentiality of the person alleged to have committed the infraction, as well as of the persons put forward as witnesses, shall be guaranteed.

The person reporting the violation may not be penalized or discriminated against in the company for doing so, if he/she has acted in good faith. Likewise, respectful treatment of the people who are the subject of the investigations shall be guaranteed, respecting the principle of presumption of innocence of the denounced party.

Violation of the Code of Conduct or of the policies that implement it may lead to disciplinary measures, which will also apply to anyone who orders or approves the violations, or has knowledge of them and does not act immediately to correct them.

PRACTICAL ASPECTS

While the Code of Conduct provides broad guidance on the standards of behaviour within the Group, no code can anticipate all the situations that may consider the Group's day-to-day operations. Consequently, the code is not a substitute for the responsibility and requirement to judge correctly and to seek additional conduct. It is recommended to seek additional conduct and support from the Corporate Compliance Office.



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